

**ID 10**

**SHROPSHIRE LOCAL PLAN EXAMINATION**

<b>Representor unique Part A Ref *</b>	<b>A0073</b>
<b>Matter</b>	<b>8</b>
<b>Relevant questions nos</b>	<b>17</b>

**Stage 1 Hearing Statement**

\*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>



# Hearing Statement on behalf of The Strategic Land Group Ltd (ID: A0073)

In relation to: Matter 8 - Infrastructure and delivery,  
monitoring and viability (policies SP1, SP2, SP14)

Shropshire Local Plan Examination

Emery Planning project number: 22-185

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unlocking development opportunities

Project : 22-185  
Hearing : Land at Adderley Road,  
Market Drayton, tbc  
Client : Shropshire Local Plan  
Examination  
  
Date : 01 June 2022  
Author : Wiktoria Sypnicka

Approved by : John Coxon

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## 1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as "SLG") and Bellway Homes Ltd to attend the Shropshire Local Plan Examination. SLG has an interest in draft allocation MDR006: Land adjoining Adderley Road and there is an agreement in place for Bellway Homes Ltd to acquire the site.
- 1.2 This hearing statement sets out our response to the Inspector's Stage 1 Matters, Issues and Questions in relation to Matter 8 - Infrastructure and delivery, monitoring and viability (policies SP1, SP2, SP14). It should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan, and our other Hearing Statements submitted to this examination.

## 2. SLG response to the Inspectors' questions

### **Q17 - Has appropriate regard been had to the cumulative impacts on development of all existing and proposed local standards, supplementary planning documents and policies?**

- 2.1 No. Draft plan Policies DP1 Residential Mix and DP12 The Natural Environment are likely to affect the viability of residential developments.

#### **Policy DP1 Residential Mix**

- 2.2 The draft policy sets out the housing mix requirements for residential developments. We consider that the draft policy will have an impact on development in respect of viability.
- 2.3 Parts 4 and 5 of Policy DP1 state:

*"4. All dwellings specifically designed for older people or those with disabilities or special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations.*

*5. On sites of 5 or more dwellings, at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and a further 70% of the dwellings will be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations, unless site-specific factors indicate that step-free access cannot be achieved."*

- 2.4 We have previously outlined in our representations to the Regulation 19 Consultation that we do not consider that the policy as drafted is consistent with the NPPG. The guidance is clear that the requirement for wheelchair accessible homes (i.e M4(3) standard) should only be applied to those dwellings where the Local Authority is responsible for allocating or nominating a person to live in that dwelling. This is reflected in the Council's Viability Study at paragraph 8.15, which states that for the purpose of the assessment, it is assumed that any wheelchair accessible homes will be affordable homes. However, the policy as drafted does not specify this.
- 2.5 Further, the Viability Study projects significant costs for such affordable dwellings, at £10,111 per dwelling, or £32,750 per hectare based on a 5% requirement. The study explains that deliverability of affordable housing has been challenging due to viability issues. The Council is therefore pursuing a minimum affordable housing requirement of 10% in all areas based on their 'on the ground' experience. However, this experience of viability issues was achieved prior to the introduction of further policy requirements, such as Policy DP1(4) and DP1(5).
- 2.6 Overall, we do not consider that the appropriate regard has been had to the cumulative impacts on development of Policy DP1 and the requirement for at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations. The test of necessity and viability set out in the NPPG have not been met in relation to these requirements.

### **Policy DP12 The Natural Environment**

- 2.7 The Council has not had appropriate regard to the cumulative impacts on development of the proposed Policy DP12(3), which requires all developments to 'achieve a 10% net gain in biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22'.
- 2.8 We do not consider that the impacts of this policy have been fully assessed by the Council. The requirement for a 10% BNG is likely to impact upon the developable areas of site allocations, and potentially development yield. The Council's Viability Study states that the cost of 10% BNG would be £31,000 per hectare. Although it is not clear how this figure was reached, Appendix 14 to the Viability Study shows that the Residual Value in North Shropshire is significantly affected by the policy.

- 2.9 Should the BNG requirement remain, there is also likely to be a need for off-site compensation and offsetting measures to be in place from the adoption of the plan as some sites may not be able to accommodate the requirement.