Shrewsbury Friends of the Earth Comments on the SAMDev Proposals

1 Introduction

Members of the Group have studied the documentation made available and have visited some preferred sites in order to submit a constructive contribution. We have also attended several of the public meetings arranged by Shropshire Council and Shrewsbury Town Council and are therefore aware of many of the issues that residents have raised.

2 General

- 2.1 We fully support the aspirations to provide and enhance cycle, pedestrian and public transport provision in connection with all future development. However, we consider that a more radical approach than in the past is necessary to provide continuous cycle routes and that this can be achieved either by design or at "pinch points" by conceding priority to cyclists over motor traffic. Shrewsbury's cycle routes are much appreciated but many people, especially children, don't use them because they are either not continuous or have dangerous stretches. With an increase in population of some 20% proposed many of the looming traffic problems could be solved by doing everything possible to encourage cycling.
- 2.2 Most of the River Severn through and close to the town provides valuable wildlife habitat as well as high quality recreational benefits. The Rea Brook and Rad Brook are also very important both to wildlife and residents but several preferred sites as proposed impact adversely on these. Comments below on specific sites detail our concerns. It is important that adequate width of corridor in all flood conditions is provided and that they are wild areas not intensely managed parkland.
- 2.3 Although it is envisaged that brownfield sites will become available during the plan period the Council does not seem to have a way of promoting these in preference to developing countryside. By not identifying brownfield sites as "preferred" the message is that targets will be met by building on the greenfield sites that are designated as "preferred", which are less costly to build on in any case.
 Surely it is important that the final version of the plan avoids this undesirable scenario?
- 2.4 The Vision for Shrewsbury also says public sector owned land should be targeted for development (along with brownfield sites). Although we wish to avoid as much development on countryside as possible it is vital to retain green areas within the town. Land that should be protected includes, for example, the Golf Course and the Wakeman playing field. We also recognise that some existing agricultural land is used by the public for leisure purposes where there is no alternative, as in the case of the land to the east of Battlefield Road. If the development boundary of Shrewsbury is to be extended, new green areas should be created.
- 2.5 We note it is accepted that the £110m needed for the NWRR won't be found in the short/medium term. The suggestion that £5m be spent on improvements to the alternative routes around the west south and east of the town is a positive move and may result in more people realising that this is not an onerous option. Along with the radical improvements for cyclists referred to above and other measures to reduce through traffic in the town centre it could well result in a significant reduction to the busy periods on Welsh Bridge, Smithfield Rd and the Station Gyratory.
- 2.6 Paras 76 and 77 of the NPPF allow the protection of areas of green space that are of special importance to the community. One such area is the piece of land at Pengrove next to Burrs Field. This has been the subject of many planning applications over decades (all refused and the most recent bei.g 3 weeks ago). It is a si4e oB hugh importance to tie ðre;Irvation of the character of the River Loop and without doubt it meets the 3 criteria for designation gmvå."i& Para 77. We most strongly support ips 0potection as "Green Space" in thd Püan.

Although the use of paras76,77 is limited theve -cy well be other areas where such action is justified and we wmulD!urge use of this provision to help keep those areas that are "demonstrably special" to the Community undeveloped.

3 Particular Sites

3.1 West SUE

The retention of the route for a future NWRR is blighting this proqosod deoelo8ment, If the route is being kept then the assumption should be made that one day a buwy 2mad will exist. However, housing is shown amon÷ and up against most of the route and health/care businesses along the rest. Thus we would have hundreds0oF ye}ple living next to a by-pass and in particular a section of the population who need peace and quiet suffering too. This whole proposal requires a rethink or the road abandoned.

Sustainable transport provision is vital and in particular a continuous safe cycle route should be provided to the town centre.

3.2 South SUE

Housing is shown along a considerable length of the By-pass. This is a very noisy road and extreme measures will be necessary to reduce noise levels to acceptable levels. In 2012 we should not be allowing housing when we know there will be noise levels detrimental to the people living there.

Again sustainable transport must be a priority and a cycle route through the development to join the existing cycle path along the disused railway (from Pritchard Way to Shrewsbury Business Park) is a "must have". Some off site works are necessary but the benefits of linking the development to this route and keeping cyclists off what will be a busy Oteley Rd makes it well worthwhile.

The development is shown extending down to the Rea Brook and at points on the opposite bank existing housing comes right to the watercourse. There is thus a great risk that an insufficient wildlife corridor may result and particular attention to this area is needed. A proper wild area must be left along the Brook at all times.

3.3 London Road (SHREW001)

This site will be on a slope facing people on the A5 as they approach Emstrey roundabout from the north. It will be prominent and the first sight of Shrewsbury that new visitors have. Special attention to its design is therefore important if it is not to look like an area of urban sprawl.

Attention to the wildlife corridor along the river is important. Even in flood conditions a corridor needs to be available and building should be kept far enough back from the river to allow this.

3.4 Preston Street (SHREW027)

This is a site that impacts adversely from several aspects. The increase in traffic would clearly cause problems on Preston Street and at the Column roundabout. To meet reasonable requirements for cycle routes the issues at Column roundabout will have to be solved - a problem that was recently dealt with by deleting all cycling provision from the current Column-London Rd. Improvement Scheme. Also a cycle route through Cherry Orchard to Castle Walk will be needed too.

Another major concern is the quality of the area as a wildlife habitat. The old road down to the ferry crossing is lined with ancient hedgerow and a short walk reveals very quickly that it is supporting many different birds. People who live nearby will testify to seeing an exceptional variety of birds and animals.

The route to the ferry is part of our local heritage and although not formally designated this cannot be dismissed. Overall it is a much appreciated recreational asset with many of the people living nearby using it.

The rest of the area includes good quality agricultural land.

The site as shown extends close to the river and comments above about wildlife corridors apply here too.

Overall we feel development of this site is particularly destructive and alternatives should be considered.

3.5 Dale Rd (SHREW120R)

This site also borders the river and adjacent houses already leave only a narrow wildlife corridor. Any new development should be kept further back.

3.6 Hillside Drive (SHREW016)

Again comments on wildlife corridors along the river apply.

3.7 Bowbrook (SHREW030/ 094/ 019)

These sites take another area rich in wildlife. If developed extensive areas should be left wild and effective wildlife corridors provided along the Rad Brook. Landscaped parkland does not meet the need and should be in addition.

3.8 Land to the east of Battlefield Road (SHREW106)

As with the South SUE, this site borders a very noisy road, the A49, and extreme measures will be necessary to reduce noise to acceptable levels. Any new development might be divided from the road by a wide tree-planted corridor.

As with Preston Street, there will be severe problems managing an increase in car traffic trying to exit onto a busy road at peak times. In this case, there is already congestion on Shillingstone Drive caused by cars from the houses to the south east of the proposed development site.

4 Affordable housing

We would like the Council to ensure that each developer provides the amount of affordable housing appropriate to their site. We would be concerned if, for example, a developer was to submit their development plans in phases which might enable them to avoid this.

5 Development Design

It is important that new developments are not just "add-ons" to the town, but where they are of substantial size, are seen as potential communities with an identity of their own to be developed and supported.

- 5.1 Dense development can lead to friction. Cars are parked on streets, potentially blocking the path of emergency vehicles; or encroaching onto pavements, blocking pushchairs etc. Recent developments have often been at too high a density and the final results are unsatisfactory. It is appreciated that high density means a smaller area overall has to be developed but it is felt that the quality of life of residents and the aesthetics of sites will be much improved by slightly lower densities and more green space. It was obvious from some of the "indicative layouts" for sites that developers were showing "pretty pictures" and this was much resented. It is hoped that when they submit their real intentions that the Council will be firm in resisting the pressure to cram in as many units as possible and will give full consideration to the needs of future residents.
- **5.2** Communities can more easily develop where there is communal space. Designs should reflect residents' need for small and larger open spaces; home zones/woonerfs (where pedestrians and cyclists have priority over pedestrians), play areas with equipment, sports pitches, etc. and also for indoor communal space such as community centres/sports halls.

- **5.3** Services must also be considered: access to a local shop, GP practice, school aswell as public transport links etc.
- 5.4 It is important that houses are built to the highest possible environmental standards. Shropshire Council is in a position to require standards that improve on Government guidance and on their own policies in the Local Plan.

 Insulation, green energy use and green energy generation are all important. Consideration should be given to: community generation of heat transferred to homes on a grid; community generation of electricity via PV panels; solar thermal panels on individual houses.