Shropshire Council: Shropshire Local Plan



Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Re	Part B: Representation						
Name and Or	ganisation: Dav	vid Walker					
Q1. To which document does this representation relate?							
Regulation	n 19: Pre-Submiss	ion Draft of the	Shropsh	nire Local Plan			
Sustainabi Local Plan	ility Appraisal of tl	ne Regulation 19	e: Pre-S	ubmission Dra	ift of t	he Shr	opshire
Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)							
Q2. To which	part of the doc	ument does t	this re	presentatio	n rel	ate?	
Paragraph: S14	Policy	: S14.2	Site:	WEF025	Po	olicies Map:	
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:							
A. Legally com	npliant		Yes:	\checkmark	No:		
B. Sound			Yes:		No:	\checkmark	
•	with the Duty to C appropriate).	o-operate	Yes:	\checkmark	No:		
Q4. Please give Draft of the Stails to comple If you wish to sup	ve details of whe hropshire Local with the duty poort the legal complex total Plan or its contact.	I Plan is not I to co-operatoliance or sound	egally te. Plea ness of t	compliant of ase be as publication	or is reciso 19: Pr	unsou e as p e-Subn	und or ossible. nission Draft
	, Shropshire Coເ						
_	assessment gave		_				
sustainability score than this site. 15 had a worse score. One other site had the same							
score. Objectively there were more sustainable sites they could have chosen.							
			- 2-				

Regulation 19: Pr	t the modification(s) you consider necessary to make the e-Submission Draft of the Shropshire Local Plan legally und, in respect of any legal compliance or soundness mattersed at Q4 above.
examination. You will i	ompliance with the duty to co-operate is incapable of modification at need to say why each modification will make the Regulation 19: Pre-Submission of Local Plan legally compliant or sound. It will be helpful if you are able to put

Draft o	f the Shropshire Local Plan le I your suggested revised wor	gally compliant or sound	d. It will be helpful if	you are able to put
A rob	ust needs assessment must ted in the sustainability ass	take place before sites		
		/Dlanes es		(
suppor	note: In your representat ting information necessary ration(s). You should not a sions.	ion you should provide to support your repres	succinctly all the eventation and your s	uggested
	his stage, further submi			
Subm	your representation is ission Draft of the Shripate in examination b	opshire Local Plan,	do you conside	
	note that while this will pro (s), you may be asked at a			
$\overline{\checkmark}$	No, I do not wish to partic	cipate in hearing sessio	n(s)	
	Yes, I wish to participate i (Please tick one box)	n hearing session(s)		
Q7. If	you wish to participat onsider this to be nece	te in the hearing se essary:	ession(s), please	e outline why
those 1		etermine the most app y wish to participate in	ropriate procedure hearing session(s).	. You may be asked
			Part A Reference	20.
		Office Use Only	Dart D Deferen	201

Part B Reference:

Shropshire Council: Shropshire Local Plan



Representation Form

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Part B: Representation								
Name and Organisation: David Walker								
Q1. To which document does this representation relate?								
	Regul	ation 19: Pre	-Submissio	n Draft of the	Shropsh	ire Local Plar	1	
	Susta Local		aisal of the	Regulation 1	.9: Pre-Si	ubmission Dr	aft of t	the Shropshire
	Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)							
Q2. T	o wh	ich part of	the docu	ment does	this rep	oresentatio	n rel	ate?
Paragr	Paragraph: 2.3 Policy: Site: Policies Map:							
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the								
_		e Local Plai compliant	n is:		Yes:	V	No:	П
		compliant						
B. S	Sound				Yes:	Ш	No:	\checkmark
C. C	Compli	ant with the I	Duty to Co-	operate	Yes:	$\overline{\checkmark}$	No:	
`		ck as appropr						
_		_	_	_		_		Pre-Submission unsound or
		-				_		e as possible.
of the S	Shrops							e-Submission Draft also use this box to
The SLAA assessment wasn't open or transparent. Relying on parish councils, with little or no grasp of what they were decising in many cases wasn't as rigorous as it could have been.								
Not withstanding that the sustainability appraisal process was fundamentally flawed. Each site has been given a score based on a common set of assessment criteria. Whilst you could argue about individual scores that they have been scored consistently is the main thing. Each site was given a rating of Good, Fair or Poor.								
under proce If var	was given a rating of Good, Fair or Poor. The rating was only based on the scores within each settlement. This is wrong and undermines the point of using common assessment criteria and is a fundamental flaw in the process. Site should have been compared on an equal footing and not on a settlement basis. If variation of approach is required on a settlement by settlement basis a form of weighting in the criteria would have been better but not ideal.						ndame on a s	

The result of this distorted rounding of the Good, Fair and Poor Criteria, is that sites with

equal scores end up with a different rating. Worse still sites with a good rating ratings have been passed over in favour of sites with poorer ratings. By not following an objective appraisal and using a subjective assessment they have undermined the whole appraisal. The Good Fair and Poor bands aren't evenly distributed – 104, 106 and 84 respectively in each band would be a better distribution of scores. Yours bands have a distribution of 104, 120 and 54 respectively. Of the allocated sites you have allocated 3 Good sites and 12 fair sites in North Shropshire. Arguable given 104 sites rated as good then there are at least 9 Good sites some in North Shropshire who should be feeling agreived that that haven't been allocated. Many sites that have been allocated were also rejectes in the initial SLAA (Please continue on a separate sheet if necessary) Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters vou have identified at O4 above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. The SLAA needs to be redone and properly weighted across the whole plan area not on a community by community basis to clearly demonstrate fairness. (Please continue on a separate sheet if necessary) Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination. Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)? Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate. No, I do not wish to participate in hearing session(s) Yes, I wish to participate in hearing session(s) (Please tick one box) Part A Reference: Office Use Only Part B Reference:

Q7. If you wish to you consider this t	participate in the hearing session(s o be necessary:), please outline why
	•	a separate sheet if necessary)
those who have indicate	pector will determine the most appropriate peted that they wish to participate in hearing so participate when the Inspector has identifi	session(s). You may be asked
Signature:		Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Council: Shropshire Local Plan



Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

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Pa	rt B:	Repres	entati	on					
Ν	lame an	d Organisatio	n: David	d Walker					
Q1.	To wh	ich docum	ent does	this repres	entatio	n relate?			
\checkmark	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan								
	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan								
	Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)								
Q2.	To wh	ich part of	the docu	ment does	this rep	presentatio	n rel	ate?	
Para	ıgraph:	S14	Policy:	S14.1	Site:		P	olicies Map:	
_	-	u consider e Local Pla		lation 19:	Pre-Sub	mission Di	aft o	f the	
	•	compliant	11 15.		Yes:	7	No:		
В.	Sound				Yes:	Ш	No:	\checkmark	
	•	iant with the contraction in the	•	-operate	Yes:	$\overline{\checkmark}$	No:		
Dra fails If yo of th	ft of the stocom wish to shrops	e give detaine Shropshi mply with to support the shire Local Pla comments.	ire Local the duty t legal compl	Plan is not to co-opera iance or sound	legally ate. Plea dness of to	compliant ase be as p he Regulation	or is recis 19: Pr	unsounde as pos	d or sible. sion Draft
		and distribution or the contract of the contra		in North Shro	pshire co	mpared to th	e rest	of the co	unty is
app	ropriate	tlements are because the draft plan to r	smaller se	ttlements doi	n't have t	he infrastruct			
usii Sor hor ass	ng the R ne need se. Eve	allocation tai light Home Ri l assessments n then the ned he need of th	ght Place s are still in ed assessm	urveys has o train other y ent isn't taki	nly been et to star ng accoui	carried out aft. This is put nt of implicit	ter sit ting th need a	es were a le cart bef and is only	llocated. fore the /

Q5. Please set out the modification(s) you consider necessary to make the	
Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally	
compliant and sound, in respect of any legal compliance or soundness matter	rs
you have identified at Q4 above.	
Please note that non-compliance with the duty to co-operate is incapable of modification at	

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

	f the Shropshire Local Plan Io I your suggested revised wo		•	
A rob	ust needs assessment must ted in the sustainability as:	t take place before sites		
		(Please co	ntinue on a senarat	e sheet if necessary)
suppor	e note: In your representate in grant in the standard information necessary cation(s). You should not a sesions.	tion you should provide to support your repres	succinctly all the eventation and your s	vidence and uggested
	this stage, further subm on the matters and issu			
Subm	your representation i ission Draft of the Shi ipate in examination l	ropshire Local Plan,	do you conside	
Please	note that while this will pro n(s), you may be asked at a	ovide an initial indication	n of your wish to pa	
$\overline{\checkmark}$	No, I do not wish to parti	cipate in hearing sessio	n(s)	
	Yes, I wish to participate (Please tick one box)	in hearing session(s)		
	you wish to participa onsider this to be nec		ession(s), please	outline why
those 1	e note: The Inspector will on who have indicated that the firm your wish to participate nation.	determine the most app ey wish to participate in	ropriate procedure hearing session(s).	. You may be asked
Signat	ıre:		Date:	26/02/2021
		Office Use Only	Part A Reference	e:
		Office obe offing	D . D D C	

Part B Reference:

Shropshire Council: Shropshire Local Plan



Representation Form

of the new development.

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	- ,						
Part B: Rep	presentat	ion					
Name and Orga	nisation: Dav	id Walker					
Q1. To which document does this representation relate?							
Regulation 1	.9: Pre-Submissi	on Draft of the	e Shropsh	nire Local Plar	1		
Sustainabilit Local Plan	ry Appraisal of th	e Regulation 1	l9: Pre-S	ubmission Dra	aft of t	he Shro	opshire
Habitats Reg Shropshire L (Please tick		nent of the Re	egulation	19: Pre-Subn	nission	Draft o	of the
Q2. To which pa	art of the doc	ıment does	this re	presentatio	n rela	ate?	
Paragraph: S14	Policy:	S14.1(i)	Site:		Po	olicies Map:	
Q3. Do you cons Shropshire Loca		ulation 19:	Pre-Sub	omission Dr	aft of	f the	
A. Legally compl	liant		Yes:	\checkmark	No:		
B. Sound			Yes:		No:	$\overline{\checkmark}$	
C. Compliant wit	th the Duty to Co	o-operate	Yes:	$\overline{\checkmark}$	No:		
(Please tick as a	ppropriate).						
Q4. Please give Draft of the Shr fails to comply	opshire Local	Plan is not	legally	compliant	or is	unsou	nd or
If you wish to suppo of the Shropshire Lo set out your comme	ocal Plan or its cor						
In Park Hall Shrop PKH031, PKH032. 2 (fair), -6(fair), -5 score of -1 (fair). but weren't alloca	Shropshire cour 5 (fair),-1 (fair), Two other sites i	icil's sustainat -4 (fair), -4 (f	oility asse fair), -2 (essment gave fair) respectiv	these ely wi	site a ra th a cor	ating on - mbined
The large allocation has residents worried that they will be subsumed into Oswestry. It is foreseeable that future allocations will mean that Oswestry will also consume Whittington.							
There are better onew garden villag					oropria	te to cr	eate a
There isn't enough	h investment in t	he infrastruct	ure of the	e existing sett	lemen	t. The r	ıew

infrastructure will be welcome but there is not detail about how that will fully meet the needs

Q5. Please set out the modification(s) you consider necessary to make the
Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally
compliant and sound, in respect of any legal compliance or soundness matters
you have identified at Q4 above.
•

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Oraft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
A robust needs assessment must take place before sites are allocated and the needs properly weighted in the sustainability assesments
(Please continue on a separate sheet if necessary
Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.
Q6. If your representation is seeking a modification to the Regulation 19: Pre- Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
\overline{V} No, I do not wish to participate in hearing session(s)
Yes, I wish to participate in hearing session(s)
(Please tick one box)
Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Please continue on a separate sheet if necessary) Please note: The Inspector will determine the most appropriate procedure to adopt to hear

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Office Use Only	Part A Reference:	
Office Use Only	Part B Reference:	

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Council: Shropshire Local Plan



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<u> </u>	Repres	_	on					
Name an	d Organisation	n: David	l Walker					
Q1. To wh	ich docume	nt does	this repres	entatio	n relate?			
Regu	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan							
	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						opshire	
☐ Shrop	ats Regulation sshire Local Pla se tick one bo	an	ent of the Re	egulation	19: Pre-Subn	nissior	n Draft (of the
Q2. To wh	ich part of t	he docu	ment does	this rep	presentatio	n rel	ate?	
Paragraph:	S14	Policy:	S14.2	Site:	WHN024	P	olicies Map:	
-	u consider t e Local Plan	_	lation 19:	Pre-Sub	mission Di	aft o	f the	
A. Legally	compliant			Yes:	\checkmark	No:		
B. Sound				Yes:		No:	$\overline{\checkmark}$	
•	C. Compliant with the Duty to Co-operate Yes: (Please tick as appropriate).							
Q4. Please Draft of th	Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.							
	o support the le shire Local Plan comments.							
In Whittington Shropshire Council has allocated site WHN024. Shropshire council's sustainability assessment gave this site a rating on -6 (Fair). 14 sites had a better sustainability score than this site. 12 had a worse score. Objectively there were more sustainable sites they could have chosen.								
There is no sense in the plan of how any of the developments and planned growth will alleviate the extra traffic in the village. Station Road is dreadful and sites should be allocated to provide some relieve for resisents from the traffic in the village.								

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.
you have lacinthica at Q+ above.
Please note that non-compliance with the duty to co-operate is incapable of modification at

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	f the Shropshire Local Plan le I your suggested revised wo					
A rob	ust needs assessment must ted in the sustainability ass	t take place before sites	•			
		(Please co	ntinue on a senarat	e sheet if necessary)		
suppor	e note: In your representation information necessary cation(s). You should not assions.	tion you should provide to support your repres	succinctly all the e entation and your s	vidence and uggested		
	this stage, further subm on the matters and issu					
Subm partic Please	f your representation in ission Draft of the Ship ission Draft of the Ship ission I will propose that while this will propose you may be asked at a second asked at a second in the second is a second in the second is a second in the second is a second in the second in	ropshire Local Plan, hearing session(s)? ovide an initial indicatio	n do you conside on of your wish to pa	r it necessary to		
SE33,0,	rsion(s), you may be asked at a later point to confirm your request to participate. No, I do not wish to participate in hearing session(s)					
	Yes, I wish to participate in hearing session(s) (Please tick one box)					
	you wish to participa onsider this to be nece		ession(s), please	e outline why		
those 1		determine the most app ey wish to participate in	ropriate procedure hearing session(s)	. You may be asked		
Signac	ле					
		Office Use Only	Part A Reference	ce:		

Part B Reference:

Shropshire Council: Shropshire Local Plan



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Part B: Represen	tation				
Name and Organisation:	David Walker				
Q1. To which document	does this represe	entatio	n relate?		
Regulation 19: Pre-Sub	omission Draft of the	Shropsh	nire Local Plar	1	
Sustainability Appraisa Local Plan	l of the Regulation 19	e: Pre-S	ubmission Dra	aft of t	he Shropshire
Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of the Reg	Julation	19: Pre-Subn	nission	Draft of the
Q2. To which part of the	document does	this re	presentatio	n rela	ate?
Paragraph: 2	Policy: SP2	Site:			olicies Map:
Q3. Do you consider the Shropshire Local Plan is		re-Sub	omission Dr	aft of	the
A. Legally compliant		Yes:	\checkmark	No:	
B. Sound	B. Sound Yes: No: 🗹				
C. Compliant with the Duty to Co-operate Yes: 🗹 No: 🔲					
(Please tick as appropriate).					
Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.					
If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.					
The 30,000 target is quite ar	bitrary. It is not base	ed on lo	cal need. Inde	eed Sh	ropshire Council

housing needs surveys (Right Home Right Place) started after sites were chosen without public consultation. How can allocations be considered sound if they put the cart before the horse? Sites have been allocated in the wrong places. For example, in West Felton, the allocated site is not adjacent to community facilities or public transport. Other sites up for consideration were much more sustainable and could be argued were better sites. For Whittington where is the overall strategy to manage housing and traffic growth in the longterm? Park Hall has sites allocated in the plan that were rejected in the Strategic Land Availability Assessment while other sites elsewhere 'with long-term potential for housing' weren't included.

Just allocating sites without strategic vision isn't good enough. Allocating sites doesn't get them built. Allocating sites doesn't fulfil the real need for genuinely affordable homes to rent and buy at all levels of the market. There is more to the housing crisis than just throwing

numbers at the problem. Throwing up houses without the jobs and infrastructure to support them just create more problems. A more holistic approach to town planning is required.

The 30,000 target is entirety a political decision. Building at a very high rate will allow them to grow the tax base without raising council tax. It has very little to do with need.

Two years ago they consulted on their growth target:

The CPRE's suggested a target of 18,000

The Government's suggested 25,400

Shropshire Council suggested 3 options – all higher than the government:

- a 'Moderate growth' target of 26,250
- a 'Significant growth' target of 27,250
- a 'High growth' target of 28,750

Their higher still target of 30,000 is highly questionable in that context. More so when you consider they have a weak plan for infrastructure needed to deliver this level of housing and support the new business parks.

We all want more affordable homes but they must be sustainable, and built-in the right places based on local need. They need to stay affordable in the long-term. Homes need to be high quality supported by improved infrastructure. They need to be part of a co-ordinate vision to addresses existing problem areas like traffic. This plan leaves a lot to be desired and falls far short of the sound plan Shropshire needs.

There is insufficient evident that needs have been properly assessed or met for housing or commercial development

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

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Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put
forward your suggested revised wording of any policy or text. Please he as precise as possible

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(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Office Use Only	Part A Reference:
	Part B Reference:

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

partic	cipate in exam	ination nearing	session(s)?		
		his will provide an asked at a later po			articipate in hearing ticipate.
\checkmark	No, I do not wis	sh to participate in	hearing session(s)	
	Yes, I wish to p	articipate in hearin	g session(s)		
	(Please tick one	box)			
_		participate in the best of the	e hearing sess	ion(s), please	e outline why
those 1	who have indicate firm your wish to		e the most approp o participate in he	oriate procedure Paring session(s)	sheet if necessary) to adopt to hear . You may be asked tters and issues for
Signat	ure:			Date:	26/02/2021

Office Use Only	Part A Reference:
	Part B Reference: