

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	Stuart Crossen Cerda Planning Ltd
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input checked="" type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	1 - 81
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

Please refer to our consultation document which considers the local housing need and provides evidence and details why the policy will not serve the needs of the whole community so is neither legally compliant or sound.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.

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Paragraph(s):	2.1 – 14.5
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- A. Legally compliant Yes: No:
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Please refer to our consultation document which considers the flaws in the Sustainability Appraisal, how it has not informed the Councils Strategic approach and how it fails to provide sufficient housing to meet Shropshires local needs or the unmet needs of the Black Country. The plan fails to provide sufficient housing to serve the needs of the whole community, is not justified effective or positively prepared so is neither legally compliant or sound.

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Paragraph(s):	2.1 – 9.26
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- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

Please refer to our consultation document, in particular appendix A. The document fails to acknowledge the current position of neighbouring authorities and the growing unmet needs of the Black Country, it fails to provide sufficient housing as detailed in our representations. The plan fails to provide sufficient housing to serve the needs of the whole community and the growing unmet needs of the Black Country, is not justified effective or positively prepared so is neither legally compliant or sound.

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Shropshire Local Plan 2024 Consultation

A large, light grey curved shape in the bottom right corner of the page, partially overlapping the text.

Land at Bayston Hill,
Betley Lane East
Gleeson Land Limited

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10 June

2024

Prepared by:

Stuart Crossen

BA (Hons)

PgCert PgDip

MA

MRTPI

1. Introduction

- 1.1□ Cerda Planning Ltd is instructed to make representations to the Shropshire Local Plan Review – additional 2024 Consultation Draft Local Plan on behalf of Gleeson Land Limited.
- 1.2□ Gleeson welcome the continued progress of the Shropshire Local Plan and wish to support the Council in its preparation. Modifications will be required to the plan to address certain issues, and particularly that more land needs to be identified for residential development to ensure that:
- Enough flexibility has been built into the housing land supply to safeguard against the issues identified with the current supply and emerging effects of the growing unmet housing needs of Black Country Authorities;
 - Enough specialist housing will be delivered to address identified needs;
 - Homes are provided as soon as possible; and,
 - A diverse mix of housing can be provided to address the specific needs of the Borough.
- 1.3□ On February 15, 2023, the Planning Inspectors examining the draft Shropshire Local Plan released an Interim Findings document (ID28). This key document followed the completion of the Stage 1 Hearing Sessions, which specifically addressed legal, procedural, and strategic issues, including strategic policies.
- 1.4□ Subsequently, the Planning Inspectors issued further correspondence related to their Interim Findings on October 4, 2023 (ID36) and January 16, 2024 (ID37).
- 1.5□ In response to the Planning Inspectors’ Interim Findings and subsequent correspondence, the Council has now conducted additional assessments and prepared supplementary documentation related to a range of issues and our representation are in response to their consultation.

-
- 1.6□ The plan was originally submitted to the Inspectorate on the 3rd September 2021. Housing need was calculated using the standards method. Planning practice guidance states that these figures can only be relied upon for a period of 2 years. This has now been exceeded.
- 1.7□ The Council aims to address the unmet housing needs in the Black Country, which arose during the preparation of the Black Country Plan. As part of their strategy, they allocated 1,500 houses from their housing supply. However this decision effectively reduced the overall number of houses to meet Shropshire’s housing requirements, the figure provided by the preferred Sustainability Appraisal (SA) growth option.
- 1.8□ The Inspectorate asked the Council to assess, through further SA work, the implications of meeting the needs of Shropshire as well as some of the unmet needs of the Black Country (1500 homes and 30ha of employment land).
- 1.9□ The Council did not have evidence to justify reducing the housing and employment land requirement for Shropshire and the SA did not assess the impact of accommodating the agreed unmet needs of the Black Country in addition to Shropshire needs. Because the proposed plan aims to address unmet needs in the Black Country, the SA must evaluate viable alternative options in alignment with sustainability objectives.
- 1.10□ The Inspectorate concluded that *“to remedy the shortcomings set out above the Council will need to carry out additional SA work and where necessary the Housing and Employment Topic Paper and Green Belt Topic Paper.”*
- 1.11□ The Council is now required to conduct a comprehensive Regulation 19-type consultation. This consultation provides an opportunity for anyone who wishes to do so to comment on any new material. This includes individuals who did not previously submit comments during the Regulation 19 stage of the Plan-making process but now wish to do so due to a change in the Council’s evidence and strategy.

1.12 □ The following document are being consulted on:

- □ Draft policy on Housing Provision for Older People and those
- □ with Disabilities and Special Needs and its explanation.
- □ Shropshire Local Plan Updated Additional Sustainability Appraisal Report – April 2024
- □ Updated Housing and Employment Topic Paper – April 2024
- □ Updated Green Belt Topic Paper – April 2024

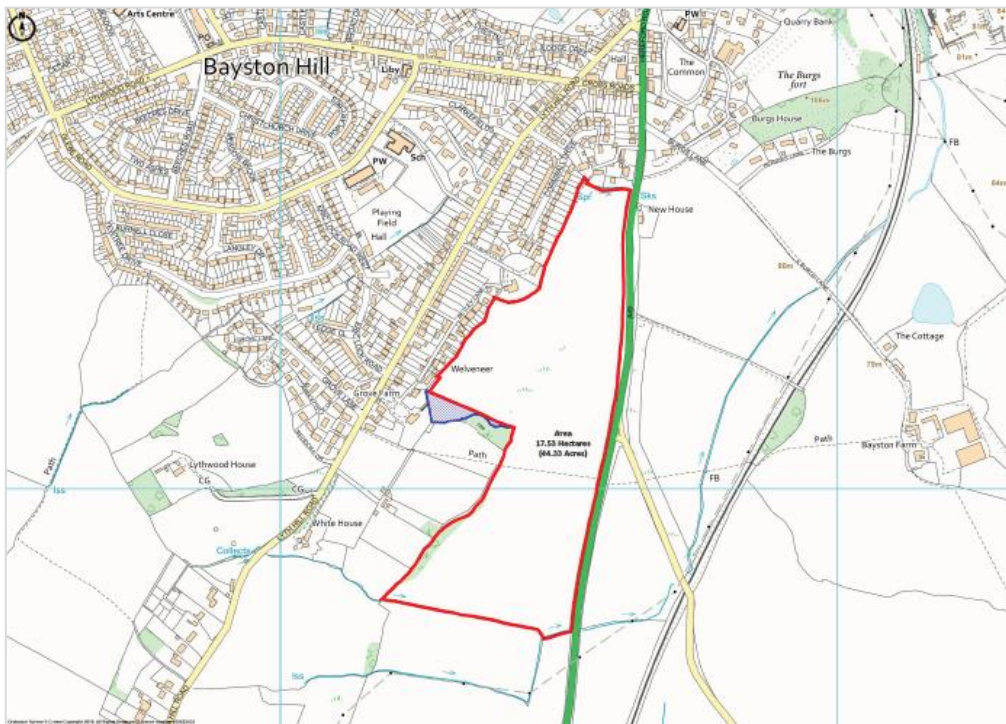
1.13 □ These representations also relate to the site selection methodology used by the Council in their site sifting process focussing on key issues including landscape, transport, heritage and ecology, identifying that Shropshire Council has incorrectly assessed the site within its Sustainability Appraisal and Site Assessment Environmental Report and as such has undermined its opportunity to assist in delivering strategic growth at Bayston Hill. The Framework states that planning should be genuinely plan-led which should set out a positive vision for the future of an area. The Framework also sets out that Plans should be kept up to date and based on joint working and cooperation to address wider local issues. Plans should provide a practical framework in which decisions on planning applications can be made with a high degree of predictability and efficiency.

1.14 □ To address some of the shortcomings of the Councils evidence, regarding the local housing need, Gleeson Land Limited have prepared a Bayston Hill, Shropshire Local Housing Needs Review June 2024 (LHNR) which is referred to in this document and is found in appendix A.

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2. Omission Site

- 2.1□ Land at Bayston Hill, Betley Lane East site is an omission site which, as set out later in these representations, is put forward to assist in rectifying the significant soundness issues identified in relation to the draft plan.
- 2.2□ The site is roughly triangular in shape and extends to approximately 17.50 hectares in size. It is situated immediately adjacent to the settlement edge of Bayston Hill to the south-east.

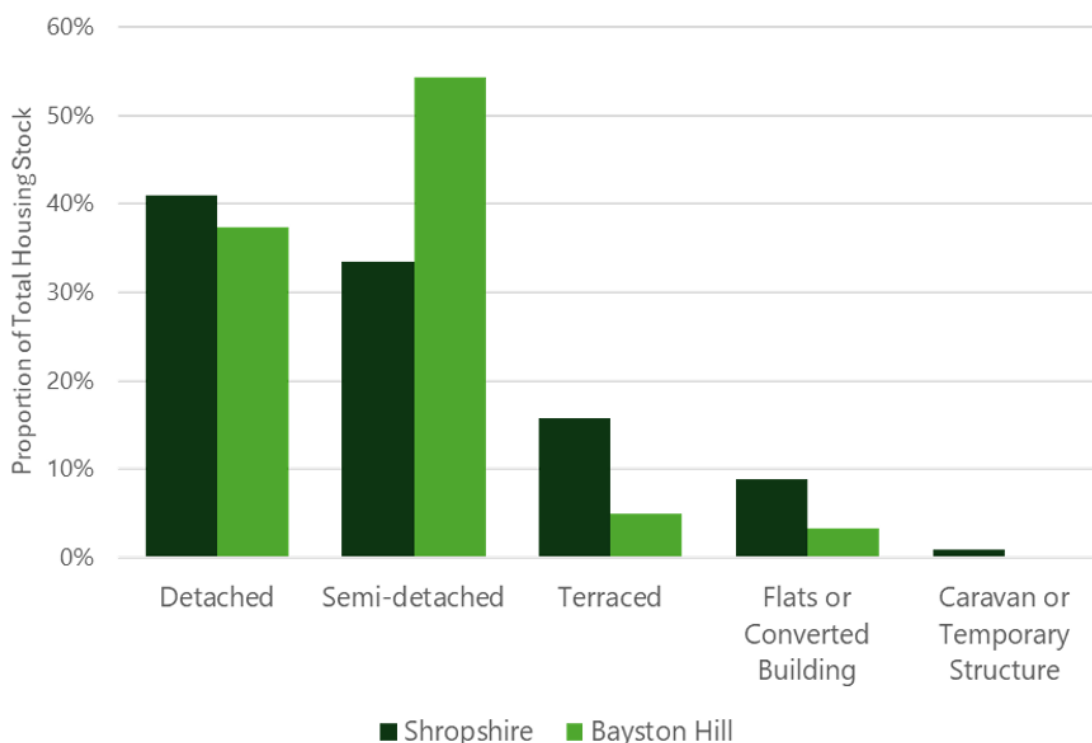


- 2.3□ The majority of the site is currently in use for agricultural purposes. It also comprises areas of rough semi-improved grassland, dense and scattered scrub and tall ruderal vegetation. Two areas of woodland are located in the centre of the site containing mature trees. The site is bound by two hedgerows, a tree belt and two streams. Land falls away across the site from the northwest to the southeast where it joins the A49, Hereford Road.

2.4□ There is a good range of local services and facilities within close proximity to the site within Bayston Hill. The nearest bus stop is on Lyth Hill Road directly to the west of the site which provides services to Shrewsbury. The nearest railway stations are at Shrewsbury and Church Stretton.

2.5□ The population of Bayston Hill has stagnated over a 10 year period in relation to Shropshire as a whole *“With a total inter-censal population change of only 137 persons, Bayston Hill's population change has effectively stagnated over the 10-year period. This is largely due to minimal planned housing growth over this period.” (LHNR)*

2.6□ Figure 3.4 of the LHNR provides an illustration of existing housing stock and the difference in relation to Shropshire as a whole:



Source: Census 2021 and Gleeson Land analysis

2.7□ The Strategic Land Availability Assessment (SLAA) evaluated the suitability, availability, and achievability (including viability) of land for housing and employment development. It encompassed the process previously known as the Strategic Housing Land Availability

Assessment (SHLAA). The SLAA serves as a crucial component of the evidence base supporting the Shropshire Council Local Plan Review. Additionally, it informs Shropshire Council's approach to development delivery, with a focus on housing and employment across the region (excluding the Telford and Wrekin Council area). Please note that while the SLAA is an essential technical document, it does not directly allocate land for development or cover all locations where future growth will occur. Instead, it provides information that will be further investigated during the plan-making process.

- 2.8□ The 2018 SLAA considered this site under reference BAY040 that this site had long term potential for residential use.
- 2.9□ Bayston Hill has been identified within the emerging Local Plan as a Community Hub, capable of accommodating a proportionate amount of growth. An opportunity through the Plan review to re-draw the settlement boundary for the large village to accommodate additional housing to meet the identified housing need therefore exists.
- 2.10□ Regarding future redevelopment of the site, it should closely align with the surrounding urban context and create a more gentle transition to the main village. This approach is consistent with the Framework Plan, which carefully considers both the site's constraints and its potential opportunities.
- 2.11□ Advice from a highways consultant has been sought in relation to access in and out of the site which would need to be directly from the A49, which is a trunk road, and our previous representations and Vision Document set out the strategy for dealing with access and included a safety audit. Positive engagement with Highways England continues.
- 2.12□ The strategic approach for Shropshire set out within policy SP2 seeks to enable the delivery of development in a sustainable pattern across the District. New development will be focussed in the urban areas at:
- Shrewsbury (as the strategic centre);

-
- Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch (Principal Centres)
 - Albrighton, Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem (Key Centres)
 - Clive Barracks, Tern Hill and the former Ironbridge Power Station (Strategic settlements)
 - RAF Cosford (Strategic Site)

2.13 The Plan recognises the rurality of much of Shropshire and it attempts to ensure the long-term sustainability of rural communities. It directs growth in the urban areas listed above and would be complemented new development within Community Hubs. The Shrewsbury Place Plan Area contains a number of Community Hub settlements of which Bayston Hill is one.

2.14 Two sites are currently proposed as allocations within Bayston Hill at Land off Lyth Hill Road (BAY039) for 100 dwellings and at the former Oaklands School (BAY050) for 47 dwellings. Planning permission had been granted at the former Oaklands School for 23 dwellings and a hybrid application is pending for 118 dwellings at Lyth Hill Road.

2.15 This illustrates the fact that the site at Bayston Hill is suitable, available and deliverable and capable of making a valuable contribution to the provision of sustainable housing development, which will assist the Council in its aim of meeting its own and the unmet need of other authorities within the Housing Market Area. Access arrangements are achievable from the A49 Hereford Road. The additional traffic flows associated with the proposed site allocation are unlikely to lead to any adverse highway capacity issues and seek to resolve a local highway 'black spot' with the Condoval junction onto the A49.

2.16 The site is located within the Shrewsbury Place Plan Area Bayston Hill. Place Plan Areas ensure that important infrastructure to support communities is directed the rights places

to support developed areas within the settlement hierarchy and to ensure they remain sustainable.

2.17□ The Shrewsbury Place Plan identifies Bayston Hill within the emerging Plan as a Community Hub and therefore an appropriate location to focus much of the development within the rural area.

2.18□ The village is described in the SLAA (August 2020) as:

“Bayston Hill is a relatively compact settlement to the south of Shrewsbury on the A49. In terms of constraints, the settlement is flanked to the west by the Rea Brook, which takes a path along the north western edge of Bayston Hill. To the east, the settlement is again bordered by a watercourse which runs along the length of the village edge, and additionally by the railway line. To the north, the A5/A49 Shrewsbury Bypass separates the village from the southern fringe of Shrewsbury, and the land on either side of the A5 corridor a significant and important gap between the two settlements. There are also several dense tree belts of vegetation covered by Tree Preservation Orders on the north western edge of the settlement and on the south west edge.

Due to its close proximity to Shrewsbury, the village has strong links with the town and as a consequence, access to good services, facilities and infrastructure. The settlement is serviced by a frequent bus service running from Monday to Saturday. There are a range of services in the village. There are three shops, post office, two schools and four pubs.”

2.19□ Based on the above, in pure planning policy terms, proposals for residential development at the site at Bayston Hill is in accordance with the emerging Plan. There is no reason therefore why the Council should not reconsider the site as an additional site allocation

for residential use in the emerging plan to meet the needs of Shropshire having already identified more suitable sites which serve the Black Counties unmet need. The Council should give proper consideration of the site at Bayston Hill which could accommodate up to 250 additional dwellings which would provide a buffer and potentially avoid an early review of the Local Plan once adopted and which represents a more robust strategy with windfall available to meet any additional evidenced housing need for the area.

2.20 □ A Vision Document with framework masterplan was submitted at regulation 19 stage which was derived following a constraints and opportunities assessment which itself has been informed by the technical and environmental testing of the site, indicating that this 17.50-hectare site could deliver approximately 250 houses across a development area of 7.40 hectares, whilst having regard to outlined mitigatory measures whilst also deploying the following design and layout principles:

- □ Active, “outward facing” development;
- □ Retained hedgerows to be bolstered with native species to increase biodiversity;
- □ Creation of new habitat for wildlife including native wildflower grassland, shrub and tree planting to deliver habitat enhancements;
- □ Substantial areas of public open space with children’s play and green corridor links. This will create an enhanced gateway/entrance to the village when approaching from the south and allow a gradual transition within the landscape from open countryside to the edge of the village and built form ;
- □ A potential SuDs feature to create new breeding habitat for wildlife such as amphibians through the creation of permanent standing water. New areas of tussocky grassland and other shelters would provide additional habitat opportunities and reptiles;
- □ Retention and improvements to 2 public rights of way which traverse the site;
- □ New footpath along the site frontage;
- □ Retention and provision of appropriate standoff buffer to potential Veteran trees;

-
- Vehicular access to the proposed allocation site can be achieved through the introduction of a 4-arm priority-controlled compact roundabout, with a 50m ICD, located at the same location as the existing A49 Hereford/Unnamed Road junction;
 - The proposed roundabout would provide an improved gateway feature into Bayston Hill, providing a clear transition between the rural and built up areas, and would naturally help to calm traffic speeds on the A49 Hereford Road, providing additional and significant highway safety benefits. It would therefore provide a significant betterment over the existing situation, whereby the achievable level of forward visibility (circa 22m) to the existing give way line and queuing traffic when approaching the junction from Condoover falls significantly short of the visibility requirements (215m) based on the speed of the road.

2.21□ The consultation is focussed on finding additional capacity for housing to meet the Black Countries unmet need. However, the LHNR considers what the local need for the plan period is for Bayston Hill and has taken a ‘bottom-up’ approach, “This annual growth rate has been applied to the population within the Bayston Hill to determine a local housing need figure of 307 dwellings over the period covered by the submitted Plan, or 14 dpa”. In addition the LHNR suggests “to allow for ‘flexibility and to positively support the ability to address identified issues and opportunities’ the submitted Local Plan applies a 15% uplift to the Shropshire’s Standard Method local housing needs figure. In view of this, a 15% flexibility uplift to the 2021-based population projection with market signals uplift scenario results in a Bayston Hill local housing need figure of 353 dwellings over the period covered by the submitted Plan, or (16 dpa)”.

2.22□ Table 4.1 of the LHR breaks down the plan period need as follows:

Table 4.1: Bayston Hill Local Housing Need Scenarios: Plan Period Adjusted Figures

Local Housing Needs Scenario	Annual Local Housing Needs	Submitted Plan Period Total (2016-38)	Adjusted Plan Period Total (2016-39)
Standard Method Population Apportionment	20	440	460
Local Plan Housing Figure Population Apportionment	24	524	548
Demographic Projection with Market Signals Uplift	14	307	321
Demographic Projection Scenario with 15% Flexibility Uplift	16	353	369

2.23 □ Taking a best- and worst-case approach of the top down figures provided by the Council and this ‘bottom up’ approach the LHNR concludes that a mid-point for the four scenarios would be appropriate, a figure of 424 dwellings over an extended 2016 to 2029 period (19dpa).

2.24 □ In summary, the site at Bayston Hill is fully capable of being brought forward to assist the Council in providing much needed homes in accordance with the emerging planning policies contained within the emerging draft Plan and can provide certainty that the Plan can meet the predicted local need for Bayston Hill which will not benefit from sustainable windfall development over the plan period.

2.25 □ The site is suitable, available, and achievable and being promoted by Gleeson Land Limited who has an established and proven track record in delivering sites and subsequent housing completions. It is therefore requested that the Council give proper consideration to the site being allocated for residential development for up to 250 dwellings in this current Plan review.

□

3. National Planning Policy Changes and the Unmet Housing Need of Birmingham and the Black Country.

- 3.1 □ It is over 2 years since the plan was submitted to the Inspectorate. There have been significant changes in National Planning Policy which are relevant to the Shropshire Plan.
- 3.2 □ The key Framework changes, which have had an impact on neighbouring local plans, are found in the following paragraphs:

144. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:

- a) demonstrate why normal planning and development management policies would not be adequate;
- b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- c) show what the consequences of the proposal would be for sustainable development;
- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
- e) show how the Green Belt would meet the other objectives of the Framework.

145. Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-

making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non- strategic policies, including neighbourhood plans.

- 3.3□ South Staffordshire have recently consulted on a revised Draft Plan at regulation 19 stages and published in their Green Belt Exceptional Circumstances Topic Paper April 2024 (GBECT), which reports in paragraph 2.4 that “the NPPF now clarifies that there is no requirement for authorities to review or amend their Green Belt, and it is within authorities’ gift to do so where they can evidence and justify exceptional circumstances.” As a result, they have significantly altered their strategy and begun a new regulation 19 consultation.
- 3.4□ The change in Strategy has resulted in a reduction of their housing supply from 9089 dwellings to 4,726 over the same plan period. Both the regulation 18 and previous 19 versions of the plan made it clear that the 4,000 homes contribution was set in 2018 based on the findings of the jointly commissioned Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Growth Study (2018) which identified across the HMA: *to 2031, a minimum shortfall of some 28,000 homes and a maximum shortfall of 69,000. to 2036, a minimum shortfall of some of 61,000 homes and a maximum of some 116,000.*
- 3.5□ Consequently, South Staffordshire’s proposed 4,000 home contribution set in 2018 represented a 14% contribution to the HMA wide shortfall based on the ‘best case’ shortfall scenario to 2031; and a 6.5% contribution to the HMA wide shortfall based on the ‘best case’ shortfall scenario to 2036. The net result is that only 640 dwellings will now be provided.
- 3.6□ What happens in South Staffordshire is relevant because the authority is between the Black Country and Shropshire, and they were best placed to provide housing to meet the

unmet needs of the Black Country. But they are not alone in this new approach which is as a result on the NPPF changes.

- 3.7□ Since the start of the Shropshire Examination in Public (EIP) The Black Country Plan (BCP) has been abandoned, this was because Dudley Borough Council decided against releasing any green belt land for housing development. The BCP proposed to export 28,239 homes to other authorities. Subsequently, Dudley have now consulted on their own Regulation 18 plan, which revealed a proposed shortfall of 1,078 homes. Meanwhile, Sandwell also conducted a Regulation 18 consultation, identifying a significant housing shortfall of 18,606 homes. In Wolverhampton, the Issues and Options Consultation favoured exporting 11,413 homes through the Duty to Cooperate mechanism. Walsall Council have made the least progress with a new Local Plan. Currently Walsall cannot demonstrate a 5-year housing supply and has only identified 3,370 houses against a need of 5,453, a shortfall of 2,083. Walsall confirm in their Local Development Scheme that their current need alone for the period 2020-2039 is 16,152 homes. Including the release of green belt the Council identified 13,344 houses could be delivered including carried forward allocations in the BCP. Taking account that a plan is likely to be ready for adopted as the existing supply comes to an end which would mean carried forward allocations of 6,471 houses would be depleted, and taking account of the plan period difference, the Black Countries unmet need would now stand at 33,905 and is not decreasing.
- 3.8□ The 2018 Growth Study followed the adoption of the Birmingham Development Plan in 2017, the examination of which identified a *Birmingham city only* shortfall of 37,900 homes (to 2031). It is important to recognise that this 37,900 home shortfall figure is the only figure that has actually been tested and found sound at local plan examination.
- 3.9□ Taking the Birmingham City unmet need position as a starting point therefore, based on the contributions set out in plans within the HMA which have either been submitted for examination, examined or adopted, the total ‘contribution’ to unmet need arising from

Birmingham alone to 2031, amounted to just 11,280 dwellings (North Warwickshire – 3,790, Solihull - 2,105, Stratford – 2,720 and Lichfield 2,665).

- 3.10□ Notably, only two of these plans have actually been adopted (North Warwickshire and Stratford) with, at the time of writing, Solihull’s plan requiring main modification to find a further c.1,700 homes and Lichfield scrapping their plan to start again, the cabinet report suggested this was because of the imminent NPPF changes in relation to the exceptional circumstances test. Thus, just 6,510 homes towards this ‘plan identified’ 37,900 home Birmingham City shortfall to 2031 have the benefit of an adopted plan behind them to facilitate their delivery.
- 3.11□ Birmingham is working on a new plan and evidence was published as part of their Issues and Options Consultation. According to the latest Housing and Economic Land Availability Assessment (HELAA), the estimated potential capacity from identified sites and windfalls, considering completions between 2020/21 and 2021/22, amounts to 70,198 dwellings. However, there remains a shortfall of approximately 78,415 dwellings that need to be addressed during the preparation of this Plan.
- 3.12□ The Housing and Economic Development Needs Assessment (HEDNA) indicates that if Birmingham continues with the Standard Method for calculating housing need in line with South Staffordshire, a 15-year plan would require 101,250 new homes. The Housing and Economic Land Availability Assessment (HELAA) identifies that there is a potential capacity for the development of 52,572 dwellings on identified sites in the city. This leaves an unmet need of 48,678 homes.
- 3.13□ The recently published Birmingham HEDNA suggests that they might demonstrate exceptional circumstances to move away from using the Standard Method and justify an alternative approach which might lower the amount of housing they would need to provide. Paragraph 1.26 states that “any lowering of the housing need number for

Birmingham would have a converse increase in the other local authorities in the HMA if the need is assessed consistently”.

3.14 □ Collectively the emerging evidence suggests that the unmet housing need for GBBCHMA the has not decreased and can now be calculated to be in excess of 100,000. Because most of the surrounding Green Belt Authorities are now progressing plans under the current Framework, not the version which the Shropshire plan is aligned too, they do not need to release any Green Belt. Consequently, Shropshire should now be adopting a strategy to release significantly more sustainable, suitable and deliverable sites.

3.15 □ Our assertion is that the HMA wide shortfall to 2036 (and beyond) has increased which, along with an extension to the plan period (the plan now runs to 2041) on which the contribution was based, means that proportionally, increasing windfall supply is not sufficient. This issue goes to the heart of the plan and remains unresolved, affecting the soundness of the emerging plan.

3.16 □ We maintain therefore that for this plan to be positive, justified and effective, there needs to be a greater contribution towards meeting the unmet needs arising within the GBBCHMA, an increase rather than continue on the current plan which will immediately lead to an early plan review.

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4. The Role of the Shropshire Plan and Revised Strategy Review

4.1 □ It is recognised by the Government that there is an urgent need to increase the rate of house building in England and make housing supply more responsive to changes and demand.

4.2 □ Paragraph: 008 Reference ID: 2a-008-20190220 of the government guidance for housing and economic development needs assessments states:

Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.

However, local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.

4.3 □ Over 2 years have passed which is an unusual length of time for an Examination to run, highlighting the issues with the plan strategy.

4.4 □ Shropshire in their updated Housing and Employment Topic Paper April 2024, are now proposing a minimum housing required of 31,300 dwellings between 2016 and 2038.

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- 4.5□ This includes a continuation of 1,500 dwelling contribution to the Black Country which they state were blended within the previous housing requirement.
- 4.6□ They determined that to meet the additional housing uplift which had resulted from their updated Sustainability Appraisal (SA) there were four options:
- a. Option 1: Increasing Settlement Guidelines and Windfall Allowances.
 - b. Option 2: Densification of Proposed Site Allocations.
 - c. Option 3: Increasing Site Allocations.
 - d. Option 4: A Combination of Two or More of the Other Options.
- 4.7□ The Sustainability Appraisal concluded that the first option, to rely on increased windfall housing which effectively means nothing has changed, was the most sustainable option.
- 4.8□ Windfall sites are those which have not been identified within the Local Plan. Paragraph 70 of the NPPF specifies that “where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”
- 4.9□ The During the examination it became clear that to meet the Black Countries unmet housing need, Shropshire had effectively reduced their need by the same amount.
- 4.10□ The Inspector in in their letter to the Council reference ID28 paragraph 23 made the following request: “Given the Council were planning on releasing Green Belt land to meet its own needs, it seems unlikely that the unmet needs of the Black Country could be met without the release of Green Belt land. Can the Council please provide a revised Green Belt Topic Paper setting out the exceptional circumstances for releasing Green Belt land

to meet its own needs and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.”

- 4.11□ This requirement is also in the context that the Inspector has requested that policy SP2 includes a review trigger should there be a future request from the Black Country to meet any more of their unmet housing needs.
- 4.12□ The Council for have updated their Sustainability Appraisal (SA). The SA process systematically assesses the social, environmental, and economic impacts of a plan from its inception. By doing so, it ensures that decisions align with sustainable development goals.
- 4.13□ The Council conclude that they should continue to high growth strategy and to include a 1,500-dwelling contribution to the Black County Authorities Unmet Housing need. Whilst we support a high growth approach, we do not consider that the contribution is sufficient based on the current available evidence which demonstrates that the Black Country Authorities unmet need is increasing.
- 4.14□ The next stage of the SA goes on to consider 4 options to increase their housing supply. These options are:
- a. Option 1: Increasing Settlement Guidelines and Windfall Allowances.
 - b. Option 2: Densification of Proposed Site Allocations.
 - c. Option 3: Increasing Site Allocations.
 - d. Option 4: A Combination of Two or More of the Other Options.
- 4.15□ The Council has chosen Option 1 which relies on increasing settlement housing guidelines and by relying on an additional Windfall capacity. Draft Policy SP7: Managing Housing Development summarises the key considerations in circumstances where either the proposed settlement housing guideline appears likely to be exceeded or not achieved.

4.16 □ To understand why they have come to this decision the following table compiles and summaries the scoring which provided justification for their selected approach:

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Sustainability Objective	Option One Short Term	Option One Medium Term	Option One Long Term	Option Two Short Term	Option Two Medium Term	Option Two Long Term	Option Three Short Term	Option Three Medium Term	Option Three Long Term	Option Four Short Term	Option Four Medium Term	Option Four Long Term
1: Protect and enhance the range of plants and animals in Shropshire and the quality and extent of wildlife habitats.	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
2: Encourage a strong and sustainable economy throughout Shropshire	+	+	+	+	+	+	+	+	+	+	+	+
3: Provide a sufficient amount of good quality housing which meets the needs of all sections of society	++	++	++	++	++	++	++	++	++	++	++	++
4: Promote access to services for all sections of society	++	++	++	+	+	+	+/?	+/?	+/?	+/?	+/?	+/?
5: Encourage the use of sustainable means of transport	+	+	+	+	+	+	+/?	+/?	+/?	+/?	+/?	+/?
6: Reduce the need of people to travel by car	+	+	+	+	+	+	+/?	+/?	+/?	+/?	+/?	+/?
7: Support active and healthy communities.	+	+	+	-/?	-/?	-/?	+/?	+/?	+/?	+/?	+/?	+/?



8: Protect and improve soil quality	-/?	-/?	-/?	?	?	?	?	?	?	?	?	?
9: Conserve and enhance water quality in Shropshire and reduce the risk of water pollution	-/?	-/?	-/?	-/?	-/?	-/?	?	?	?	?	?	?
10: Reduce flood risk and improve flood management	-/?	-/?	-/?	?	?	?	?	?	?	-/?	-/?	-/?
11: Conserve and enhance Shropshire's air quality and reduce the risk of air pollution	-/?	-/?	-/?	-/?	-/?	-/?	?	?	?	-/?	-/?	-/?
12: Reduce carbon dioxide emissions	+	+	+	+	+	+	+/?	+/?	+/?	+/?	+/?	+/?
13: Promote adaptation and mitigation to climate change	-/?	-/?	-/?	-/?	-/?	-/?	+/?	+/?	+/?	+/?	+/?	+/?
14: Promote efficient use of natural resources	++	++	++	+	+	+	?	?	?	?	?	?
15: Conserve and enhance features and areas of heritage value and their setting	?	?	?	-/?	-/?	-/?	?	?	?	-/?	-/?	-/?
16: Conserve and enhance landscape character and local distinctiveness	-	-	-	-	-	-	-	-	-	-	-	-

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- 4.17□ The table highlights the fundamental problem that the SA, is inconclusive. Options 3 and 4 require further work in relation to the site assessments which would reduce the number of question marks in the strategy option assessments, the question marks are essentially an indication that they have not explored or analysed the effects. This strongly indicates that a decision had already been made to adopt the option one strategy prior to the SA being undertaken.
- 4.18□ An example of the issue of unknown factors can be seen in Objective 10 for option 3 where the commentary suggests *“the extent of any impact on flood risk and flood management is dependent on the location of any extensions to existing proposed allocations/new proposed allocations. Proposed site allocations are assessed separately within the SA process.”* This type of response is common for the commentaries throughout options 3 and 4. With respect to flood risk and flood management the Council is in control of which sites it selects. Not only might mitigation be possible for the effects of development but also, development could provide solutions to existing issues, and it is perfectly possible that this factor alone could be a positive.
- 4.19□ For these reasons the Council has not fully considered all the options. They should have reviewed the site assessments and allocations to reduce the number of unknowns in the SA. The SA is only as effective as the information that is put in it and the Council by failing to provide the necessary information for options 3 and 4 have ensured that they could direct the outcome rather than use the SA process to inform the preferred option.
- 4.20□ The SA is an essential component of the plan-making process. It plays a crucial role in establishing a robust evidence base for the plan and seamlessly integrates into the plan preparation. Transparency and public participation are key principles, ensuring that the sustainability appraisal informs decision-making and facilitates the evaluation of alternatives. Furthermore, it helps demonstrate that the chosen plan is the most suitable among reasonable alternatives. In this instance the SA lacks transparency because it is inconclusive, and the Council should complete an assessment of excluded sites to inform options 3 and 4 so that an updated SA can be produced and consulted on.

4.21 □ We also disagree with the conclusions for option 1 with respect to Sustainability Objectives 2, 3 and 4 as follows.

2: Encourage a strong and sustainable economy throughout Shropshire

This option would facilitate additional windfall development sufficient to meet the proposed uplift to the housing requirement. As much of the additional windfall development resulting from this option would be directed towards appropriate sites in urban areas, it is likely to increase the ability to positively respond to sustainable development opportunities, support the achievement of economic growth aspirations including through the creation of more jobs, and support the diversification of our labour force. This is because it is generally considered that these opportunities are more significantly associated with 'urban areas' than rural areas.

4.22 □ This conclusion results in a positive score, however there are risks with any over reliance of windfall development which should be taken into account. Windfall by its nature is unplanned. An example of the risks can be seen from permitted development rights for Houses in Multiple Occupation. If local plans achieve sustainable release of suitable and high-quality houses to the market they can ensure that the very poorest examples of HMO conversions are unviable. Such has been the demand for housing that there are examples elsewhere in England of families living on remote industrial estates where office buildings have been converted into HMO's which have no access to services and facilities. The sort of development which would be contrary to the policies of Shropshire's Development Plan.

4.23 □ Although future windfall is unknown, the past examples of windfall development are understood. Subdividing properties, losing community facilities, employment uses to windfall development can reduce the quality and character of an area and can lead to development which is not sustainable. Because the Council has no way of the

consequence of over relying on Windfall release this Sustainability Objective should be reduced to a question mark.

3: Provide a sufficient amount of good quality housing which meets the needs of all sections of society

This option would facilitate additional windfall development sufficient to meet the proposed uplift to the housing requirement. It is likely that this option would also facilitate the ability to deliver additional good quality housing which meets the needs of all sections of society. This includes much needed affordable housing and housing to meet the needs of specific groups within our communities – including older people and families. It would concentrate this development in the most sustainable settlements with the widest array of infrastructure, services and facilities necessary to support new development. It could also have a positive geographic implication, allowing for the more balanced distribution of development across locations / settlements that are seen as more and less ‘viable’ or ‘attractive to the market’.

4.24 This option doesn’t take account of the fact not all settlements are sustainable and there may be some which should not be expanded due to a lack of necessary infrastructure. Settlements such as Bayston Hill will likely suffer from continued stagnation over the plan period because the plan does not provide sufficient housing to meet their local needs as evidenced in the LHNR.

4.25 The risks of windfall development considered above also apply to this objective and the risks mean that this should be scored down.

4: Promote access to services for all sections of society

This option would facilitate additional windfall development sufficient to meet the proposed uplift to the housing requirement. It would concentrate this development in the most sustainable settlements with the widest array of infrastructure, services and

facilities necessary to support new development. It could also increase the ability to support existing and provide new services and facilities, as a result of increased 'critical population mass' which supports viability and sustainability.

- 4.26 □ This conclusion is at odds with what we know about housing demand and its potential effect on existing services and facilities, particularly in smaller settlements which often lose their local shop to house conversions, requiring the use of the car to collect even basic goods. Bayston Hill has few options to deliver windfall due to the limited range of existing housing stock.
- 4.27 □ The risks we outline in response to the commentary of Sustainability Objective 2 equally apply and again this should be scored down as not all effects would be positive.
- 4.28 □ Windfall in the Councils housing data can be shown to have increased over the last 5 years. However, this is to be expected because the National Planning Policy Framework (NPPF) has played a key role by expanding permitted development rights through the prior notification system. The Shropshire 2023 adopted local plan five year housing supply statement confirms the over the last 5 years 80 houses have been delivered through prior notification applications and are all likely to be windfall development.
- 4.29 □ New permitted development rights and the opportunities they provide are often a finite resource and over the next 5 years prior notifications windfall development would likely decline.
- 4.30 □ We would also dispute the comments made in paragraph 5.120 of the housing supply statement which state “there is a constant and significant recycling of previously developed land; significant numbers of infill development; high number of conversions of barns and other rural buildings”. All of these represent finite opportunities to provide housing development and are because of a significant demand for housing combined

with improved farming practices, for which any future improvements will not likely release a substantial number of buildings which can be converted to housing.

- 4.31 □ In particular we can estimate that this predictable decline of prior notification changes of use will affect small scale sites of 5 dwellings or less the most.
- 4.32 □ Lichfields prepared an Economic Development Needs Assessment (EDNA) for Shropshire and is part of the evidence for the plan. Paragraph 2.46 recommends that *“land should be protected for B1 (a, b, c), B2, B8 employment uses. In particular, Shrewsbury’s limited supply of larger office properties should be protected from inappropriate change of use/redevelopment proposals. To support this, it is recommended that (based solely on the evidence of Shrewsbury, and without prejudice to the rest of the county) that Shropshire Council seek an exemption from the new permitted development rights which will permit (limited) changes of use from B1(a) office to C3 residential.”*¹
- 4.33 □ The EDNA dates from 2021 and no restrictions have been put into place. Lichfield’s must consider that there is a specific issue in Shrewsbury and the report does not support the loss of offices to provide windfall housing supply.
- 4.34 □ The Council have also historically permitted housing on employment sites which the EDNA recommends against losing and with growing employment needs the Council will not be able to rely upon such sites for future windfall. One such example is Old Station Yard, Brownlow Road, Ellesmere which had planning permission for 65 units. Past trends of large employment sites are already exhausted and there is clear evidence which supports the retention of employment sites.
- 4.35 □ In conclusion the amended strategy is based on an inconclusive Sustainability Appraisal which has been generous in its assessment of option one by not taking full account of the risks and known effects of windfall development and the consequences not planning

¹ Shropshire Economic Development Needs Assessment Final Report, April 9th 2021

where housing growth should take place. Bayston Hill for example, as evidenced in the LHNR, will not have a sufficient supply of housing over the Plan period to meet its needs. The housing stock in Bayston Hill being mainly semi-detached is unlikely to provide additional unit through windfall and there are no significant previously developed sites which could provide housing windfall in the context of a need for services, facilities and employment land. Although housing windfall is yet to show a decline in the Councils statistics, the issues considered above strongly indicate that the Council cannot rely on past trends which were as a result of National Policy changes and relied upon redevelopment of employment sites which are now much needed to support existing communities and housing growth over the next plan period.

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5. Increasing Settlement Guidelines and Windfall Allowances

- 5.1 □ The Council has chosen to rely on windfall to meet their housing shortfall which was identified through the examination.
- 5.2 □ Over the assessed period, significant shifts in planning policy have influenced windfall development from various sources. The National Planning Policy Framework (NPPF) has played a pivotal role by providing flexibility. Specifically, policies related to repurposing redundant buildings have contributed to windfall completions. Despite being updated in 2021, the NPPF continues to offer policy flexibility.
- 5.3 □ Additionally, changes in permitted development rights (starting from 2013) have encouraged shifts in land use. Prior approval changes now facilitate the conversion of various property types into residential units. Notably, as of July 2021, Commercial, Business, and Service (Class E) units can also be transformed into dwellinghouses with prior approval. These cumulative policy adjustments over the years have contributed to the annual increase in windfall completions.
- 5.4 □ The Council's Strategic Land availability assessment 2018 recommended a robust approach to windfall *“only a very modest small-scale windfall allowance of 299 dwellings per annum has been applied, significantly less than the average and any individual years rate of delivery during the current Local Plan period. To add further robustness, this has also not been included for the first three years of the trajectory (2017/18 to 2019/2020).”*²
- 5.5 □ Shropshire's five-year supply statement (31st March 2023) concludes that “windfall development does and will continue to represent an important part of the housing land supply”.

² Shropshire Council Strategic Land Availability Assessment (SLAA) published 29/11/18

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- 5.6□ There are factors which have sparked the recent trends the Council is referring too, factors which are not set to continue at the same rate so cannot be relied upon as an indicator for future windfall allowance.
- 5.7□ Over the assessed period, planning policy has undergone significant changes, impacting windfall allowances. The National Planning Policy Framework (NPPF) has played a key role by promoting flexibility through its policies. Notably, policies related to repurposing redundant buildings have encouraged windfall development. Additionally, changes in permitted development rights, particularly since 2013, have facilitated shifts from various uses to residential. As of July 2021, further adjustments allow units falling under Commercial, Business, and Service (Class E) to convert into dwellinghouses with prior approval. These cumulative changes are believed to contribute to the annual increase in windfall completions.
- 5.8□ There is a finite number of sites that can benefit from the policy changes which have allowed recent uplifts in windfall development. One clear example can be seen in class Q development which allows conversions of agricultural buildings to dwellinghouses. The Council is abandoning their robust approach to calculating future windfall in light of the evidence which suggests that the policy factors and remaining capacity which supported previous trends will not be sustainable.
- 5.9□ The Housing and Employment Topic Paper update 2024 does not fully consider the reasons behind the past trends in housing windfall or fully justify why its previous robust strategy is no longer supported.
- 5.10□ Of the 31,300-housing supply proposed, 3,522 of these would be windfall which is approximately 11.3% of the proposed housing supply and which leave no margin to provide additional required development which is known to be required as a result of the growing unmet Black Country need which is considered further in the text below.

5.11 □ There are other risks with this strategy too. Paragraph 62 of the National Planning Policy Framework emphasizes the importance of assessing and incorporating housing needs for various community groups, including older individuals. The Council’s evidence reveals a significantly higher concentration of older residents within the Plan area compared to the national average.

5.12 □ The Town and County Planning Association guide “beyond Box Ticking” states “As planning is vital in promoting equality and inclusion and in reducing poverty, inequality and exclusion, it is important not only that EqlAs identify whether draft policies are expected to have positive impacts for certain groups, but also that they consider how policy can be developed to maximise positive impacts”³.

5.13 □ The Inspector raised concerns that the plan was not responding to this issue and the Council have responded with an amended Draft DP Policy: Housing Provision for Older People and those with Disabilities and Special Needs which requires that for all sites of 5 or more dwellings developers are “strongly encouraged to achieve the M4(2) (accessible and adaptable dwellings) standard within Building Regulations or higher” and for the provision of specialist housing there are the following key requirements:

On site allocations for 250 or more dwellings and all development sites for 250 or more dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 20% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs documented within Paragraph 8 of this Policy.

On site allocations for 150-249 dwellings and all development sites for 150-249 dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 15% of houses must constitute a form of specialist

³ Beyond Box-Ticking, A short guide to meaningfully assessing, Local Plan policy impacts on equality and inclusion, 2019

housing for older people and/or those with disabilities and special needs documented within Paragraph 8 of this Policy.

On site allocations for 50-149 dwellings and all development sites for 50-149 dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 10% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs documented within Paragraph 8 of this Policy.

- 5.14 The need for M4(2) and M4(3) housing was specifically addressed in the Strategic Housing Market Assessment (SHMA). According to the SHMA, during the Local Plan period, approximately 13% of the projected household growth in Shropshire will necessitate wheelchair-accessible dwellings meeting the M4(3) standard. Additionally, 33% of households will require accessible and adaptable dwellings conforming to the M4(2) standard.
- 5.15 The Strategic Housing Market Assessment (SHMA) estimates that the number of older households with wheelchair users will increase by approximately 10% of the total growth in older households. These households will require M4(3) standard dwellings. However, the remaining 67% of older households, impacted by long-term health problems or disabilities affecting their housing needs, will need M4(2) standard dwellings. It's worth noting that some of this need will be addressed through specialist housing
- 5.16 In response the Council considers it “appropriate to require that on sites of 5 or more dwellings 5% of dwellings meet M4(3) standard and a further 70% of dwellings meet M4(2) standard, unless site-specific factors indicate that step-free access cannot be achieved”.
- 5.17 The policies are not robust in their wording to ensure that the requirements are adhered to, which will be particularly difficult for large windfall development on previously

developed land which usually has viability issues through costs associated with, demolition, conversion and contamination. For existing strategic sites which are overdelivering the windfall numbers are likely to be either too low to provide sufficient provision and would likely not be submitted in numbers high enough to meet the policy thresholds identified above.

5.18 □ Bayston Hill as evidenced in the LHNR, like many other settlements across England has an ageing population and housing allocations are an opportunity for the plan to address their known needs over the plan period.

5.19 □ The amended strategy now has a high reliance on windfall to deliver the housing needed to meet Shropshire and the Black Countries needs and this reliance on windfall effectively defers identification of suitable sustainable housing allocations to meet these needs. The amended strategy is neither justified nor effective in this respect. In addition, the 11.3% of housing delivery to come from windfall means that the draft DP policy: Housing Provision for Older People and those with Disabilities and Special Needs will not address the Inspectors concerns that the plan fails to meet paragraph 62 of the relevant Framework which requires that requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

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6. Accommodating the Black Country Unmet Housing Need.

- 6.1 □ During the examination it became clear that by providing a supply of houses to meet the Black Countries unmet housing need Shropshire had reduced theirs.
- 6.2 □ The Inspector in ID28 paragraph 23 made the following request: *“Given the Council were planning on releasing Green Belt land to meet its own needs, it seems unlikely that the unmet needs of the Black Country could be met without the release of Green Belt land. Can the Council please provide a revised Green Belt Topic Paper setting out the exceptional circumstances for releasing Green Belt land to meet its own needs and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.”*
- 6.3 □ This requirement is also in the context that the Inspector has requested that policy SP2 includes a review trigger should there be a future request from the Black Country to meet any more of their unmet housing needs.
- 6.4 □ Instead, the Council has chosen to essentially do nothing and provide justification for doing so. Part of the solution is to increase settlement guidelines under draft policy SP7:

SP7. Managing Housing Development

1. In addition to supporting the development of the housing on the allocations set out in Policies S1-S20, there will be positive consideration of other sustainable housing development where this does not conflict with the Policies of the Local Plan.

2. In particular, additional housing development opportunities which would support the reuse of disused land or premises within settlement development boundaries as shown on the Policies Map; or contribute towards achieving wider town centre regeneration will be supported. (The subject site is unconstrained by green belt policy).

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

- a. The benefits arising from the proposal, aside from increasing housing supply;
- b. The likely delivery of the outstanding commitments;
- c. Any cumulative impacts arising from the development, especially on infrastructure provision; and
- d. The increase in the number of dwellings relative to the guideline.

4. Additional market housing development outside the settlement development boundaries shown on the Policies Map will be strictly controlled in line with Policy SP10, and will only be considered potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific considerations set out in the Settlement Policies.

- 6.5□ There are no changes proposed to the policy, only that they will deliver more windfall from allocations which deliver more than were originally predicted.
- 6.6□ The Council are relying on evidence from completions of sites which are allocated in the development plan which ended up with an increase in completed units and existing evidence of previous above expected windfall development.
- 6.7□ The development plan is for a 15-year period, and it should be noted that this is in the context of a housing crisis, where one of the most affected areas adjoins Shropshire. Housing pressure, green belt restrictions, the historic lack of allocated sites combined with government changes to permitted development rights designed to help tackle the crisis, has meant that windfall development has historically increased.

6.8□ Windfall has increased in line with housing demand, if sufficient housing was provided for, future Windfall would likely decrease. Historically it has provided a source of housing supply to meet an unpredicted housing need. The difference now is that we understand the growing need and should be working towards adopting plans which can meet those needs, with windfall in reserve if anything unpredicted emerges. The current situation means that demand is shaping places.

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7. Sustainability Appraisal (SA) and Site Assessment Environmental Report Review

- 7.1□ The Sustainability Appraisal and Site Assessment Environmental Report seeks to illustrate that all sites submitted to the Council has been assessed logically. However, it is our view that the Shropshire Local Plan in its current form fails to conform to the guidance within the NPPF that requires allocations to be based on an adequate, up to date and appropriate evidence base and economic signals which assess the role and function of each settlement and the capacity of these to accommodate new housing and employment growth.
- 7.2□ These representations will outline how the Council has failed in its duty to provide a robust assessment that demonstrates all sites submitted to the Council have been assessed logically taking on board the available evidence. In particular, serious concerns are raised in relation to the omission of site BAY040 – Land at Bayston Hill.
- 7.3□ Representations made on Gleeson Land Limited’s behalf at Regulation 18 stage in September 2020 set out that the site is capable of assisting the Council in delivering their housing requirement. However, at that time no clear indication was provided in terms of potential yield, except that it was likely to be much less than that anticipated within the SLAA November 2018 that anticipated a potential yield of 525 dwellings.
- 7.4□ Cerda reviewed the Regulation 19 consultation documents, and it was clear that whilst the site selection process has been expanded upon, it was now clear which criteria each of the sites has been assessed against. There was not sufficient justification of how the 2 proposed allocations within Bayston Hill were chosen over the application site (as the sites shared similar scores against the objectives set out in the SA as well as similar 2 conclusions on various anticipated impacts of development on such as visual impact, highway safety and so on.)

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- 7.5□ The Submission Plan consultation provided an opportunity to review and comment on the Sustainability Appraisal which underpins the Local Plan. The Sustainability Appraisal is an iterative process which must be carried out during the preparation of a Local Plan and since the previous regulation 19 consultation there have been further updates to the SA. Its purpose is to promote sustainable development by assessing the extent to which the emerging plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives.
- 7.6□ In accordance with Article 5(1) of the SEA Directive and regulation 12(2) of the SEA Regulations, the environmental report must identify, describe and evaluate the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan.
- 7.7□ Alternatives is the SEA/SA stage that has been most consistently challenged at examination/inquiry and in the courts. Three sets of information are needed for each set of alternatives:
- What reasonable alternatives have been identified and on what basis?
 - How they have been assessed and compared (including how sustainability issues have been considered)?
 - What are the preferred alternatives and why are they preferred over alternatives?
- 7.8□ The Council has proposed two allocations at Bayston Hill in order to provide the additional around 200 dwellings which the emerging Local Plan directs to the settlement. The sites selected have been through a site sifting process which is set out within the Sustainability Appraisal and Site Assessment Environmental Report (December 2020). Both allocations if approved and built are expected to deliver 23 and 118 – 141 dwellings, leaving a shortfall which cannot be satisfied by unplanned windfall sites.
- 7.9□ Essentially Stage 1 consisted of all the sites included within the SLAA. A strategic screening and review of the sites was carried out and further promoted sites were

included to go onto Stages 2a and 2b. Stage 2a consisted of an assessment of the performance of each of the sites against the 16 objectives of SA.

7.10 □ Sites were assessed on a settlement basis and compared against each other. Scores for each of the SA objectives above were combined to give an overall numerical value and “score” – Poor, Fair or Good⁴.

7.11 □ Relevant criteria have been extracted from the matrix within the SA in relation to each of the proposed allocated sites and the subject site to make comparison of the three sites easier. Only the relevant fields of the full SA matrix have been included at this stage.

Criteria	Criteria description	BAY039	BAY050	BAY040
5	Site boundary within 480m of GP surgery	+	+	+
	Site boundary within 480m of a library	-	+	+
	Site boundary within 480m of outdoor sport	+	+	+
	Site boundary within 480m of amenity green space		+	0
6	Site boundary within 480 m of public transport	-	+	+
15	Site is wholly classified as low landscape sensitivity for residential or site is inside the development boundary	0	+	0
Overall score		FAIR -4	Good -1	Good -3

7.12 □ It is difficult to understand why the lower scoring site BAY039 which achieved a FAIR score of -4 was chosen over the site at BAY040 which was attributed a higher score and rating of -3 GOOD.

7.13 □ On comparing the positive scores in green above for the 2 proposed allocations and the subject site it is clear to see that BAY040 scored better than the proposed allocation BAY039.

⁴ Appendix Q Shrewsbury Place Plan Area Site Assessments, August 2020

7.14 □ The SA scoring methodology has not influenced the outcome which underpin the Council’s justification for selecting sites and there is consequently no transparency to site selection.

7.15 □ Further discrepancies are highlighted within stage 2b. During this stage each of the sites were screened against size and obvious constraints. The table below compares commentary, conclusions and recommendations made by Council officers in relation to each of the proposed allocation sites and the subject site.

	BAY039	BAY050	BAY040
Coal Authority Area	YES	YES	YES
Mineral safeguarding	YES	YES	YES
Party/wholly in grade 1,2,3 Agricultural land quality	YES	YES	YES
% site in flood zone 1	100%	100%	100%
Landscape considerations	Medium and medium-low	Not assessed	Medium -Low
Visual impact considerations	Medium High and High	Not assessed	High
Highways considerations	Direct access – yes. Development to fund new estate road access and review traffic speed and fund any necessary interventions. Deliverable within highway land.	Direct access – yes. Development to fund new estate road and accommodate pedestrian and cycle access.	Direct access – yes. Assumes development would fund a major access onto the A49. Highways England may require this to be a modification of the Concover junction. Potentially 524 homes. Off-site works are not envisaged being achievable unless the development can secure an attractive direct pedestrian/cycle route into Bayston Hill from the western boundary of the site.

			The site is effectively detached from Bayston Hill and the facilities and without good pedestrian links would create otherwise avoidable vehicular trips on the Strategic Highway Network.
Ecological considerations	<p>HRA required for NOx pollution from increased traffic. May also be needed for recreational impacts on Bomere, Shomere and Betton Pools and Berrington Pool Ramsar sites. More than 30sqm per bedroom may be required to address recreational issues in the HRA which could reduce numbers of dwellings possible.</p> <p>EclA required to assess the significant boundary and infield trees plus 2 hedgerows and areas of grassland. lizards could be present.</p>	<p>HRA required for NOx pollution from increased traffic. May also be needed for recreational impacts on Bomere, Shomere and Betton Pools and Berrington Pool Ramsar sites. More than 30sqm per bedroom may be required to address recreational issues in the HRA which could reduce numbers of dwellings possible.</p> <p>If priority habitats are present, this area should not be developed.</p> <p>Botanical surveys required. TPO'd trees on site.</p>	<p>HRA required for NOx pollution from increased traffic. May also be needed for recreational impacts on Bomere, Shomere and Betton Pools and Berrington Pool Ramsar sites. More than 30sqm per bedroom may be required to address recreational issues in the HRA which could reduce numbers of dwellings possible.</p> <p>EclA would be required. Protected species likely. Small area in the west could be priority grassland. Mature trees and hedgerows. Significant landscape impact. 2 footpaths present.</p> <p>Natural lie of the land could be followed to create a green corridor from the steeper bank though to the Northern end. Enhancements would be made.</p>
Heritage considerations	May be some potential for archaeology. Heritage Assessment (archaeological DBA	N/A	Potential negative affect on Scheduled Monument of The Burgs. Heritage

	and field evaluation) to be submitted with application.		Assessment required with application.
Tree considerations	Agricultural land with very significant boundary and hedgerow trees and tree groups. Tree survey/arboricultural report required.	TPO on site	Agricultural land with significant boundary trees and tree groups and hedgerows. Tree Survey, AIA and tree protection plan required.
Public protection comments	No significant constraints noted	Potential to mitigate noise through separation distances, orientation, glazing and boundary treatment.	Noise mitigation available and could include stand off distances, glazing and ventilation, orientation of dwellings, barrier treatment and/or combinations of.
Conclusion of stage 2a SA	FAIR	GOOD	GOOD
Strategic considerations	Site is well related to the built form, with dwellings to the north. Well defined hedgerow field boundaries. 12% site within 20m of a detailed river network. Located within landscape sensitivity parcel which is considered to have medium landscape and medium- high visual sensitivity. HRA required to assess impact on Ramsar sites. Hedgerows and mature trees may support protected species. Site may have archaeological interest. Site contains grades 1,2 and 3 agricultural land – best and most versatile agricultural land.	Site is located within the existing built form of the settlement. Site contains an area of identified open space (former school playing field). School surplus to requirements and potential exists for better open space provision on the site through its redevelopment. Assessment to clearly indicate that the facility/open space is surplus to requirement or its loss replaced by equivalent or better would be required. HRA required to assess NOx pollution from increased road traffic and cumulative impact on Ramsar Sites.	The site is very large. The northern end of the site is relatively well related to the built form of the settlement, with dwellings to the north and west. However, due to the point of access, connectivity between the site and the surrounding built form would be very limited. The central and southern elements of the site area more sprawling and have a lesser relationship to the existing built form and limited connectivity. Located in a landscape sensitivity parcel which is considered to have high visual sensitivity. Detached from Bayston Hill and facilities and services. The existing highway would need off site works to serve the

		Site contains grades 1,2 and 3 agricultural land – best and most versatile agricultural land.	development of this site, which are not considered achievable as the development cannot deliver an attractive direct pedestrian/cycle route into the town. Without these improvements development of this site would create unavoidable vehicular trips on the strategic road network. There are preferable sites in the settlement which have a better relationship to the built form, well defined boundaries, offer opportunities for planning gain; and benefit from good access into the highway network.
Recommendation	Allocate for residential development for 100 dwellings	Allocate for residential development for 47 dwellings.	Retain as countryside.

7.16□ The text highlighted in blue illustrates the similarities between perceived constraints which could prevent or reduce development on each site coming forward identified by the Council in relation to two proposed housing allocations and the subject site. As is evident there are common issues which effect all 3 sites including landscape and visual impact, highway safety, impact on heritage assets and ecology.

7.17□ The SA advises that sites did not proceed past Stage 2b to Stage 3 where there:

- is uncertainty about whether the site is available for relevant forms of development. (generally considered to be available where they have been actively promoted through the preparation of the current local plan;

-
- strategic assessment of the site has identified a significant physical, heritage and/or environmental constraint (also identified within the SLAA).
- 7.18 It was made abundantly clear in Regulation 18 representations that the site is available, and that Gleeson Land Limited have a legal interest in the site for residential purposes.
- 7.19 Furthermore, the Council was advised within the Regulation 18 representations that necessary technical and environmental reports had been commissioned to demonstrate that there are no constraints to the development of this site.
- 7.20 Based on the above, it is our view that Shropshire Council in failing to assess site BAY040 and its supporting technical information are in clear breach of the above guidance having failed in their duty to review all reasonable alternatives.
- 7.21 The National Planning Guidance (NPPG) sets out that a Sustainability Appraisal is a systematic process that must be carried out during the preparation of a Local Plan. The appraisal must set out how sustainable development is achieved, in doing so assessing reasonable alternatives, achieving environmental, economic and social objectives.
- 7.22 The SA offers an opportunity to ensure that proposals within the Local Plan are the most appropriate and suitable having assessed reasonable alternatives. It underpins the Local plan and as such its lawfulness is a requirement in the overall plan making process. Importantly guidance sets out that Sustainability Appraisal should be an iterative process informing the Local Plan prior to the completion.
- 7.23 In light of this guidance, it is our view that the Council's assessment of alternative sites is fundamentally flawed as they have failed to undertake a comprehensive assessment of the alternatives utilising up to date information in relation to site BAY040.

Site BAY040 Reassessment

- 7.24 □ In order to address the Council’s reasoning for dismissing site BAY040, it is important to provide a re-assessment of site BAY040 outlining that the site is suitable for an allocation within the Shropshire Local Plan.
- 7.25 □ To this end, a Vision Statement has been produced and was included as part of the previously regulation 19 representations. We request that the Council give it proper consideration as a credible and deliverable residential allocation. The document provides a summary of key points and recommendations made within each technical and environmental assessments which were produced by the professional team to inform its content. The document includes chapters in relation to location, planning history, previous assessment of the site within the SLAA, site constraints and opportunities (ecology and biodiversity, landscape and visual impact, transport, including site access, highway improvements and locational sustainability and heritage.
- 7.26 □ The recommendations and conclusions of each specialist subject has been fed into a Concept Framework Plan. The document demonstrates that the 17.50 hectare site can deliver approximately 250 houses within a development area of 7.40 hectares following the following design and layout principles. It is important to note that all of the concerns raised by officers during the Stage 2b sifting exercise which were fundamental to the decision not to allocate the site for residential use have been dealt with as follows:
- 7.27 □ Landscape and Visual - Aspect Landscape Planning produced a Landscape and Visual Briefing note to provide an overview of the baseline landscape and visual situation and potential landscape and visual effects of the proposed development of the site. A Landscape Opportunities and Constraints Plan was produced which was fed into the final Framework Plan. A site visit was undertaken to appreciate current views of the site from

various viewpoints. It concludes that views of the site are limited to the immediate northern and western boundaries as a result of existing development and landform, and from the immediate and local landscape to the east. There are clear opportunities to enhance the degree of enclosure to the site by restoring lost landscape features that would create a green gateway along the A49.

7.28□ It acknowledges that given the scale and location of the site there is a potential risk of adverse landscape and visual effects if the proposals are not carefully and sympathetically designed. However, the development of the site will adopt a high quality, landscape-led approach which will ensure that the proposals can be successfully integrated without significant adverse effects upon the receiving landscape character or visual environment. A series of recommendations are set out which should be included within proposals for the site which have been fed into the Framework Plan.

7.29□ Highways - The complete Technical Note used to inform the Vision Document provided by SCP Transportation Planning was submitted as part of the previous regulation 19 representations. The Assessment includes a review of accident data for in the vicinity of the site and concludes that it does not represent a material concern in the context of the allocation site. It considers the site to be well located in terms of its accessibility by all the major non-car modes of transport. Facilities and amenities, including bus stops are within acceptable walking distances of the site so that prospective residents will not be wholly reliant on the car.

7.30□ Vehicular access to the site can be achieved through the introduction of a 4-arm priority-controlled compact roundabout, with a 50m ICD, located at the same junction as the existing A49 Hereford Road/Unnamed Road junction (leading to/from Condover). The design of the roundabout is fully in accordance with Design Manual for Roads and Bridges and would provide a significant betterment over the existing situation, whereby the achievable level of forward visibility to the existing give way line and queuing traffic when

approaching the junction from Condover falls significantly short of the visibility requirements based on the speed of the road.

- 7.31 □ The roundabout access has been subject to an independent Stage 1 Road Safety Audit which confirms that there are no material safety issues that would prevent the scheme from coming forward, with all matters raised being able to be addressed at detailed design stage. Swept path analysis has also been undertaken which confirms that the movements of a 16.5m articulated HGV could be accommodated providing better HGV access from Condover.
- 7.32 □ The roundabout will also act a new improved gateway feature entry into Bayston Hill, providing a clear transition between the rural and built- up areas, and would naturally help to calm traffic speeds along the A49, providing additional significant highway benefits.
- 7.33 □ A 2m footway can be provided along the site frontage, between the site access roundabout and the existing pedestrian infrastructure on the A49, and additional connections can be provided onto the footway to improve the permeability of the site. Two Public rights of Way run through the site which provide links to the Lyth Hill Road/Burgs Lane; both will be retained and enhanced to provide pedestrian and cyclist links.
- 7.34 □ To further improve the sites accessibility by bus, it is considered that bus stops could be introduced along the site’s frontage on both sides of the A49 which could be utilised by bus service 435 which already passes the site.
- 7.35 □ The trip generating potential of the site has been estimated and detailed capacity assessments have been undertaken at the site access and the Bayston Hill Roundabout. The results show that the site will operate within its practical capacity in the future

assessment years, with the proposed allocation in place, and the proposed allocation site will not have a material impact on the operation of the Bayston Hill Roundabout.

7.36 □ Ecology - Aspect Ecology produced an Ecological Constraints and Opportunities Note to inform the Vision Document and was also submitted with the previous regulation representations. They were particularly asked to consider the implications of the site on the nearby Ramsar sites as identified by the Council. It was concluded that the recreational activity arising from the development (approximately 250 dwellings; far less than the 524 dwellings assessed by Council officers at Stage 2b) could largely be absorbed at source. It was also considered unlikely that any future residential development of the site would require ground water abstraction or contribute to ground or surface water pollution subject to the implementation of an appropriately designed drainage strategy. The allocation of the site for residential development is unlikely therefore to be contrary to the conservation objectives of the SAC.

7.37 □ The survey confirmed that in terms of habitat the vast majority of species are common and widespread and do not constitute important ecological features. Two hedgerows, two oak trees of potential veteran status and 2 streams were noted on site, all of which constitute high ecological value and would be retained within the proposed development of the site.

7.38 □ In terms of impact on fauna, the note concludes that a number of trees have features to provide potential to support roosting bats (these would be retained); no evidence of Badger setts or activity on site; watercourses offered negligible opportunities for Otter and Water Vole; no suitable breeding aquatic habitat present on site and any terrestrial habitat is of negligible value for Great Crested Newts. No protected or notable bird species was returned from the site itself but foraging and nesting habitat for local birds and Barn Owls were recorded. A rough area of grassland is considered to provide suitable habitat for reptiles including Slow-worm. Further surveys are recommended to

accompany any planning application. A series of opportunities were set out which have been fed into the Framework Plan which would bring significant enhancements for biodiversity as part of the development of the site.

7.39 □ Heritage - RPS produced a Built Heritage and Archaeology Constraints and Opportunities Assessment to support the Vision Document which fully assesses the impact of development on the site in relation to the Burgs Hillfort Scheduled Monument and Grade II listed buildings in the vicinity of the site. It concludes that development within the site is considered to cause less than substantial harm to the heritage significance of these assets. In addition to this, appropriate master planning may facilitate a reduction in any future assessment of harm.

7.40 □ Vision Statement – the document includes a Framework Masterplan which has been derived from constraints and opportunities identified by the professional team through the environmental and technical testing of the site. This plan indicates that the 17.50 hectare site could deliver approximately 250 houses across a development area of 7.40 hectares, whilst having regard to outlined mitigatory measures whilst also deploying the following design and layout principles:

- □ Active, “outward facing” development;
- □ Retained hedgerows to be bolstered with native species to increase biodiversity;
- □ Creation of new habitat for wildlife including native wildflower grassland, shrub and tree planting to deliver habitat enhancements;
- □ Substantial areas of public open space with children’s play and green corridor links. This will create an enhanced gateway/entrance to the village when approaching from the south and allow a gradual transition within the landscape from open countryside to the edge of the village and built form;

A potential SuDs feature to create new breeding habitat for wildlife such as amphibians through the creation of permanent standing water. New areas of

tussocky grassland and other shelters would provide additional habitat opportunities and reptiles;

- Retention and improvements to 2 public rights of way which traverse the site;
- New footpath along the site frontage;
- Retention and provision of appropriate standoff buffer to potential Veteran trees;
- Vehicular access to the proposed allocation site can be achieved through the introduction of a 4-arm priority-controlled compact roundabout, with a 50m ICD, located at the same location as the existing A49 Hereford/Unnamed Road junction;
- The proposed roundabout would provide an improved gateway feature into Bayston Hill, providing a clear transition between the rural and built-up areas, and would naturally help to calm traffic speeds on the A49 Hereford Road, providing additional and significant highway safety benefits. It would therefore provide a significant betterment over the existing situation, whereby the achievable level of forward visibility (circa 22m) to the existing give way line and queuing traffic when approaching the junction from Condover falls significantly short of the visibility requirements (215m) based on the speed of the road.

7.41 The Vision Statement demonstrates that the site is fully capable of being brought forward to assist the Council in providing much needed market and affordable housing in accordance with the policies of the emerging Local Plan.

7.42 Using the environmental and technical information within the consultant reports, it is possible to use the Council’s scoring system to create a clear and reasonable comparison exercise and effectively re-score site BAY040’s SA score. (yellow equals minus score, green positive, 0 neutral). Range of scoring is 2 to -13. Good is 2 to -3, Fair is -4 to -8 and Poor is -9 to -13.

		Council’s Score	Cerda’s score
Criteria	Criteria description	BAY040	

2	1 km of Ramsar Site	-	-
5	Site boundary within 480m of GP surgery	+	+
	Site boundary within 480m of a primary school	-	-
	Site boundary within 480m of a library	+	+
	Site boundary within 480m of a leisure centre	-	-
	Site boundary within 480m of children's playground	-	+
	Site boundary within 480m of outdoor sport	+	+
	Site boundary within 480m of accessible green space	-	+
	Site boundary within 480m of amenity green space	0	+
6	Site boundary within 480m of public transport	+	+
14	300 metres of a Scheduled monument	-	-
	300 metres of Listed Buildings	-	+
Overall score		GOOD -3	GOOD 4

7.43□ The Council had already scored the site as Good in their SA but attributed the numerical score as -3. Cerda's score has increased to 4, which is still Good (as this is the highest category) and has been adjusted to take account of the fact that the development of the site is well within 480m of the common (360m from the site boundary) which provide a public area of natural open space and for children to play in, which would remove two negative scores due to the current proximity of these facilities in relation to the site. In any case if the Council justified any specific requirement for children's play equipment our site is of sufficient size to address that need. Furthermore, the site boundary is not within 300m of a listed building.

7.44□ The above comparison clearly highlights that the Council have incorrectly scored the site in connection with children's play and natural open space and listed buildings.

7.45 □ The Vision Statement and supporting technical and environmental assessments provide the Council with an opportunity to re-assess the site and to avoid dismissing this site, which is available, suitable, economically viable and deliverable, as residential allocation.

7.46 □ A failure to re-assess, it is our view that the Council's preferred strategy is fundamentally flawed and leaves the Council at risk of legal challenge. The shortfalls within scoring go to the heart of the Council's assessment and must be revisited.

□

8. Conclusions

- 8.1 ☐ Gleeson Land’s portfolio comprises over 70 sites across England ranging from 20 dwellings to over 2,500 dwellings. Gleeson Land has a strong track record in providing deliverable planning consents to the housebuilding industry, which regularly results in new housing being built out in a timely manner. Gleeson’s average time from receiving outline planning consent to commencement of development is 22 months. The average time from commencement to first occupation is 10 months. In view of this, Gleeson Land expects completions on the Bayston Hill site could be achieved within five years from date the Local Plan is adopted, thereby bolstering Shropshire Council’s housing delivery and meeting the Bayston Hill housing requirements identified within the local housing needs review.
- 8.2 ☐ The Framework requires that local plans area examined to assess whether they have been prepared in accordance with the legal and procedural requirement. Plan must meet the tests of soundness which are:
- a) ☐ Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) ☐ Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) ☐ Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

-
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 8.3□ Changes in government policy and emerging plans are increasing the level of unmet need under the new National Planning Policy Framework.
- 8.4□ The updated SA and evidence behind the assessment of the best options is lacking which means no real choice can be made, fundamentally the SA is inconclusive, and the Council need to address missing information which can provide evidence based decision-making crucial to delivering a sound plan.
- 8.5□ The LHNR has found that the Council are not planning enough housing to meet the local needs for Bayston Hill over the plan period and the population growth will likely stagnate. This will mean that the Council cannot address the housing needs of an ageing population through its limited planning housing allocations.
- 8.6□ Furthermore, the SA does not take any account of the risk of over relying on windfall development which is unplanned and the quantity of which cannot be relied upon as it is interdependent with future Government Policy and the capacity of sites for conversion, subdivision or change of use which has not been assessed. Such development is also unlikely to create the housing needed as evidenced in the LHNR:
- *A broad range of small (1-bedroom and 2-bedroom) and larger family (4+ beds) housing types and tenures.*
 - *Housing opportunities to facilitate local downsizing or sheltered / specialist later living housing.*
 - *Affordable housing and private rented properties.*

-
- 8.7□ It is crucial that our site is allocated for housing over the next plan period to ensure that sustainable growth in Bayston Hill can be achieved and that the Council can shape and meet the predictable future needs of the local community.
- 8.8□ The main modifications provide an opportunity for the Council to ensure it meets its duty to provide a robust assessment that demonstrates all sites submitted to the Council have been assessed logically taking on board the available evidence. The clear errors highlighted by Cerda can be acknowledged and there is no justified reason this site should not be allocated for housing development.
- 8.9□ For these reasons the Councils strategy and decision not to allocate more sites does not meet the tests of soundness.

Appendix A

Local Housing Needs

Land at Betley Lane East, Bayston Hill, Shropshire

| Local Housing Needs

June 2024

gleeson land

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Appendix 1: Land at Betley Lane, Bayston Hill site location plan.

Appendix 2: Right Homes Right Place: Bayston Hill.

Appendix 3: Bayston Hill Community Led Plan: The Big Survey.

1.□ Introduction

- 1.1□ This Local Housing Needs (“LHN”) report has been prepared in support of Gleeson Land’s legal interests in Land at Betley Lane, Bayston Hill, Shropshire as accessed off the A49 Hereford Road (“the Site”), (LPA reference BAY040). A site location plan is included as **Appendix 1**.
- 1.2□ National planning policy is clear that delivering a sufficient number and range of homes to meet the needs of present and future generations helps to support strong, vibrant and healthy communities. Bayston Hill is identified as a significant rural service centre where growth is needed to ensure the long-term sustainability of rural communities.
- 1.3□ The LHN report therefore sets out Bayston Hill’s local housing needs over the period covered by the emerging Shropshire Local Plan 2016 to 2038. The LHN covers the following:
 - Relevant Planning Policy and Guidance.
 - Local Context.
 - Bayston Hill Local Housing Needs.
 - Summary Conclusions.

2.□ Relevant Planning Policy and Guidance

- 2.1□ This section of the LHN report provides a summary of relevant planning policy and guidance that has informed the assessment of Bayston Hill's local housing need.

National Planning Policy Framework

- 2.2□ The National Planning Policy Framework ("the Framework") was republished in December 2023 and is a material consideration of particular importance in relation to ensuring the submitted Shropshire Local Plan (2016 – 2038) is 'sound' (namely paragraph 35(d)).
- 2.3□ Achieving sustainable development has been at the heart of the Framework since it was first introduced in March 2012. A central strand of the Framework's social objective (paragraph 8 (b)) is to:

"Support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations".

- 2.4□ Paragraph 60 of the Framework states:

"To support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

- 2.5□ Since the 2019, the Framework has been clear that the minimum number of homes needed should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (paragraph 61).

- 2.6□ Paragraph 63 states:

"The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes."

- 2.7□ Paragraphs 67 and 68 state:

"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations."

"Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority."

Planning Practice Guidance

2.8□ The Planning Practice Guidance (“PPG”) accompanies the Framework and contains a section on ‘Housing and economic needs assessment’ that was updated on 16 December 2020.

2.9□ The PPG defines housing need in the following terms:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”

2.10□ The PPG sets out the standard method prescribed by paragraph 61 of the Framework for use by local authorities when determining its minimum local housing needs (ID: 2a-002 and 2a-004). To summarise the standard method the approach takes a ten-year average for an area from the 2014-based household projections and applies a fixed percentage uplift based on the area’s median house price to workplace-based income ratio. The resulting figure may be subject to a 40% cap, depending on when the local plan was adopted, and the figure generated by uplifting the household projections. In some locations (but not Shropshire) a further cities and urban centres uplift is applied.

2.11□ ID: 2a-010 outlines that housing need may be higher than the figure generated by the standard method, for example due to growth strategies, Housing Deals, infrastructure improvements or unmet need.

2.12□ Regarding the need of specific groups, the PPG contains a section on ‘Housing needs of different groups’ that was last updated on 24 May 2021. ID:67-001 outlines amongst other things:

- The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups. This guidance sets out advice on how plan-making authorities should identify and plan for the housing needs of particular groups of people.
- This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.
- Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.
- When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.

2.13□ Whilst the PPG does not contain guidance on how sub-district level housing needs can be assessed, there is Government endorsed guidance in the form of the Locality ‘Housing Needs Assessment at Neighbourhood Plan Level: A toolkit for neighbourhood planners (“the Toolkit”). The ‘Neighbourhood Planning’ section of the PPG states at ID: 41-105:

“Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the ‘basic conditions.’”

The Toolkit

- 2.14□ The Toolkit was prepared by AECOM on behalf of the local authority. The overview section of the Toolkit outlines:

“Establishing future need for housing is not an exact science. As such, no single approach provides a definitive answer. However, a process that gathers a wide range of relevant data, and then makes balanced, reasonable judgements based on that data, is likely to be on the right lines.

For HNAs at a neighbourhood level, much of the existing data you need will cover your local planning authority or a housing market area, both of which are much larger than any neighbourhood plan area. As such, one particularly important consideration is the extent to which the neighbourhood diverges from the local authority or housing market average.

This reflects the fact that a single town, village or neighbourhood virtually never forms its own housing market and must therefore be assessed in the context of its wider market. For example, does it have more or fewer older people, or larger dwellings, than its local authority or housing market area average? Both considerations would help inform conclusions on the type of housing needed.

Building on this point, HNA at neighbourhood level is best thought of as a review of existing data already freely available from a range of sources to establish how many and what type of homes to plan for. As such, it is usually possible and desirable, to produce a fit-for-purpose HNA without spending time or money on primary evidence gathering. HNAs should draw on available existing (secondary) data and information to provide evidence of housing needs in the area. Primary research (e.g. survey) is only recommended where it is necessary to fill important gaps in the evidence base after existing data has been reviewed and analysed.”

- 2.15□ In accordance with national guidance the Toolkit methodology has been used to inform the assessment of Bayston Hill’s local housing needs.

Shropshire Core Strategy

- 2.16□ The Shropshire Core Strategy, adopted March 2011, made provision to deliver 27,500 new homes over the 2006 to 2026 period. Although no growth was specifically planned at Bayston Hill, the Core Strategy expected 35% of the total housing requirement to be delivered within the rural areas, which includes Bayston Hill.

Shropshire Site Allocations and Management Document

- 2.17□ The Shropshire Site Allocations and Management of Development (SAMDev) was adopted in December 2015. The SAMDev outlines that Bayston Hill is one of four Community Hubs within the Shrewsbury area (the others being Baschurch, Bomere Heath and Nesscliffe).
- 2.18□ The SAMDev does not allocate any sites at Bayston Hill, but outlines as a guideline that around 50-60 dwellings over the period to 2026 should be accommodate by infilling, groups of houses and conversion of buildings. This being only 0.2% of the total Shropshire housing figure.

Emerging Policy

- 2.19□ The Shropshire Local Plan 2016 to 2038 was submitted to the Secretary of State for examination in September 2021. The proposed housing requirement is 30,800 dwellings over the 2016 to 2038 period (1,400 dwellings per annum (dpa)). The housing requirement is based on the Government’s Standard Method (24,894 dwellings), with uplifts to (a) Help meet unmet needs from neighbouring authority needs (1,500 dwellings); and (b) to provide flexibility.
- 2.20□ Bayston Hill is described as a large urban village and classified as a Community Hub within the settlement hierarchy. The Plan outlines that Community Hub settlements are considered significant rural service

centres where growth is needed to ensure the long-term sustainability of rural communities.

2.21□ The Plan outlines that around 200 dwellings are expected to be delivered at Bayton Hill over the period to 2038. This equates to 0.6% of the total proposed housing figure for Shropshire. The Plan allocates two sites that collectively are expected to deliver 147 dwellings over the period to 2038. These being:

- Land off Lyth Hill Road (BAY039): 100 dwellings.
- Former Oaklands School Site (BAY050): 47 dwellings.

2.22□ It is noted that planning permission has been approved on the Former Oakland School site for 23 dwellings (Ref: 22/02517/FUL – Cornovil Developments Ltd) and there is a pending hybrid application for 118 dwellings on the Land off Lyth Hill Road site (Ref: 24/00765/FUL – Redrow Homes Ltd). If both approved, the two allocated sites will deliver 141 dwellings.

2.23□ The Council's Housing Teams consultation response to the Former Oaklands Primary School site highlighted that there is 'high demand' for affordable housing in Bayston Hill.

Right Home Right Place: Bayton Hill

2.24□ 'Right Home Right Place' housing need surveys are periodically undertaken by Shropshire Council's Affordable Housing team. The survey results of the 2021 survey have been summarised and published by Bayston Hill Parish Council (**Appendix 2**):

- 15% of respondents are thinking about moving home, of which 65% wished to remain in Bayston Hill Parish. Key reasons for wanting to move included:
 - 30% stating their current property was 'too large' or 'need to downsize'.
 - 28% stated their home was either 'too small' or they had a 'growing family'
 - 9% stated their home was 'unsuitable for physical need'
 - 5% stated 'overdevelopment of the area'
 - 5% stated the property 'needs improvements / repairs'.
- Of those wishing to move:
 - 64% of respondents wanted either a detached or semi-detached property.
 - 29% wanted a bungalow.
 - 4% were looking for a flat or terraced house.

Bayston Hill Community Led Plan: The Big Survey

2.25□ During the spring / summer 2018 a group of Bayston Hill resident volunteers, seeking to develop a 'Community Led Plan' (not a Neighbourhood Plan) undertook 'The Big Survey' of local residents covering a range of topics / issues including housing. The Big Survey results (**Appendix 3**) highlighted:

- There is a strong demand for larger 3- and 4-bedroom homes – however, there is a very significant number of currently occupied homes with 2 or more unused bedrooms, suggesting opportunities for downsizing / sheltered or similar is needed.
- Respondents saw the advantages of new housing meeting local needs, as well as providing affordable housing for young people.

- Of the respondents looking for houses, almost half (48%) were looking for 3 / 4 bedroom homes, and about 28% for a 1 / 2 bed house. When asked about the type of housing needed in the next 20 years, there was strong support for low cost starter homes, bungalows and retirement homes, as well as for more traditional 1 / 2/ 3 bedroom homes. The replies suggested that smaller properties (1 / 2 bedrooms, bungalows and starter homes) would be more needed than larger properties.
- There was strong support for future social housing (rented and part ownership) to be restricted to local needs.

Policy and Guidance Summary

- 2.26□ The Framework and PPG seek to significantly boost the supply of homes where there are needed. A central strand of the Framework's sustainable development social objective is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Adopted and emerging Local Plan policy outlines that growth is needed at rural service centres to ensure the longer-term sustainability of rural communities.
- 2.27□ To help assess sub-district local housing needs the PPG endorses the Locality 'Toolkit', which outlines that establishing future need for housing is not an exact science. As such, no single approach provides a definitive answer. However, a process that gathers a wide range of relevant data, and then makes balanced, reasonable judgements based on that data, is likely to be on the right lines.
- 2.28□ Despite Bayston Hill being considered a significant rural service centre only around 200 dwellings are proposed over the Plan period (10 dpa). This equating to only 0.6% of the total proposed housing figure for Shropshire.
- 2.29□ Local resident surveys have consistently highlighted the demand / need for:
- A broad range of small and large family housing types and tenures.
 - Housing opportunities to facilitate local downsizing or sheltered / specialist later living housing.
 - Affordable housing.

3. Local Context

Study Area

- 3.1 In order to assess local housing needs associated with Bayston Hill, it is necessary to define the relevant area. Bayston Hill Parish is considered to be a sound and credible local geography, particularly given this would be the relevant 'neighbourhood plan area' should a neighbourhood plan be ultimately progressed.

Population and Households

Population

- 3.2 Table 3.1 identifies population growth for Shropshire and Bayston Hill between 2011 to 2021. Bayston Hill's annual average growth rate of only 0.3% is half that for the wider Shropshire area (0.6%).

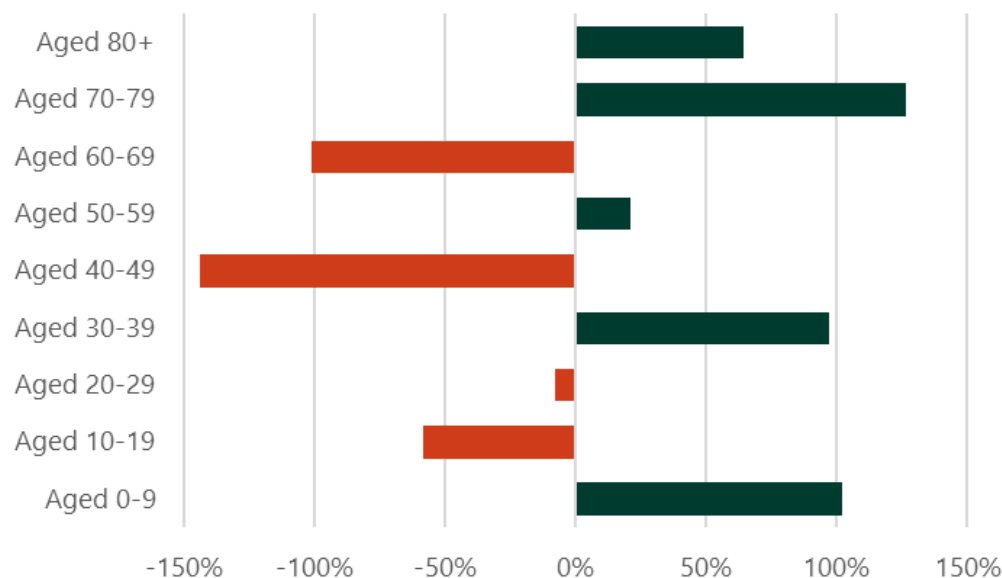
Table 3.1: Population change 2011 to 2021

Area	2011	2021	Actual Change	Percent Change	CAGR ¹
Shropshire	307,108	324,669	17,561	5.7%	0.6%
Bayston Hill	5,075	5,212	137	2.7%	0.3%

Source: Census 2011 and 2021 and Gleeson Land analysis

- 3.3 With a total inter-censal population change of only 137 persons, Bayston Hill's population change has effectively stagnated over the 10-year period. This is largely due to minimal planned housing growth over this period.
- 3.4 As illustrated within Figure 3.1 below, over the past 10-years Bayston Hill's population aged 10-29; 40-49; and 60-69 has declined. These age groups typically associated within growing / larger family households. Conversely, the settlements positive population growth has been amongst the 0-9; and 30-39 age cohorts. Those typically associated with younger / smaller family households. The proportion of those aged 70+ also increased over the 10-year period.

Figure 3.1: Bayston Hill Population Change 2011 to 2021

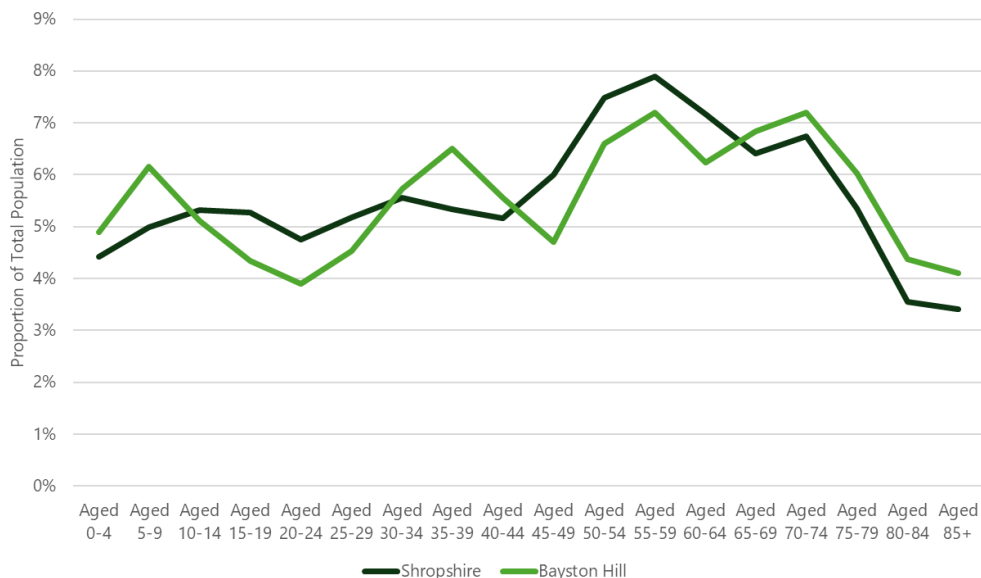


Source: Census 2021 and Gleeson Land analysis

¹ CAGR: Compound Average Growth Rate

3.5□ Figure 3.2 shows the age structure of Bayston Hill and Shropshire. Whilst there is variance across age cohorts, Bayston Hill has a relatively similar age structure profile to Shropshire. Bayston Hill and Shropshire has a relatively equal population structure, with between 3% to 8% of total population falling within each 10-year age cohorts.

Figure 3.2: Population structure (2021)



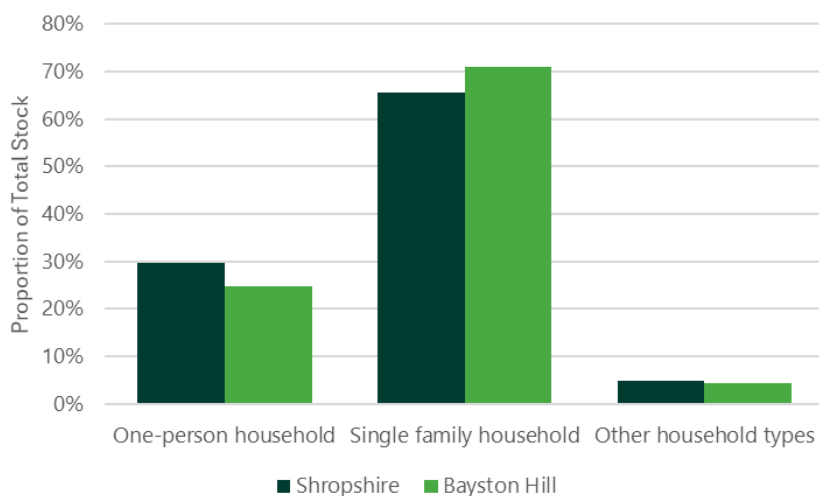
Source: Census 2021 and Gleeson Land analysis

Households

3.6□ At the time of the 2021 Census there were 2,209 households within Bayston Hill. Bayston Hill has an average household size of 2.36 persons, which is broadly the same as the wider Shropshire area (2.33 persons per household).

3.7□ As illustrated within Figure 3.3 Bayston Hill has a slightly higher number of single family households (71%) compared to Shropshire (66%); and a lower proportion of one-person households (25%) compared to Shropshire (30%). broadly comparable household composition to the wider Shropshire area. Of the single households, Bayston Hill has a greater proportion headed by someone aged 66+ (68%) compared to the wider Shropshire area (52%).

Figure 3.3: Household Composition (2021)

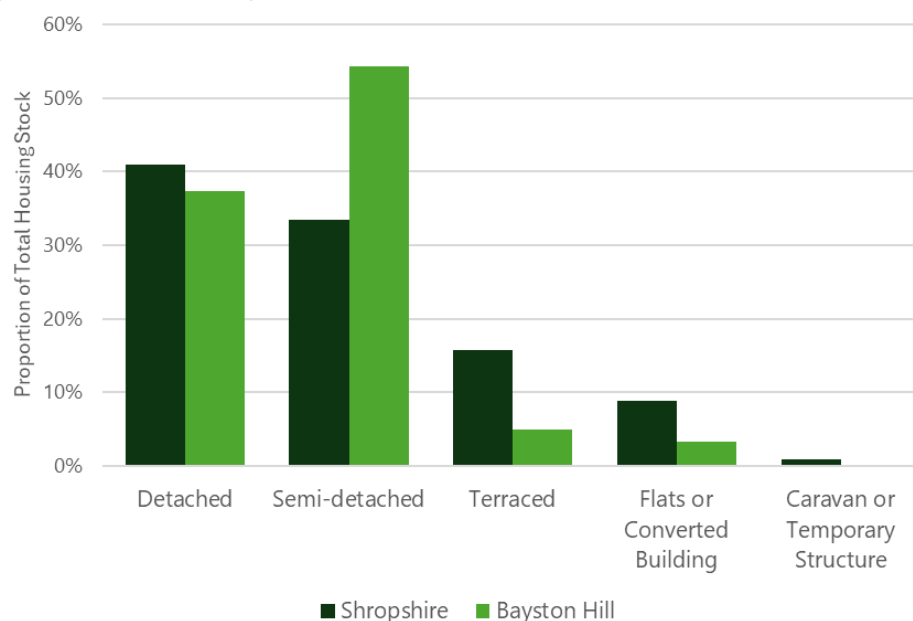


Source: Census 2021 and Gleeson Land analysis

Housing stock

- 3.8□ Figure 3.4 shows housing stock by accommodation type for Bayston Hill and Shropshire. The profile for the Bayston Hill differs compared to the wider Shropshire area. The proportion of semi-detached housing stock within the Bayston Hill is higher (55%) compared to the wider Shropshire area (33%). Conversely the proportion of terraced and flat / converted building stock is higher within Shropshire (16% and 9% respectively) compared to Bayston Hill (5% and 3% respectively).

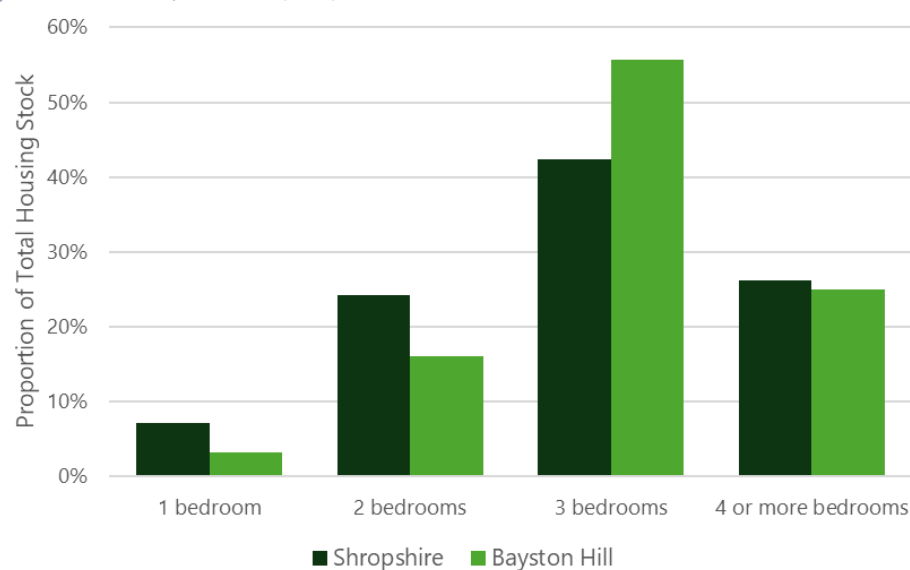
Figure 3.4: Accommodation type (2021)



Source: Census 2021 and Gleeson Land analysis

- 3.9□ Figure 3.5 shows housing stock by number of bedrooms. Bayston Hill has proportionally a higher number of larger 3-bedroom properties (56%), compared to Shropshire (42%). Conversely Bayston Hill has a lower proportion of smaller 1 and 2-bedroom properties (19% collectively) compared to the wider Shropshire area (31% collectively) and a comparable 4 or more bedroom properties to Shropshire.

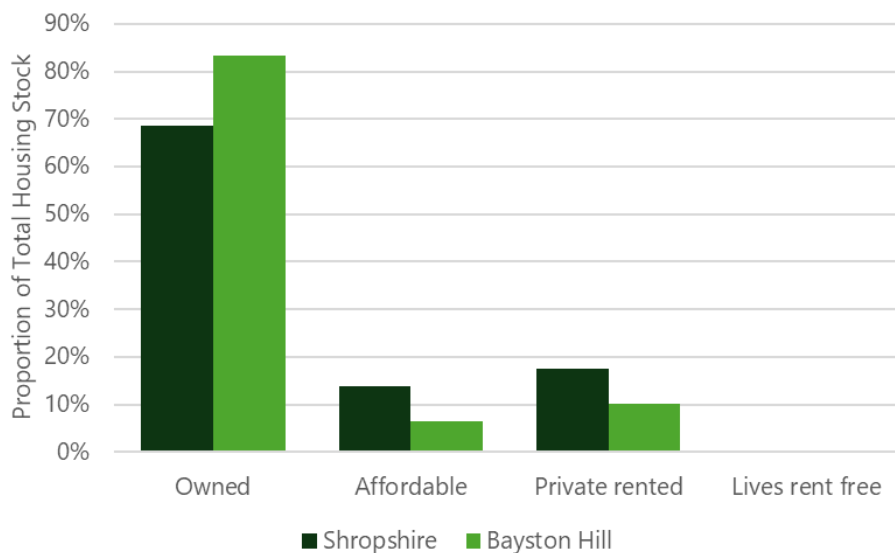
Figure 3.5: Number of bedrooms (2021)



Source: Census 2021 and Gleeson Land analysis

3.10□ Figure 3.6 shows housing stock by tenure for Bayston Hill and Shropshire. Bayston Hill has a higher proportion of privately owned housing stock (88%), compared to Shropshire (69%). Bayston Hill has a lower proportion of housing stock available to affordable housing (6%) or private rent (10%) compared to the wider Shropshire area (14% and 17% respectively).

Figure 3.6: Tenure (2021)



Source: Census 2021 and Gleeson Land analysis

Local Context Summary

- 3.11□ With only an increase of 137 persons between 2011 and 2021, Bayston Hill's population growth almost stagnated over the last inter-censal period. Similar to Shropshire as a whole, Bayston Hill currently has a relatively balanced population structure. However, as with all settlements across England, meeting the housing needs of an aging population will become an increasing issue for Bayston Hill over the emerging Local Plan period and beyond.
- 3.12□ To help broaden housing stock availability to meet current and future housing needs a greater proportion of detached, terraced and flat / apartment housing types should be delivered.
- 3.13□ Regarding housing size there is an under provision of smaller (1- and 2-bedroom) housing stock to meet the needs of younger households but also older households that would potentially downside.
- 3.14□ An increase affordable housing stock and properties for private rent would also help rebalance Bayston Hill's housing stock.

4.□ Bayston Hill Local Housing Need

- 4.1□ The concept that housing need often exceeds population and household projections to boost housing supply and improve affordability has been long-established – even predating the original 2011 Framework. The concept underpinned the original (pre-2018) Framework under the Strategic Housing Market Area Assessment process, but also underpins, albeit in a more simplified form, the current (post-2018) Framework as part of the Standard Method local housing needs formula.
- 4.2□ As referred above, the PPG does not contain guidance on how sub-district level housing needs can be assessed. However, in support of neighbourhood planning the Government has endorsed the Locality 'Toolkit'.
- 4.3□ Drawing on the above, our assessment of local housing need for Bayston Hill considers both 'top-down' and 'bottom-up' approaches.

Top-down Local Housing Need

Standard Method with Population Apportionment

- 4.4□ The Standard Method figure for Shropshire is 25,894 dwellings over the Plan (1,177 dwellings per annum (dpa)). As outlined within Table 3.1, Bayston Hill had a population of 5,075 in 2021 this being approximately 1.7% of Shropshire's total population (307,108).
- 4.5□ The Standard Method apportionment for Bayston Hill based on a proportional population distribution would be 440 dwellings over the period covered by the submitted Plan, or 20 dpa.

Proposed Local Plan Housing Figure with Population Apportionment

- 4.6□ An alternative approach for determining an appropriate top-down figure would be using a proportionate population distribution of the proposed Shropshire Local Plan housing requirement (38,800 dwellings over the Plan period, or 1,400 dpa).
- 4.7□ The proposed Local Plan housing figure population apportionment for Bayston Hill would be 524 dwellings over the period covered by the submitted Plan, or 24 dpa.

Bottom-up Local Housing Need

- 4.8□ The 'bottom-up' approaches are not based on the Standard Method local housing need figure, but on local population, from which a housing need is derived based on different growth assumptions. The benefit on the 'bottom-up' approach is that it directly responds to needs arising within the locality. However, conversely the 'bottom-up' approaches do not necessarily take into account factors such as employment, market signals and affordable housing need in the same way that the 'top-down' Standard Method local housing need figure would. In view of this, the 'bottom-up' figures have applied the Shropshire Standard Method market signals (step 2) affordability ratio (8.45).

Demographic Projection with Market Signals Uplift

- 4.9□ 2021-based population projections underpinned by recent 5-years demographic trends, expect Shropshire's population to grow at 0.6% per annum over the period to 2038. This annual growth rate has been applied to the population within the Bayston Hill to determine a local housing need figure of 307 dwellings over the period covered by the submitted Plan, or 14 dpa.

Demographic Projection Scenario with 15% Flexibility Uplift

4.10□ To allow for 'flexibility and to positively support the ability to address identified issues and opportunities' the submitted Local Plan applies a 15% uplift to the Shropshire's Standard Method local housing needs figure. In view of this, a 15% flexibility uplift to the 2021-based population projection with market signals uplift scenario results in a Bayston Hill local housing need figure of 353 dwellings over the period covered by the submitted Plan, or (16 dpa).

Plan Period Adjustment

4.11□ The Framework (paragraph 22) outlines that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to longer-term requirements and opportunities.

4.12□ Given the submitted Local Plan covers the period to 2038, at least an additional year must be added to the Plan period to ensure it covers the 15-year minimum. This assuming the submitted Plan is indeed adopted during the course of 2024.

4.13□ In view of this, the Bayston Hill local housing scenario figures covering the submitted Plan period have been adjusted to add an additional years needs within Table 4.1 below:

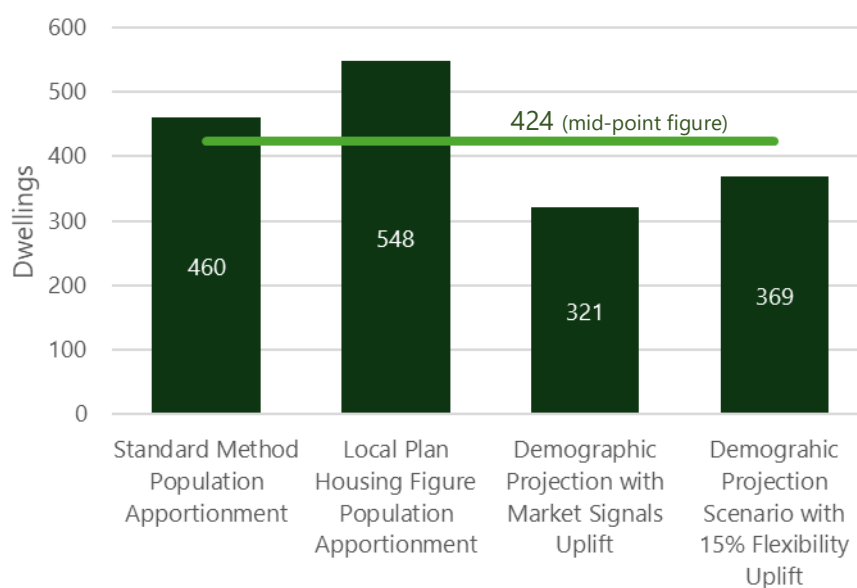
Table 4.1: Bayston Hill Local Housing Need Scenarios: Plan Period Adjusted Figures

Local Housing Needs Scenario	Annual Local Housing Needs	Submitted Plan Period Total (2016-38)	Adjusted Plan Period Total (2016-39)
Standard Method Population Apportionment	20	440	460
Local Plan Housing Figure Population Apportionment	24	524	548
Demographic Projection with Market Signals Uplift	14	307	321
Demographic Projection Scenario with 15% Flexibility Uplift	16	353	369

Bayston Hill Local Housing Needs Conclusion

4.14□ A summary of the 'top-down' and 'bottom-up' residual local housing need figures for Bayston Hill for the period covered by the emerging Local Plan is provided within Figure 4.1 below. The mid-point for the four scenarios considered provides a Bayston Hill local housing needs figure of 424 dwellings over the 2016 to 2029 period (19 dpa).

Figure 4.1: Bayston Hill Local Housing Needs Scenarios – 2016 to 2039.



5.□ Summary Conclusions

- 5.1□ The Framework and PPG seek to significantly boost the supply of homes where there are needed. A central strand of the Framework's sustainable development social objective is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Adopted and emerging Local Plan policy outlines that growth is needed at rural service centres to ensure the longer-term sustainability of rural communities.
- 5.2□ Bayston Hill's housing needs over the Plan period have been identified using both 'top-down' and 'bottom-up' scenarios. The mid-point for the four scenarios considered provides a Bayston Hill local housing needs figure of 424 dwellings over an extended 2016 to 2039 period (19 dpa).
- 5.3□ With the submitted Local Plan only making provision to deliver around 200 dwellings at Bayston Hill, less than half of the settlements identified housing needs is therefore currently being planned to be met.
- 5.4□ With only an increase of 137 persons between 2011 and 2021, Bayston Hill's population growth almost stagnated over the last inter-censal period. To the detriment of the vibrancy and health of the settlement, without planned housing growth to meet identified needs, there is a risk Bayston Hill's population will start to decline over the Plan period.
- 5.5□ Similar to Shropshire as a whole, Bayston Hill currently has a relatively balanced population structure. However, as with all settlements across England, meeting the housing needs of an aging population will be an increasing issue for Bayston Hill (and Shropshire more generally) over the Plan period and beyond.
- 5.6□ Census data and housing survey's undertaken by local residents have repeatedly highlighted demand and need for:
- A broad range of small (1-bedroom and 2-bedroom) and larger family (4+ beds) housing types and tenures.
 - Housing opportunities to facilitate local downsizing or sheltered / specialist later living housing.
 - Affordable housing and private rented properties.

Appendix 2

Right Home Right Place: Bayston Hill



Bayston Hill Parish: RHRP Survey Analysis

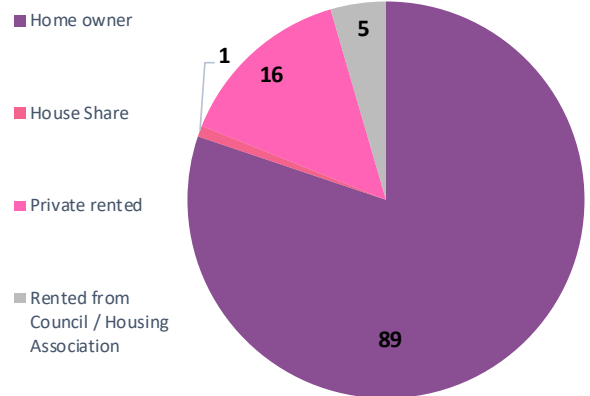
June 2021

750 responses from residents of Bayston Hill Parish as at 18th June 2021. 111 residents were thinking of moving and of these 27 indicated that their first choice would be to live somewhere else, 72 wished to remain in Bayston Hill Parish, the remainder didn't state a preference.

Of those thinking of moving:

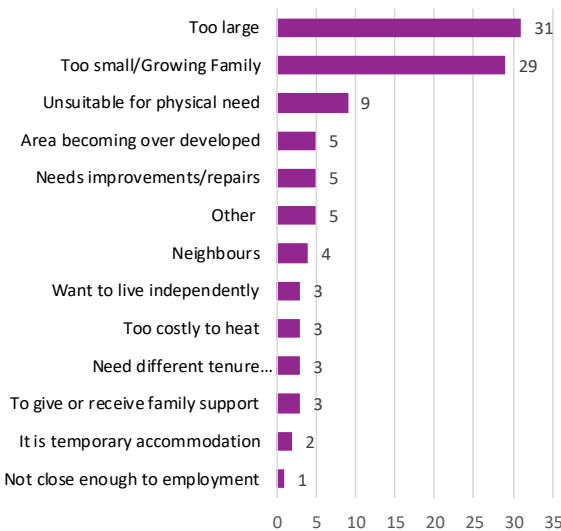
- 80% of respondents were home owners.
- 21 respondents were living in rented accommodation.
- 1 respondent was living in a house share.
- Of those wanting to move household size ranged from one to five, with the average number of people per household being 2.5.
- Of those wanting to move 17 households had a resident aged over 75 and 31 households had children under the age of 16.

Type of Accommodation Currently Occupied*



*Results of those who indicated current type of accommodation occupied

Reasons for wanting to move



Out of the 750 people living in Bayston Hill who responded to the survey 111 said they were thinking of moving.

Of those wanting to move, 30% said their current property was "too large" or "need to downsize".

28% said that their home was either "too small" or they had a "growing family".

9% stated that their home was "unsuitable for physical need".

5% (5) stated that "overdevelopment of the area" was the reason they wanted to move & a further 5% stated that their current property "needs improvements repairs".

3% (3) stated that they "want to live independently"

Please note some respondents wishing to move may have indicated more than one reason to move and therefore figures may not sum to the total expressing a wish to move.

– 71 respondents stated that they require housing to buy, affordable, open market, key worker and entry level housing.

– Of those wanting open market housing to buy 45 were currently home owners and two private rented.

– 21 respondents said they needed affordable housing to buy, 19 were currently home owners and 2 lived in private rented.

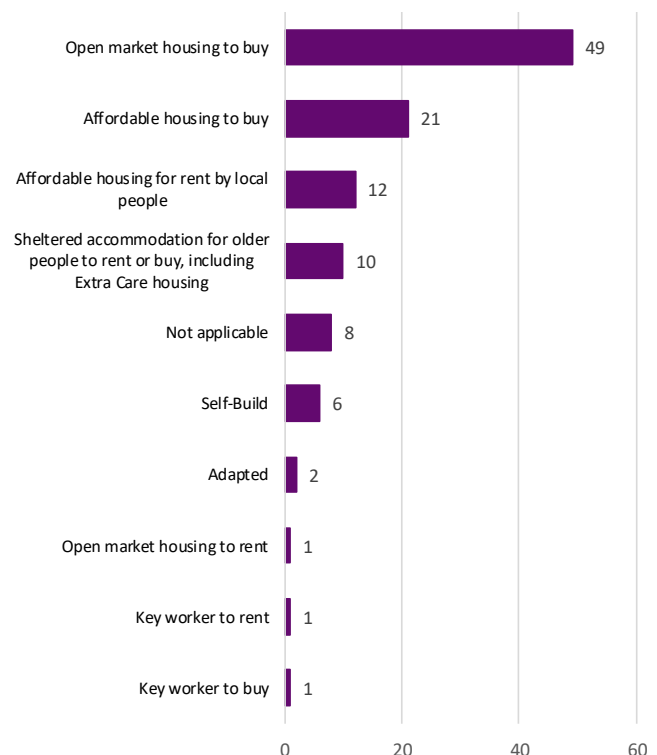
– 14 respondents expressed a need for housing to rent, 1 said open market housing to rent, 12 said they required affordable housing for rent by local people and 1 said key worker to rent.

– 6 respondents state they required "self-build".

– 2 respondents, currently home owners required "adapted" property.

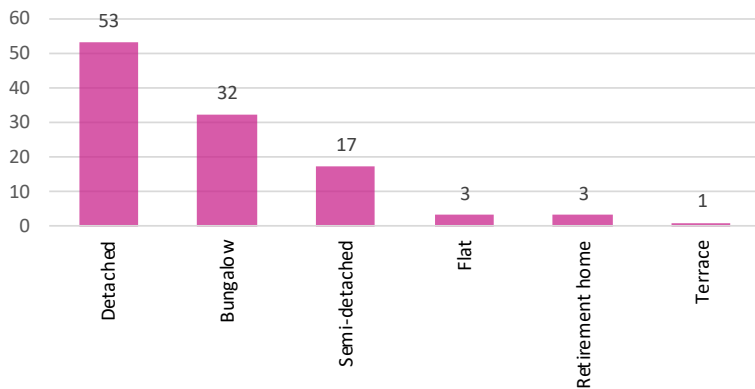
– 10 expressed a need for "Sheltered Accommodation" 7 were currently home owners, 1 rented from Council/Housing Association, 1 private rented & 1 stated they lived in a house share.

Types of housing required



Please note some respondents wishing to move may be prepared to consider more than one type of housing and therefore figures may not sum to total expressing a wish to move.

Housing Types Wanted



Please note some respondents wishing to move may be prepared to consider more than one

- 5 respondents require 1 bedroom, 38 require 2 bedrooms, 44 require 3 bedrooms, 23 require 4 bedrooms and 1 required 5 bedrooms.
- Respondents requiring 3 or more bedrooms were more likely to want a detached, semi-detached or bungalow.
- Forty one respondents reported a need to move within the next 12 months, with a further 27 anticipating moving in the next 2 years.

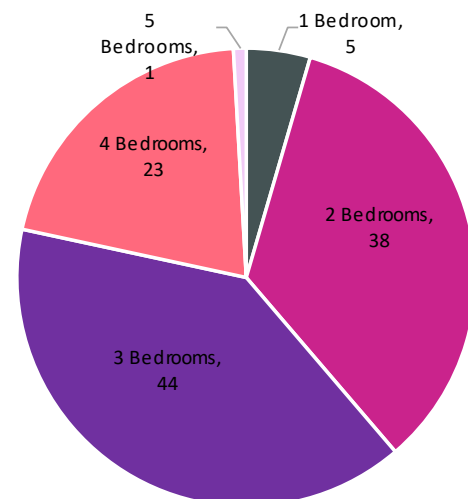
Timescale for Moving	Number of Respondents
In the next 6 months	15
In the next 6-12 months	26
In the next 2 years	27
In the next 5 years	40

- Most respondents specified rent between £391 & £520 per month as acceptable. Ten respondents considered monthly rent above £650 to be acceptable.
- In terms of house prices, sixty two households considered a price above £180,000 would be acceptable, 57 were currently home owners and five private rented.

- 64% of respondents who were thinking of moving wanted either a detached or semi-detached property.
- 79% of those wanting a detached or semi-detached property were home owners.
- 29% (32) of respondents thinking of moving said they wanted a bungalow and 27 were currently home owners.
- 4% (4) were looking for a flat or terraced housing and 2 were home owners, 1 shared a house & 1 private rented.
- 3 required a retirement home.

*Results of those who were thinking of moving and indicated type of accommodation required

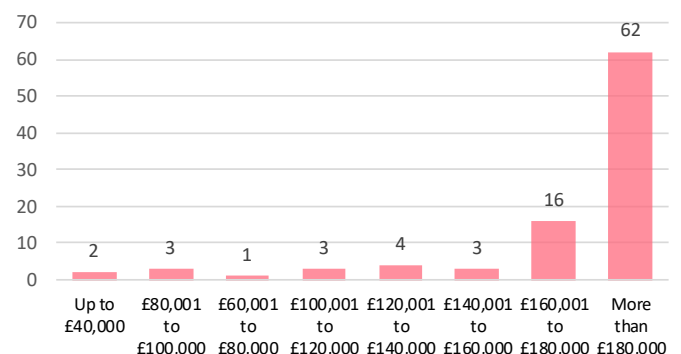
Number of Bedrooms Needed



Affordable Rents



Affordable House Purchase Price



As at 1st April 2021 there were 77 households on the waiting list that had expressed a first preference to live in Bayston Hill Parish. Initial analysis suggests that 71 households had a local connection to Bayston Hill Parish and 61 currently live within Shropshire.

Appendix 3

Bayston Hill Community Led Plan: The Big Survey

Bayston Hill Community Led Plan

The Big Survey

Preliminary overview of results

Parish Survey Summary

Introduction

A small group of volunteers has been working to develop a new 'Community Led Plan' designed to set out the needs and ambitions of the village over the next ten-year period. The views of current residents are key to that work and during the spring/summer 2018, villagers were asked to complete an extensive questionnaire covering four (inter-related) themes:

- Health and wellbeing
- Environment
- Community (inc Community Safety)
- Planning and development

Paper copies were delivered to all houses within the Parish and an online version was also made available and publicised widely. A separate questionnaire for younger residents was developed and circulated in the same way. Results were collated and analysed by independent consultants (Resources 4 Change) so that the steering group only received anonymised data.

In addition to the survey, the group has also conducted 'conversations' at events such as Coffee in the Lounge, held drop in sessions at local cafes and shops, organised a business breakfast and undertaken a number of projects with children from Oakmeadow School.

This paper gives a short overview of the survey results. The group is now working to convert the data and hundreds of narrative comments into a series of SMART (specific, measurable, achievable, relevant and timely) objectives. This will not simply be a 'to do' list for the Parish or Shropshire Council, but will be relevant for other statutory agencies, the social and voluntary sectors and for our community.

Overview:

Bayston Hill residents are happy, reasonably healthy, proud of where they live and the of their 'community'; they are well informed, but concerned about the condition of infrastructure, apparently rising crime and anti-social behaviour and the threat of excessive and misplaced development.

- The data reflects the views of 1313 people (representing between 23.9% and 27% of the population depending on population estimate used)
- The over 65 group is 17% over represented in the responses compared to the profile of ages within the Parish, but this is not untypical with this type of survey
- The gender balance is in line with the profiles
- **R4C are confident that the data sample is sufficiently robust for us to use to extrapolate and to build a plan around.**
- Over 80% of respondents are positive enough about the village to say (when asked) that they live in Bayston Hill (as opposed to Shrewsbury or Shropshire)
- Overwhelmingly, respondents cited the community spirit (overall rating of 4.66 out of 6), neighbourliness, friendliness of the village as the things they liked most about living here; the semi-rural location, green space, access to amenities (such as GPs, shops and other services) and easy access to Shrewsbury were also highly valued
- Over 40% of residents have lived in the village for more than 20 years and over 60% more than 10 years.
- The state of the Parade, paths, roads, traffic/speeding, youth crime and constant threat of development are the things liked least and also represented the things people would most like improved
- Residents feel they are well informed (nearly 90% say with little or no effort they can find out what is happening) with 97% saying they get news and information via The Villager, 62% via word of mouth, nearly 43% via social media
- Around 60% responded that they give some voluntary time to VCSE organisations in any year with 36% at least once a month or more frequently
- 74% said they felt they were in good or very good health, though over 20% had conditions that limited their daily activity
- When asked how satisfied with life they were, the collective response was 8 (on a scale of 1 to 10), even more felt their life activities were

worthwhile and that at the point of completing the survey they were 'happy'. As a note of caution, there was a notable level of anxiety at around 2.8 overall.

- Development is obviously a very live issue and there was some acceptance of the need for new builds – though the strongest support was for multiple small developments. The preferred location was the Oaklands site, with some support for Pulley Lane, the Glebeland and Lyth Hill Road. Sites not favoured were between the village and Meole Brace; Lyth Hill Country Park; Pulley Lane; the Glebefield; and a generic “green areas within the village”.
- There was also strong demand for larger 3- and 4-bedroom homes – however there is a very significant number of currently occupied homes with 2 or more unused bedrooms, suggesting opportunities for downsizing/sheltered or similar is needed.

Community, Community Safety and Health and Wellbeing

The definition of “Community” is broad, and it can be difficult to identify consistent responses and conclusions to a wide range of questions. However this is an important area of study, and one which can give a sense of how people feel about their place in the village. Each response is individual, but there may be patterns in their replies which can help indicate ways of collectively strengthening the community structure of Bayston Hill.

Q2. Q3. Q6. Once people move to Bayston Hill, they tend to stay. This is particularly true of the 55+ age group, a high proportion of whom have lived in the village for over 20 years, and many of them much longer. 80% of respondents said that, when asked where they live, they gave Bayston Hill as the answer rather than Shrewsbury. This suggests a feeling of belonging, supported by a liking for good amenities; the semi rural nature of the village; convenience and access to Shrewsbury; and the friendliness and community spirit of the place.

Q4. Q21. Inevitably there are concerns about some aspects of life, but despite adverse comments about traffic problems, littering and dog fouling, and the poor appearance of some parts of the village – in particular the Parade - these do not seem to outweigh the generally positive attitudes that are expressed.

Q9. Q10. Q39. There is a strong view that the services and facilities needed in the village are good or adequate (79%). However, concerns are expressed about the appearance of the shopping area; health facilities; public transport; road and pavement condition and parking controls; and access to affordable exercise facilities.

Q12. Q13. Q14. When asked about the most important facilities for local people, broadband and public footpaths came out top, but all the others listed were also seen as of above average importance, with the exception of allotments provision. Looking ahead, the most important services to improve over the next 10 years were also broadband and footpaths, coupled with facilities for young people, and schemes to reduce isolation. In the subsequent question about service improvements reference was also made to the library, better disabled access and traffic calming.

Q16. Q17. Q19. Q20. Despite the generally positive sense of community, most answers revealed that very few people had been actively involved in Bayston Hill groups in the previous 12 months. 40% had never given voluntary time to support a community organisation, although 37% had contributed at least once a month. There was strong support for more activities for young people, such as a youth club, (85%), and whilst 80% would not be interested in helping to run such facilities, perhaps it is encouraging that 20% would consider doing so.

Safety

Q22. Q23. Most concerns were about the level of policing; burglary and theft; anti-social behaviour; and vandalism. The level of policing in particular was thought to have deteriorated in recent years.

Health and Wellbeing

Q24. Q25. Q26. There was a positive response to the frequency with which people take aerobic exercise, and 74% declared their health to be good or very good. 79% did not feel that their activities were limited by health problems.

Q27. Q28. General satisfaction with life was very positive, an average score of 8 out of 10, and over 80% felt that their lifestyle and activities were worthwhile.

Q77. Q38. 80% of people felt that living in Bayston Hill affected their wellbeing in a positive way, and 76% that they could get support with any health and wellbeing issues if needed.

Conclusions

In general, the responses suggest that most people find life in Bayston Hill a positive experience, with a sense of community and belonging that is perhaps surprising given the size of the village. The setting of the village, its services and amenities are valued and contribute to the sense of wellbeing. However there are concerns which surface regularly, both in this section and in others (Business; Planning; Environment). These include “visible” matters such as parking, A49 access and speeding; the appearance of the Parade; dog fouling and litter; and the prospect of increased housing and loss of open space. Less visible but no less

important are concerns over the lack of policing, and associated fears of burglary, vandalism and anti-social behaviour.

The health of the population came over in a positive light, again perhaps surprising given the age profile of the respondents. However it is important not to neglect minority responses, and to note that while the majority reported good health, 22% reported as “fair”, and 6% as “bad” or “very bad”.

Because of the breadth of this part of the questionnaire, and the inevitable differences in some of the responses, it is not easy suggesting hard and fast courses of action. (Although some may be picked up if suggestions under the Planning and Environment papers are taken up). This is compounded by difficulties in identifying a group or groups within the village that could take up some of the more significant issues. (*But perhaps I'm wrong here and there may be organisations that I'm not aware of? Your help badly needed here!*)

Perhaps one way forward would be to identify the two or three most important issues which, if they could be wholly or partly addressed, would make the sense of community and wellbeing even stronger than it is. Once identified, individuals or groups could be targeted to lead the work, starting with the findings from the questionnaire, researching the issue in detail, and reporting regularly to the Parish Council and The Villager on their progress. The replies to the questions on volunteering suggest that there is a body of people who are prepared to give their time and skills to enhance the community life of Bayston Hill.

Environment

The term “environment “covers a range of subjects, and inevitably some of the responses will fall under other headings such as transport and development. ***This is a good example of how each of the themed areas are interlinked.*** The general findings about how the residents of Bayston Hill react to environmental issues is as follows:

Q3. A significant percentage of people identified the semi-rural countryside nature of the village as being the thing they liked most about living in Bayston Hill. (40%), and 80% felt that living in the village positively affected their wellbeing.

Q16. Q18. Asked whether respondents would give one hour a month to the benefit of the village, and in what capacity, 43% replied that they would give the hour to practical environmental and conservation tasks. This was the most supported category. However, the vast majority of people had never been involved in any sort of environmental group.

Q12. Q13. The importance of public footpaths was stressed in reply to a number of questions, although it is possible that in some of their replies respondents were referring to pavements in the village, rather than statutory public paths.

Q75. Q80. 70% said they used public footpaths, byways and open spaces at least once a week, many of them daily, and over 80% wanted better access out into the surrounding countryside.

Q74.Q76. Replies regarding open/green space were a bit contradictory. Whilst people were concerned to protect and increase open space, (nearly 300 respondents saw the issue as “very important”), 110 of 160 (40%) did not think there was a need for more green spaces in the village.

Q79. On wildlife, 78% of the 476 replies saw a locally rich combination of all aspects of the natural environment as being most important, including hedgerows, trees and woods, watercourses and wildlife.

Q67. Q68. There was good support for renewable energy sources to serve the village, in particular a solar farm providing it was community owned. Wind turbines were less popular, but still favoured by almost twice as many people as opposed them. There was also strong support for all new housing to be highly energy efficient, as well as for the retro-fitting of high quality insulation.

Q69. Q70. Q71. Improving opportunities for sustainable travel focussed on reducing traffic speeds, providing better bus services and improving pavements. However when asked if they would use a Sunday bus service for example, the majority said no, and very few would be willing to take part in a car pool (12%) or a cycle hire scheme (15%). Despite these small numbers it is encouraging that some people are willing to consider these options.

Q72. It can be seen that there is general support for “the environment”, even though this is a very broad subject. Tangible and obvious initiatives such as recycling, renewable energy, supporting plastic free actions in shops and more tree planting are encouraged in the replies received. However the problem is often translating this general enthusiasm into action which would bring about positive, practical change and benefits.

Conclusions

Whilst most replies refer to tangible initiatives (see paragraph above) there is a need for communities to consider the wider impact of climate change, and to take action to mitigate its effects. This might come in the form of small scale actions in the first instance, but even these need to be understood in the wider context of the future of the planet if global warming continues at its current rate. People often shy away from this approach on the grounds that the actions of an individual, or a small group of people, can have no impact on a global problem. But this is defeatist thinking, and the replies to the questionnaire on this subject reveal that there is a level of concern in Bayston Hill that could be tapped to bring a concerted approach to environmental issues in the village.

Perhaps one way of approaching this is to call a meeting of concerned people from the village, including youngsters of school age, to debate how they might set up a group to raise awareness and look at practical actions that could be taken on the basis of the concerns illustrated in the questionnaire. It may be helpful to have a speaker from a group that is

already tackling these issues on behalf of its community, such as Stretton Climate Concern, to give practical advice on developing the group. Perhaps the village could nominate “champions” who would be willing to take the lead on specific subjects – wildlife, renewable energy, recycling etc. Help could also be sought from specialist groups such as Shropshire Wildlife Trust, Marches Energy Agency and Veolia.

Planning and Development

Most responses (and indeed questions) related to housing provision – need/demand; type of housing; location of housing.

Housing – Need/Demand

Q40. Q41. Approximately 120 respondents said they were seeking to buy or rent housing in the village, of whom about 70 would be looking to do so in the next 10 years. (Note that the Local Plan Review proposes that a further 171 houses are built in Bayston Hill up to 2036. The two main sites proposed are land off Lyth Hill Road (100 dwellings), and the Oaklands/Glebe site (50 – 60 dwellings). It would seem therefore that the local need recorded from the questionnaire returns could be met if the Local Plan proposals are delivered. However, note that a large number of households did not reply to the questionnaire, and there will be demands for housing from this group that has not been recorded.

Q52. Q53. Respondents saw the advantages of new housing meeting local needs, as well as providing affordable housing for young people. The disadvantages that were highlighted were concerns about over-stretching services such as schools and health, and putting pressure on other infrastructure including the A49 junction. Concerns were also expressed about the loss of open space,

Housing – Type

Q43. Q46. Of the respondents looking for houses, almost half (48%) were looking for a 3/4 bedroom home, and about 28% for a 1/2 bed house. When asked about the type of housing needed in the next 20 years, there was strong support for low cost starter homes, bungalows and retirement homes, as well as for more traditional 1/2/3 bedroom houses. The replies suggested that smaller properties (1/2 bedrooms, bungalows and starter homes) would be more needed than larger properties.

Q44. There was strong support for future social housing (rented and part ownership) to be restricted to local needs.

Housing – Location and Sites

Q50. Q51. Responses were clearly in favour of a number of small developments. (Contrast this with the Local Plan Review proposals on 2 main sites). There was also support for the suggestion that a housing partnership should be formed to develop land on behalf of the village and in line with the agreed Community Plan, and that new development should be guided by a master planning approach which would consider open spaces and other physical changes, in addition to housing.

There was very strong support for the protection of the strategic gap between Bayston Hill and Shrewsbury, complemented by opposition to development outside the current village boundary.

Q47. Q48. There were contrasting replies to the questions asking for views on the best and the least favoured locations for new housing. The preferred location was the Oaklands site, with some support for Pulley Lane, the Glebeland and Lyth Hill Road. Sites not favoured were between the village and Meole Brace; Lyth Hill Country Park; Pulley Lane; the Glebefield; and a generic “green areas within the village”.

While the majority of working people who replied to the questionnaire do so outside the village, there is still an important minority who work in Bayston Hill.

Travel to Work

Q54. The majority of people who work do so outside the village. Predictably, the majority work in Shrewsbury, (52%), with a further 12% elsewhere in Shropshire. Just over 13% work in the village, and 8% run their own business in the village, including working from home. The majority of people work over 30 hours per week, but a significant minority work part-time, mostly between 16 and 30 hours.

Q31. Q32. Q33. When asked about commuting 45% replied that their work involved a commute, 55% that it did not. (These results may be skewed by retired people answering). Of the commuters, 78% travelled less than 30 minutes, and 15% for 30 to 60 minutes. Asked about commuting affecting

wellbeing, 70% said it did not, but a significant minority (22%) felt that it did, and 8% were unsure.

Q56. Q57. Travel to work is predominantly by car (74%). Rail commuting is very low, most of the balance being made up by use of the bus, cycling or walking. Changes that would allow more sustainable travel referred almost exclusively to better and cheaper bus services.

Business Needs

Q61. Q62. Of the people who run a business in the village or work from home, the overwhelming needs were for a good mobile phone service and superfast broadband. Respondents were generally satisfied with the infrastructure that they required, such as the availability of workspace and supply of appropriately skilled staff. Very few problems were identified which hindered the development of local businesses, but this is not to say that everything that is needed is provided for. The businesses themselves, together with other agencies such as Shropshire Council, must be aware of opportunities to improve services and facilities when they occur.

The Community Response to Business

Q63. Q64. Q65. The community was asked if it supported more employment opportunities in Bayston Hill, and this was agreed overwhelmingly (83%). In particular, respondents referred to professional services, IT, shops and cafes, and light industry. Reasons given opposing expansion were traffic and parking problems; the effect on village character and residential areas; the lack of need; and the lack of appropriate land and buildings. However this opposition was tempered by encouragement, providing the businesses were small or involved working from home.

Respondents were also heavily in favour of encouraging more visitors to Bayston Hill (80%), with opposition citing an increase in traffic, the lack of tourist facilities and the residential nature of the village.

Conclusions

Although the subject is Planning and Development, most responses referred to housing issues. Inevitably, there were contrasting views on the number of new houses required and the location of new sites, and to

get a cohesive village view on housing will not be easy, nor should it be expected.

However there was consistency in some areas, in particular over the need for new housing to meet local needs with the provision of starter homes, bungalows and smaller properties. Views on location varied, but again there was a sense that the strategic gap between Bayston Hill and Shrewsbury should be maintained (although there has been some erosion of this in recent years with new developments off Pulley Lane). The protection of open spaces was also a fairly common theme, as was the need to ensure that infrastructure was not overstretched by new development.

The control of new housing lies in the hands of Shropshire Council, and it would be misleading to suggest that the Parish Council, or any other village grouping, can dictate the strategy for new housing. However, there may be ways in which more detailed matters can be influenced, such as the type and design of the houses, and even some say over location. The Council's Local Plan Review, and consultation thereon, offers a way of influencing matters. The Parish Council already has a role on representing village views, and this representation could be guided by the feedback from the questionnaire. A paper to the Parish Council summarising the key messages from the village over housing might be helpful – supported of course by the full questionnaire responses.

The replies suggest a stable and satisfied response to employment issues in Bayston Hill, and an encouraging attitude to new employment opportunities, providing they are low impact. The services and facilities that already exist for local businesses are well regarded, although it would be a mistake to be complacent and assume that everything is perfect.

Clearly employment opportunities in Shrewsbury, Telford and the wider West Midlands serve most working people in Bayston Hill well, and there would seem to be little need to seek out new areas of land in or around the village to meet limited requirements.

A significant shift that could take place in favour of the environment would be to try and reduce the proportion of people who travel to work by car. Given that large numbers of people are working in Shrewsbury, it

would be worthwhile examining whether more could be done to encourage sustainable travel by improving bus services, cycle ways and the potential for car sharing or pooling.

On the subject of new land for employment and industry, there was little in the questionnaire replies to suggest that this was an issue, and nothing to indicate that a new site was required. Again, this might be helpful feedback to the Local Plan Review.

SUMMARY

The planning group is most grateful to the many hundreds who took the time to complete what we know was a very detailed questionnaire. The thousands of narrative comments are also most welcome – though are taking some time to analyse!

What is clear is the sense of belonging that residents feel toward the village and the typical length of residence combined with the general sense of happiness says a lot about it as a place to live. Dilution of that, physically through development and consequent impact on services and other infrastructure are clearly concerns. As a broad overview it is probably fair to say that current dissatisfaction is mainly with the physical infrastructure, appearance and design of the village and most satisfaction with the social, community and inter-personal.

Where next?

The group is currently working on turning all this data and feedback into a SMART plan which will then be circulated and consulted on before finally being submitted to the Parish Council for adoption.

To repeat this will not be a 'to do' list for the Council nor any sort of instruction to the Parish or other statutory agencies. It will though contain realistic ambitions and suggested developments and activities that reflect the views of residents and which if completed will get us to where we want to be in 10 years' time – the definition of which will be a critical part of the next stage.

Appendix B

Relevant Previous Shropshire Plan Submissions

Relevant Regulation 19 documents submitted previously:

- RPS, Built Heritage and Archaeology Constraints and Opportunities Assessment, November 2020
- Cerda, Vision Statement, Promotion Document, February 2021
- Aspect, Ecology Constraints & Opportunities, December 2020
- SCP, Transport and Access Review January 2021
- Aspect, Landscape & Visual Briefing Note, December 2020