

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:	Metacre Ltd.
------------------------	--------------

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="DP1"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

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.

DP1 – Residential Mix

Housing Mix - Policy DP1 Part 2 seeks to control the mix of units being brought forward on sites of 5 or more dwellings. It is noted that the policy partly relies on the 'Right Homes Right Place' Local Housing Needs Surveys or equivalent survey endorsed by Shropshire Council, to inform at least 50% of the housing mix. The rationale for the stated 50% of housing meeting a prescribed housing mix is not set out. The requirement is considered to be overly restrictive and unjustified.

In relation to the use of housing need data to identify a preferred mix of units, the majority of Key Centres, which are focal points for housing delivery, do not have surveys available. There is also a need to provide clarity on when a Local Housing Need survey is considered up to date within the Explanation of this policy.

Such surveys only provide a ‘snap shot’ of the local situation, which can change significantly over a short period of time.

In light of the limited nature of the Local Housing Needs Surveys, housing delivery for the majority of Key Centres and settlements will be prescribed by part 2b of the policy. This stipulates that for open market housing, at least 25% of units will be 2 bed or less and a further 25% will be 3 bed or less.

While the National Planning Policy Framework (NPPF) recognises that the size, type and tenure of housing needs to be assessed and reflected in planning policy (paragraph 61), policy DP1 is considered to be overly prescriptive and will impact on the viability and marketability of residential schemes. As such it is requested that reference to a specific housing mix be removed from the policy.

Wording should be added enabling a developer to put forward a case for a certain mix of units, based on evidence of the local market, local circumstance or other relevant issues. This would then allow site specific discussions to be made by officers, based on suitable evidence, to enable a bespoke mix of units to be agreed. As set out in paragraph 31 of the NPPF, the preparation and review of all policies should be underpinned by relevant and up-to-date evidence bases, which ‘*take into account relevant market signals*’.

Nationally Described Space Standards (NDSS) – Policy DP1, Part 3 states that all affordable units will achieve the NDSS and open market dwellings will be ‘*strongly encouraged*’ to comply with the NDSS. As set out in footnote 46 of the NPPF, local plan policies may make use of the nationally described space standard, where the need for an internal space standard can be justified.

Shropshire’s own evidence, as set out within the Delivery and Viability Study (paragraph 8.6 and Appendices 6 and 7), is inconclusive in relation to the level of housing currently achieving the NDSS. This is due to the Land Registry data for new builds (Appendix 6) not including bedroom numbers and the residential Newbuild Asking Price data (Appendix 7) not showing floor areas for all units and only being for one month of housing sales. The evidence therefore does not demonstrate a persistent significant under delivery against NDSS as a whole, nor does it identify that Shropshire Council has experienced a systemic problem such as to provide a compelling ‘need’ case for NDSS to be required to be enshrined into Local Plan Policy for all sites to achieve. As such it is not considered that the justification required by footnote 46 of the NPPF has been demonstrated.

In terms of how the potential application of NDSS will affect the viability of residential schemes, this is also not clear from the sales information included in the Delivery and Viability Study. It is highlighted that an increase in room sizes does not necessarily result in an equivalent increase in the value of the unit. For example, if the size of a 3 bed unit is increased it does not necessarily follow that the value of that unit will increase by the same rate per sq.ft. to match the size increase. There will inevitably be a reduction in overall price per sq.ft. as there will ultimately be a limit to what a 3 bed unit will be worth in a specific location, irrespective of its size. This needs to be fully taken into account within the SLP Delivery and Viability Study to determine whether the proposed policy requirement is deliverable.

Access Standards - Part 5 of the policy states that on sites of 5 or more dwellings, at least 5% of units will be built to M4(3) (wheelchair user dwellings) standard and a further 70% of units will be M4(2) (accessible and adaptable dwellings) or higher standard within building regulations.

The requirement to provide an element of accessible and adaptable accommodation is noted due to the general aging population in the area. However, the cost of this provision needs to be fully understood in terms of the viability of future schemes.

The recognition in the SLP Delivery and Viability Study that the introduction of these optional technical standards will be an additional cost, that must be considered in the local plan viability assessment for new development, is welcomed. However, the costs included in the Viability Assessment assumptions for M4(2) and M4(3) delivery have not been informed by relevant local stakeholders and developers. They have simply been derived from ‘Housing Standards Review – Final Implementation Impact Assessment’ (DCLG March 2015)

Office Use Only	Part A Reference:
	Part B Reference:

and indexed to December 2019 equivalent figures. This should be reviewed as part of the plan preparation and evidence base process.

Specialist Housing – It is noted that on sites of 50 or more dwellings part 6 of the policy requires an appropriate range of specialist housing to be delivered. When determining if specialist housing is appropriate within a new development, consideration should be given to locational factors, such as proximity to essential community services specifically for those who would occupy such specialist housing. The impact of delivering such specialist housing should also be considered in relationship to the overall viability of the scheme.

Parts 1-6 or policy DP1 have potentially significant viability implications for new residential developments.

(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.

Requested Change: Part 2 of the policy relating to the unit size mix is considered to be overly prescriptive and may impact on the viability and marketability of residential schemes. It is requested that reference to a specific housing mix be removed from the policy.

Wording should be added to Part 2 enabling a developer to put forward a case for a certain mix of units, based on evidence of the local market, local circumstance or other relevant issues.

The introduction of NDSS into the SLP policy requirements is not considered to be justified by evidence of a persistent significant under delivery against NDSS in Shropshire. The costs of compliance with the NDSS needs to be fully understood in terms of the SLP viability.

The costs involved in the adoption of the optional access standards is not fully justified by the evidence base for the SLP. As such Policy DP1 does not accord with paragraph 31 of the NPPF and should be removed from the SLP.

The location of specialist housing should be based on proximity to specific facilities that future residents of such housing would require.

If parts 1-6 are retained, an additional part 7 should be included in policy DP1, stating that ‘housing schemes which do not comply with the requirements sets out in 1-6 due to viability concerns but represent otherwise sustainable development will be considered where evidence is clearly presented and agreed by the Council’.

(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:

Metacre Ltd. wishes to made further representations on the points raised above.

(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: Andrea Caplan

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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="DP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

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.

DP2 – Self-Build and Custom-Build Housing

It is noted that Policy DP2 stipulates that sites of 10 dwellings or more will be encouraged to make 10% of the dwellings available as serviced plots for Self-Build and Custom-Build developers, where there is an identified need on the Self-Build Register. A series of detailed requirements for how such plots should be provided are then set out.

The SLP draft requirements are not considered to be justified or consistent with national policy. In particular, on major housing sites brought forward by a single developer there is a real risk that this approach could slow down the delivery of housing.

Shropshire's Self-Build Register sets out the type of projects sought by individuals considering a self-build project. It shows that interest is focused on detached and bungalow properties. These types of dwellings

typically require large plots and may not necessarily fit into the densities considered appropriate for schemes being developed in urban areas. This point is raised in 2a. of the policy. Moreover, it is our experience that those seeking to self-build are not generally seeking a plot within a larger residential development, they would prefer a stand-alone plot.

There is also the potential for conflict on larger sites between those seeking to self-build versus the requirements of a Design Code approved for the wider site. Design Codes are a key component of the new planning system proposed in the White Paper and will become more common place on large site going forward. Those wishing to self-build and custom-build are unlikely to want to comply with a Design Code developed for a large housing development.

It is also noted that the self-build register does not provide confirmation of the ability of registered parties to be able to deliver their own homes and this could result in uncertainty and delays to delivery of the full capacity of a site. This uncertainty is highlighted by the proposed inclusion of 2d of the policy. In accordance with the marketing requirements of 2d, several plots within a developed-out housing scheme could remain vacant for more than 2 years. If these plots are not acquired by a self-builder, then the main developer may need to re-commence construction works on site, which would have significant financial implications.

By applying the 10% requirement, bringing forward a development of 100 units would lead to 10 self-build dwelling plots and thus 10 separate sales agreements would need to be secured between the main development and interested parties. As self-build and custom houses can only be occupied by the individuals or groups who actually build (or commission the building) of those specific units, such individuals are not generally acquainted with the wider development process. Therefore, entering into the numerous contracts for self-build construction would represent a significant burden to the developer of the wider land parcel, and potentially slow housing delivery on major sites.

In addition there are also practical issues to consider, for example the day to day operation of the self-build construction sites, within wider residential construction sites. There are potential health and safety issues related to having 10 or more individual construction sites operating within a development site, where the principle developer would have limited control over the operation of the individual projects. This therefore represents an onerous requirement on development sites and could result in self-build units taking significantly longer to complete than neighbouring developer built units.

The confirmation that the requirement for self-build units will be dependent on demand identified within the self-build register is welcomed. However, it is maintained that the provision of such plots should be left to the discretion of the developer based on market trends and needs, which are liable to change over the plan period. The delivery of such homes within larger sites has the potential to impact the delivery and viability of housing sites.

It is noted that there is a significant windfall allowance identified within Appendix 5 of the SLP. It would be more appropriate to provide for self-build and custom-build housing through the delivery of small windfall sites, identified during the local plan period.

(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.

Office Use Only	Part A Reference:
	Part B Reference:

Requested Change: Policy DP2: Self-Build and Custom-Build Housebuilding, should be revised to address the issues set out above. Self-Build and Custom-Build houses should be encourage on smaller sites (e.g. 10 units or below) which are more likely to be attractive to those seeking to self-build. Additionally, when carrying out 'Call of Sites' exercises, a question should be included asking for sites to be put forward which could specifically accommodate self-build and custom-build units. Again, these would generally be smaller sites.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

(Please tick one box)

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

Metacre Ltd. wishes to made further representations on the points raised above.

(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: Andrea Caplan

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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="DP3"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

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.

DP3 – Affordable Housing

The policy aims to provide well designed, high quality affordable homes of the right type and tenure, is welcomed. However, the requirements set out in part 1 of the policy are considered to be inflexible. It is maintained that the number, size, type, tenure and distribution of affordable dwellings to be provided should be subject to negotiation with the applicant, dependent on recognised local housing need, specific site and location factors and development viability.

Part 2 of the policy refers to the use of an overage clause in order to secure the potential for future contributions towards affordable housing, where a scheme's affordable housing provision has been reduced in accordance with a viability case demonstrating that a compliant level of affordable housing cannot be provided. No further clarity is included in the policy as to what parameters would be included in overage clauses.

(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.

Requested Change: Part 1 of Policy DP3 is considered to be inflexible and overly prescriptive in relation to the types and mix of affordable housing to be delivered. The policy should also include reference to discussions between the Council and applicant to reach the most appropriate affordable housing solution for individual sites, this should consider flexibility of the mix and types of affordable homes based on appropriate evidence provided.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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

(Please tick one box)

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

Metacre Ltd. wishes to made further representations on the points raised above.

(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.

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Andrea Caplan

Date:

26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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="DP11"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	-----------------------------------	-------	----------------------	---------------	----------------------

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.

DP11 – Minimising Carbon Emissions

Part 1b. of DP11 states that all proposals for 10 or more dwellings will need to achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations. The costs for such measures are considered in the Local Plan Delivery and Viability Study and are taken from the 'Energy Cost of carbon Reduction in New Buildings' report (Centre for Sustainable December 2018). These costs have not been informed by local stakeholders and do not necessarily reflect local circumstances.

Part 1c of the policy goes on to require all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources. Again, the costs of this requirement and the ability of specific sites to deliver on-site energy needs to be considered in terms of local circumstances.

Policy 1d. strongly encourages all proposals for one or more dwellings and in particular those of 50 or more dwellings to:

- i. Achieve zero net-carbon emissions;*
- ii. Maximise the use of on-site district heating and cooling systems, especially where these utilise renewable energy and*
- iii. Maximise opportunities to connect to wider heating and cooling networks both for energy supply and export, especially where these utilise renewable energy*

These aims are considered to be extremely ambitious. It is highlighted that the Government's latest target is to bringing all greenhouse gas emissions to 'net zero' by 2050. The policy does not take into account that the national grid now generates more energy from zero carbon sources than from fossil fuels, a figure that is increasing due to the ability to generate electricity through large scale renewable energy facilities across the country. As such, in terms of increasing the use of renewable energy, it may be more efficient and cost effective for new development to plug into the national grid than for piecemeal energy generation measures to be installed on individual sites.

Reference in Part 4 of the policy to scheme viability in terms of the delivery of the policy's requirements is welcomed.

(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.

Requested Change: The potential costs involved in the delivery of the measures set out in Policy DP11, as included in the Local Plan Delivery and Viability Study should be informed by local stakeholders and should reflect local circumstances. The benefits of using renewable energy provided by the wider national grid, as opposed to piecemeal onsite generation should be fully understood. Flexibility is required in the policy to address site specific issues.

(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:

Metacre Ltd. wishes to made further representations on the points raised above.

(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: Andrea Caplan

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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:	DP12	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	------	-------	----------------------	---------------	----------------------

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.

DP12 – The Natural Environment

Part 3 of the policy introduces the requirement for 10% Biodiversity Net Gain. It is noted that the Government's impact assessment accompanying the Biodiversity Net Gain strategy suggests an average cost in the region of circa £21,000 per hectare and that this is used in the assessment. However, this figure needs to be based on local data reflecting the biodiversity situation in Shropshire and the likely new habitats required. In particular, the implications of having to acquire additional land on which to provide some of a scheme's net gain needs to be fully understood in terms of land availability and cost.

(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.

Requested Change – The costs and full implications of requiring development to deliver 10% biodiversity net gain must be understood at a local level and considered in the Local Plan Delivery and Viability Study. Further guidance is required as to how such net gain could be provided off-site so as not to compromise the ability to make best use of a sustainable development site and to also provide truly effective biodiversity gains for the wider area.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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

(Please tick one box)

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

Metacre Ltd. wishes to made further representations on the points raised above.

(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:

Andrea Caplan

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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:	DP15	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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.

DP15 – Open Space

It is noted that the proposed wording of the policy states that there is an 'expectation' to deliver 30sqm of open space per person and that 'consideration will be given to reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents'.

The new policy wording will allow for wider site circumstances to be taken into consideration and for the notion of 'quality over quantity' to be realised, as set out in paragraph 4.158. Shropshire Council's recognition that the provision of open space should not be driven purely by mathematical calculation is welcomed

(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.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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

(Please tick one box)

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

(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.

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Andrea Caplan

Date:

26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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:	DP27	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	------	-------	----------------------	---------------	----------------------

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.

DP27 – Broadband

DP27.5 refers to residential and commercial developments being expected to maintain and improve the connectivity of mobile voice and data communications networks. Parts a-d of Policy DP27.5 are overly onerous for site developers. The role of providing and maintaining communications networks is one for the communication infrastructure companies and not one for site developers.

(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.

Requested Change – Part 5 of Policy DP27 should be removed as the provision and maintenance of such communication networks are the responsibility of the relevant infrastructure providers.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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

(Please tick one box)

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

Metacre Ltd. wishes to made further representations on the points raised above.

(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: Andrea Caplan

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

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.

SP2 – Strategic Approach

The positive strategic approach for Shropshire, as set out in SP2.1, is welcomed and supported.

The housing and employment figures set out in policy SP2.2 for the period of 2016-2038 are noted, and result in a requirement of around 1,400 new dwellings and 15ha of employment land per annum. In terms of this level of housing delivery, the 'Shropshire Council – Five Year Housing Land Supply Statement' (2019) sets out that over the last 5 years housing completions have reached and surpassed the 1,400 annual figure.

In terms of Local Housing Need (LHN), Shropshire Council's assessment using the Government's Standard Methodology indicates that as of April 2020 there is a need for 25,894 dwellings over the plan period (2016-2038). As explained in National Planning Policy Guidance, this figure represents the minimum number of homes expected to be planned for, and is therefore a starting point for the delivery of growth in an area.

The SLP includes a housing requirement for Shropshire of 30,800 dwellings over the plan period, which Shropshire Council considers to provide flexibility to respond to changes in the Local Housing Need figure over the plan period. However, the additional allowance of 4,906 dwellings over the LHN for the entire plan period of 22 years, is considered to be extremely modest if Shropshire is to meet its wider aspirations for growth. As set out in the Economic Growth Strategy for Shropshire (2017-2021) the Council has a commitment and ambition to grow the local economy of the County through investment and an increase in productivity and diversification of the labour force.

These economic ambitions require an increase in the housing requirement above the minimum LHN so that a lack of labour is not a constraint on realising the economic growth potential of the County. The 300ha of employment land required within the plan period is identified to help drive this growth. However, the provision of additional housing will also be key to promoting growth in the area and supporting the delivery of new employment.

The current housing requirement in the adopted Local Plan is 1,375 dwellings per annum. The housing requirement in the emerging plan provides for only 25 dwellings per annum more (a 1.8% increase). This is not considered sufficient to support the economic growth being sought within the County.

As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID : 2a-010-20190220). The NPPG states that a higher figure “can be considered sound” providing it “adequately reflects current and future demographic trends and market signals”. The Council has demonstrated that “circumstances” exist, through the economic ambitions of the County, to justify a housing need higher than indicated by the standard methodology.

(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.

Requested Change – It is considered that the overall housing requirement identified in the SLP does not represent a boost to the supply of homes in the area, as is required to support the economic growth aspirations of Shropshire Council. A higher housing requirement should be considered by the Council.

(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:

Metacre Ltd. wishes to made further representations on the points raised above.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Date:

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:	Metacre Ltd.
------------------------	--------------

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="SP3"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

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.

SP3 – Climate Change

The aim of transitioning to a zero-carbon economy is noted, as is the recognition in paragraph 3.29 of the explanatory text, that this is a very challenging target.

Policy SP3 part 2 goes on to refer to integrating or supporting both on and off-site delivery of renewable and low carbon energy in accordance with the requirements of Policy DP12, as well as supporting district heating and cooling networks, and community energy generation schemes. It is stressed that the practicalities and cost implications of such policy requirements will need to be fully considered and incorporated into the SLP Delivery and Viability Study.

The Shropshire Delivery and Viability Study (July 2020) recognises that building to increased standards would require higher costs (paragraph 8.18) and sets out several scenarios for potential build cost implications. The

Study needs to take account of local circumstances and up to date information from developers in the Shropshire area and appropriate industry bodies, to ensure that it reflects a true assessment of costs involved in the proposed climate change measures and how this effects site viability.

(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.

Requested Change – Further consideration is needed in relation the deliverability and viability of the measures set out. This must be reflected in the Delivery and Viability Study supporting the SLP and supported by up to date local evidence from developers and industry bodies. The first sentence of SP3.2 should be reworded to state ‘Integrating or supporting both on and off-site delivery of renewable and low carbon energy, where viable, including by....’

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

(Please tick one box)

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

Office Use Only	Part A Reference:
	Part B Reference:

Metacre Ltd. wishes to made further representations on the points raised above.

(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: Andrea Caplan

Date: 26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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="SP7"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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.

SP7 – Managing Housing Development

The strategy for managing housing development set out in Policy SP7 is supported. In particular, the reference in SP7.4 to considering additional housing development outside of the identified settlement development boundaries when necessary, provides flexibility to enable the delivery of Shropshire's identified housing requirements.

As noted in the policy, there may be circumstances where the development guidelines for a particular settlement are unlikely to be met. This may be due to site specific constraints being identified on a site following its allocation for development. Such constraints may limit the level of market housing that can be delivered on that particular site and as such there will be a demonstrable risk to the delivery of that site allocation within the plan period.

In such circumstances, it is only appropriate that other suitable sites are considered to accommodate the identified housing need for that settlement. As noted in the policy, those additional sites may require land that is currently outside of the settlement boundary.

This flexible approach will help ensure housing is delivered in accordance with the identified requirements of the Local Plan period and reflects the NPPF's presumption in favour of sustainable development. As set out in paragraph 3.50 of the SLP, the development boundary of a settlement is a mechanism to positively manage development. This approach is welcomed.

(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.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

(Please tick one box)

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

Office Use Only	Part A Reference:
	Part B Reference:

Metacre Ltd. wishes to made further representations on the points raised above.

(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: Andrea Caplan

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

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:	Metacre Ltd.
------------------------	--------------

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:	SP12	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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.

SP12 – Shropshire Economic Growth Strategy

Part 3 of the economic growth strategy set out in SP12 is supported. It is agreed that the Principal Centres and Key Centres, such as Wem, should be the focus for economic growth and investment to ensure Shropshire's continued prosperity.

Many of the Key Centres identified in the SLP are critical economic and social hubs for the wider rural communities of Shropshire. As such focusing the delivery of housing within such areas is essential, while also enabling a controlled level of housing in smaller Community Hubs and Community Clusters.

(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.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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

(Please tick one box)

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

(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:

Andrea Caplan

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference: