



SY Homes  
c/o Qu-est Design And Planning  
Unit 7 Henry Close  
Battlefield Enterprise Park  
Shrewsbury  
SY1 3TJ

Date: 16th July 2019

Our Ref: PREAPP/19/00264

Your Ref:

Dear Andrew Andrew Balshaw

TOWN AND COUNTRY PLANNING ACT 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015

**PLANNING REFERENCE:** PREAPP/19/00264

**DEVELOPMENT  
PROPOSED:**

Conversion to residential apartments/new build apartments  
to include retention of existing listed building (hotel), and  
demolition of rear annex and other modern buildings

**LOCATION:**

Lord Hill Hotel, Abbey Foregate, Shrewsbury, Shropshire,  
SY2 6AX.

Thank you for your recent request for advice on the above proposal prior to submitting a planning application. I have considered your proposal and consulted with the most relevant Planning Consultees and can provide the following guidance in relation to any follow-on application:

**CONSULTEE RESPONSES:**

SC CONSERVATION: This formal Pre-application submission affects the site occupied by the Lord Hill Hotel, a Grade II listed early 19th Century substantial former red brick villa with hipped Welsh slate roof, which according to Trinder in 'Beyond the Bridges: The Suburbs of Shrewsbury 1760-1960' was at least by the late 19th Century known as The Shrubby and occupied by grocer John Bagnall and later by corn merchant Alfred Attfield, and considered at that time to be an important Shrewsbury residence. By 1964 the building was converted to hotel use and a series of extensions in the 1960s, 70s, 80s and beyond have had a detrimental impact on the significance and the setting of the listed building as likely have modern internal works over the years, where it is anticipated that the careful removal of unsympathetic extensions and other works would likely be considered in principle as a positive approach on heritage grounds subject to a formal historic building assessment, further discussion on the proposed internal and external works proposed and submission of a fully detailed proposal.

This formal submission also proposes what appears to be quite substantial new buildings to the rear of the original villa building, along with the removal of the 1980s built Wrekin Lodge which is sited at the rear bottom of the site.

In considering this type of proposal, due regard to the following local and national policies, guidance and legislation is required in terms of historic environment matters: SC Core

Strategy policies CS6 (Sustainable Design and Development) and CS17 (Environmental Networks), SC SAMDEV policies MD2 (Sustainable Design), MD13 (The Historic Environment), and with national policies and guidance including the National Planning Policy Framework (NPPF) revised 2018 and Historic England Guidance including The Setting of Heritage Assets. As the building on this property and on adjacent properties are Grade II listed, in legislative terms Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) is applicable in considering the impact of the proposal on the character, significance and setting of the listed building. Additionally, as the property is within the Shrewsbury Conservation Area, and more specifically within the 'Abbey Foregate Special Character Area' special regard to Section 72 of the Act is also required in terms of the extent to which this proposal would preserve or enhance the character or appearance of the Conservation Area. As there is a substantial new build element to this scheme, new development should also make a positive contribution to local character and distinctiveness among other relevant policies within both the NPPF and the local plan.

Additionally sufficient information in the form of a professionally prepared Heritage Impact Assessment would need to be supplied to meet the requirements of paragraph 189 of the NPPF and local plan policy MD13 in terms of providing a proportionate assessment of the impact of this type of proposal on the significance and setting of the heritage assets on this site, adjacent sites and the wider Conservation Area, as well as the design rationale proposed when taking into account the relevant policies and legislation noted above.

Any assessment will need to fully consider the sensitive positioning of properties on this south side of Abbey Foregate where rear gardens fall towards the historic former mill race below and the Rea Valley lands beyond, where new development has the potential to impact on the appearance and the context of the natural character of these valley lands, which contribute strongly to the character and the appearance of the wider Conservation Area and the Special Character Area. Proposed development schemes to the rear of existing established development where it is potentially close to the Rea Valley open space corridor and valley lands would need to be accompanied by a professionally prepared Landscape Visual Impact Assessment. I would also refer you to the comments from the Trees Team as they relate to potential development within the Conservation Area.

It is noted that a formal Pre-application meeting has been requested and I am happy to attend this type of meeting as it relates to historic environment issues and design matters.

SC ARCHAEOLOGY: We have no comments to make on this application with respect to archaeological matters.

SC ECOLOGY: The planning application submission should include the following:

Ecological Impact Assessment (EclA)

A planning application on this site must be accompanied by an Ecological Impact Assessment of the land in and surrounding the proposed development and a discussion of any potential impacts resulting from the development.

An Ecological Impact Assessment should consist of:

- Extended Phase 1 habitat survey, habitat map and target notes on any significant biodiversity or geological features including species, habitats, designated wildlife or geological sites and the Shropshire Environmental Network.

- A desk study of historical species records and local, regional or national wildlife designated sites.
- Supplementary detailed surveys (phase 2 habitat surveys, protected or priority species or geological features as appropriate to the site).
- Evaluation of the importance of biodiversity or geological features present at a local, regional, national, international level.
- Analysis of the direct and indirect impacts of the development (during construction, working area, additional infrastructure and post construction).
- Any losses or gains to priority habitats or the Environmental Network should be stated (hectares).
- Proposed avoidance, mitigation or compensation measures, including method statements where appropriate.
- Legal implications such as the need for European Protected Species Mitigation Licences or other licences (e.g. badgers) and details on how the favourable conservation status of populations of protected species will be maintained.
- Proposed biodiversity or geodiversity enhancement measures.

The Ecological Impact Assessment should be carried out by a suitably qualified and experienced ecologist with the relevant protected species licenses. The Ecological Impact Assessment should be submitted to the Local Planning Authority prior to a planning decision being made.

### Bats

This application site meets the trigger point for requiring a bat survey since it involves modification, conversion, demolition or removal of buildings and structures (especially roof voids) involving the following: Pre-1960 detached buildings and structures within 200m of woodland and/or water.

The bat survey should be carried out as follows:

A Preliminary Roost Assessment including a thorough internal and external inspection of the building and an assessment of the potential for bat roosts to be present. Recommendations should be made regarding the need for additional surveys (see below) and/or precautionary methods of working. During the Preliminary Roost Assessment the ecologist should also record any evidence of nesting wild birds.

A Presence/Absence Survey should be carried out in all cases where the Preliminary Roost Assessment finds evidence of bats, potential for bats or where a complete and thorough inspection cannot be carried out. The presence/absence survey will involve dusk emergence and/or pre-dawn re-entry surveys to aid identification of the species of bats present and estimation of the numbers of individuals. The presence/absence survey should follow the guidance on survey effort and frequency in the Bat Conservation Trust's Good Practice Guidelines (3rd edition, 2016) and will usually comprise 2/3 emergence and/or pre-dawn re-entry surveys\* between May and September (optimum period May to August). The Presence/Absence Survey will allow the surveyor to consider the need for mitigation, enhancements and compensation, to assess the likelihood of an offence being committed and to make a decision as to the need for a European Protected Species Mitigation Licence from Natural England

\*Note – 2 surveys carried out within the same 24 hour period constitute one survey.

A Roost Characterisation Survey should be carried out in cases where an offence is considered likely to occur, where mitigation is required and where a European Protected Species Mitigation Licence from Natural England will be required. The Roost Characterisation Survey is intended to establish number of bats in the colony, access points used, temperature and humidity regime in the roost, aspect and orientation of the roost, size and perching points, lighting and a surrounding habitat assessment.

For any planning application triggering the need for a bat survey, the following documents should be submitted to allow determination of the application:

1. A Preliminary Roost Assessment and any further surveys recommended by the licensed ecologist (e.g. Presence/Absence Survey and Roost Characterisation Survey).
2. A site plan showing any mitigation and enhancements being offered for bats (e.g. bat box locations, bat loft locations with measurements and internal details)
3. A lighting plan showing location and specification for any proposed lights on the site. The lighting plan should reflect the Bat Conservation Trust's Bats and Lighting in the U.K. guidance.

All bat surveys should be carried out by an experienced, licensed ecologist and in accordance with the Good Practice Guidelines. Mitigation should be designed in line with Natural England's Bat Mitigation Guidelines.

Any deviation from the methods, level or timing of surveys set out in the Good Practice Guidelines should be accompanied by a reasoned evidence statement from the licensed ecologist carrying out the survey clarifying how the sub-optimal survey is ecologically valid.

#### Finding an ecological consultant

A list of ecological consultants who work in Shropshire is available on request. This list is by no means exhaustive and contains information on other ways of finding a consultant. Shropshire Council cannot recommend any consultant or guarantee their work.

You should always check that the ecologist you select has the relevant protected species survey licences issued by Natural England. Without a valid survey licence, the report provided by an ecologist may not be considered adequate by the Local Planning Authority.

It is always wise to seek several quotes since prices can vary.

I am happy to be contacted by the appointed ecologist to discuss the application prior to survey work being carried out if that is helpful.

It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision (Government Circular 06/2005).

For more information about ecological survey requirements, please refer to Shropshire Council's Guidance Note 1: When is an Ecological Assessment required?  
<https://shropshire.gov.uk/media/1871/guidance-note-1-when-is-an-ecological-assessment-requiredapril-2014.pdf>

Please note: This pre-application advice does not constitute a formal decision of Shropshire Council in respect of any future planning application(s). No guarantee of a

particular decision or even recommendation can be given as any application will contain additional information and will have to undergo a process of consultation which may raise new issues.

Please contact me, or one of the other Ecology team members, if you have any queries on the above.

Sophie Milburn  
Assistant Biodiversity Officer  
sophie.milburn@shropshire.gov.uk  
Tel.: 01743 254765

SC TREES: I have no objection in principle however there appears to be trees on and adjacent to the site. To properly assess the impacts a tree report prepared in accordance with BS 5837 2012 'Trees in relation to Design, Demolition and Construction recommendations for tree protection' should be provided with a full application.

It is expected that any proposed development would make provision to retain any trees identified as significant or potentially significant in the terms of public amenity or provide substantial justification and mitigation where their removal is proposed, with particular regard to views from the Reabrook Valley.

WSP on behalf of SC HIGHWAYS: No response has been received and I will forward comments when available.

WSP on behalf of SC DRAINAGE:

1. Part of the site is in Flood Zone 2 and 3 and a Flood Risk Assessment (FRA) should be produced where the developer should complete a FRA using Shropshire Council's Strategic Flood Risk Assessment (SFRA) documents for guidance. The SFRAs are available on the Shropshire Council website. The criteria for a FRA are set out in National Planning Policy Framework and the Technical Guidance to the National Planning Policy Framework. Reference should also be made to the Environment Agency West Area (Midlands) Flood Risk Assessment Guidance notes.

A FRA should include, as a minimum:

- Assessment of the Fluvial flooding (from watercourses)
- Surface water flooding (from overland flows originating from both inside and outside the development site)
- Groundwater flooding
- Flooding from artificial drainage systems (from a public sewerage system, for example)
- Flooding due to infrastructure failure (from a blocked culvert, for example)
- Flood compensation storage, finished floor levels and evacuation plan should be detailed.
- Proposed surface water drainage strategy

2. The site is classed as brownfield, therefore a 50% betterment to the current surface water flows should be provided in accordance with Shropshire Council requirements. SUDs applicability for the site is Infiltration. The use of soakaways should be investigated in the first instance for surface water disposal. The betterment requirement will be assumed to have been achieved if all surface water is disposed of via soakaways. Percolation tests and the sizing of the soakaways should be designed in accordance with BRE Digest 365

to cater for a 1 in 100 year return storm event plus an allowance of 25% for climate change. Full details, calculations and location of the percolation tests and the proposed soakaways should be submitted for approval.

Surface water should pass through a silt trap or catchpit prior to entering the soakaway to reduce sediment build up within the soakaway.

Should soakaways not be feasible, drainage details and calculations to limit the proposed discharge, for the 1 in 100 year, 6 hour rainfall event must be constrained to a value as close as is reasonable practicable to the greenfield runoff volume for the same event as in accordance with the Non- Statutory Technical Standards for Sustainable Drainage Systems dated March 2015 should be submitted for approval. The attenuation drainage system should be designed so that storm events of up to 1 in 100 year + 25% for climate change will not cause flooding of any property either within the proposed development or any other in the vicinity.

3. If non permeable surfacing is used on the new access, driveway and parking area or the new access slopes toward the highway, the applicant should submit for approval a drainage system to ensure that no surface water runoff from the new access run onto the highway.

4. The proposed method of foul water sewage disposal should be identified and submitted for approval, along with details of any agreements with the local water authority and the foul water drainage system should comply with the Building Regulations H2.

SC REGULATORY SERVICES: The proposed residential development is along Bage way which is a relatively fast and busy route. Regulatory services would advise that a noise assessment may be appropriate to determine whether any properties or windows near this route would require noise mitigation to achieve BS standards for daytime and nighttime noise.

## **OFFICER APPRAISAL:**

The main issues regarding the development of this site include:

PRINCIPLE OF DEVELOPMENT

DEVELOPER CONTRIBUTIONS

LAYOUT, SCALE, DESIGN AND APPEARANCE AND IMPACT ON HERITAGE ASSETS

### PRINCIPLE OF DEVELOPMENT

The site is within the urban development boundary for Shrewsbury on the proposals map of the adopted SAMDev DPD. Both conversion and new build residential development of this brownfield site is therefore acceptable in principle and would also accord with Core Strategy Policy CS2 that identifies Shrewsbury as the main focus for all new residential development.

Policy CS8 seeks to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors. The loss of the existing hotel needs to be considered, as visitor accommodation and tourism contributes to the local economy. Justification for the loss of the hotel and change of use would need to be provided, including evidence of marketing as a going concern and the level of demand for visitor

accommodation, sufficient to demonstrate that there would be no significant adverse impact on the visitor economy.

## DEVELOPER CONTRIBUTIONS

### Community Infrastructure Levy (CIL)

The scheme will be CIL liable and the CIL team can provide further advice on this. Existing floor areas to be demolished or converted may be deductible when the CIL liability is calculated.

Affordable Housing - CS11 and the Supplementary Planning Document (SPD) on the Type and Affordability of Housing require that all new housing developments make a contribution to affordable housing. Affordable housing would be calculated at the prevailing rate at the time of submission of any planning application for full planning permission or at the Reserved Matters stage if submitting an outline application.

The rate for this area is currently 20% and would apply to the new build element of the proposal and would not apply to the conversion of the listed building.

Education – I have not consulted Education and Policy but on larger residential schemes in the urban area of Shrewsbury additional education contributions are sometimes required in addition to CIL. Depending on the size of the scheme and the type of residential accommodation being provided Education will confirm whether CIL will be sufficient or whether additional developer contributions will be required.

The following formula was used for a mixed residential development that I dealt with at Copthorne Barracks in 2017:

Primary -  $2.35$  (average household size)  $\times$   $7.53$  (primary school % of population)/ $100 = 0.1770$  (primary pupil yield per dwelling)  $\times$  total number of dwellings  $\times$  £13,115 (Department of Education cost per primary pupil place)

Secondary -  $2.35$  (average household size)  $\times$   $6.02$  (secondary school % of population)/ $100 = 0.1415$  (secondary pupil yield per dwelling)  $\times$  total number of dwellings  $\times$  £17,050 (Department of Education cost per secondary pupil place)

Open Space contribution – Policy MD2 requires that adequate open space is provided and is set at a minimum standard of 30sqm per person (equivalent to 3ha per 1,000 population). The number of future occupiers will be based on a standard of one person per bedroom. For developments of 20 dwellings or more, this should comprise an area of functional recreational space for play, recreation, formal or informal uses including semi-natural open space.

Depending on the size and type of development we sometimes accept a reduced amount of on-site open space and off-site contributions in lieu of on-site provision. However landscaping and adequate open space are an integral part of achieving a satisfactory scheme that is appropriate to the context of the site and the prevailing characteristics of the area and in this particular case the setting of existing heritage assets

### Viability

If you consider that a combination of CIL and the affordable housing contribution in addition to any other contributions will render your development unviable, you should

complete the Shropshire Council viability assessment form for assessing the viability of the affordable housing contribution in the first instance. However it is expected that the land value should reflect the development potential for the site taking into account the policy requirement for developer contributions as outlined above.

#### LAYOUT, SCALE, DESIGN AND APPEARANCE AND IMPACT ON HERITAGE ASSETS

The Conservation officer (Karen Rolfe) has provided comprehensive details of all the relevant local and national policies and guidance and advised that the removal of all the later additions at this site is acceptable in principle and will better reveal the original listed house and enhance its appearance. However, the design, layout and scale of any new development needs to be carefully considered to ensure that the new build does not adversely impact on heritage assets including the setting of nearby listed buildings (the listed hotel and the adjacent Chadeslode House) and the wider conservation area.

Policy CS6 requires new development to be designed to a high quality that is appropriate in scale, density, pattern and design taking into account the local context and character of the area and make effective use of land whilst protecting the natural and built environment. MD2 of the recently adopted SAMDev amongst other things requires proposals to:

*Contribute to and respect locally distinctive or valued character and existing amenity value by:*

- i. Responding appropriately to the form and layout of existing development and the way it functions, including mixture of uses, streetscape, building heights and lines, scale, density, plot sizes and local patterns of movement; and*
- ii. Reflecting locally characteristic architectural design and details, such as building materials, form, colour and texture of detailing, taking account of their scale and proportion;*

Very limited information has been provided regarding the scale and design of the proposed development and the number of units proposed, but my initial thoughts are that the proposal represents over development of the site. The proposed converted hotel and the two apartment blocks appear to be sited too close to each other with insufficient landscaped areas and open space provision. Whilst a development of two apartment buildings in addition to the conversion of the listed hotel is not unacceptable in principle the proposed footprint of the buildings indicated on the site massing plan appear much too large.

Two apartment buildings with a smaller footprint or three much smaller apartment building (or blocks of development) or a mix of apartment buildings and some houses might be more appropriate. An alternative development of a mix of houses more in keeping with the adjacent 'Chadeslode House' site could also be explored? As advised above the proposal will need to include satisfactory landscaping and open space provision and the layout plan submitted does not currently provide this.

In addition to the visual impact of any proposal and the impact on heritage assets, the impact on residential amenity at the adjacent 'Chadslope House' site (including over bearing impact, over shadowing, overlooking and loss of privacy) need to be considered.



## OTHER MATTERS

Ecology, Trees, Regulatory services and Drainage have all provided advice and details of what would be required to support any application for development of this site. With regards to the FRA it is expected that any built development should be outside of flood zone 2 and 3.

I will forward Highways comments once available but I am not expecting any objection given the existing access and vehicular activity associated with the existing use. The proposal will need to include adequate parking and turning areas and also confirmation of whether any internal road will be built to an adoptable standard.

Details of refuse storage and collection points and access and turning space for refuse vehicles will also be required. It is likely that conditions will be recommended requiring the submission of a travel plan and Construction management plan.

### **Local List Validation Requirements**

Providing that the information detailed in the above section is provided within the following list of documents, it will enable any planning application to be registered and validated against the Council's local list validation requirements:

Affordable Housing Statement  
Biodiversity report/ Ecological Impact Assessment (EclA)  
Community Infrastructure Levy (CIL)  
FRA/ Surface Water Management scheme  
Heritage Impact Statement  
Landscape Visual Impact Assessment  
Noise Impact Assessment  
Open Space Assessment  
Tree Survey / Arboricultural Report

### **National List Validation Requirements**

I can also confirm the application will need to comply with National submission requirements in order to be validated and for this particular proposal I recommend that you also submit the following

#### ✓ **Completed Application Form**

Where possible please submit using the online [Planning Portal](#) however if you wish to download and submit a paper application, please submit a total of 2 sets of all documents. Please also ensure that the **Ownership Certificate (A,B, C or D as applicable)** and the **Agricultural Land Declaration** sections are completed in all instances

#### ✓ **Location Plan**

Based on an up-to-date map at an identifiable metric scale (1:1250 or 1:2500). The plan should identify sufficient roads, buildings, adjoining land etc. to ensure that location of the site is clear. The site should be edged clearly in red line and include all that is within the proposal; including any access from a highway, landscaping, parking, open areas around building etc. A blue line should be drawn around any other land owned or controlled by the applicant if close to or adjoining the site.

✓ **Site Plan (existing and proposed)**

Applications should normally include existing and proposed plans at a standard metric scale (1:100 or 1:200 for householder applications and 1:500 otherwise). All site plans should be numbered and versioned if the drawing is subsequently amended. All site plans should accurately show:-

- Direction of North and an indication of scale
- The footprint of all existing buildings on site with written dimensions and distances to the site boundaries or a scale bar appropriate to the building scale. If using more than one scale on a drawing please clearly indicate so.
- The paper size that the drawing should be printed at
- Building, roads and footpaths on adjoining land to the site including access
- Any public Rights of Way
- The position of all existing trees on and adjacent to the site
- The extent and type of hard surfacing
- Boundary treatment including type and height of walls or fencing

Types of existing and proposed site plans include:-

- Block plan of site (e.g. at 1:100 or 1:200) showing site boundaries
- Existing and proposed elevations (e.g. at 1:50 or 1:100)
- Existing and proposed floor plans (e.g. at 1:50 or 1:100)
- Existing and proposed site sections and finished floor and site levels (e.g. at 1:50 or 1:100)
- Roof plans (e.g. at 1:50 or 1:100)

As all application are stored electronically and made available via the Shropshire Council website, applicants are asked to ensure that documents and drawings are of a sufficient quality and that their clarity is such that the documents can be viewed accurately after being scanned.

✓ **The correct planning fee**

Most applications incur a fee. The on-line Planning Portal includes a fee calculator for applicants, however you can also contact Shropshire Council Planning Validation Team for clarification on the correct fee to submit:-

Email: [planningcvt@shropshire.gov.uk](mailto:planningcvt@shropshire.gov.uk)

Phone: 0345 678 9004

✓ **Design and Access Statement**

A written report supporting the proposed development and should include a written description and justification of the proposal, show that the proposal is based on a thoughtful design process and a sustainable approach to access. The level of detail required depends on the scale and complexity of the application, and the length of the statement varies accordingly.

I trust the above is helpful, but please note that it is an informal opinion based on the information you have provided at this stage. Any planning application submitted will be determined taking into account the details contained in the application; the policy of the Development Plan; Government planning policy; the outcome of any consultation with statutory or other consultees; any representations received and any other material consideration. Any expenditure incurred in preparing plans or making the application must be entirely at their own risk.

**When submitting your follow on application, please ensure that you clearly state the Pre-Application 'Planning Reference' number that is provided at the top of this letter.**

If your proposed project requires **Building Regulations Approval** or you are unsure whether it does please contact us on **01743 258710**, email [buildingcontrol@shropshire.gov.uk](mailto:buildingcontrol@shropshire.gov.uk) or visit our website <http://new.shropshire.gov.uk/building-control/> for pre-application advice and a competitive fee.

Yours sincerely

*Jane Raymond*

Jane Raymond

Technical Specialist Planning Officer

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