

## Part B: Your Response

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Name and Organisation:	Stuart Thomas Berrys on behalf of CEG
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<b>b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.</b>	<input type="checkbox"/>
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**Please be as precise as possible.**

Shropshire Council Local Plan Review

Response to post submission consultation on key documents prepared in response to the Planning Inspectors Interim Findings (ID28).

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1.2 This consultation response is submitted on behalf of CEG which has engaged with the Council through the local plan preparation process and has a preferred site allocation within the draft local plan referenced SHR158. The site forms part of a wider strategic allocation SHR158, SHR060 and SHR161.

1.3 Representations in support of the site were made at Regulation 19 stage covering the policies listed below:

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## **2. Updated Green Belt Topic Paper**

2.1 Table 4.1 of this document assesses the sites identified by the Council to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. The table identifies that only one of the proposed site allocations is located within the Green Belt – SHF018b & SHF018d and this relates the employment need only. None of the selected housing sites require Green Belt release.

2.2 Notwithstanding the above the Council have identified housing sites for Green Belt release within the plan. These are set out in Table 5.1 and the associated paragraphs (5.2 – 5.8).

2.3 We would question the Council's conclusions and evidence on this matter insofar as there appears to be an undefined distinction between the exceptional circumstances which apply to meet Shropshire housing and employment land needs and the exceptional circumstances which apply to accommodate part of the proposed contribution to the unmet needs forecast to arise within the Black Country.

2.4 We would disagree with the Council's conclusion that Alveley is not a suitable location to meet Black Country needs particularly given its geography and functional relationship to the area. We cannot see how a site in Shrewsbury would represent a better option or how this would "contribute to the achievement of the wider spatial strategy for Shropshire", as stated in paragraph 7.15 of the document.

2.5 In addition to the above we fail to see how the Council have not selected sites in Shifnal to accommodate Black Country housing needs but have done so to accommodate Black Country employment needs. The evidence for doing so is unclear



and is not summarised in the topic paper, which solely focusses on the exceptional circumstances for release of employment land.

*(Please continue on a separate sheet if necessary)*

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## 2. Sustainability Appraisal

2.1 The SA sets out a geography of Shropshire within which potential sites that could contribute to the unmet housing and employment land needs of the Black Country could be located. Consistent with the assessment of the functional relationship between Shropshire and the Black Country, this was informed by consideration of:

- a. Geographic proximity and the location and quality of main road and rail transport links between Shropshire and the Black Country.
- b. Migration patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
- c. Commuting patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
- d. The extent to which Travel to Work Areas (TTWA's) associated with the Black Country penetrate into Shropshire and vice versa.

2.2 Having been through this exercise the Council then identify sites associated with the following settlements as being reasonable options:

- a. Albrighton.
- b. Bridgnorth.
- c. Broseley.
- d. Highley.
- e. Much Wenlock.
- f. Shifnal.
- g. Shrewsbury.

2.3 This assessment included all sites within the relevant assessment geography, not just those sites proposed for allocation within the submission version Plan. As a consequence, and as recognised in paragraph 12.84 of the UASA, it is unsurprising that



the sites assessed as the most sustainable and appropriate locations for accommodating the unmet needs of the Black Country are existing allocations within the submission version Plan. However, these allocations were included within the submission version Plan to meet the needs arising within those settlements and Shropshire as a whole, not the Black Country. To identify these sites as contributing, in whole or part, to meeting the needs of the Black Country effectively reduces the contribution these sites make to addressing Shropshire's housing needs.

The inclusion of the sites in the Submission Plan was for the purpose of contributing to meeting the Shropshire housing requirement. The purpose and justification for the allocation cannot change after the Plan has been submitted unless the original purpose is found to be unsound.

2.4 There are unconstrained sites available within higher tier settlements that, whilst outside of the UASA assessment geography, would make an appropriate contribution to meeting the uplift in the overall dwelling requirement and would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements.

2.5 We would question the methodology used to select Shrewsbury within this pool of settlements, particularly as the Council seem to predominately rely upon the Shrewsbury – Wolverhampton railway line to justify its inclusion. All of the other settlements selected are located within the East of the County and are better placed to meet the identified need, with Shifnal also being on the railway line. The quickest travel time between Shrewsbury and Wolverhampton is around 45 minutes and is a distance of approximately 35 miles. We are unclear how accommodating the proposed contribution to the Black Country on Shrewsbury sites would contribute to the achievement of the wider spatial strategy for Shropshire.

2.6 If it is deemed that Shrewsbury is an appropriate location then the assessment of sites SHR060, SHR158 & SHR161 is only FAIR in respect of Black Country sustainability. Alternatively, sites SHR057 and SHR177 both score GOOD and we would therefore question why one has been selected over the other. In addition, there are other sites within the settlements selected which would also score GOOD. The Council seem solely to rely upon a "balanced planning judgement" however the thought process, methodology and conclusions arising from this balanced judgement are unclear.

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## **2. GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation**

2.1 We acknowledge that the Strategic Housing Market Assessment (SHMA) for Shropshire demonstrates that there is a higher proportion of older people living in Shropshire than the national average. Furthermore, it anticipates that over the plan period to 2038, the proportion of older people living in Shropshire and the number of single person households will increase at a faster rate than the national average. The Council's planning strategy for this is to secure a percentage of specialist housing for older people on allocated sites. In the case of preferred allocation SHR060, SHR158 & SHR161 paragraph 15 of the policy is relevant with a 20% requirement for specialist housing.

2.2 The evidence put forward by the Council to demonstrate this level of need is set out in paragraph 5 of the reasoned justification stating "*The SHMA projects that over the Local Plan period, there will be a need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision in order to maintain current prevalence rates (this being the amount of specialist houses for older people compared to the number of older people).*"

2.3 The levels of development proposed for Shrewsbury includes the delivery of around 8,625 dwellings (proposed to be increased to 8,975 dwellings). Accordingly, implementation of draft Policy GC25 at 20% provision would, in theory, deliver 1,795 specialist houses over the plan period. This would represent 51% of the SHMA need for older persons accommodation and 72% of the SHMA need for residential care provision.



2.4 20% of the allocation would represent 300 units. This is a significant amount in a single site allocation. Whilst Shrewsbury is the County Town, we consider that this requirement is disproportionately high in a market with only a limited number of care providers. 10% would be a more appropriate figure to ensure that there isn't a negative impact on the deliverability of this strategic site. Regardless of the adopted percentage, we would want some greater assurances that specialist housing can represent all or part of contribution to affordable housing and/or employment provision. The wording of paragraph's 14 and 18 are unnecessarily complicated and difficult to interpret. Subsection a-c of 18 should be removed.

2.5 In addition to the above the policy should provide greater clarity on how it will be applied on phased developments. Paragraph 15 is imprecise and should provide greater certainty that the overall quantum of specialist housing would not exceed 20% rather than being applied to individual phases. The policy should also set out the circumstances which would allow for an exception based on market evidence.

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## **2.0 Housing and Employment Topic Paper**

2.1 **Housing Need** – We support the 2020 base date assessment of Local Housing Need (EV069) being used to conclude that local housing need in Shropshire was some 25,894 dwellings over the 22-year plan period from 2016-2038. This equates to an annual average of 1,177 dwellings.

2.2 Housing Requirement - We support the high growth strategy with the minimum housing requirement being set at 31,300 dwellings between 2016 and 2038 representing an uplift of 500 dwellings on the housing requirement proposed in the submission version of the Plan.

2.3 The consequence is that Shrewsbury has a 350 dwelling increase to the proposed housing guideline to 8,975 dwellings between 2016 and 2038. We object to this approach on the basis that the nett increase in dwellings should not be accommodated through increased windfall allowance above the submitted Plan levels. All nett additional dwelling should be provided through the allocation of additional identified site(s). NPPF Paragraph 72 states 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. The Council states that there has been a greater provisions from windfall than expected in the plan period to date, however this could simply mean that windfall sources have come forward more quickly than expected. It does not indicate an increase in windfall capacity. There are reasonable prospects that instead that the capacity of windfall sites and all sites for housing land could significantly reduce due to the need to accommodate biodiversity net gain (BNG)

2.4 **Unmet Housing Need from Black Country** - Two reasonable options for contributing to this unmet housing need are considered by the Council within the



Updated Additional Sustainability Appraisal (SA) and Topic Paper. Option 1 is No Contribution and Option 2 is 1,500 dwelling contribution. We have no objections to the conclusions reached by the Council that Option 2 is the most appropriate option for inclusion within the plan. We recognise that there is a lack of any prescribed formula in national planning policy for calculating this uplift to Shropshire's housing need and suggest there should be a review mechanism within policy to reflect any changing requirement within the plan period.

2.5 Notwithstanding the above we would object to the Council's interpretation that they can attribute the uplift to existing site allocations rather than new sites, more appropriately located to accommodate the need. We set out our reasons for this in our comments on the SA and Green Belt review below.

2.6 The approach taken seems merely to be an accounting exercise on the basis that it would not result in any changes to the development guidelines and associated capacity of the site. The proposed modification to Policy s16.1 and the associated Schedule S16.1(i) to include reference to Black Country contribution is confusing and unnecessary.

In addition the delivery of homes on this site able to be counted towards the Black Country needs are unable to be measured until the total delivery from each site is complete and the planned Shropshire requirements is deducted. As such the proposed approach does not allow for accurate or appropriate monitoring of delivery for the Black Country as set out by the Inspectors in ID28 para. 26.

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