

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:	Landor Planning Consultants Limited
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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="S18"/>	Policy:	<input type="text" value="S18.1(i)"/>	Site:	<input type="text" value="Land North of Chester Road"/>	Policies Map:	<input type="text" value="S18 Whitchurch"/>
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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.

The allocation of land for residential development identified under Policy S18.1(i) as Land North of Chester Road (WHT037 and WHT044) is supported.

However, we consider the plan to be unsound as the notional site capacity is expressed in terms of a 'Provision', in this case 200 dwellings. In our view, the lack of qualification to the notional capacity has the potential to jeopardise housing delivery unless the value is expressed as a minimum requirement. The site has the capacity to accommodate a greater number than 200 dwellings whilst complying with other Local Plan policies such as open space provision, sustainable drainage and habitat enhancement. It should be stated as a minimum of 200 dwellings to ensure efficient use of land and to maximise the prospect that the objectively assessed housing need will be met. In the absence of this modification there is a realistic possibility that allocated sites could be developed at low densities.

As currently expressed the Policy is contrary to National Planning Policy Framework (February 2019), Section 11, Making effective use of land. Paragraph 117 and 122 are cited as relevant.

In other respects the allocation is supported for the following reasons set out below.

Working in Partnership with David Wilson Homes (DWH)

Site WHT037 is owned by The Westons and Mr and Mrs D Holland. Site WHT044 is owned by The Dolphins. The Westons own approximately 64% of the combined site proposed for allocation, and therefore are the principal landholders.

All three owners are working in collaboration and partnership with David Wilson Homes (DWH) to ensure the site is available, deliverable and comes forward for development, at the first opportunity.

DWH is actively building houses in Shropshire and contributing to Shropshire's housing supply of both market and affordable homes. It has a demonstrable track record on housing delivery.

DWH commenced development of the SAMDev residential allocation WHIT046 comprising 100 dwellings (Phase 1) in 2015. The development was completed in July 2018 and delivered in accordance with the Council's requirements for affordable housing, on site open space provision and sustainable drainage solutions. The development also secured improvements to the existing foul drainage systems serving the area.

The landowners have allowed DWH access to carry out site investigations including ground investigation tests, arboriculture surveys, ecology, highways and drainage assessments in readiness for a full planning application to be submitted (2021).

Meeting the Housing Requirement

The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (The Reg 19 DSLP) identifies that 1600 additional dwellings are to be provided in Whitchurch between 2016 and 2038.

The Reg 19 DSLP identifies Whitchurch as a Principal Centre and a focus for development, which will contribute towards the strategic growth objectives of the North-East of the County.

The Reg 19 DSLP confirms that the objectively assessed need for 1600 additional units is met by 260 completions to-date and a further 748 dwellings on sites with extant planning permission and a further 60 dwellings on saved SAMDev allocations. This leaves a remaining requirement for 554 dwellings to be provided on new sites.

Existing residential commitments in Whitchurch, totaling 956 dwellings, are largely accounted for by the allocated sites in the SAMDev Plan, as yet undeveloped, at WHIT009, Tilstock Road (500 units with outline planning approval) with reserved matters applications for 324 dwellings submitted in May 2020 still pending and Oaklands Farm (60 units).

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Part B Reference:

DWH is actively building houses in Shropshire and contributing to Shropshire's housing supply of market and affordable homes. It has a demonstrable track record on housing delivery, which has not been met or matched by the promoters of other sites allocated for residential development in Whitchurch.

In partnership with DWH, The Westons, as landowners in this area, seek to deliver the allocated site Land North of Chester Road (WHT037 and WHT044) that forms a logical extension to the now completed WHIT046 site.

The site identified for residential development in the Reg 19 DSLP, Policy S18.1(i), Land North of Chester Road (WHT037 and WHT044) is available and suitable for development, and will make a positive contribution to meeting the identified housing need for Whitchurch.

(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.

Modify Schedule S18.1(i). Residential Allocations: Whitchurch Principal Centre, column 3 to read Minimum Level of Provision, 200 dwellings.

The principle of a minimum level of provision ought to be applied to WHT037 and WHY044 and all residential allocations identified in the Local Plan.

In the absence of this modification, the Local Plan is unlikely to meet the objectively assessed housing need for the remaining plan period, and is in conflict with the Government's objective, Making effective use of land set as out in Section 11 of NPPF (February 2019).

(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)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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	Part B Reference:

Land north of Chester Road can accommodate more than 200 dwellings and satisfy other relevant plan policies. In our view, the lack of qualification to the notional capacity of the site has the potential to jeopardise housing delivery unless the value is expressed as a minimum requirement. This principle ought to be extended to all sites allocated for residential development in the Local Plan and, in the absence of any such modification, there is a realistic prospect that the objectively assessed housing need will not be met. A primary objective of Government policy, as expressed in Section 5 of NPPF, is significantly boosting the supply of homes.

Whitchurch is identified as a Principal Centre. The delivery of the allocated site, Land north of Chester Road is important in terms of plan strategy. The modification proposed ought to be put before the Examination as it has implications for other objectors to the Local Plan arguing that the housing requirement figure for the remaining plan period is under estimated.

(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:

Date:

21/02/2021

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Part A Reference:

Part B Reference: