

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:	Megan Streets Gladman Developments 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 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 checked="" 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):	Sections 1 -11
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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 see the attached statement

(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.



Shropshire Council
Local Plan Examination

**Updated Housing and Employment Topic Paper
(GC45)**

June 2024



[gladman.co.uk](https://www.gladman.co.uk)



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1 HOUSING AND EMPLOYMENT LAND TOPIC PAPER

- 1.1.1 Gladman are supportive of the increase in the minimum overall housing requirement to 31,300 dwellings over the plan period (2026-2038) including; 1,500 dwellings towards the unmet housing need forecasted to arise in the Black Country, and the 15% uplift above the Local Housing Need figure. The PPG is clear that the standard methodology identifies the minimum annual housing need figure and does not establish a housing requirement figure. Ambitions to support economic growth, deliver affordable housing and unmet needs from other authorities should be taken into consideration during the Plan preparation process¹. Therefore, the uplift of 15% shows that draft Policy SP2 is positively prepared.
- 1.1.2 The Housing and Employment Topic Paper is clear that the housing requirement is a minimum, and should be expressed as such in draft Policy SP2. Gladman welcome the wording change from 'around' to a 'minimum', within the policy wording. This change positivity allows for housing needs to be met, supports economic growth, and deliver affordable housing.
- 1.1.3 The overall change in requirement is 500 dwellings over the plan period 2016-2038. The Topic paper identifies four Options for how the additional homes could be met, through which the Council has concluded that Option 1 - Increasing Settlement Guidelines and Windfall Allowances would meet the increase in the housing requirement. This Option may deliver the additional 500 dwellings over the plan period, however to provide more certainty over its delivery, Gladman would suggest identifying additional housing allocations through Option 3 (Extensions to current proposed site allocations or the allocation of additional sites).
- 1.1.4 Further housing allocations could be identified to ensure that the spatial strategy balances the housing needs alongside the employment growth. Gladman have previously identified in our Matter 4 (Housing and Employment Needs)

¹ Planning Practice Guidance Paragraph: 002 Reference ID: 2a-002-20190220

representation that the employment growth within the Principal Centres such as Market Drayton is at an imbalance to that of the housing allocations. Market Drayton has been allocated 1,200 dwellings over the plan period, 3.9% of the Local Plan housing requirement, yet will deliver 35 hectares of employment land equating to 11.6% of the employment land requirement for the Local Plan.

- 1.1.5 Additional site allocations would ensure that affordable housing is delivered, given that windfall site may fall below the policy requirement to deliver affordable homes. Larger allocations would ensure that affordable homes are delivered, helping meet the affordable needs of the county.
- 1.1.6 The proposed amendments to the settlement guidelines and associated windfall allowances have been identified in Shrewsbury, Whitchurch and the Former Ironbridge Power Station. Some of the windfall allowance has already been met including the 75 additional dwellings at the Ironbridge Power Station. However, the majority of the amendments have been made in Shrewsbury, with an increase of 350 dwellings. The previous windfall allowance has been met in the town. However, a number of the identified potential windfall sites, have either not had a planning application submitted, the planning permission has lapsed or there are identified delivery issues. Therefore, the certainty these sites may be put into question.
- 1.1.7 Gladman would suggest that housing allocations, within the top 3 tiers of the settlement hierarchy would provide the most certainty of deliverability of market and affordable housing.

