

## 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 11<sup>th</sup> June 2024**.

Name and Organisation:	Amy Henson Berrys on behalf of Fletcher Homes
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### Q1. To which document(s) does this response relate?

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

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

Paragraph(s):	Please see text below where paragraph numbers are highlighted in bold
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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.**

Shropshire Council Local Plan Review Response to post submission consultation on key documents prepared in response to the Planning Inspectors Interim Findings (ID28). The Council is undertaking a further 6 week consultation on four specific documents as part of the local plan review listed below:-

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

GC44 Shropshire Local Plan Updated Additional Sustainability Appraisal Report - April 2024

GC45 Updated Housing and Employment Topic Paper - April 2024

GC46 Updated Green Belt Topic Paper - April 2024.

This consultation response is made on behalf of Fletcher Homes who engaged with the Council through the regulation 19 stage of the local plan preparation process with specific reference to site CSH006 in Cross Houses.

These representations considered the following policies:-

Policy: Strategic Policy SP2 'Strategic Approach'

Policy: Settlement Policy SP8 'Managing Development in Community Hubs'

While the current consultation is not inviting comments on other aspects of the draft Shropshire Local Plan it is relevant to reference the representations made on behalf of Fletcher Homes having regard specifically to the documents the subject of this additional consultation.

In this we draw your attention in particular about the sustainable nature of the site CSH006 and its compliance with the objectives set out in the NPPF that fit with the development profile typical of Shropshire, i.e. small to medium sites in sustainable locations.

In particular the NPPF states at paragraph 70 that:- “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly” The consultation response is made in respect of documents GC25, GC44 and GC45 and each is considered further as follows.

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

GC25 seeks to provide a policy framework to deliver the needs of an ageing population having regard to the evidence that Shropshire has a demographic with a greater proportion of older people than the national average as well as proving to be an attractive retirement destination. The Office for National Statistics considers the changing demographic position between the last two censuses (held in 2011 and 2021) confirming that in this time the average age in Shropshire increased from 44 to 48 higher than the national and regional average of 40years.

Significantly the census return confirmed close to 15% increase in people aged between 50 and 64 and a commensurate 15% decrease in the number of residents aged between 35 and 49. There is also a rising trend in the economically inactive (retired) at 28.5% in part due to inward migration as well as a rising percentage of the population being aged 50 or over 47.8% as of 2021 compared with 41.4% in 2011. This all points to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active. While the aspirations of this development plan policy are laudable it is drafted in a manner that is both wordy and granular.

Consequently, it may not capture the broader aspirations the policy seeks to deliver in terms of housing and personal choice, continued independence for an ageing population, or in maintaining the strength of community cohesion many residents benefit from. The diversity of housing accommodation to support families with young and older members who are more likely to co locate in settlements that meet their specific needs. Larger towns such as Oswestry are more likely to fulfil this objective in the context of Shropshire a large and otherwise sparsely populated county.

**Paragraphs 2 to 6** of the draft policy set out how accessible and adaptable housing will be provided. Shropshire is a large, rural and sparsely populated county and the policy does not capture some of the solutions that would allow people to remain living in rural communities close to friends and families able to support them. Examples could be in identifying support for those looking to downsize to more appropriate new build accommodation (in the community) or alternatively the

provision of housing to meet the needs of extended families independently on the same site.

In addition to this the benefits of looking at a rural communities wholistically to meet its future needs, to include the older and younger generation through long term investment in housing and employment and community infrastructure is a relevant consideration in the contribution that CSH006 site could bring within a short term time frame.

#### **GC44 Shropshire Local Plan Updated Additional Sustainability Appraisal Report - April 2024.**

This document has been requested by the Planning Inspectors to update the previous sustainability appraisal in light of the additional housing and employment land requirements to meet the need of the Association of Black Country Authorities. While agreement has been reached between Shropshire Council and the Black Country authorities as to the number of additional houses and area of employment land this agreement was reached between Regulation 18 and 19 stages of the Local Plan preparation and after the original sustainability appraisal was produced. GC44 seeks to assess the effects of the strategy and consider alternative options.

Cross Houses has been recognised as a suitable settlement for development in previous plans, namely the Shrewsbury and Atcham Borough Local Plan and the SAMDev Plan. Cross Houses is located on the A458 strategic corridor half-way between the Strategic Centre of Shrewsbury and the Principal Centre of Bridgnorth. Both Shrewsbury and Bridgnorth are planned to continue to experience growth in jobs and facilities and Cross Houses will in consequence continue to benefit from excellent access to these opportunities via the A458. The allocation of site CSH006 would contribute to meeting Shropshire's housing needs and also to ensuring that Whitchurch benefits from a sufficient number of households in the settlement to maintain the vitality of the settlement's services and facilities and secure the future of the settlement.

#### **GC45 Updated Housing and Employment Topic Paper - April 2024 Paragraph 7.24**

The updated housing and employment topic paper is informed by the updated sustainability appraisal do these documents need to be considered together. GC45 considers a range of options for growth adopting a high growth preference as being the most sustainable model for Shropshire. In principle this is supported because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.

The Housing and Employment topic paper distributes additional growth to Shrewsbury, Whitchurch and Buildwas. It does not identify other locations specifically and in the context of sustainability assessment criteria that will be the subject of challenge this we suggest a limiting approach to accommodating the additional housing numbers. **Paragraph 7.24** of the topic paper confirms that in the Council's view that there is a correlation between greater growth and greater economic and social benefits derived from the development that greater growth provides, either on site or through CIL or s106 contributions.



It then suggests that greater growth conversely generates greater adverse environmental impacts. This is not necessarily true. Clearly development of a greenfield site may be considered to be an environmentally adverse impact but in some cases the development of the greenfield site may also resolve a pre existing environmental constraint such as pluvial flooding. Alternatively there may be pre-existing contamination or other geotechnical issues that development would resolve through appropriate remediation. It is not therefore automatically the case that development will be environmentally detrimental.

At **paragraph 7.28** of the topic paper reference is made to the desirability of providing flexibility to respond to changes to local housing need over the plan period and in this respect it is suggested that settlements that meet relevant sustainability criteria, such as Cross Houses, should be given the opportunity through the development plan to deliver appropriate housing or employment opportunity through the plan period to meet this need.

The Updated Housing and Employment Topic Paper (UHETP) **paragraph 8.65-8.66** considers four 'reasonable' options for accommodating the proposed 500 dwelling uplift in the housing requirement, as follows:

- 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.

The preferred option is 1, increasing settlement guidelines and windfall allowances, and these increases are proposed for Shrewsbury, Whitchurch and the Former Ironbridge Power Station. The preferred option for accommodating an uplift in the dwelling requirement is not considered appropriate. There is a finite and diminishing supply of brownfield land and windfall sites within settlements. Recent policy changes (including most specifically the need to provide Biodiversity Net Gain on new developments) also have a significant impact upon the capacity of both allocated and windfall sites to provide housing. To rely upon increasing settlement guidelines and windfall allowances in three settlements to provide the required uplift in dwellings, and meet the minimum housing requirement figure, is therefore considered inappropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF).

In addition, in not allocating land for development, it is difficult to determine whether the Plan makes appropriate provision for those with specific housing requirements such as those requiring affordable housing, housing designed for older people or those with disabilities and special needs, or those who wish to build or commission their own homes. Such provision is predominantly sought through percentage contributions on allocated sites. Windfall sites tend to be smaller and less likely to trigger requirements for provision such as affordable housing, whilst provision on brownfield sites may be 'reduced by a proportionate amount' (NPPF, paragraph 65).

Given the above, it is considered evident that option 3, increasing site allocations, should be adopted to ensure that the Plan is justified, deliverable and effective.

*(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)?**

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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.*



## Part B: Your Response

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Name and Organisation:	Amy Henson Berrys on behalf of Fletcher Homes
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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 **The Updated Housing and Employment Topic Paper (UHETP) Paragraph 9.1** considers 'reasonable' options for accommodating the proposed 1,500 dwelling contribution to the Black Country and details that the SA site assessment process has identified three sites to accommodate this provision, as follows:

- a. BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
- b. SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
- c. IRN001 - Former Ironbridge Power Station: 600 dwellings

However, these allocations were included within the submission version Plan and therefore included 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.

As a consequence, further consideration should be given to increasing the allocation of housing land within the Plan. There are unconstrained sites available within higher tier settlements (in accordance with the proposed spatial strategy) that would make an appropriate contribution to meeting an 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.

An example of such a site would be site **ELL007 within Ellesmere**, a key centre. It would be accessed via an adjoining housing development under construction by Fletcher Homes. The allocation of the site would contribute to meeting Shropshire's housing needs and also ensure that Ellesmere, as a key centre, benefits from a sufficient number of households in the settlement, reducing the reliance on windfall development, and maintaining the vitality of the settlement's services and facilities.

**The Updated Additional Sustainability Appraisal's (UASA's) assessment (paragraph 6.8)** of the 'reasonable' options for contributing to the unmet housing needs forecast to arise in the Black Country is supported.

Nonetheless, it is considered evident that option 1, making no contribution to the unmet needs of the Black Country, should not be considered a 'reasonable' option as it would conflict with the presumption in favour of sustainable development, contained within paragraph 11 of the National Planning Policy Framework, which states that (emphasis added):

*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

In addition, we are aware that the Association of Black Country Authorities (ABCA) wrote to Shropshire Council on the 24 February 2021 (in response to Shropshire Council's Regulation 19 consultation), to highlight that there will continue to be a significant shortfall of land to meet the Black Country's housing needs even in the light of Shropshire's proposed contribution in its Regulation 19 Plan and the proposed contributions in other emerging neighbouring Local Plans, including South Staffordshire, Lichfield and Cannock. Proposals for updated evidence, considering the housing market area shortfalls and potential growth locations are currently in discussion across the West Midlands Development Needs Group. In the interim, South Staffordshire's 2024 publication version Plan significantly reduces its proposed contribution towards the Black Country's Housing Needs (from that proposed in its 2022 publication version Plan), and states, in **paragraph 5.10**, that "consultation by the Black Country authorities in 2021 and Birmingham City Council in 2022 indicated a potential shortfall of 28,239 and 78,415 homes respectively, indicating that the shortfall is likely increasing".

Given the above, it would appear more reasonable to consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution.

**Section 10 of the Updated Additional Sustainability Appraisal (UASA)** details the assessment of the reasonable options for accommodating the proposed uplift to the proposed housing requirement.

**The UASA details, in paragraph 10.51**, that none of the reasonable options identified for accommodating the uplift to the proposed housing requirement are likely to result in a strongly negative effect and **paragraph 10.52** states that “all of the reasonable options are considered likely to result in a strongly positive effect on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society in the short, medium and long term”. However, there is a finite and diminishing supply of brownfield land and windfall sites within settlements and recent policy changes including, most specifically, the need to provide Biodiversity Net Gain on new developments, also have a significant impact upon the capacity of both allocated and windfall sites to provide housing.

In addition, in not allocating land for development, it is difficult to determine whether the Plan makes appropriate provision for those with specific housing requirements such as those requiring affordable housing, housing designed for older people or those with disabilities and special needs, or those who wish to build or commission their own homes. Such provision is predominantly sought through percentage contributions on allocated sites. Windfall sites tend to be smaller and less likely to trigger requirements for provision such as affordable housing, whilst provision on brownfield sites may be ‘reduced by a proportionate amount’ (NPPF, paragraph 65).

As a consequence, it is contended that the preferred option of ‘accommodating the proposed uplift in housing requirement by increasing settlement guidelines and windfall allowances’ is not considered likely to result in a strongly positive effect on **SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society**. In this regard, increasing site allocations provides far more certainty and should be reassessed accordingly.

**Within section 12, the Updated Additional Sustainability Appraisal (UASA) paragraphs 12.82-12.87** detail the assessment of sites to accommodate the proposed 1,500 Dwelling contribution towards the unmet needs of the Black Country.

The preferred option for accommodating an uplift in the dwelling requirement is not considered appropriate. There is a finite and diminishing supply of brownfield land and windfall sites within settlements. Recent policy changes (including most specifically the need to provide Biodiversity Net Gain on new developments) also have a significant impact upon the capacity of both allocated and windfall sites to provide housing.

To rely upon increasing settlement guidelines and windfall allowances in three settlements to provide the required uplift in dwellings, and meet the minimum housing requirement figure, is therefore considered inappropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF).

In addition, in not allocating land for development, it is difficult to determine whether the Plan makes appropriate provision for those with specific housing requirements such as those requiring affordable housing, housing designed for older people or those with disabilities and special needs, or those who wish to build or commission their own homes. Such provision is predominantly sought through percentage contributions on allocated sites. Windfall sites tend to be smaller and less likely to trigger requirements for provision such as affordable housing, whilst provision on brownfield sites may be ‘reduced by a proportionate amount’ (NPPF, paragraph 65).

Given the above, it is considered evident that option 3, increasing site allocations, should be adopted to ensure that the Plan is justified, deliverable and effective.





*(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)?**

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

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## Part B: Your Response

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Name and Organisation:	Amy Henson Berrys on behalf of Fletcher Homes
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Shropshire Council Local Plan Review

Response to post submission consultation on key documents prepared in response to the Planning Inspectors Interim Findings (ID28). The Council is undertaking a further 6 week consultation on four specific documents as part of the local plan review listed below:-

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

GC44 Shropshire Local Plan Updated Additional Sustainability Appraisal Report - April 2024

GC45 Updated Housing and Employment Topic Paper - April 2024

GC46 Updated Green Belt Topic Paper - April 2024.

This consultation response is made on behalf of Fletcher Homes who engaged with the Council through the regulation 19 stage of the local plan preparation process with specific reference to site CCT010.

These representations considered the following policies:-

Policy: Strategic Policy SP2 'Strategic Approach'

Policy: Settlement Policy S8.2 'Community Hubs: Ellesmere Place Plan in relation to Cockshutt'

Policy: S8.3 'Community Clusters: Ellesmere Place Plan Area in relation to Cockshutt'.

While the current consultation is not inviting comments on other aspects of the draft Shropshire Local Plan it is relevant to reference the representations made on behalf of

Fletcher Homes having regard specifically to the documents the subject of this additional consultation.

In this we draw your attention in particular about the sustainable nature of the site CCT010 and its compliance with the objectives set out in the NPPF that fit with the development profile typical of Shropshire, i.e. small to medium sites in sustainable locations.

In particular the NPPF states at paragraph 70 that:- "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly". This consultation response is made in respect of documents GC25, GC44 and GC45 and each is considered further as follows.

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

GC25 seeks to provide a policy framework to deliver the needs of an ageing population having regard to the evidence that Shropshire has a demographic with a greater proportion of older people than the national average as well as proving to be an attractive retirement destination. The Office for National Statistics considers the changing demographic position between the last two censuses (held in 2011 and 2021) confirming that in this time the average age in Shropshire increased from 44 to 48 higher than the national and regional average of 40years. Significantly the census return confirmed close to 15% increase in people aged between 50 and 64 and a commensurate 15% decrease in the number of residents aged between 35 and 49.

There is also a rising trend in the economically inactive (retired) at 28.5% in part due to inward migration as well as a rising percentage of the population being aged 50 or over 47.8% as of 2021 compared with 41.4% in 2011. This all points to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active.

While the aspirations of this development plan policy are laudable it is drafted in a manner that is both wordy and granular. Consequently, it may not capture the broader aspirations the policy seeks to deliver in terms of housing and personal choice, continued independence for an ageing population, or in maintaining the strength of community cohesion many residents benefit from. For example, the diversity of housing accommodation to support families with young and older members who are more likely to co locate in settlements that meet their specific needs could be improved. This type of accommodation is needed across all rural settlements in the county and as such Cockshutt could be well placed to achieve this objective in a planned way.

Paragraphs 2 to 6 of the draft policy set out how accessible and adaptable housing will be provided. Shropshire is a large, rural and sparsely populated county and the policy does not capture some of the solutions that would allow people to remain living in rural communities close to friends and families able to support them. Examples could be in identifying support for those looking to downsize to more appropriate new build accommodation (in the community) or alternatively the provision of housing to meet the needs of extended families independently on the same site. In addition to this the benefits of looking at a rural communities wholistically to meet its future needs, to include the older and younger generation through long term investment in housing and employment and community infrastructure is a relevant consideration in the contribution that CCT010 site could bring within a short term time frame.

GC44 Shropshire Local Plan Updated Additional Sustainability Appraisal Report - April 2024.



This document has been requested by the Planning Inspectors to update the previous sustainability appraisal in light of the additional housing and employment land requirements to meet the need of the Association of Black Country Authorities. While agreement has been reached between Shropshire Council and the Black Country authorities as to the number of additional houses and area of employment land this agreement was reached between Regulation 18 and 19 stages of the Local Plan preparation and after the original sustainability appraisal was produced. GC44 seeks to assess the effects of the strategy and consider alternative options.

Cockshutt has been recognised as a suitable settlement for development in previous plans, namely the North Shropshire District Local Plan and the SAMDev Plan. It has a primary school, nursery, post office, regular bus service, public house, community hall, church, library, children's playground, sports pitches and super-fast broadband.

To remove Cockshutt's current status as a Community Hub in the SAMDev Plan will lead to the loss of services and facilities over time and reduce the village's long-term sustainability. It consigns Cockshutt to decline, contrary to the stated aspirations of the Plan to improve sustainability. The only change in the village's circumstances is the closure of its convenience store which has reduced its score in the Council's Hierarchy of Settlements' Paper from 50 points in 2017 to 46 points in 2020. The threshold for a Community Hub is deemed by the Council to be 48 points, in a rural location such as this, the measure of sustainability should be considered more loosely as Shropshire Council has acknowledged previously in the adopted Core Strategy and SAMDev Plans previously. Here it is acknowledged that rural communities function over a wider network to create sustainable rural communities with services spread between these locations. Consequently in terms of assessing site selection it is suggested that a less rigid approach could be applied to rural settlements.

#### GC45 Updated Housing and Employment Topic Paper - April 2024

The updated housing and employment topic paper is informed by the updated sustainability appraisal do these documents need to be considered together. GC45 considers a range of options for growth adopting a high growth preference as being the most sustainable model for Shropshire. In principle this is supported because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.

The Housing and Employment topic paper distributes additional growth to Shrewsbury, Whitchurch and Buildwas. It does not identify other locations specifically and in the context of sustainability assessment criteria that will be the subject of challenge this we suggest a limiting approach to accommodating the additional housing numbers. Paragraph 7.24 of the topic paper confirms that in the Council's view that there is a correlation between greater growth and greater economic and social benefits derived from the development that greater growth provides, either on site or through CIL or s106 contributions.

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At paragraph 7.28 of the topic paper reference is made to the desirability of providing flexibility to respond to changes to local housing need over the plan period and in this respect it is suggested that settlements that meet relevant sustainability criteria, such as Cockshutt, should be given the opportunity through the development plan to deliver appropriate housing or employment opportunity through the plan period to meet this need.

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

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