



For Shropshire  
Council use

Respondent  
no:

## Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

**Pre-Submission Draft (Final Plan)  
17 March 2014 – 28 April 2014**

### Representations Form

Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:

[www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev)

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at [www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev).

#### Your details: Who is making this representation?

Name: Paul	Davis
Organisation (if applicable):	
Address:	
Telephone:	

**If you are acting as an Agent, please use the following box to tell us who you are acting for:**

Name:	
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

## Your Representations

**Please note, you must use a separate form for each representation you wish to make.**

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

The Land at Mount Farm (WHIT046) Schedule S18.1a in the SAMDev
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Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>
<b>Object</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

<b>Legally compliant</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Sound</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

<b>Positively prepared</b>	
<b>Justified</b>	<input checked="" type="checkbox"/>
<b>Effective</b>	
<b>Consistent with National Policy</b>	

**In the box below please specify your reason for supporting or objecting.**

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

**Please find below the reasons for objecting to the soundness of the document which has included the Land at Mount Farm ( WHIT046 ) Schedule S18.1a in the SAMDev.**

Before considering the inclusion of Mount Farm in the SAMDev as a preferred site it is extremely important, and highly relevant, to review the Government Inspectors report on his findings after the public inquiry on the North Shropshire Local Plan 2000-2011.

He was concerned at the lack of a primary school in the vicinity of the site, and no proposals to provide one.

He also had a firm view that “ **the site is elevated and development would be prominent in views from the north and north-west. Viewed from the direction**

of Tarporley Road the development would occupy open ground above the level of The Grove, extending southwards from Wellfield Way. Much of this land has an undeveloped appearance and is of high visual amenity value.

The character of the landscape in this area at present displays an attractive pastoral quality of relatively small scale fields, with a network of hedgerows and trees. The landscape generally falls from the higher ground by Haroldgate towards the northwest. I consider that it would constitute a substantial area of new development in a relatively sensitive landscape, occupying an elevated position. This is a relatively unspoilt approach to Whitchurch which in my judgement contributes strongly to its character and setting as a rural market town. The impact of existing development on the skyline is limited and the predominant characteristic is of a well maintain rural landscape “.

As a result of these findings the Mount Farm land was deleted from the Local plan. Today all of these findings remain current and relevant, nothing has changed in the area.

### **Infrastructure**

Who will pay for the increased infrastructure needed to service the extra population eg Doctors, District Nurses, Schools, Police, Fire etc? The proposals for **500** houses at Tilstock Road together with a school, **86** houses next to Hill Valley Golf Club, **76** houses on Mile Bank Road brown field site and the **100** houses on Mount farm will require high levels of commitment to provide and fund these facilities, these details are unacceptably absent in the plans.

There are insufficient places available in local junior schools for existing residents, and the local Doctors surgeries are full to capacity. A contribution (the proposed Community Infrastructure Levy of £40 per square metre, ie £500,000) to the local authority is totally inadequate to enable them to improve the necessary services which will be required by the new residents.

Whitchurch is traditional market town without employment available locally to sustain the proposed increase in the number of residents. Is there evidence to confirm that there is a demand for additional housing of this type in Whitchurch? In addition to employment concerns, what facilities will be provided for the children and teenagers, when will they be provided and how will these projects be funded?

### **The Design and Density of the proposed Development**

Wellfield Way and Tarporley Road are areas with high quality, prestige housing and the proposed site is not in keeping with the character of the area. It will adversely impact upon the open aspect of the landscape and the proposed development will be outside the present designated area for building. Placing 100 houses on Mount Farm is far too high a density of housing with no acknowledgement of the detrimental impact it will have upon the residents of Wellfield Way and the value of their properties. Residents of Wellfield Way will have three storey properties sited within 10m of their boundary. A compulsory 10 metre environmental wildlife buffer zone between the existing development of Wellfield Way and the proposed houses should be implemented (in preference to 'between the new development and the fields').

### **Phasing of all housing Development in Whitchurch**

In policy H2 Housing land and Phasing the District Council state that they will keep the supply of housing land under review with the aim of ensuring that at any time sufficient land is available to meet the planned needs of the District Council for the next 5 years. The Council will require the phased development of sites listed under policies H4 and H5. This is to assure that the total planned provision is not exhausted in the early years; that an excessive amount of land is not made available at the outset; that a settlement is not swamped by over development and ensure the availability of infrastructure or adequacy of other services in a particular area.

### **Problems with Access**

The access road Haroldgate is unsuitable for any increased traffic flow. Despite conforming to general transport regulations a more detailed inspection will show where the hazards arise. Haroldgate is an extremely treacherous road in bad weather conditions and the increased traffic movement of 700% will exacerbate these lethal conditions for all road users.

If our understanding is correct, that all access for agricultural vehicles servicing the remaining fields of Mount Farm will not be using Haroldgate and the farmer has acquired another access off the Chester Road, please can the Council confirm this, and put a condition on the planning permission (if it gets that far) that this is required?

The road has very tight bends as it goes down to Tarporley Road, and slopes sideways as it turns. The gradient is very steep - at the maximum allowed of 1 in 12. This means that during icy conditions it is very difficult and often impossible to access Haroldgate from Tarporley Road (due to poor traction and resulting wheel spinning). When descending Haroldgate in frosty weather it is very easy to slide sideways out of control often resulting in one sliding across Tarporley Road. We have all experienced numerous incidents and near misses and this will only become more frequent and more serious when there are more vehicles using Haroldgate. The bends are extremely tight making it very hard for 2 vehicles to pass and this is made more treacherous during bad weather. It is totally unusable for longer vehicles such as a service bus, or vehicles with a trailer or caravan.

If it is intended to service 100 extra houses it will result in a minimum of 180-200 additional cars exiting Haroldgate. It will become a bottleneck at peak times - the morning and afternoon school run for example. Cars will be used as there are no schools currently within what parents will consider a safe walking distance from the proposed site, with the majority of traffic turning right across Tarporley Road. This will result in excess pollution whilst engines are still cold, increased noise and extended journey times at peak periods while vehicles queue to exit Haroldgate.

The risks associated with using Haroldgate during bad weather will be intensified by the huge increase in traffic volume. Vehicles exiting the proposed Mount Farm development will also need to negotiate the considerable gradient to reach the apex of Haroldgate.

## Conclusion

There are other sites which would present greater opportunities to include the necessary provision of infrastructure resources to support increased housing provision in Whitchurch. Mount Farm is a Housing estate which is not needed in Whitchurch at the present time. There are over 150 homes currently for sale in Whitchurch, will all these houses sell, and where are the jobs to sustain the influx population? There are no substantive proposals for how this population increase might be sensibly sustained.

Whitchurch has been allocated an unreasonable and unsustainable level of new house development, culminating in the proposed Mount Farm development which is not required and should be deferred until the new build housing in the pipeline has been built and sold.

It was rejected by the Government inspector in the last round of the North Shropshire Local Plan 2000-2011 mainly due to the high visibility of the site on the approach to Whitchurch, and the lack of a primary/junior school on the North of the town. This will inevitably mean many journeys to transport children to schools away from the site, at least twice a day. This is not sustainable development.

The lack of schooling was highlighted in the SAMDev background evidence : Whitchurch Housing Sites Assessment, page 212, together with electricity and sewage upgrades required, and including the need for a flood risk assessment.

The junction of Haroldgate to Tarporley Road was also included, with the need for safety improvements provided to facilitate development .This document was obviously produced as a desk top exercise, lacking the local, on the ground knowledge, which makes the resultant decision dubious and unsafe. The site was rejected by SHLAA in 2009 as being contrary to existing policy.

We ask for your support and judgement on our concerns and reject the inclusion of Mount Farm as a preferred site from the SAMDev as the inclusion is unsound for the reasons stated.

**Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound?** You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

**Do you consider it necessary to attend and give evidence at the examination?**

Yes, I wish to give evidence about my representation at the examination.

No, I wish to pursue my representations through this written representation.

If you wish to attend the examination, please explain why you think this is necessary in the box below:

**N/A**

**Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.**

When the SAMDev Plan has been submitted for examination	✓
When the Inspector's Report is published	✓
When the SAMDev Plan is adopted	✓

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

[Planning.policy@shropshire.gov.uk](mailto:Planning.policy@shropshire.gov.uk)

**Or return it to:** Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

**Please note, we will acknowledge receipt of representations made by e-mail.**

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.