



25 APR 2014

For Shropshire  
Council use

Respondent  
no:

## **Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan**

**Pre-Submission Draft (Final Plan)  
17 March 2014 – 28 April 2014**

### **Representations Form**

**Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:**

[www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev)

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at [www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev).

#### **Your details: Who is making this representation?**

Name:	Joyce Jones
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

**If you are acting as an Agent, please use the following box to tell us who you are acting for:**

Name:	
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

## Your Representations

**Please note, you must use a separate form for each representation you wish to make.**

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

**Policy S18: Whitchurch**

Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Object</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

<b>Legally compliant</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Sound</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

<b>Positively prepared</b>	<input type="checkbox"/>
<b>Justified</b>	<input checked="" type="checkbox"/>
<b>Effective</b>	<input checked="" type="checkbox"/>
<b>Consistent with National Policy</b>	<input checked="" type="checkbox"/>

**In the box below please specify your reason for supporting or objecting.**  
If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

This objection relates to the proposed housing requirement for Whitchurch and Part 5 of Policy S18.1.

### Housing Requirement

I object to the housing requirement for Whitchurch of 1,200 dwellings as it is too high.

Between the SAMDev Preferred Options and the Revised Preferred Options there was an increase of 200 dwellings, something that looks in the main to have been as a result of a reduction in the Wem housing requirement.



Whitchurch is already a commuter town, the patterns of which are heavily dependent on car travel. The impact of bringing more housing will increase out-commuting by car. In my objection to the Wem housing requirement I noted how close that town is to Shrewsbury and how easily Shrewsbury can be reached by train from it. Whitchurch too has a railway station on the Crewe-Shrewsbury line, albeit the journey to Shrewsbury is twice as long as it is from Wem, but the difference between Wem and Whitchurch is that Whitchurch has much better direct road access to places such as Chester and Wrexham. Therefore, whereas Wem is within Shrewsbury's zone of influence, the working aged population of Whitchurch is drawn to a much wider range of larger settlements with car use being the only genuine way of commuting to many of them.

It has to be recognised that market towns are places where there are large patterns of out-commuting. This is not unique to Shropshire. The problem is that when a market town is within the commuter catchment of a number of larger settlements and there is no real alternative but to commute by car, then this has an impact on sustainability.

This scenario exists for Whitchurch. Any person working in places such as Chester or Wrexham will only use their car, thus making Whitchurch inherently less sustainable than somewhere like Wem where train travel is attractive, both in terms of journey time and cost compared to all day parking charges.

Regarding the attractiveness for building more housing in Whitchurch, I understand there are concerns over electricity supplies with one employer recently leaving the town because of this. The only secondary school has performed very poorly in recent inspections and, with parental choice, people looking to relocate into the area may choose a town where there is a much better performing school. The alternative to this is that pupils go to school in a different town, something that again raises questions about sustainability.

The level of new housing proposed in Whitchurch is too high, unnecessary and has adverse implications for sustainable development. It should revert back to the SAMDev Preferred Options figure of 1,000 dwellings. This decrease would have no implications for the conclusions of the Sustainability Appraisal.

#### S18.1 Part 5

Part 5 says that, exceptionally, unallocated sites can come forward within the Plan period adjoining the town boundary including the tract of land inside the A41 by-pass (between the Tilstock Road roundabout and the Chester Road roundabout). No reference is made to other land within the non-A41 part of the by-pass.

As part of its earlier work the Council has concluded that land within the A41 by-pass around Wrexham Road is not suitable for housing development, mainly because of traffic and highway issues. This land was also subject to



significant objections when development has previously been suggested. On the basis that not all the land is therefore suitable for development within the by-pass the reference to it should be removed from the policy because it is misleading. The NPPF says that only policies which provide a clear indication of how a decision maker should react to a development proposal should be included in the plan but this policy is asking a decision maker to consider land that the Council has already deemed as being inappropriate.

The supporting text in Paragraph 5.184 says that it is envisaged that the release of additional land will only be acceptable towards the end of the Plan period and then only if there is a quantified threat to the delivery of the overall strategy. The use of the word 'envisaged' is so weak it is worthless. Why not be bold and say land will not be released until the end of the Plan period. The earliest it should be released is 2024 in case opportunities arise for any yet unknown windfall brownfield sites, something that is encouraged by the NPPF.

It is unclear what is meant by the term 'overall strategy' at the end of Paragraph 5.184 but it is assumed it relates to housing delivery in Shropshire as a whole. This is completely unreasonable and contrary to the NPPF in terms of a delivery strategy because building houses in Whitchurch when they could be needed in Ludlow, Craven Arms or Much Wenlock would result in a Plan that is neither Justified nor Effective. The Plan is not sound if this paragraph does mean the strategy for the whole of Shropshire and this needs to be amended to refer to the delivery of housing in Whitchurch only.

Paragraph 5.184 also mentions the Whitchurch Town Plan and says that development to the west of the town inside the by-pass is in keeping with that plan but it is not a neighbourhood plan and therefore I believe in planning policy terms it has no status at all. It would also be interesting to see who commented on that plan when it was being prepared because as a local resident I was unaware that it existed.

As noted above, the land around Wrexham Road has already been discounted by the Council as unsuitable so it is wrong to include it in either the policy or its supporting text. If it is included then the Council will find it almost impossible to resist any part of it if a planning application is submitted because this policy effectively endorses any land within the A41 by-pass. There has been significant local resistance to the land around Wrexham Road and the NPPF has as its first core land use planning principle that planning should be genuinely plan-led, empowering local people to shape their surroundings. Therefore the Council cannot just dismiss local peoples' concerns over this land, something the policy does at the moment.

There is important information in the supporting text of the policy that needs to be brought into the policy itself to strengthen it, subject to some amendments. The policy should therefore include reference to development not coming forward until 2024 at the earliest and only if there is a quantifiable threat to the delivery of the housing requirement for Whitchurch.



**Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)**

The housing requirement for Whitchurch should be reduced to 1,000 dwellings over the Plan period.

Part 5 of Policy S18.1 should be amended as follows:

*With reference to Policy MD3 Part 4, the exceptional release of additional housing sites ahead of 2026 will be subject to the requirements of Policy MD3, and focussed on suitable land adjoining the development boundary.*

*The exceptional release of any land for housing will only be acceptable where the Local Planning Authority considers there will be a quantified threat to the delivery of the individual housing requirement for Whitchurch. If any other settlements have failed to meet their requirement then the policy will not be triggered as it will be for those settlements to address their own housing shortfalls.*

*The exceptional release of land will only be acceptable after 2024 to allow for any potential brownfield windfall sites within the development boundary to come forward to make up the shortfall in supply for the town.*

The above changes will make the policy sound because they bring it into line with the NPPF in that the policy would have a clear explanation of how the decision maker should react; and would also reflect the NPPF in terms of local people being empowered. In terms of the dwelling requirement, with my suggested changes to the Wem requirement, this is now the most appropriate strategy when compared with reasonable alternatives.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

**Do you consider it necessary to attend and give evidence at the examination?**

Yes, I wish to give evidence about my representation at the examination.

☐

No, I wish to pursue my representations through this written representation.

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If you wish to attend the examination, please explain why you think this is necessary in the box below:

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**Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.**

When the SAMDev Plan has been submitted for examination	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the SAMDev Plan is adopted	<input checked="" type="checkbox"/>

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

[Planning.policy@shropshire.gov.uk](mailto:Planning.policy@shropshire.gov.uk)

**Or return it to:** Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

**Please note, we will acknowledge receipt of representations made by e-mail.**

**Data Protection Act 1998 and Freedom of Information Act 2000**

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.