

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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

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

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The draft plan should not include a prescriptive policy on housing mix, size, types or tenure as needs will change over the plan period. Such a policy would potentially undermine viability and delivery of sites.

Vistry consider that any such policy should be dealt with as a supplementary planning document which can be regularly updated and, in addition, there should be no 'blanket' policy – standards should reflect the needs of specific settlements and areas.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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:

Ian Deverell

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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 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.

<p>In line with Vistry's response to Policy DP1, the imposition of an inflexible requirement for the delivery of serviced plots on sites could again undermine the viability and deliverability of sites.</p> <p>Please see accompanying statement for full response in the context of wider representations.</p>

(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 see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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:

Ian Deverell

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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 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.

Paragraph 20 of the NPPF states that strategic policies should make provision for housing, including affordable housing. Paragraph 62 of the NPPF goes further to distinguish that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified.

Part 1B of Policy DP3 and its reference to 'exceptional circumstances' must therefore be deleted as it directly conflicts with guidance contained within the NPPF.

Please see accompanying statement for full response in the context of wider representations.

(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.

Part 1B of Policy DP3 and its reference to 'exceptional circumstances' must therefore be deleted as it directly conflicts with guidance contained within the NPPF.

Please see accompanying statement for full response in the context of wider representations.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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:

Ian Deverell

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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

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

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020.

Policy DP11 should therefore be deleted as it will be a duplication of national guidance.

Please see accompanying statement for full response in the context of wider representations.

(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.

Policy DP11 should therefore be deleted as it will be a duplication of national guidance.

Please see accompanying statement for full response in the context of wider representations.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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:

Ian Deverell

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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="DP28"/>	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 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.

Aligned to the three overarching objectives of sustainable development identified within paragraph 8 of the NPPF, Policy DP28 seeks to deliver a sustainable pattern of growth and development, investing in the necessary communications and transport infrastructure and services, providing remote access to services and employment and making available accessible, safe, reliable, low carbon transport modes and active travel choices.

As set out in response to Policy SP2, Vistry do not consider that the strategic approach aligns with the intent of Policy DP28 and specifically in the artificial suppression of Residential Growth in Albrighton, one of the county's most sustainable settlements which is closely related to both the GBBCAHMA and the strategic allocation proposed at RAF Cosford with high quality sustainable transport connections to both.

Please see accompanying statement for full response in the context of wider representations.

(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 see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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:

Ian Deverell

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Agent)
------------------------	----------------------------------

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="S1.1"/>	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.

Vistry consider that as drafted, the draft Plan is not sound in relation to the Albrighton Place Plan Area for the following reasons:

- As set out throughout these representations, while Policy S1.1 recognises the importance of the strategic allocation of RAF Cosford and the opportunities it presents, the plan does not propose to fully realise them, particularly delivering new homes nearby to meet this significant economic growth.
- As set out in response to Policy SP2, the draft Plan fails to recognise the inherent sustainability of Albrighton and years of suppressed housing growth which have led to an ageing population, rising housing prices outstripping the Shropshire average, and an inability for first-time buyers to get onto the housing market.

- To remedy the above a greater quantum of growth should be allocated at Albrighton to ensure the plan can be found sound.
- In addition to the above, a more proportionate amount of safeguarded land should be proposed at Albrighton due to its inherent sustainability. The draft Plan has recognised the sustainability of other settlements within the District but has failed to take this approach at Albrighton (as we have set out at **Section 3** in response to policy SP11). To remedy this a greater quantum of safeguarded land should be proposed at Albrighton.
- At the same time, there is significant concern regarding the suitability of the sites proposed for safeguarding at Albrighton, which we elaborate on further below.

Proposed Safeguarded Site: Land Bounded by Kingswood Road, High House Lane and the By-Pass (P35)

Land bounded by Kingswood Road, High House Lane and the By-Pass was referenced in previous iterations of the LPR as 'P35'. For consistency and clarity, it would be beneficial to allocate site reference numbers to each of the safeguarded sites so that the Policies Map can be cross referenced at the appropriate points within the Local Plan Review. For ease, we have maintained reference to the site as 'P35' within these representations.

Vistry is concerned that proposed safeguarded site at land bounded by Kingswood Road, High House Lane and the By-Pass (P35) will significantly alter the form and character of Albrighton. The site is on the periphery of the village and any development will materially change gateway views on a key approach route into the village, impacting upon the setting of the Albrighton Conservation Area, within which part of the site is located within.

The Council's Green Belt Assessment (September 2017) assesses a wider parcel of land to the south and east of Albrighton which includes P35. In the assessment of this parcel, it is considered that the Green Belt in this location is relatively open "*with the openness of the land playing a major role in its setting*"¹. Indeed the Green Belt Assessment considers that "*the openness of the land within the parcel is considered to contribute positively to the historic significance of Albrighton and to its special character*"².

The topography of P35 plays an important role in enclosing the village from the surrounding countryside. Development here would be prominent on the rising slope when approaching Albrighton along Kingswood Road from the southeast. Works to High House Lane or Kingswood Road necessary for development would adversely affect their rural character, views experienced from them, and is likely to result in the loss of mature vegetation.

In addition the gross site area identified within Site P35 (some 6.3ha) includes approximately 14 existing dwellings in separate land ownership to the wider site. It is not clear if these dwellings would form part of any future development at the site, should it come forward following its removal from the Green Belt. Clarification of the land ownership is further constrained as noted at paragraph 5.19 of the Council's Green Belt Release Exceptional Circumstances Statement (December 2020) which identifies that "*the availability of the site is currently unknown, however given that it is proposed for safeguarding for future development beyond the Local Plan Review period it is considered that this will change in the future*". Vistry are therefore concerned that the physical constraints to its deliverability in addition to an unknown availability of the site further diminish its appropriateness for identification as a safeguarded site.

Furthermore, the Council's SA does not consider sustainable travel options of bus and train and instead focuses on a simplistic approach of access to specified facilities (primary school, GP surgery, library, leisure

¹ Shropshire Green Belt Assessment – Final Report (September 2017) Page 166

² Shropshire Green Belt Assessment – Final Report (September 2017) Page 166

Office Use Only	Part A Reference:
	Part B Reference:

centre, children’s playground, outdoor sports facility, amenity green space and accessible natural green space).

For example, the SA identifies that site P35 is within 480m of a Primary School, GP Surgery, Library, Leisure Centre and Outdoor Sports Facility. This is not correct. Using the Council’s methodology of measuring a straight line from the boundary of the site, the distances are:

- Primary School, 510m;
- GP Surgery, 650m; and
- Library, 980m.

When the actual walking / cycling distances are considered, the distances are all well in excess of 1km from the site. The straight line distances used by the SA are therefore not a robust measure of a site’s sustainability. In addition, it is not just length of route which should be considered, but also its quality. Site P35 is disconnected from Albrighton and there are currently no safe routes for pedestrians to access the facilities of the town or public transport facilities.

Proposed safeguarded site P35 is therefore not a suitable site for future housing development and should remain in the Green Belt. For it to be released from the Green Belt as safeguarded land is not justified, it will render the plan unsound.

(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 see accompanying statement which includes Vistry Homes Limited’s representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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:

Ian Deverell

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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="SP1"/>	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 type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).

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

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

'The Shropshire Test' provides a series of guiding principles which should assist the Council in being able to identify the most sustainable locations for meeting the identified housing and employment need throughout the plan area and aligning with national policy insofar as providing a mechanism to test the sustainability of sites with the 'tests' aligning with the objectives set out within NPPF paragraph 8.

In the context of this test (and as demonstrated in the table enclosed at **Appendix 3 of the full representations**), Albrighton is a sustainable location for further housing growth given its excellent social, community and transport infrastructure, and the approach advanced in the draft plan to support the growth of RAF Cosford as a strategic employment site (Policy S21). It is on the edge of the Black Country and wider Greater Birmingham conurbation, with a regular rail service to Wolverhampton, Birmingham City Centre, Telford and Shrewsbury, and is in close proximity to the M54 growth corridor (comprising the employment sites at i54, ROF Featherstone, and the estates on Wobaston Road).

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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: Ian Deverell

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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 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.

Policy SP2, the 'Strategic Approach' establishes that over the plan period 30,800 new dwellings will be delivered, equating to around 1,400 dwellings per annum (dpa). This represents 223 additional dwellings per annum (4,906 additional new homes across the plan period) than Shropshire's standard method local housing need of 1,177 dwellings per annum. This includes a 1,500 home contribution to the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) shortfall. In this respect the draft Plan specifically references this contribution meeting the Black Country shortfall.

The supporting text to policy SP2 and the sustainability appraisal are clear that the higher housing growth being pursued "...offers significant opportunities to meet the requirements of all sections of society in terms of location, affordability and adaptability. It is likely to support existing services such as schools, doctor's surgeries, shops and play areas in the medium to long term" (page 90 of the draft Plan SA).

Whilst we welcome the uplift above the county's minimum standard method housing need in principle, we do not agree that the plan's spatial strategy, in particular the amount of growth proposed for Albrighton (500 dwellings), will realise the opportunities identifies in the draft Plan and SA to improve affordability or maximise the viability and vitality of existing services and facilities (a requirement of NPPF paragraph 78 also), nor alleviate existing pressures from pent up demand.

The spatial strategy also does not reflect where significant job creation is expected (such as at Cosford and along the M54 / A5 growth corridor). NPPF paragraph 93 encourages an integrated approach to considering the local of housing, economic and community facilities and services to enable healthy communities. The level of growth proposed at Albrighton does not reflect this.

At the same time, the spatial strategy also fails to respond to where the Black Country shortfall arises. Greater development should be located in closer proximity to the Black Country to meet this need where it arises.

The Turley Technical Review of the Need for New Homes in Albrighton (enclosed at **Appendix 4 to the main representation enclosed separately**) demonstrates that there is long-term decline in Albrighton's population and a more recently static picture which is materially changing the demographic profile of the town. Where historically it has demonstrated a notably sustainable profile, including a high proportionate share of those of working age, it is rapidly seeing an ageing of its population.

Whilst the ageing of its population is an inevitable consequence of earlier growth, this is compounded by a sustained reduction in younger people, including children as a result of its constrained growth. This constrained growth has also resulted in affordability issues in the village, specifically for first time buyers.

This absence of new supply is compounded by the high demand for homes. There is evidence of an acute worsening of market conditions, with consequences for the affordability of housing. This is further limiting the ability of younger households to access housing in the settlement, which is further inhibited by the lower representation of smaller homes in Albrighton.

Influenced in part by its proximity and accessibility to RAF Cosford as a significant employer and a proposed allocation for greater employment growth (which Vistry fully support) Albrighton has demonstrated relatively strong commuting patterns with RAF Cosford and also with its wider alignment with key strategic corridor along the M54 / A5. Yet there is no substantial or reasonable consideration in the draft Plan of the relationship between job creation at Cosford and the need for new homes nearby.

This is despite the draft Plan acknowledging itself at paragraph 5.15 (page 169) that the:

"...relationship between Albrighton and the nearby Strategic site at RAF Cosford, with many employees and personnel based at RAF Cosford choosing to live in Albrighton and/or use the facilities within the settlement and certain facilities at RAF Cosford being available for residents of Albrighton".

Given the clear evidence that Albrighton's housing delivery remains constrained despite a pressing need and growing demand, and the anticipated and planned significant employment growth at Cosford, a greater quantum of growth should be directed to Albrighton to ensure the plan is consistent with national policy, positively prepared, effective and justified.

Vistry's site to the west of Newport Road can make a significant contribution to this, as well as the wider county's housing needs.

Office Use Only

Part A Reference:

Part B Reference:

We comment further on the proposed allocations in response to Policy s1.1 and the proposed safeguarded land in response to policy SP3 below.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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: Ian Deverell

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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.

In order to address climate change, as well as fundamental climate change targets and policies, in line with NPPF paragraph 103, it is essential that new development is directed to the most sustainable settlements which are already within close proximity to existing and emerging key employment locations, and which already benefit from sustainable means of transport.

The identified housing guideline for Albrighton is limited to 500 dwellings. This level of growth does not reflect its exceptional sustainability which is clearly evidenced within the Council's 'Hierarchy of Settlement Paper', including a railway station with services to Cosford, Wolverhampton, Birmingham, Telford and Shrewsbury, a wide range of services and facilities and also in close proximity to the Strategic Employment Site at RAF Cosford. Nor does it recognise the planned significant job creation at Cosford, contrary to NPPF paragraph 92.

Indeed the artificial suppression of growth at Albrighton is exemplified by the plan's inconsistency in directing the same amount of new housing to Craven Arms, which is much further from employment opportunities and is a significantly reduced provision of services and amenities compared with Albrighton.

As drafted Policy SP3 is therefore not positively prepared or consistent with national planning policy.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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: Ian Deverell

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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="SP4"/>	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 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.

Policy SP4 'Sustainable Development' duplicates the NPPF and reiterates the principles set out within Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

PPG states:

"Paragraph 11 of the National Planning Policy Framework indicates that Local Plans should reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. However, there is no need for a plan to directly replicate the wording in paragraph 11 in a policy" (Paragraph: 036 Reference ID: 61-036-20190723).

Policy SP4 would therefore be more effective if further details were provided relating to how the presumption will be applied locally, otherwise it should be deleted.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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: Ian Deverell

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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="SP11"/>	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 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.

Paragraph 136 of the NPPF states that where necessary, Councils should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching beyond the plan period.

The role of safeguarded land is not just to ensure that Green Belt boundaries are enduring, but also to provide a 'contingency' of land in sustainable locations, outside the Green Belt, which can come forward for development to meet housing needs. It assists in 'de-risking' the plan, should any of its allocations not come forward or if there are any significant delays.

Albrighton is one of the most sustainable settlements within the county and also one of only a small number which is constrained by the West Midlands Green Belt given its proximity and functional relationship

with the built up area of Wolverhampton. As such unlike other more rural and less sustainable settlements, there are limited opportunities where windfall sites can come forward to meet local need at Albrighton.

Although provision is made for safeguarded land at Albrighton, it is in no way proportional to the village's sustainability and role in the settlement hierarchy. Table SP11.1 underlines this point. 92.8ha of safeguarded land for future residential development is proposed at Shifnal, which sits within the same tier in the settlement hierarchy, albeit is larger and therefore has a larger allocation of 1,500 dwellings. In contrast a much less proportional provision of safeguarded land for residential development at Albrighton of 19.9ha is proposed.

If the plan is to take a consistent approach and is positively prepared and effective a greater provision of safeguarded land should be proposed at Albrighton.

At the same time there are significant concerns regarding the suitability of the land proposed for safeguarding at Albrighton, which we discuss further in response to Policy S1.1 and in the full version of these representation enclosed separately.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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)?

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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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: Ian Deverell

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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:	Vistry Homes Limited (C/O Turley)
------------------------	-----------------------------------

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="SP14"/>	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 type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).*

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

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Shropshire Economic Growth Strategy identifies the 'M54 growth corridor' as one of the key strategic corridors and growth zones.

In considering the implications of the strategic M54 growth corridor for Albrighton, the 'M54 Growth Corridor – Strategic Options Study' (June 2019), identifies RAF Cosford as one of the key strategic sites considering the existing levels of employment it provides and also future expansion and opportunities. This reinforces our view that the employment growth proposed for Cosford is significant and therefore a greater provision of housing is needed in close proximity to sustainably realise the employment allocation's potential.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement which includes Vistry Homes Limited's representations in respect of the above Policy.

(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:

It is necessary given the need to fully respond to the Inspector's matters, issues and questions in respect of Land to the west of Albrighton.

(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:

Ian Deverell

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference: