

## 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:	Joyce Jones
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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="4.60"/>	Policy:	<input type="text" value="DP4"/>	Site:	<input type="text"/>	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 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 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.

The explanation text to DP4 (paragraph 4.60) says that there is an expectation that exception sites will not exceed 25 dwellings. The policy wording itself needs to say the same rather than leave it open to debate.

Paragraph 16 of the NPPF says plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. DP4 is not clear and therefore is not sound because it is not consistent with national policy.

Exception sites are supposed to be just that, an exception. If you let them be any size then they should be defined in the local plan as specific allocations. 25 is a reasonable number under this policy, and as the plan thinks this is the right amount, it needs to be enshrined in the actual policy.

(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.

*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.*

DP4 should be revised to state that exception sites should be a maximum of 25 dwellings.

*(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.*

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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)*

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 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.*

Signature:

Joyce Jones

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## 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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### Part B: Representation

Name and Organisation:	Joyce Jones
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#### Q1. To which document does this representation relate?

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- 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"/>	Policy:	DP7	Site:	<input type="text"/>	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 type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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*(Please tick as appropriate).*

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Part (e) of DP7 says the scale of the development will solely be dictated by the evidence of local affordable housing need but will not normally exceed 10 dwellings.

Paragraph 16 of the NPPF says plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. DP7(e) is not unambiguous because in theory it could be any number above 10 and therefore is not sound because it is not consistent with national policy.

*(Please continue on a separate sheet if necessary)*

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DP7(e) needs to be more precise and there should be no room for ambiguity. The words "not normally" should therefore be deleted from the policy.

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Joyce Jones

Date:

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Part A Reference:

Part B Reference:

## Representation Form

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Name and Organisation:	Joyce Jones
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#### Q1. To which document does this representation relate?

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- 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"/>	Policy:	<input type="text"/>	Site:	<input type="text"/>	Policies Map:	<input type="text" value="S18"/>
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- |  |      |                                     |     |                          |
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| A. Legally compliant                     | Yes: | <input type="checkbox"/>            | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/>            | No: | <input type="checkbox"/> |

*(Please tick as appropriate).*

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I support the sites allocated for development on the Policies Map for Whitchurch - WHT014, WHT037, WHT042 and WHT044; and those saved and continued from the SAMDev.

*(Please continue on a separate sheet if necessary)*

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

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Signature:

*Joyce Jones*

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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### Part B: Representation

Name and Organisation:	Joyce Jones
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#### Q1. To which document does this representation relate?

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- 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"/>	Policy:	<input type="text" value="S18.1(i)"/>	Site:	<input type="text" value="WHT014"/>	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 type="checkbox"/>            | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input 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.

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This site continues the new housing that has been built in this part of town. Like WHT037 and WHT044 it is very well situated for the town centre. It makes perfect sense to continue to build houses on Liverpool Road. WHT014 is far more sustainable, both in terms of access to services and shops, and has less impact on things like roads and landscape than alternative options. The Council is correct to allocate WHT014 and I support it.

*(Please continue on a separate sheet if necessary)*



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Signature:

Joyce Jones

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:



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Name and Organisation:	Joyce Jones
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#### Q1. To which document does this representation relate?

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- (Please tick one box)*

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

Paragraph:	<input type="text"/>	Policy:	S18.1(i)	Site:	WHT037 / WHT044	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 type="checkbox"/>            | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/>            | No: | <input type="checkbox"/> |

*(Please tick as appropriate).*

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These sites will continue the successful housing development that has already taken place around them. They are very well located and genuinely within walking distance of the town centre, including Sainsbury's which is only a few minutes away. I therefore support their allocation.

*(Please continue on a separate sheet if necessary)*

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

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Signature:

Joyce Jones

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Joyce Jones
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#### Q1. To which document does this representation relate?

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- 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"/>	Policy:	S18.1(i)	Site:	WHT042	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 type="checkbox"/>            | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/>            | No: | <input type="checkbox"/> |

*(Please tick as appropriate).*

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This site is very well located by the railway station and to the jobs around Waymills. This combination delivers sustainable development. Both the station and industrial estate are walkable, as is the town centre along Station Road into Green End. This site is far superior to other options that the Council has quite correctly rejected for failing to deliver sustainable development. I therefore support its allocation.

*(Please continue on a separate sheet if necessary)*

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Date:

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Part A Reference:

Part B Reference:

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- 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="3.7 and 3.18"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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- |  |      |                          |     |                                     |
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SP2 states that the local plan will deliver around 30,800 dwellings and around 300 hectares of employment land. Paragraph 3.7 refers to the former including 1,500 dwellings from the Black Country and paragraph 3.18 refers to the latter including 30 hectares of employment from the Black Country.

Both paragraphs say that this development will be accommodated through the distribution of growth outlined in SP2 and delivered through policies S1-S21. In other words there is no geographical aspect to the location of the Black Country related development and it will simply be spread around Shropshire. Therefore, by way of example, Weston Rhyn in the top north west corner of the county will be delivering **some of Dudley's housing** – plainly a nonsensical situation.

Much of the north west, west and north east of Shropshire has no real relationship with the Black Country. These areas have a relationship more with North East Wales, the North West and the Potteries.

I am not aware of any real direct public transport links from these locations to the Black Country and therefore nothing to discourage car use if these locations should be expected to provide housing and jobs for the conurbation.

The 1,500 dwellings and 30 hectares of employment are not for Shropshire, they are for the Black Country. It would therefore be expected that those who will live and work in these new homes and business will be current Black Country residents. It is implausible to think that the same people decanted to Shropshire to live will be the same people who take up jobs on the 30 hectares of employment and what will actually happen is the new residents will commute back into the conurbation, and those working in Shropshire will travel out of the conurbation. The result therefore of dispersing Black Country development around Shropshire will be unsustainable travel patterns.

The way the Black Country development is dealt with is neither positively prepared nor justified. It is not achieving sustainable development or an appropriate strategy.

What should be happening is for the focus of any Black Country development to be on the eastern edge of Shropshire between Telford and Wyre Forest District, and on the M54/A5/Rail transport corridor to Shrewsbury. This would encompass not only Shrewsbury but its surrounding settlements who have easy links to that transport corridor.

*(Please continue on a separate sheet if necessary)*

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The 1,500 dwellings and 30 hectares of employment land being provided for the Black Country should be redirected to the eastern edge of Shropshire and the M54/A5/Rail transport corridor to Shrewsbury.

The housing and employment numbers for these relevant areas should be increased. At the same time the numbers for the north west, north and north east of Shropshire including Oswestry, Whitchurch and Market Drayton (and their Place Plan Areas) should be reduced to reflect this re-distribution.

The local plan would then have the appropriate strategy to achieve sustainable development in relation to this matter.

*(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.*

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	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)?

*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)*

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 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.*

Signature:

*Joyce Jones*

Date:

25/02/2021

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