

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:	Galliers Homes
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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"/>	Policy:	S3.2	Site:	<input type="text"/>	Policies Map:	Alveley
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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 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.

Settlement Policy S3.2 in relation to Alveley

Galliers Homes strongly support the designation of Alveley as a Community Hub and the proposed changes to the Green Belt boundary.

The village is a significant settlement with an estimated 718 dwellings and a good range of services and facilities, including local job opportunities. The village is well served by rural bus services and is a sustainable location for accommodating rural development within the east Shropshire Green Belt. The Council's Hierarchy of Settlements paper gives Alveley a sustainability score of 59 points, ranking it in 15th place out of 42 Community Hub settlements.

There is strong demand in the local area for a range of housing. The proposed housing guideline is equivalent to a growth rate of 0.9% per annum over 20 years and is the minimum necessary to meet the village’s housing needs, justifying the release of land from the Green Belt around Alveley.

The village’s position on the A442 between Bridgnorth and Kidderminster helps the Council make maximum use of the county’s strategic transport corridors, with the A442 linking with the growing economy of neighbouring Worcestershire and the wider West Midlands.

Alveley has a significant amount of local employment, including the Alveley industrial estate. Development in Alveley therefore aligns with the Council’s emphasis on ‘balanced growth’ and its emphasis on rural sustainability in this part of Shropshire.

For all the above reasons, we strongly support the release of land from the Green Belt as essential for the long-term sustainability of the village.

The Green Belt Review considered the harm in rolling back the Green Belt for all the sites surrounding the village. The summary map showing the relative harm, found on page 104 of the Green Belt Review Appendix 2, is reproduced below. Allocation ALV009 (P72 sub-parcel) was found to have one of the lowest levels of harm.

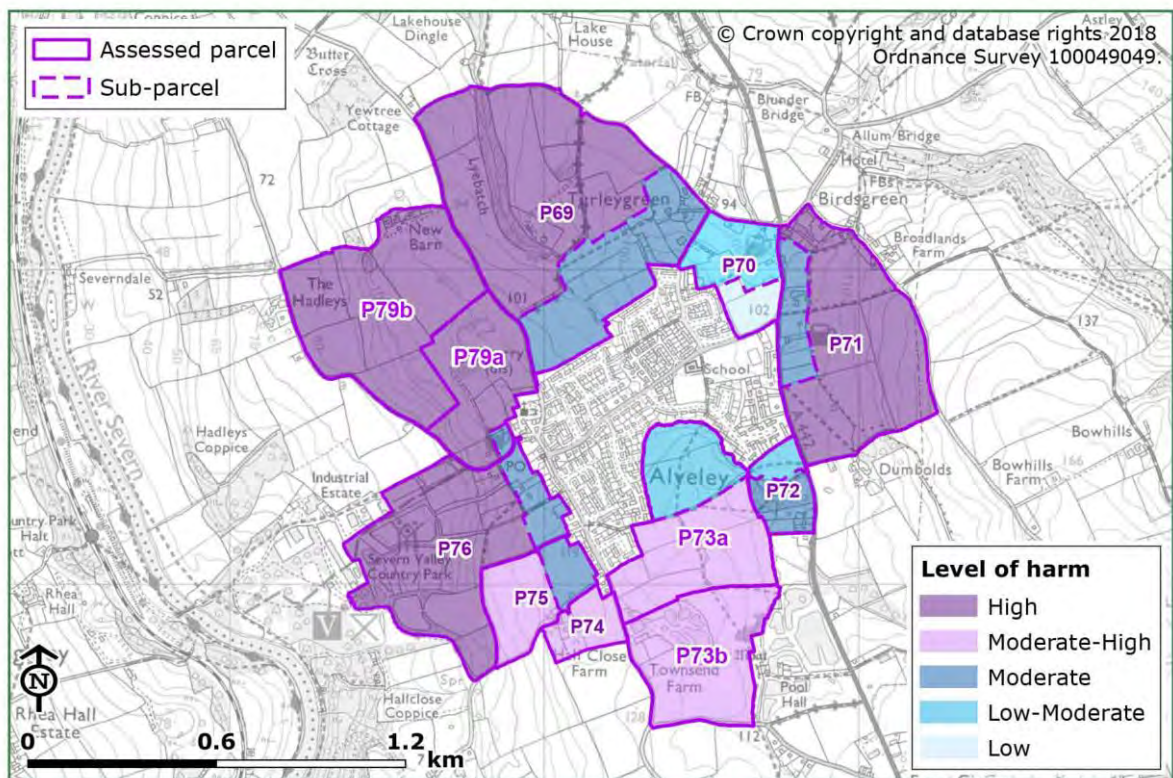


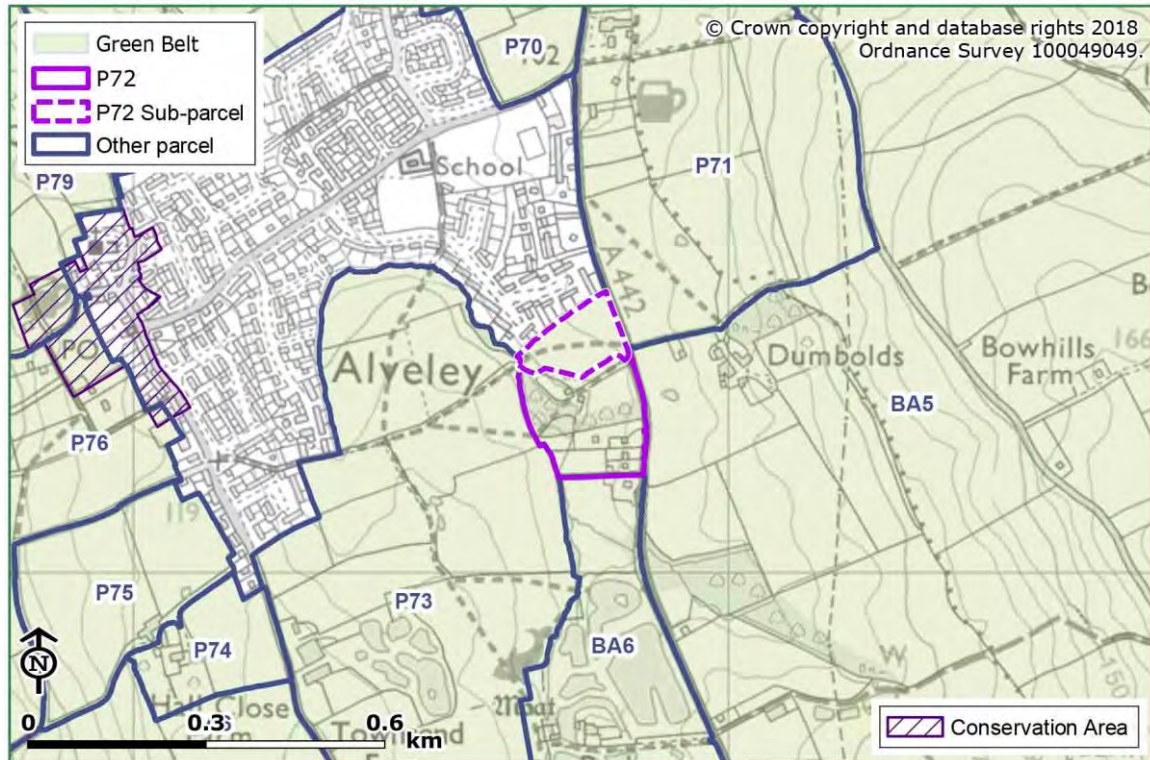
Figure A2.22: Individual Harm from Release of Parcels Surrounding Alveley

The Green Belt Review concluded that parcel P72 makes only a limited contribution to the Green Belt. It noted, "*the settlement of Alveley borders the north and is visually prominent causing a sense of encroachment within the parcel. The parcel contains a field of pasture and large residential gardens, it displays some characteristics of the countryside and is relatively open, but lacks a strong rural character.*"

Office Use Only	Part A Reference:
	Part B Reference:

“A sub-parcel has been identified within Parcel P72 that would lead to a lower level of overall harm to the Green Belt if it was to be released. Sub-parcel P72 comprises a single small field that forms the northern extent of parcel P72. The sub-parcel is strongly contained by mature trees, a residential garden, tree planting and the settlement edge of Alveley. It does not form part of the wider countryside and is heavily influenced by the adjoining settlement edge. Releasing this sub-parcel would not constitute encroachment on the countryside and would not significantly weaken the role neighbouring areas of land are playing as Green Belt. Releasing sub-parcel P72 from the Green Belt would lead to a **Low-Moderate** level of harm to the Green Belt designation in this local area.”

Fig 2. Extract from the Green Belt Review Appendix 2 Alveley (page 86)

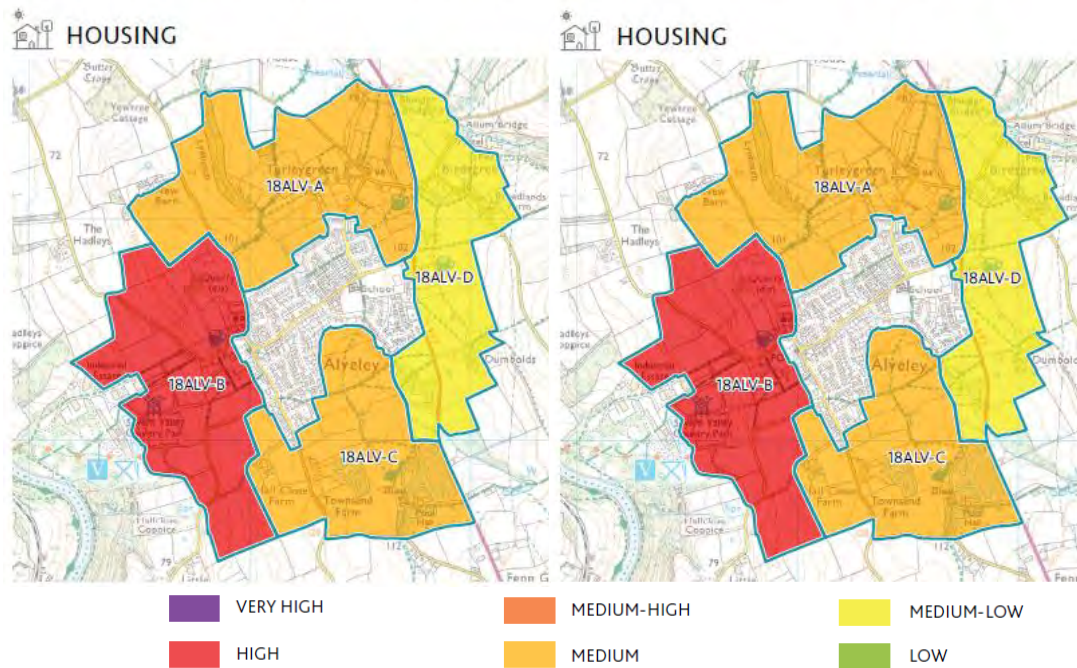


In light of the compromised nature of the parcel, its loss from the Green Belt would have limited harm.

Allocation ALV009 adjoining the south-east of the village is in the area considered by the Council’s Landscape and Visual Sensitivity Assessment to have the lowest landscape and visual sensitivity as shown by the extracts in figure 3 overleaf.

Office Use Only	Part A Reference:
	Part B Reference:

Fig 3. Extracts from the Council's Landscape & Visual Sensitivity Assessment
ALVELEY LANDSCAPE SENSITIVITY ALVELEY VISUAL SENSITIVITY



Allocation ALV009

Galliers Homes strongly support the allocation of land ALV009 adjacent to the Cleckars for 35 dwellings.

Galliers Homes has a strong record of high quality housing developments across Shropshire and a well-deserved reputation for delivering a range of housing appropriate to the local market, including affordable, 2, 3, 4 and 5 bedroomed homes. The site will be delivered to Galliers Homes' normal high quality designs, incorporating a range of features and attractive areas of public open space. An indicative layout is provided in Appendix 1.

Despite representations to the Council at the Regulation 18 stage, the development guidelines continue to potentially cause deliverability problems that mean they fail the 'effective' test of soundness.

The proposed development guidelines require a footway along the A442. To facilitate delivery of this footway, given the limited space between third party land and the highway and the problems that can occur if third party land is involved, we request that the development guidelines are amended to clarify that the footway will be achieved on existing adopted highway land.

The site is very well screened in the landscape with mature hedges and woodland on its eastern, southern and western boundaries. The impact of development on the wider landscape and the remaining Green Belt will be negligible. However it is necessary to reflect in the policy guidelines the fact that site's access will necessitate puncturing through the tree belt fronting the A442.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

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.

To make the Plan effective requires the following modifications to the development guidelines:

Schedule S3.2(i). Residential Site Allocations: Community Hubs in the Bridgnorth Place Plan Area

Site Allocation	Development Guidelines	Provision
<p>Land Adjacent to The Cleckars, Alveley (ALV009)</p>	<p>Design and layout of development should seek to retain <i>where possible</i> protected and mature trees and hedgerows, safeguard ecological interest, including adjacent priority habitat, and provide additional planting to improve biodiversity and minimise and mitigate visual encroachment into Green Belt. Opportunities should be taken to link green infrastructure from the site to the wider Green Belt and to use planting to reinforce Green Belt boundaries.</p> <p>A high-quality layout and design recognising the Green Belt edge and village gateway location of the site is expected. The mix and layout of housing provided on the site should be informed by identified local needs.</p> <p>Relevant supporting studies should be undertaken including, ecology, tree and hedgerow surveys, with their recommendations clearly reflected in site capacity and the proposed development scheme.</p> <p>The 30mph zone should be extended to reflect the extent of this site, together with appropriate traffic calming. A continuous footway should be provided along the site's road frontage and along the A442 (<i>within adopted highway land</i>) to link with the unadopted road serving The Woodlands.</p> <p>The public right of way which crosses the site would need to be taken into account in scheme design and an attractive pedestrian route should be provided through the site with the Public Right of Way across the site, which links to the existing rights of way network in Green Belt beyond the site, retained.</p>	<p>35 dwellings</p>

Office Use Only	Part A Reference:
	Part B Reference:

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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)?

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 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:

Galliers Homes can contribute positively to the examination, bringing its experience as an active local housebuilder in the Shropshire market.

(Please continue on a separate sheet if necessary)

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Signature:

Date:

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	Part B Reference:

Appendix 1: Allocation ALV009 Indicative Layout Plan



SCHEDULE OF HOUSE TYPES

* 791 (AFFORDABLE)	2 bed	7 No	@ 791
JAS JASMIN	3 bed	10 No	@ 868
BRI BRIAR	3 bed	6 No	@ 950
COM COMPTON	3 bed	4 No	@ 1007
LOD LODDON	4 bed	3 No	@ 1156
CHA CHAUCER	4 bed	2 No	@ 1305
BEL BELLE	4 bed	3 No	@ 1498
TOTAL		35 No	= 34507 sqft

POS = 106 bedrooms x 30m² = 3180 m²

Subject to site survey, tree survey, planning and highway negotiations

JOB:
Residential Development at
A442
Alveley

TITLE:
Sketch Layout 2

CLIENT:

GALLIERS
HOMES

SCALE: 1:500 @ A2 **DATE:** MAR 2019
DRAWN: KJS **DRAWING No.** ALV/002

KJS Residential Design Services

11 PERTON BROOK VALE, WIGHTWICK, WOLVERHAMPTON, WV6 8DS
Tel: 01902 761072 Mob: 07963 706224
E-mail: graham@kjsresidential.co.uk

Representation Form

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- (Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	S16.2 Bomere Heath	Site:	BOM019 & BOM020	Policies Map:	<input type="text"/>
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(Please tick as appropriate).

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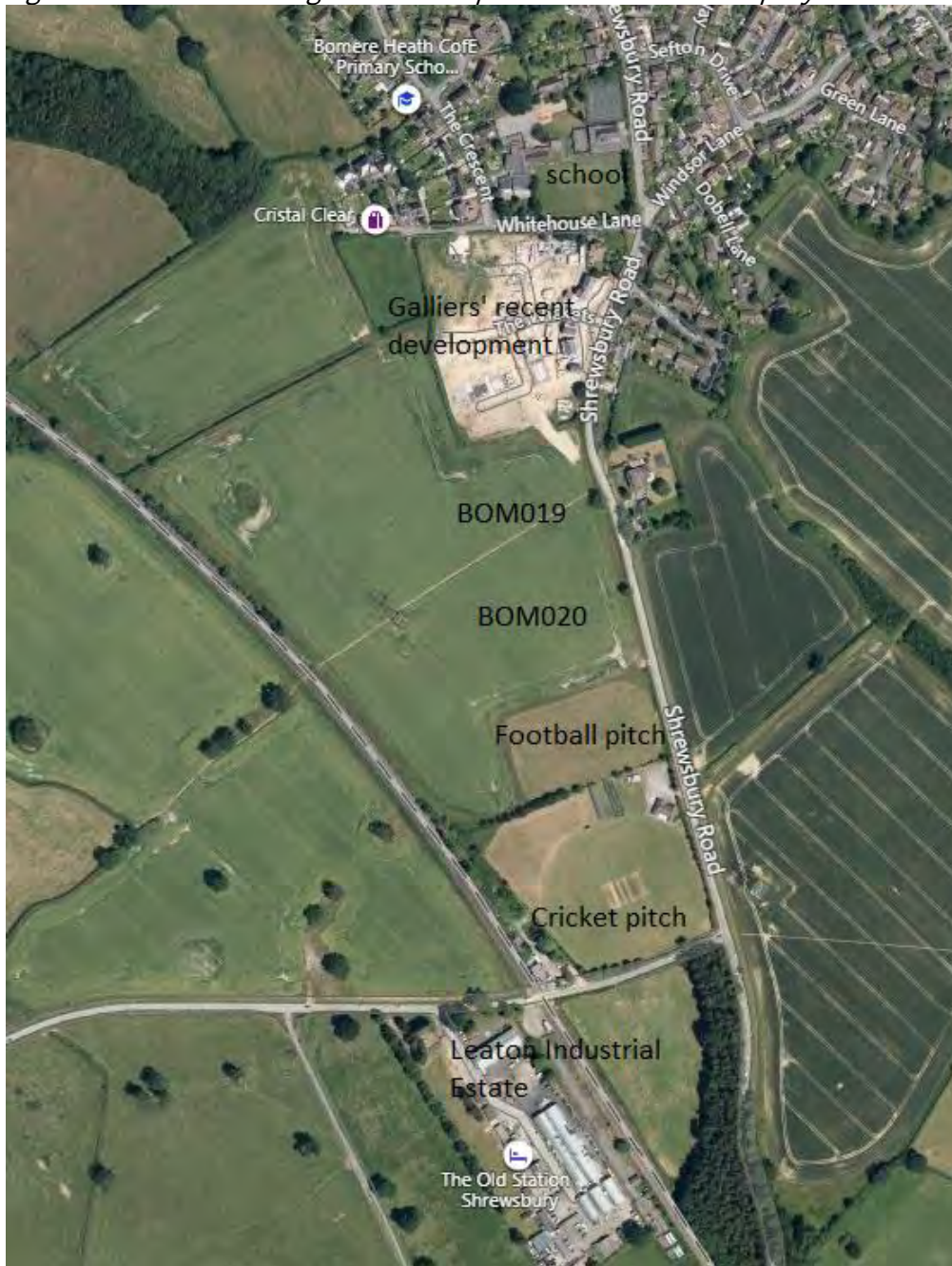
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Settlement Policy S16.2 in relation to Bomere Heath

Galliers Homes strongly supports the designation of Bomere Heath as a Community Hub as it is a sustainable settlement with a good range of services and significant local employment including the Leaton Industrial Estate.

Galliers Homes' recent development SAMDev Plan allocation BOM004 experienced very strong local demand and is now fully built out. We are confident that allocations BOM019 and BOM020 will likewise be very popular and will be delivered quickly. They form natural extensions that link the village with the cricket and football pitches to the south and the Leaton Industrial Estate beyond, as shown in figure 1 overleaf.

Figure 1. Aerial showing relationship to recreation & employment sites



Unfortunately the development guidelines remain inaccurate despite previous representations to the Council. In particular, the requirement for BOM019 to provide a new highway access off Shrewsbury Road is unnecessary because the recent access and roundabout on Shrewsbury Road was designed to accommodate the traffic for both sites. The new roundabout was oversized on the basis that it would cater for later phases of development. To require a second access is unnecessary and fails the 'justified' test of soundness.

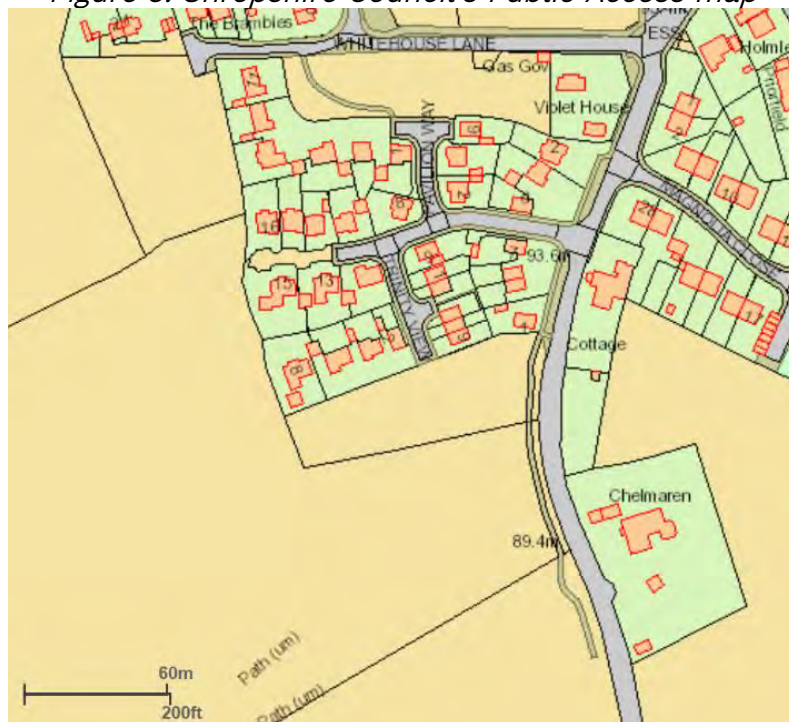
The guidelines also seek to duplicate the new pedestrian footway provided by the recent development to link the cricket and football pitches to the village. An additional '*new pedestrian footpath (to) be provided from the site to the services in the village*' is unnecessary and fails the 'justified' test of soundness.

Office Use Only	Part A Reference:
	Part B Reference:

Fig 2. Layout Plan for new development 17/00768/REM



Figure 3. Shropshire Council's Public Access map



Office Use Only

Part A Reference:

Part B Reference:

*Fig 4. Existing adopted road layout showing roundabout on Shrewsbury Road
Constructed development as section 38 Agreement Plan for 17/00768/REM*



The approved Engineering Layout Plan is attached in Appendix 1 to this representation.

It should be noted that the existing development (17/00768/REM) included a surface outfall and pond under the high voltage electricity lines, close to the railway, that was oversized and designed to cater for these later phases of development. A sustainable surface water drainage strategy is therefore in place and the agreed outfall rate with Severn Trent Water will not need changing when allocations BOM019 and BOM020 are developed.

(Please continue on a separate sheet if necessary)

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To make the plan 'justified' the development guidelines should be updated to accurately reflect the situation on the ground and remove the requirement to duplicate the access and pedestrian footway. They should refer to the provision already made to access the next phase of development via Trinity View as shown in figure 4 of this representation.

Similarly a new footpath has recently been constructed along Shrewsbury Road as part of the previous development (17/00768/REM). It is unnecessary for the new allocations to duplicate this path and fails the 'justified' test of soundness.

The following modifications would make the Plan sound:

Bomere Heath Community Hub		
Site Allocation	Development Guidelines	Provision
Land West of Shrewsbury Road, Bomere Heath - Phase 1 (BOM019)	<p>This site represents Phase 1 of the development.</p> <p>An appropriate highway access will be provided off Shrewsbury Road via the recently completed phase of development at the Wickets and Trinity View and any other necessary highway improvements undertaken including the extension of the 30mph zone and other relevant traffic calming measures.</p> <p>A <i>New pedestrian footpath <u>links</u> will be provided where necessary to link from the site to the services in the village.</i></p> <p>Existing trees, hedgerows, public rights of way and priority habitats will be retained and enhanced.</p> <p>Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from Shrewsbury Road.</p> <p>The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.</p>	40 dwellings
Land West of Shrewsbury Road, Bomere Heath - Phase 2 (BOM020)	<p>This site represents Phase 2 of the development and will follow on from Phase 1 (BOM019).</p> <p>An appropriate highway access will be provided, if appropriate, this may be via the Phase 1 development (BOM019). Any other necessary highway improvements undertaken including the extension of the 30mph zone and other relevant traffic calming measures.</p> <p>The pedestrian footpath from the services in the village will be extended into the site.</p> <p>Existing trees, hedgerows and priority habitats will be retained and enhanced.</p> <p>Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from Shrewsbury Road.</p> <p>The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be</p>	15 dwellings

Office Use Only	Part A Reference:
	Part B Reference:

	<p>managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.</p>		
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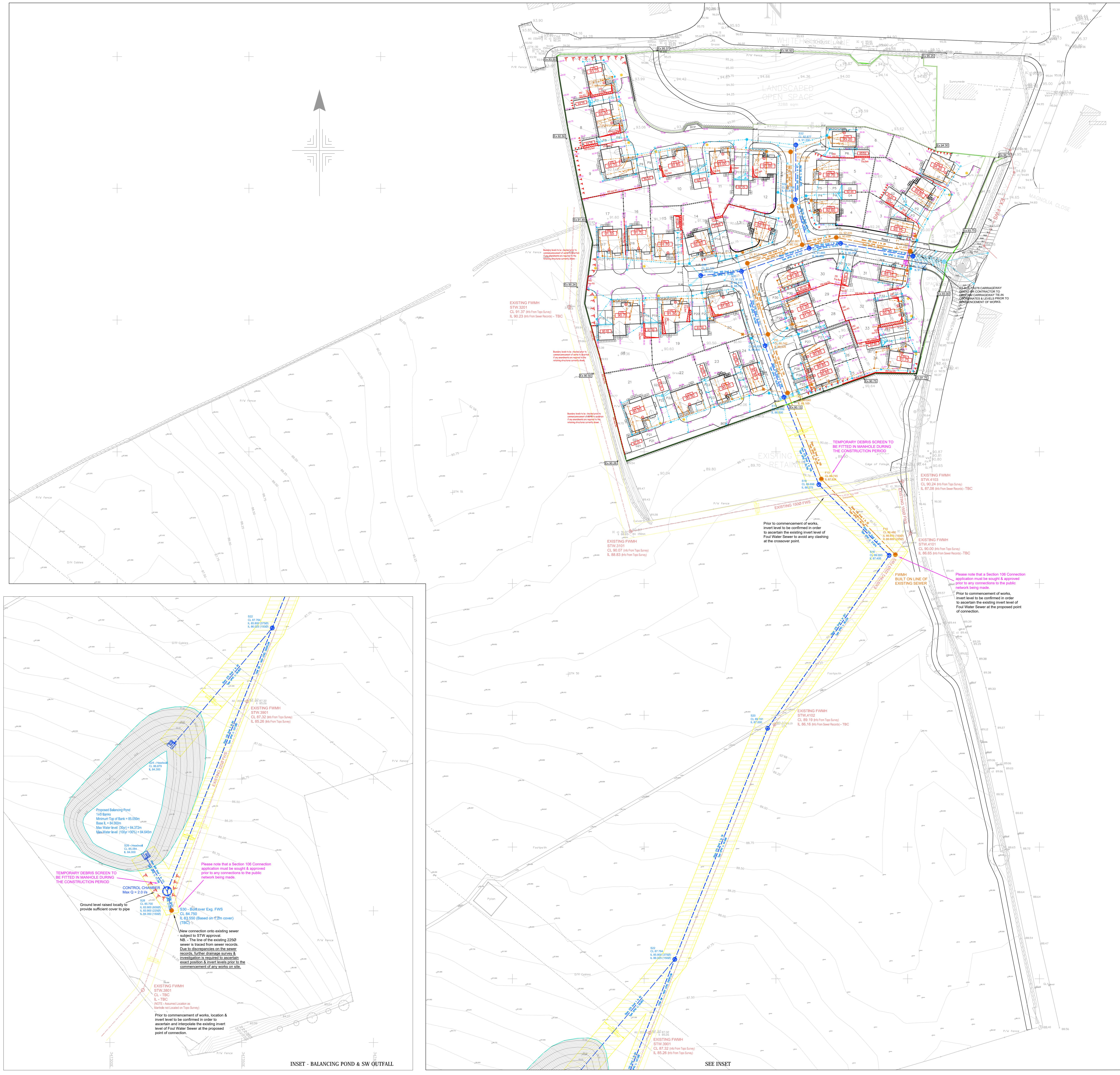
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Date:

Office Use Only	Part A Reference:
	Part B Reference:



ADOPTABLE DRAINAGE KEY (NTS)

FUJL WATER

- Manhole
- Pipe Line
- Existing Line
- Foul Rising Main

SURFACE WATER

- Manhole
- Pipe Line
- Existing Line

HIGHWAY DRAINAGE

- Gully
- Highway Drain / Gully Connection

GENERAL

- Sewer Easement
- Manhole Details

PRELIMINARY

SUBJECT TO SECTION 38 & 104 APPROVAL

ALL SEWERS IN ACCORDANCE WITH SEWER FOR ADOPTION 6TH EDITION

ROAD AND LEVELS KEY

Road Centre Line

Carriageway High Point

Carriageway Low Point

Existing Ground Level

Finished Floor Level

Street Name Plate

Part M Access

Pedestrian Crossing

MANHOLE REQUIREMENTS FOR SEWERS FOR ADOPTION 6TH EDITION - ADOPTIONS & DIVERSIONS

GENERAL REQUIREMENTS:

COPIES OF DELIVERY NOTES FOR CONCRETE AND PIPE BEING WILL BE REQUIRED INTERNETITELY AS THE JOB PROGRESSES. ALL OTHER COMPONENTS MUST BE KITE-MARKED.

CHANNELS AND BENCHING:

ALL CHANNELS WITH PIPE SIZES 100MM, 150MM, 200MM MUST HAVE BENT BEDS AND CHANNELS. ALL BENCHING TO BE A MINIMUM 60MM THICK GRANULATED CONCRETE TROWELLED TO A SMOOTH FINISH.

BRICKWORK MANHOLES:

IF THE CHAMBER IS LESS THAN 3M DEEP WE REQUIRE DOUBLE ENCAPSULATED STEEL RINGS UNLESS OTHERWISE APPROVED. IF THE CHAMBER IS OVER 3M DEEP WE REQUIRE A FULLY ENCAPSULATED STEEL LADDER. THERE MUST BE 50MM BETWEEN LADDER AND BACK OF SHAFT. DEPTH IS MEASURED FROM FINISHED COVER LEVEL TO THE TOP OF THE BENCHING. THE MAXIMUM DISTANCE BETWEEN COVER LEVEL AND THE FIRST STEP MUST BE 50MM.

BRICKWORK:

MN 2 MAX 4 COURSES UNDER FRAME AND MUST BE SOLID CLASS B ENGINEERING BRICKS OR CONCRETE SPACING RINGS NEARLY POINTED. ENGLI BOND TO BE USED ON ALL BRICKWORK. SUSPHATE RESISTING CEMENT MUST BE USED IN ALL LOCATIONS.

COVER AND FRAMES:

COVER BLAN OPENING, COVER AND FRAMES MUST BE 675 X 675 UNLESS OTHERWISE APPROVED. CHAIRS SHOULD BE USED AT ALL LOCATIONS. ON ROADWAYS MUST BE 100MM DEEP. ON RESIDENTIAL, CL 2 DE SACS 100MM MAY BE USED SUBJECT TO APPROVAL. FRAMES FOR MANHOLE COVERS SHOULD BE BEDDED IN A POLYESTER RESIN BEDDING MORTAR IN ALL SITUATIONS WHERE COVERS ARE SITED IN.

COVER AND FRAMES:

'WELL' TYPE COVERS SHOULD NOT BE USED.

IN BLOCK PAVED AREAS 150MM DEEP FRAMES MUST BE USED (IN ACCORDANCE WITH CL 2.8.5 SF&F P.25)

LATERALS:

THEY SHOULD BE LAD TO THE SAME STANDARD AS PUBLIC SEWERS. THEY SHOULD HAVE NO CHANGES OF LINE OR GRADIENT BETWEEN THE SEWER AND THE DEMARCATION CHAMBER. THEY SHOULD HAVE AN ADOPTABLE MANHOLE AS THE DEMARCATION CHAMBER. FOR MANHOLE COVERS SHOULD BE BEDDED IN A POLYESTER RESIN BEDDING MORTAR IN ALL SITUATIONS WHERE COVERS ARE SITED IN THE BOUNDARY OF THE PROPERTY, NO MORE THAN 1M INSIDE THE BOUNDARY, PREFERABLY IN THE DRIVEWAY AND NOT IN THE WHEEL TRACKS OF VEHICLES.

GENERAL NOTES

- ROADS FOOTPATHS AND PARKING BAYS WHICH FORM PART OF THE HIGHWAY TO BE ADOPTED UNDER SECTION 38 OF THE HIGHWAYS ACT 1980 SHALL COMPLY WITH THE RELEVANT COUNCIL HIGHWAY SPECIFICATION.
- SEWERS TO BE ADOPTED UNDER SECTION 104 OF THE WATER INDUSTRIES ACT 1991 SHALL COMPLY WITH THE WATER AUTHORITIES ASSOCIATION SEWERS FOR ADOPTION 6TH EDITION AND COMBINED ADOPTUM.
- ALL PIPES TO BE USED IN ADOPTABLE SEWERS SHALL BE EITHER CLAYWARE TO BS EN 252:1998 AND BS EN 1047:1997 (Surface Water) OR CONCRETE TO BS EN 12050:2000 UNLESS OTHERWISE STATED. THE MINIMUM REQUIREMENT FOR PIPES TO BE USED IN ADOPTABLE SEWERS IS TO BE AS FOLLOWS:

MINIMUM DIMENSIONS FOR MANHOLES	MINIMUM DIMENSIONS FOR MANHOLES	MINIMUM DIMENSIONS FOR MANHOLES	MINIMUM DIMENSIONS FOR MANHOLES
Manhole Type	Manhole Type	Manhole Type	Manhole Type
1. 100MM DIA - CLASS 187 - MIN CRUSHING STRENGTH 28NMM	2. 200MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 28NMM	3. 300MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM	4. 400MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM
5. 500MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM	6. 600MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM	7. 700MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM	8. 800MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM

3.1. 100MM DIA - CLASS 187 - MIN CRUSHING STRENGTH 28NMM
 200MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 28NMM
 300MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM

3.2. LARGER THAN 300MM DIA - HIGH STRENGTH CONCRETE. WHERE COVERS ARE TO BE CHECKED BY THE CONTRACTOR PRIOR TO THE COMMENCEMENT OF ANY PROPOSED DRAINAGE WORK, ANY DIFFERENCE BETWEEN ACTUAL AND DRAWN DETAILS IS TO BE REPORTED IMMEDIATELY.

4. ALL EXISTING DRAINAGE INVERT LEVELS, DIAMETERS AND LOCATIONS ARE TO BE CHECKED BY THE CONTRACTOR PRIOR TO THE COMMENCEMENT OF ANY PROPOSED DRAINAGE WORK. ANY DIFFERENCE BETWEEN ACTUAL AND DRAWN DETAILS IS TO BE REPORTED IMMEDIATELY.

5. POSITIONS OF EXISTING SERVICES/UTILITY UNDERTAKERS APPROPRIATE ADJACENT TO OR CROSSING PROPOSED SEWERS IS TO BE CHECKED BY THE CONTRACTOR PRIOR TO STARTING WORK.

SEWER CONNECTIONS

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2. LARGER THAN 300MM DIA - HIGH STRENGTH CONCRETE. WHERE COVERS ARE TO BE CHECKED BY THE CONTRACTOR PRIOR TO THE COMMENCEMENT OF ANY PROPOSED DRAINAGE WORK, ANY DIFFERENCE BETWEEN ACTUAL AND DRAWN DETAILS IS TO BE REPORTED IMMEDIATELY.

3. POSITIONS OF EXISTING SERVICES/UTILITY UNDERTAKERS APPROPRIATE ADJACENT TO OR CROSSING PROPOSED SEWERS IS TO BE CHECKED BY THE CONTRACTOR PRIOR TO STARTING WORK.

SEWER CONNECTIONS

- SEWER CONNECTIONS TO BE MADE IN ACCORDANCE WITH THE RELEVANT COUNCIL HIGHWAY SPECIFICATION.
- ALL EXISTING SEWERS TO BE ADOPTED UNDER SECTION 104 OF THE WATER INDUSTRIES ACT 1991 SHALL COMPLY WITH THE WATER AUTHORITIES ASSOCIATION SEWERS FOR ADOPTION 6TH EDITION AND COMBINED ADOPTUM.
- ALL PIPES TO BE USED IN ADOPTABLE SEWERS SHALL BE EITHER CLAYWARE TO BS EN 252:1998 AND BS EN 1047:1997 (Surface Water) OR CONCRETE TO BS EN 12050:2000 UNLESS OTHERWISE STATED. THE MINIMUM REQUIREMENT FOR PIPES TO BE USED IN ADOPTABLE SEWERS IS TO BE AS FOLLOWS:

1. 100MM DIA - CLASS 187 - MIN CRUSHING STRENGTH 28NMM
 200MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 28NMM
 300MM DIA - CLASS 120 - MIN CRUSHING STRENGTH 30NMM

2. LARGER THAN 300MM DIA - HIGH STRENGTH CONCRETE. WHERE COVERS ARE TO BE CHECKED BY THE CONTRACTOR PRIOR TO THE COMMENCEMENT OF ANY PROPOSED DRAINAGE WORK, ANY DIFFERENCE BETWEEN ACTUAL AND DRAWN DETAILS IS TO BE REPORTED IMMEDIATELY.

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3. POSITIONS OF EXISTING SERVICES/UTILITY UNDERTAKERS APPROPRIATE ADJACENT TO OR CROSSING PROPOSED SEWERS IS TO BE CHECKED BY THE CONTRACTOR PRIOR TO STARTING WORK.

The Contractor is to check and verify all building and site dimensions, levels and invert levels at construction points before work starts. The Contractor is to comply in all respects with current Building Regulations, British Standard Specifications, Building Regulations, Construction (Design & Management) Regulations, Party Wall Act, etc. whether or not specifically stated on this drawing. This drawing must be read with and checked against any structural ground conditions or other specialist documentation provided. This drawing is not intended to show details of foundations, ground conditions or ground constraints. Each area of ground related upon to support any structure depicted (including drainage) must be investigated by the Contractor. A suitable method of foundation should be provided allowing for existing ground conditions. Any aspect of final ground construction on or within the ground should be further investigated by a suitable expert. Any settlement construction should indicate typical slopes for guidance only & should be further investigated by a suitable expert. Where existing structures are to be retained they should be subject to a full specialist inspection for safety. All trees are to be planted as to ensure they are a minimum of 5 metres from buildings. A suitable method of foundation is to be provided in accordance with the proposed tree planting.

Residential & Commercial Engineering Limited do not accept any responsibility for any losses (financial or otherwise) in any claim or third party arising out of the design. The Developer or Contractor has not limited (thereby) non-compliance with other contractual provisions.

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THE ENGINEERING DESIGN IS BASED ON LAYOUT 2158-03 SITE LAYOUT 03-02-17 DWG PROVIDED BY THE CLIENT (Ref'd on 06/02/17)

INSET - BALANCING POND & SW OUTFALL

SEE INSET

GALLIERS
NEW HOMES

RACE
RESIDENTIAL & COMMERCIAL ENGINEERING

Drawing Status:
 Date: 14/02/2017
 Drawn: SM
 Checked: SM

Client:
GALLIERS

Project:
**SHREWSBURY ROAD
BOMERE HEATH**

Title:
ENGINEERING LAYOUT

Job Number:
RACE/CHS

Scale: 1:500 @ A0
 Date: Feb 17
 Drawn by: SM
 Checked by: #

Contact us:
 Residential & Commercial Engineering Ltd
 Unit 17, Lakeside Business Park, Walkmill Lane, Cannock, WS11 0XE.
 Tel: 01922 411552

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:	Galliers Homes
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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:	5.229	Policy:	S16.2 Bayston Hill	Site:	BAY005	Policies Map:	Bayston Hill
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- 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.

Settlement Policy S16.2 in relation to the Bayston Hill Community Hub

Bayston Hill's settlement residential guideline in policy S16.2 and the priority of retaining a 'Green Gap' in paragraph 5.229 fail the 'positively prepared', 'justified' and 'effective' tests of soundness.

Not positively prepared

Bayston Hill is a sustainable settlement with a good range of services and significant local employment. The Council's 'Hierarchy of Settlements' paper gives Bayston Hill 80 points for its services and facilities, ranking it second out of 42 Community Hubs

in Shropshire. With a population size of 5,156 persons, it is Shropshire's largest village.

Galliers Homes have made comments under Policy SP2 in relation to Shropshire's overall housing needs not reflecting the latest household projections published by the Office of National Statistics. As Shropshire's largest village Bayston Hill shares in the county's failure to meet its objectively assessed housing needs.

The 'Hierarchy of Settlements' paper estimates there are 2,024 dwellings in Bayston Hill so its proposed settlement guideline of 200 dwellings over the 22 year plan period 2016-2038 represents annual growth of 0.45%. This is significantly less than the proposed rate of 1.01% per annum for Shropshire as a whole. The low settlement guideline for Bayston Hill fails the 'positively prepared' test of soundness.

Not justified

Bayston Hill is located on the A49 corridor with excellent access to a wide range of jobs along the corridor and in nearby Shrewsbury. The A49 is named as a strategic corridor in paragraph 3.28 of the Plan which notes, "*The strategic approach also responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections.*" Despite the A49 being one of these strategic corridors, the Plan unjustifiably diminishes Bayston Hill's potential for growth.

Bayston Hill's proposed growth rate of 0.45% is far lower than other Community Hubs with similar sustainability scores, for example Pontesbury with the same score of 80 points for its facilities and services has a guideline figure representing 1.03% per annum growth when compared to the estimate of dwellings in the village contained in the Council's 'Hierarchy of Settlements' paper. The next most sustainable villages are St Martins with 77 points, which has growth of 1.66%, Clun with 72 points has growth of 1.1% per annum and Gobowen with 71 points has growth of 1.2% per annum.

The much lower rate of growth for Bayston Hill calls into question the basis by which the settlement growth figures have been arrived at. No justification is given in the Plan for such a low rate of growth for Shropshire's largest village, with one of the highest village sustainability scores, located in one of its strategic corridors. The settlement guideline figure fails the 'justified' test of soundness.

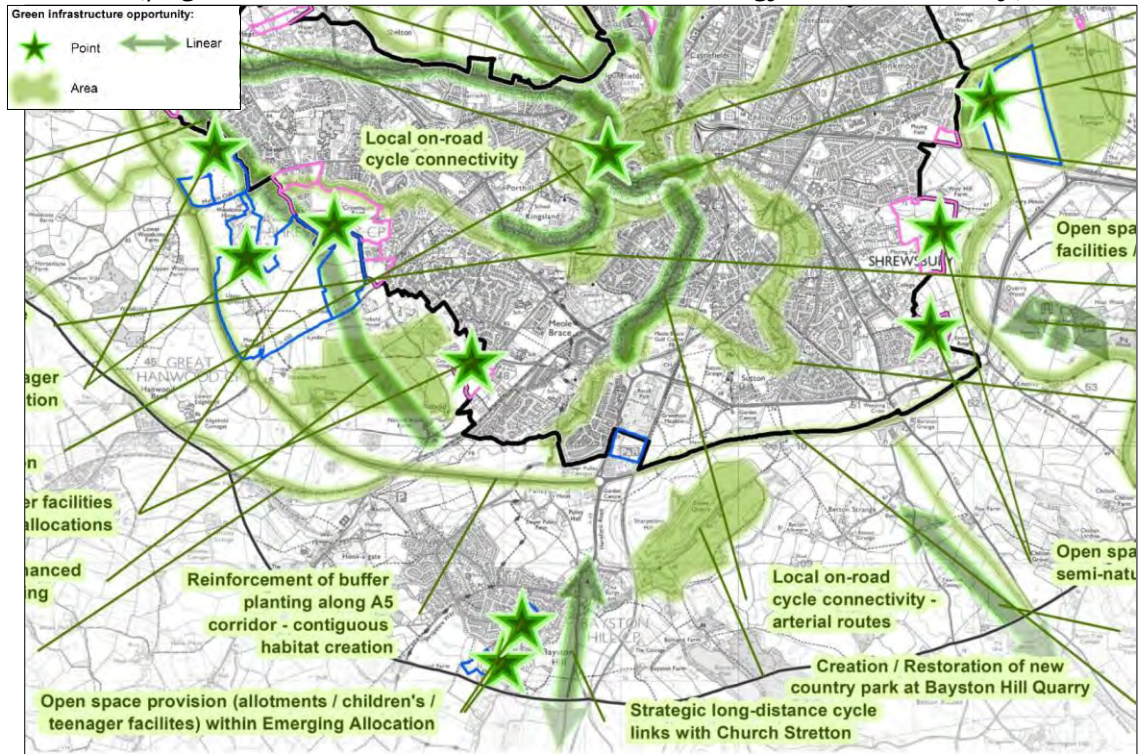
Paragraph 5.229 of the Plan states, "*Bayston Hill is a large urban village located to the south of Shrewsbury. Due to the proximity between these settlements, consistent with Community Hub Policy SP7, the retention of the Green Gap to the north of Bayston Hill is a key priority.*" There is however no evidence that supports the retention of a 'Green Gap'. It does not feature in either the Shropshire Open Space and Recreation Needs Assessment (September 2018) or in the Green Infrastructure Strategy for Shrewsbury (July 2020).

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Part A Reference:

Part B Reference:

Figure 1. Extract 'Green Infrastructure Opportunities' diagram (page 12 of the Green Infrastructure Strategy for Shrewsbury)



There is no objective evidence to justify making retention of the Green Gap a key priority that guides the development strategy for Bayston Hill.

In contrast, the South Shropshire Hills Area of Outstanding Natural Beauty is a nationally recognised landscape designation lying to the south and east of Bayston Hill.

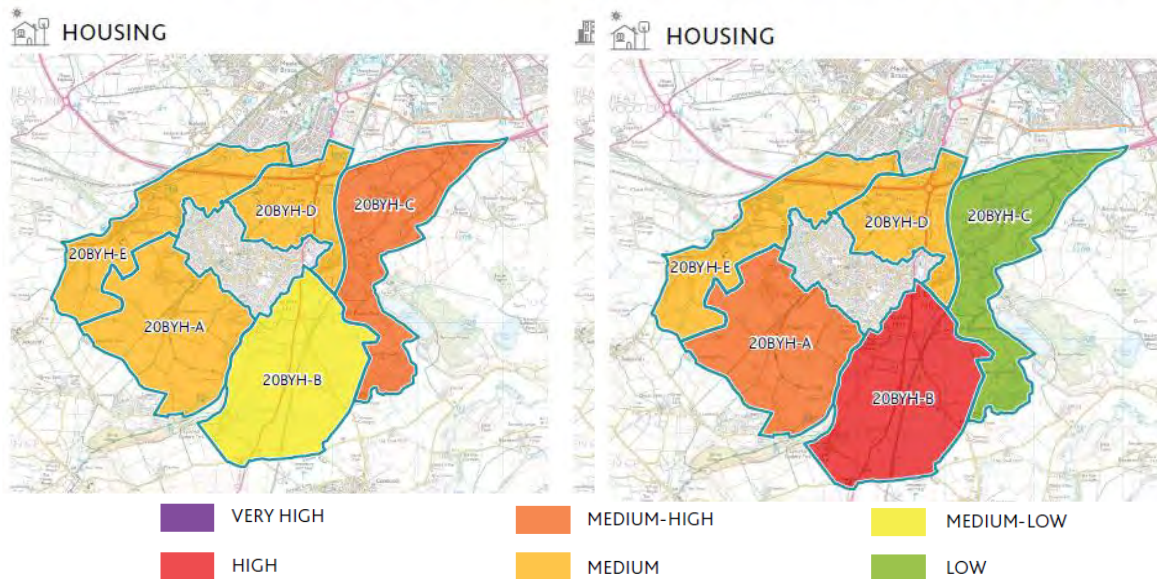
The Council's Landscape & Visual Sensitivity Assessment (2018) identifies the southern side of Bayston Hill as more visually sensitive than the northern side of the village, as shown in figure 2 overleaf. In addition to looking out towards the South Shropshire Hills Area of Outstanding Natural Beauty some 5 km to the east, south and south west, the southern end of the village is associated with the local beauty spot of Lyth Hill and is crossed by many well-walked Public Rights of Way.

In contrast, the north side of Bayston Hill has lower landscape and visual sensitivity. In relation to parcel 20BYH-E to the north-west of the village, the study states,

“Views within this rural landscape are of variable quality taking in a farmed landscape of diverse scale and condition, major road infrastructure..... To the north, views are contained by hedgerows, A5 embankment and planting. This reduces its susceptibility as new development would be better screened by the existing landform and vegetation than in a more open landscape.” It notes the potential benefits of development: *“There is also potential to improve the settlement edge which is partially integrated. There is a low sense of tranquility due to frequent road noise and quarry traffic, however this could be buffered by screen mounding and planting which would be appropriate within the parcel.”*

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	Part B Reference:

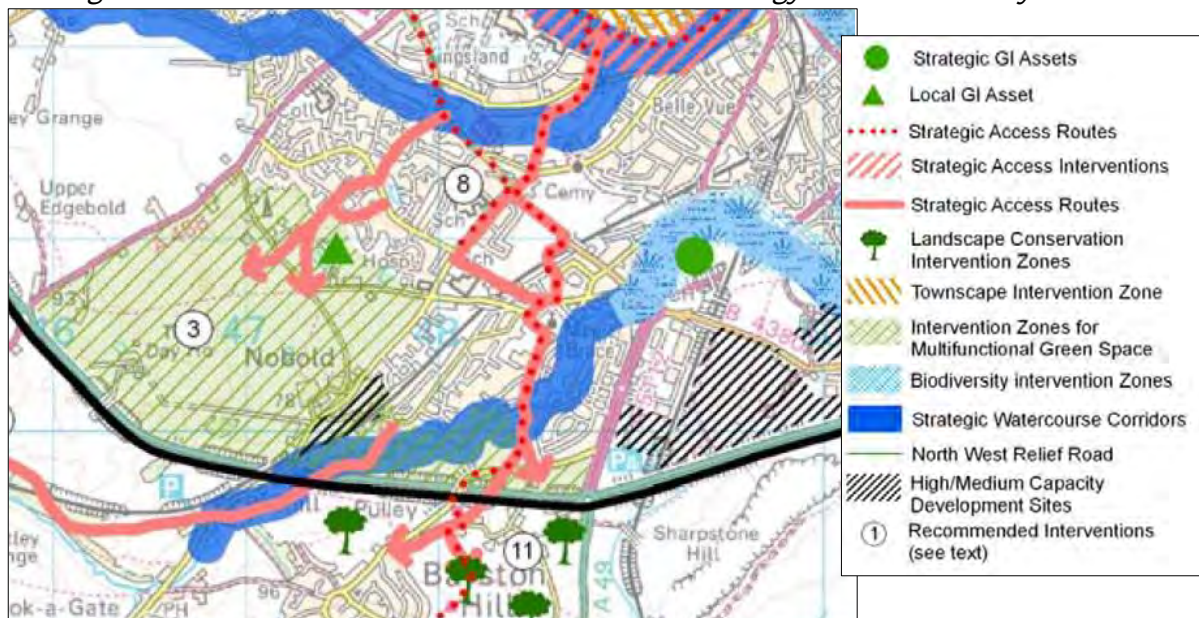
Fig 2. Extracts from the Council's Landscape & Visual Sensitivity Assessment
BAYSTON HILL LANDSCAPE SENSITIVITY BAYSTON HILL VISUAL SENSITIVITY



The Plan can do better than simply seek to retain a gap between Bayston Hill and Shrewsbury. There is an opportunity to **improve** the landscape in the gap and provide areas for recreation, for the benefit of both Bayston Hill and Shrewsbury.

This has previously been acknowledged, for example in the Green Infrastructure Strategy for Shrewsbury & Atcham (2008) that identified 'Landscape Conservation Intervention Zones' along the northern edge of Bayston Hill as shown in figure 3 overleaf.

Fig 3. Extract from 'A Green Infrastructure Strategy for Shrewsbury & Atcham'



It is perfectly possible to improve the gap by utilising private investment to this end. The settlement strategy for Bayston Hill could actively promote sites that will provide additional planting and new areas of public open space that will benefit residents and improve the landscape and recreational potential of the gap.

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	Part B Reference:

Rather than directing development towards the more sensitive landscape at the southern end of the village, where it faces the South Shropshire Hills AONB, it would be better to seek to improve the northern edge of the village with additional planting, new areas of public open space and an attractive mix of modern housing. The northern end of the village is close to the Pulley Lane cycle/pedestrian route that links Bayston Hill to secondary schools, facilities and employment opportunities.

Galliers Homes have repeatedly suggested the allocation of site BAY005 to deliver an attractive area of public open space along the northern edge of Bayston Hill (fig 4 overleaf). The site is very well located for access to Bayston Hill's shops and facilities as well as being close to the Pulley Lane route into Shrewsbury. The Council already recognises the sustainability credentials of site BAY005, scoring it 'fair' (-4) in its Site Assessments (August 2020).

Galliers Homes have an option on the land and would deliver high quality mixed residential development on this site within a few years of site BAY005 being allocated for development. As a local housebuilder with a reputation for high-quality developments, this provides Shropshire Council will certainty over its delivery.

The development of site BAY005 provides an opportunity for generous new landscaping along the ridgeline and public open space providing views north, similar in style to the popular Lyth Hill park that provides views south. The site can deliver an enhanced village edge with landscaped public open space on its northern edge.

Fig 4. Site BAY005 off Gorse Lane



In summary, the Plan's decision expressed in paragraph 5.229 that, *"the retention of the Green Gap to the north of Bayston Hill is a key priority"* is not supported by evidence and does not represent an appropriate strategy. It therefore fails the 'justified' test of soundness.

Office Use Only	Part A Reference:
	Part B Reference:

(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.

To make the Plan sound, we suggest the following modifications:

<i>S16.2 Community Hubs: Shrewsbury Place Plan Area</i>	
<i>1. Within the Shrewsbury Place Plan Area, a number of Community Hub settlements have been identified. These settlements and their residential guidelines are listed below:</i>	
<i>Community Hub Settlements</i>	<i>Residential Guideline</i>
<i>Baschurch</i>	<i>Around 360 dwellings</i>
<i>Bayston Hill</i>	<i>Around 200 At least 445 dwellings</i>

Bayston Hill Community Hub		
<u>Land off Gorse Lane, Bayston Hill (BAY005)</u>	<u>Development to provide public open space along the ridgeline with appropriate landscaping and viewpoints.</u> <u>Existing trees and hedges will be retained wherever possible.</u> <u>Appropriate highway improvements will be made to the junction of Gorse Lane and Pulley Lane.</u>	35 dwellings

"5.229 *Bayston Hill is a large urban village located to the south of Shrewsbury. Due to the proximity between these settlements, consistent with Community Hub Policy SP7, the ~~retention~~ improvement of the Green Gap to the north of Bayston Hill is a key priority. ~~Two~~ Three Local Plan residential allocations have been identified in Bayston Hill, one of which represents the redevelopment of a former school, the other is located to the south of the existing built form overlooking the South Shropshire Hills Area of Outstanding Natural Beauty, and the third provides infill development with new public open space and landscaping to improve the northern edge of the village."*

(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)?

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:

Galliers Homes can contribute positively to the examination, bringing its experience as an active local housebuilder in the Shropshire market.

(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:

H. Howie

Date:

28/01/2021

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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).

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:	Galliers Homes
------------------------	----------------

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"/>	Policy:	DP1 Residential mix	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.

Development Management Policy DP1 Residential Mix

We have serious concerns that this policy fails the 'effective' and 'justified' tests of soundness.

Specialist housing

Galliers Homes builds sites largely in the range of 25 - 100 dwellings. It is particularly concerned by the threshold of 50 dwellings contained in section 6 of Policy DP1 which states:

"On sites of 50 or more dwellings:

a. An appropriate range of specialist housing designed to meet the diverse needs of older people, such as: age-restricted general market housing; retirement living or sheltered housing; extra care housing or housing-with-care; and/or residential care homes and nursing homes will be provided."

The threshold of 50 units mis-understands the nature of specialist housing, which benefits older residents by having a significant number of specialist units in one location. On a relatively modest site of only 50 dwellings, the majority of the units would have to be specialist housing in order to achieve the necessary concentration required by the specialist housing model.

This section of the policy will have a very significant impact on the Plan's allocations sized between 50 and 100 units, many of which are on the edge of settlements in locations that are not ideal for specialist housing.

It is questionable whether specialist housing providers will be interested in acquiring such sites when their preference is usually for town-centre or edge-of-centre sites. It is also questionable whether general market housing developers, like Galliers Homes, will be interested in acquiring such sites when specialist housing is an entirely different business model and on most sites would be delivered by a different housing provider. In consequence, this section of policy DP1 will greatly reduce the interest of housebuilders in medium-sized sites in Shropshire.

No evidence has been presented for the threshold of sites of 50 or more dwellings and in consequence the policy fails the 'justified' test of soundness.

Section 6 of the Policy will have a serious, harmful impact on the deliverability of the Plan and in consequence the policy in its current form fails the 'effective' test of soundness.

Housing mix

Section 2b of the policy states that, where there is no local housing need survey, *"at least 25% of open market dwellings will be dwellings with 2 bedrooms or less. At least a further 25% of open market housing will be dwellings with 3 bedrooms or less."*

One impact of section 2b may be higher densities with more dwellings on a site in order to achieve sufficient saleable floorspace to make a scheme viable. This may alter the local character, especially in locations where the existing character comprises relatively low density housing, as occurs in many parts of rural Shropshire.

The pressure to deliver sufficient saleable floorspace from smaller dwellings will result in pressure to exceed housing guideline figures for both specific allocations and for settlements. However a cap on numbers is imposed by section 1f in Policy SP8 (Managing Development in Community Hubs) which requires that, *"The granting of permission would not result in the settlement's residential guideline being exceeded"*. Each allocation also has a guideline figure which limits the scope to increase numbers on a site.

Where numbers are constrained by the allocation or settlement guideline figure, it will not be possible to increase saleable floorspace and the resulting low floorspace per hectare will render many developments unviable.

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	Part B Reference:

This is reflected in the Council's Delivery & Viability Study, which finds that a high proportion of its typologies are not viable with the housing mix and other policy requirements in the emerging Plan. These include the added costs of providing 5% of dwellings built to the M4(3) (wheelchair user dwellings) standard and a further 70% built to the M4(2) (accessible and adaptable dwellings) standard; the costs imposed by Policy DP12 Minimising Carbon Emissions; the Community Infrastructure Levy and affordable housing contributions. The total burden on development is substantial, as summarised in Table 12.8 on page 233 of the Council's Delivery & Viability Study, reproduced below:

Extract from page 233 of the Delivery & Viability Study

Table 12.8 Cumulative Impact Of Policies. Cost as £/ha		
Only	FHS - Option 1	£117,973
Plus	FHS - Option 2	£146,312
Plus	FHS - Option 3 Plus 10% Merton	£181,734
Plus	Car Charging & Water	£218,489
Plus	10% Biodiversity Net Gain	£249,689
Plus	100% (Part M4-2).	£271,552
Plus	10% (Part M4-3)	£315,355
Plus	CIL	£554,093

Source: HDH (June 2020)

To accommodate these extra costs, developers need sufficient sellable floorspace and that requires a degree of flexibility to match housing types to current market demand. Policy DP1 severely limits that flexibility.

Galliers Homes concur with the comments received by the Council when it consulted on the Delivery & Viability Study, reported on page 260 of the Study, that:

- *The mix may be overly restrictive with too many small units.*
- *Housing mix is too general and should not be used. Mix should be left to the market.*

The housing mix imposed by section 2b of the policy will create serious deliverability problems and cause the Plan to fail the 'effective' test of soundness.

The preferred mix is not justified, being the subject of faulty reasoning. Paragraph 4.5 of the Plan refers to the Strategic Housing Market Assessment (SHMA) which has translated household projections into housing need. It confuses 'need' with demand and ignores the fact that a majority of households occupy larger dwellings than their 'need' dictates. In calculating housing 'need' the SHMA has not taken account of 'need' for a home office or guest room(s). The most popular size of dwelling for smaller households of 1-2 persons is a 3-bed house.

A requirement for 25% of dwellings to be 2-bed or smaller creates a mismatch with market demand, which is for larger dwellings. The Covid pandemic has highlighted some of the reasons why households generally prefer more space. The policy is based on an overly simplistic interpretation of housing needs and fails the 'justified' test of soundness.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

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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While there may be a role for specialist housing on large urban extensions, it does not work as part of medium-sized developments on the outer edge of Shropshire's smaller settlements. To make section 6 of policy DP1 justified and effective, the following modification is necessary:

*"6. On sites of ~~50~~ **500** or more dwellings:*

- a. An appropriate range of specialist housing designed to meet the diverse needs of older people, such as: age-restricted general market housing; retirement living or sheltered housing; extra care housing or housing-with-care; and/or residential care homes and nursing homes will be provided.*
- b. An appropriate range of specialist dwellings to meet the needs of those with disabilities and special needs will be provided."*

To make section 2 of policy DP1 justified and effective, the following modifications are necessary1:

"2. On sites of 5 or more dwellings:

- a. In locations where in the last 5 years a Local Housing Need Survey has been undertaken through the 'Right Home Right Place' initiative or an equivalent survey endorsed by Shropshire Council, at least 50% of open market dwellings will reflect the profile of housing need established within the survey. The remainder of the open market dwellings will include a suitable mix and variety of dwelling sizes; or*
- b. At least ~~25~~ **10%** of open market dwellings will be dwellings with 2 bedrooms or less. At least a further 25% of open market housing will be dwellings with 3 bedrooms or less. The remainder of the open market dwellings will include a suitable mix and variety of dwelling sizes; **or***
- c. the developer demonstrates a mix appropriate to market conditions and/or the site's characteristics."*

(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)?

Office Use Only	Part A Reference:
	Part B Reference:

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:

Galliers Homes can contribute positively to the examination, bringing its experience as an active local housebuilder in the Shropshire market.

(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: H. Howie

Date: 28/01/2021

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).

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:	Galliers Homes
------------------------	----------------

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"/>	Policy:	<input type="text" value="Policy SP2"/>	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.

Strategic Policy SP2 Strategic Approach

The housing requirement of around 1,400 dwellings per annum does not meet the Duty to Co-operate and fails the 'positively prepared' and 'consistent with national policy' tests of soundness.

The proposed housing requirement amounts to a reduction in the amount of housing in the adopted Core Strategy, which planned for 1,530 dwellings per annum from

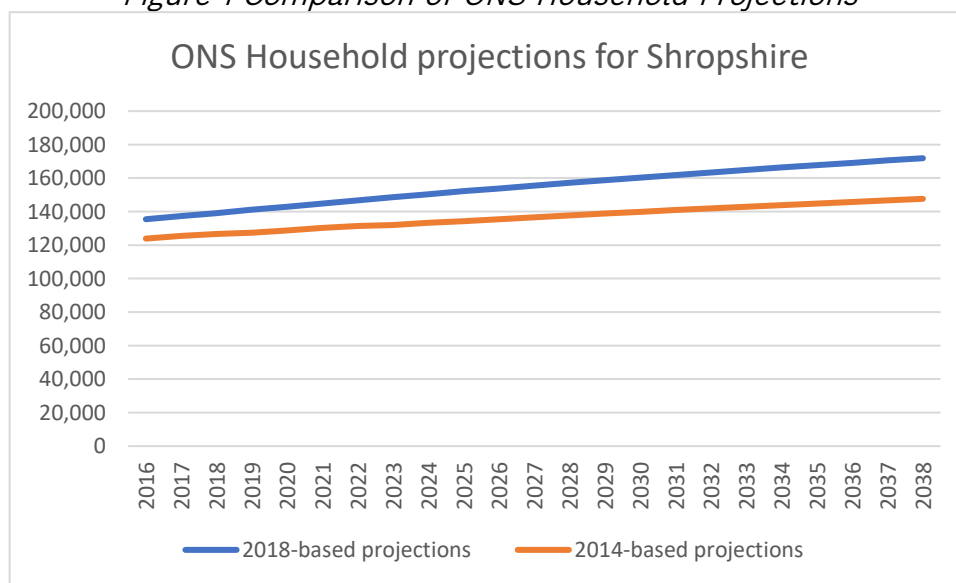
2021¹. In this respect the Plan fails, "to support the Government's objective of significantly boosting the supply of homes" as sought by paragraph 59 of the National Planning Policy Framework.

The figure of 1,400 dwellings per annum is significantly lower than the 2018-based household projections² which forecast growth levels averaging 1,656 households per annum over the plan period 2016-2038. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs.

We recognise that the figure of 1,400 dwellings exceeds the figure resulting from the standard method but paragraph 60 of the Framework states that the minimum number of homes may be determined differently from the standard method where, "exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."

Such exceptional circumstances exist in Shropshire given the significant difference between the 2014-based and the 2018-based household projections published by the Office of National Statistics (ONS). Not only do the 2018-based household projections start with a higher number of households at the start of the plan period (11,566 households higher than the 2014-based projections), they also show a higher rate of growth over the 22 year plan period (26.9% rather than 19.2%) as shown in figure 1.

Figure 1 Comparison of ONS Household Projections



Shropshire	2016 no. households	2038 no. households	Change 2016-2038	% change	Rate per annum
2014-based projections	123,886	147,635	23,749	19.2%	1,080
2018-based projections	135,452	171,876	36,424	26.9%	1,656
Combination method	123,886	171,876	47,990	38.7%	2,181

¹ Core Strategy paragraph 5.5

² Office of National Statistics 2018-based household projections, published 29th June 2020, table 406

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

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	Part B Reference:

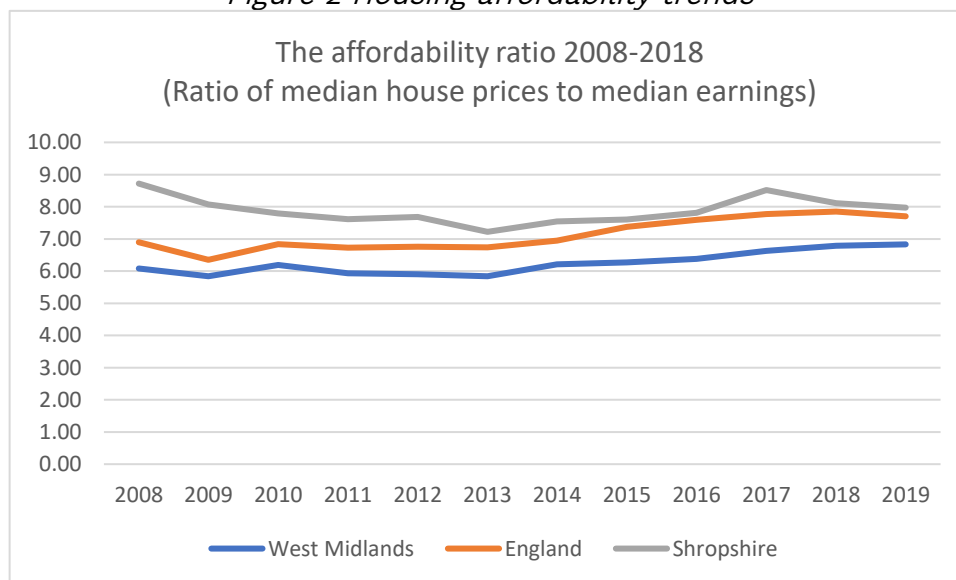
The Covid19 pandemic has further increased the rate of growth with very strong increased demand for housing in Shropshire during 2020. As the economy shifts permanently towards more internet-based working from home, Shropshire will attract even higher levels of in-migration as commuting considerations are replaced by quality of life considerations.

The 2014-based household projection is for Shropshire to have growth of 23,749 households over the plan period 2016-38 resulting in 147,635 households by 2038. In comparison, the 2018-based household projection is for Shropshire to grow to 171,876 households by 2038. This is 24,241 households *above* the standard method estimate of growth of 23,749 households over the plan period, a total increase of 47,990 households above the standard method figure for the start of the plan period in 2016. Such a large difference justifies a departure from the standard method.

The proposed housing requirement of 30,800 dwellings is less than the latest household projections of growth of 36,424 households over the plan period. If the Council insist on using the 2014-based household projections for the start date of 2016, the latest household projections show a growth of 47,990 households by 2038. It is therefore more sensible to accept the 2018-based projections as a more accurate picture of the Shropshire situation than the 2014-based projections, rather than to try and combine the two approaches.

Such a high degree of under-provision will result in rising house prices as demand outstrips supply. Shropshire already has a housing affordability ratio well above the average for the West Midlands and for England, as shown in figure 2 below. Following rapid house price rises across Shropshire in 2020 we expect the affordability ratio to increase in future years. Under-delivery of housing by the Local Plan has potential to greatly worsen the affordability of housing in Shropshire and will fail to meet the 'positively prepared' test of soundness.

Figure 2 Housing affordability trends



The Association of Black Country Authorities wrote to Shropshire Council on 9th September 2019 and re-iterated their request that Shropshire's Local Plan help provide for their identified unmet need for 26,000 homes over the period to 2038.

Shropshire has limited Green Belt and is less constrained in this respect than the Black Country Authorities. Nevertheless, the Shropshire Local Plan only attributes 1,500 dwellings of Shropshire's housing target to support the housing needs of the

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	Part B Reference:

emerging Black Country Plan. In this regard policy SP2 fails to be consistent with paragraph 60 of the Framework which states, "*In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*"

Shropshire Council has to date not published any Statement of Common Ground with the Black Country Authorities. It is contrary to paragraph 27 of the Framework to wait until submission stage before publishing any Statements of Common Ground, as the Framework requires that, "*In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.*"

This is insufficient to demonstrate consistency with paragraphs 24-27 of the Framework and the Duty to Co-operate.

(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.

To make policy SP2 sound, the annual housing requirement should be increased as follows:

- match the 2018-household projection for average growth over the plan period of 1,656 dwellings per annum; and
- add the standard method's adjustment figure based on the 2019 affordability ratio of 7.97, namely an adjustment of $\times 0.248^3$, which increases the figure by 24.8% or 411 dwellings per annum to 2,067 dwellings per annum; and
- add 5,000 dwellings (equivalent to 227 dwellings per annum) as Shropshire's contribution to meet unmet need from neighbouring areas;
- the resulting total requirement is 50,468 dwellings (2,294 dwellings per annum) which rounded up is 50,600 dwellings (2,300 dwellings per annum).

The following modification to section 2 of the policy will make it sound:

Over the plan period from 2016 to 2038, around ~~30,800~~ **50,600** new dwellings and around 300 hectares of employment land will be delivered. This equates to around ~~1,400~~ **2,300** dwellings and around 14ha of employment land per annum.

(Please continue on a separate sheet if necessary)

$$^3 \text{ Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 = (7.97 - 4) / 4 \times 0.25 = 0.248$$

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	Part B Reference:

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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)

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

Galliers Homes can contribute positively to the examination, bringing its experience as an active local housebuilder in the Shropshire market.

(Please continue on a separate sheet if necessary)

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Signature:

Date:

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Galliers Homes
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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"/>	Policy:	SP7	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.

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Strategic Policy SP7 Managing Housing Development

We consider that Policy SP7 fails the 'justified', 'effective' and 'consistent with national policy' tests of soundness.

Not justified

Section 3 of Policy SP7 makes residential development guidelines, “a significant policy consideration”. Local Plan paragraph 3.49 notes that, “the guideline is not intended to represent a ceiling on development, but going beyond it by too great a degree could result in unsustainable development.” Nevertheless, in practice the operation of section 3 is to restrict the number of new dwellings in settlements that are identified in the Plan as ‘sustainable settlements’.

The Council has presented no evidence to support its the residential development guidelines represent sustainable levels of development or that higher levels of development represent unsustainable levels. There is no evidence that the guideline figures for settlements represent an appropriate strategy, taking into account the reasonable alternatives. As such, section 3 of the policy fails the 'justified' test of soundness.

Not consistent with national policy

Applying a settlement target to restrict development runs counter to the Framework’s emphasis in paragraph 59 on, “*significantly boosting the supply of homes*” and in paragraphs 60 and 73 of treating housing requirements and land supply respectively as *minimum* figures. As such, section 3 of the policy fails the 'consistent with national policy' test of soundness.

Not effective

Hhave concerns that Policy SP7 (Managing Housing Development) in combination with Policy DP1 (Housing Mix) will adversely impact on housing delivery. Policy DP1 seeks a higher proportion of smaller houses, effectively requiring a larger number of units on a site to achieve the same saleable floorspace. It will be difficult to achieve the housing mix sought by the Council if doing so would result in exceeding the housing settlement guideline.

As the Council’s Viability Study demonstrates, viability is finely balanced in many parts of the county so developers must maximise saleable floorspace. The summary tables on pages 226-230 of the Delivery and Viability Study ([shropshire-viability-study.pdf](#)) show that the residual land value (RLV) of development sites in many of the typologies is less than the Benchmark Land Values (BLV) at which a reasonable landowners might be expected to sell their land. Where the RLV is less than the BLV the typology is coloured amber or red. For the South, 21 out of the 25 typologies are not viable; for the South Higher, 2 out of 25 typologies are not viable; for Shrewsbury, 20 out of the 25 typologies are not viable; and for the north, 23 out of the 25 typologies are not viable.

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	Part B Reference:

Table 12.6a Residential Development, – Residual Value v BLV

Full Range of Policy Options. SOUTH

			EUV	BLV	Residual Value
Site 1	Green 250	South	25,000	425,000	223,651
Site 2	Green 120	South	25,000	425,000	225,158
Site 3	Green 80	South	25,000	425,000	247,071
Site 4	Green 60	South	25,000	425,000	246,691
Site 5	Green 30	South	25,000	425,000	260,688
Site 6	Green 20	South	25,000	425,000	240,166
Site 7	Green 12	South	100,000	500,000	306,155
Site 8	Green 9	South	100,000	500,000	967,914
Site 9	Green 6	South	100,000	500,000	913,170
Site 10	Green 3	South	100,000	500,000	1,484,106
Site 11	Green Plot	South	100,000	500,000	1,069,409
Site 12	Urban 300	South	500,000	600,000	-167,530
Site 13	Urban 100	South	500,000	600,000	-388,874
Site 14	Urban 60	South	500,000	600,000	-488,641
Site 15	Urban 25 HD	South	500,000	600,000	-1,004,911
Site 16	Urban 25	South	500,000	600,000	-476,904
Site 17	Urban 16 HD	South	500,000	600,000	-980,570
Site 18	Urban 16	South	500,000	600,000	-93,688
Site 19	Urban 8 HD	South	500,000	600,000	-899,914
Site 20	Urban 8	South	500,000	600,000	348,183
Site 21	Urban 5	South	500,000	600,000	-108,616
Site 22	Urban 3	South	500,000	600,000	-601,920
Site 23	Urban Plot	South	500,000	600,000	-1,817,307
Site 24	PRS 25	South	500,000	600,000	-1,841,163
Site 25	PRS 60	South	500,000	600,000	-1,826,480

Source: HDH (June 2020)

The evidence clearly shows viability pressures which in combination with the requirements of Policy DP1 in relation to residential mix, will pressurise developers to maximise floorspace by increasing the number of units and the density of sites.

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Part B Reference:

In combination with the pressure under Policy DP1 to deliver the same floorspace through a larger number of smaller dwellings, Policy SP7's limit on housing numbers in a settlement will render a number of allocations undeliverable.

The dual pressure of Policy SP7 on the number of dwellings in combination with Policy DP1 on the size of dwellings will create deliverability issues across the county and results in the policy failing the 'effective' test of soundness.

(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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To make policy SP7 sound, the following modifications to section 3 of the policy will make the policy effective and re-balance it away from restricting development and towards delivering development and boosting housing supply, consistent with the Framework:

"The residential development guidelines for settlements set out in Policies S1-S20 are a ~~significant~~ policy consideration. Where housing proposals which are otherwise compliant with the policies of this Local Plan would lead to the residential development guideline for a settlement being exceeded, having taken account of the number of completions since the start of the plan period as well as and any outstanding commitments, including site allocations, regard will be had to all of the following:

- a. The benefits arising from the proposal, aside from increasing housing supply;
- b. The likely delivery of the outstanding commitments with a 20% non-delivery allowance;
- c. Any cumulative impacts arising from the development, especially on infrastructure provision; and
- d. The increase in the number of dwellings relative to the guideline; and
- e. the delivery of the housing mix sought in policy DP1; and
- f. the viability and delivery of the Plan's allocated sites".

(Please continue on a separate sheet if necessary)

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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)?

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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)

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

Galliers Homes can contribute positively to the examination, bringing its experience as an active local housebuilder in the Shropshire market.

(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:

H. Howie

Date:

28/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Galliers Homes
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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="SP8"/>	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.

Strategic Policy SP8 Managing Development in Community Hubs

Galliers Homes supports the statement in Policy SP8 that, "*Community Hubs are considered significant rural service centres and the focus for development within the rural area.*" However section 1f of the policy contradicts this by requiring that, "*The granting of permission would not result in the settlement's residential guideline being exceeded*". The ceiling on development set by section 1f renders the Policy unsound against the 'positively prepared', 'justified' and 'consistent with national policy' tests of soundness.

Community Hubs must accommodate not only their own organic growth but also that of their rural hinterland comprising the wider countryside and small hamlets. If Community Hubs are to genuinely be the focus for development in the rural area,

their residential guideline figures should not be less than the average forecast growth in households. The Office of National Statistics household projections forecast an additional 36,424 households in Shropshire over 2016-2038, equivalent to 26.9% growth of the 2016 figure (equivalent to 1.22% per annum). This level of growth should be the **minimum** for each Community Hub if they are to genuinely be the focus for rural development, rather than held back by policies of constraint that will over time diminish rather than improve their sustainability.

Almost all the Community Hubs have a settlement residential guideline lower than the projected household growth in Shropshire. We consider that the requirement in section 1f to keep development below the guideline figure results in the policy failing the 'positively prepared' test of soundness.

Section 1f effectively turns Community Hubs from sustainable settlements in which development is appropriate, into locations where development is refused if the residential guideline is exceeded. This contradicts the policy's earlier statement that, "*Community Hubs are considered significant rural service centres and the focus for development within the rural area.*" There is inadequate justification or evidence as to why successful and sustainable villages should tip from a positive approach to development to a negative approach, simply because they have exceeded an arbitrary guideline figure. To this extent the policy fails the 'justified' test of soundness.

Section 1f of the policy makes the guideline a ceiling figure, running counter to the National Planning Policy Framework's consistent use of housing numbers as *minimums* rather than *maximums*. It is contrary to the Government's key objective of, "*significantly boosting the supply of homes*" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It therefore fails the 'consistent with national policy' test of soundness.

Furthermore, section 1f is unnecessary repetition of Policy SP7 (Managing Housing 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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To make the Plan sound, section 1f should be deleted from policy SP8 (Community Hubs) in its entirety as follows:

~~*f. The granting of permission would not result in the settlement's residential guideline being exceeded, taking into consideration completions since the start of the plan period and outstanding commitments (including site allocations). If it does, regard will be given to policy requirements identified within Paragraph 3 of Policy SP6 and any other relevant policies of this Local Plan.*~~

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Part A Reference:

Part B Reference:

(Please continue on a separate sheet if necessary)

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 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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Date: 28/01/2021

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Part A Reference:

Part B Reference: