

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: Representation

Name and Organisation:	David Walker
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Q1. To which document does this representation relate?

- 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 which part of the document does this representation relate?

Paragraph:	<input type="text" value="S14"/>	Policy:	<input type="text" value="S14.2"/>	Site:	<input type="text" value="WEF025"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
- (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.

In West Felton, Shropshire Council has allocated site WEF025. Shropshire council's sustainability assessment gave this site a rating on -5 (Good). 10 sites had a better 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.

(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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A robust needs assessment must take place before sites are allocated and the needs properly weighted in the sustainability assessments

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Office Use Only	Part A Reference:
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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="2.3"/>	Policy:	<input type="text"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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The SLAA assessment wasn't open or transparent. Relying on parish councils, with little or no grasp of what they were deciding in many cases wasn't as rigorous as it could have been.

Notwithstanding 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.

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.

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

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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.

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26/02/2021

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S14"/>	Policy:	<input type="text" value="S14.1"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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<p>The scale and distribution of sites in North Shropshire compared to the rest of the county is neither appropriate nor fair.</p> <p>Smaller settlements are bearing a much larger burden than in the rest of the county. This isn't appropriate because the smaller settlements don't have the infrastructure in place or planned within the draft plan to meet the pressure of the large allocations.</p> <p>Overall the allocation target is far too ambitious and not based upon need. The objective need using the Right Home Right Place surveys has only been carried out after sites were allocated. Some need assessments are still in train other yet to start. This is putting the cart before the horse. Even then the need assessment isn't taking account of implicit need and is only assessing the need of those planning to move not those who would move if their needs were being met.</p>
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Paragraph:	<input type="text" value="S14"/>	Policy:	<input type="text" value="S14.1(i)"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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In Park Hall Shropshire Council has allocated sites PKH002, PKH011, PKH013, PKH029, PKH031, PKH032. Shropshire council's sustainability assessment gave these site a rating on - 2 (fair), -6(fair),-5 (fair),-1 (fair), -4 (fair), -4 (fair), -2 (fair) respectively with a combined score of -1 (fair). Two other sites in Park Hall and two more in Oswestry had a Good ratings but weren't allocated.

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 connected sites in Shropshire that would be more appropriate to create a new garden village. Residents in park hall feel dumped upon.

There isn't enough investment in the infrastructure of the existing settlement. The new infrastructure will be welcome but there is not detail about how that will fully meet the needs of the new development.

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Signature:

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S14"/>	Policy:	<input type="text" value="S14.2"/>	Site:	<input type="text" value="WHN024"/>	Policies Map:	<input type="text"/>
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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 residents from the traffic in the village.

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="2"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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The 30,000 target is quite arbitrary. It is not based on local need. Indeed Shropshire 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 long-term? 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 entirely 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 evidence that needs have been properly assessed or met for housing or commercial development

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