

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:	Stuart Thomas Berrys on behalf of Morris & Company Limited
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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 checked="" 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):	See text below
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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.

This consultation response is made on behalf of Morris & Company Limited which has engaged with the Council through a pre-application enquiry process to consider the land west of A49, Battlefield, Shrewsbury. The land was promoted during Regulation 18 to Shropshire Council and although not allocated was given references SHR195 and SHR044.

Morris & Company Limited is a long established locally based company with extensive commercial and residential experience within the Shropshire and Telford & Wrekin area.

Over the last 15 years Morris has constructed over 800,000 ft² of industrial space both within Shrewsbury and Telford, to satisfy national, regional, and local occupiers.

Morris & Co would like to raise two key components which make the plan unsound.

Firstly, it is considered that the Local Plan would benefit from less reliance on windfall employment land delivery. Document GC45 places all 20Ha of employment uplift in the category of being delivered by windfall development. This reliance on windfall means the Plan is not positively prepared because it does not specifically seek to meet the identified need for employment but rather states that it will be found on a bank of sites which are not specifically identified.

Secondly, the Local Plan continues to place reliance on allocation SHR166 which since putting this forward for allocation has now become heavily constrained and the originally estimated 45Ha to be delivered will be substantially less.

While the current consultation is not inviting comments on the other aspects of the draft Shropshire Local Plan it is relevant to reference the representations made on behalf of Morris & Company Limited through the pre-application process, so far as this is relevant to the current documentation.

In this we draw your attention in particular to our submissions made through the pre-application engagement process (Ref. PREAPP/23/00965). We would also draw attention to an assessment conducted by Avison Young on behalf of Shropshire Council which was named 'Employment Land Review 2019'. This document assessed SHR195 to be Category A employment land. Shrewsbury is the Strategic Centre for Shropshire and SHR195 was one of only two category A sites in Shrewsbury. Category A was defined as: *'Sites that are in sustainable locations which the market is expected to regard as attractive investment prospects, being assumed to be viable for development, and largely free of any significant environmental and/or technical constraints'*. For this reason, it is uncertain why this site would not be bought forward as an allocation, instead of relying on windfall delivery which is significantly more uncertain.

The consultation response is made in respect of documents GC44 and GC45 and each is considered further as follows.

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.

In the Council's GC44 paper it concludes both SHR195 and SHR044 to have an overall settlement sustainability conclusion rating of 'Poor' but an overall Black Country Contribution Sustainability Conclusion rating of 'Fair'.

Given that one of Shropshire Council's evidence base documents (Employment Land Review 2019) concluded that SHR195 was the most suitable site in the whole of Shrewsbury yet is now concluded to be of poor sustainability appears to be in direct conflict. An allocated site with reference SHR166 was considered as Category B in this same assessment and therefore, not as suitable. SHR166 also scores as a 'Poor' sustainability rating in GC44.



It has since been published that there are significant concerns in relation to the delivery of SHR166 which was set to deliver 45Ha of employment land. Withing GC44 it states that 'much of the site contains a newly designated Scheduled Monument'.

This will significantly reduce the available site area and require the need for further employment to be brought forward.

SHR195 and SHR044 fall on 7.9Ha of land which could deliver up to 15,000sqm of Employment floorspace on the edge of Shrewsbury in a sustainable location.

An examination of the sustainability criteria listed in the tables for the preferred employment allocations does raise questions about how the assessment is undertaken and the conclusions that flow from this. For example, the sustainability of the preferred allocation sites is assessed against the walking distance to facilities and services such as schools, open space, playground or doctors surgeries. There are several points this raises.

What is a sustainable walking distance? Shropshire Council equates a 10-minute walk as a reasonable walking time to reach essential services (the benchmark) and suggest this is 480m. Other councils capture a significantly longer distance within a 10-minute walk and Sustrans, the charity that focuses on walking and cycling, suggests a 10-minute walk would equate to approximately half a mile or 800m distance. If that were used as a metric then many more locations in the local plan would achieve a higher sustainability rating. Shrewsbury is the main Strategic Centre of Shropshire and its main employment area is in its North east segment. If this were to be tested against the sustainable walking distance the entire 90 Hectares would not be within 480m of a primary school (closest is 790m away), library (550m away) and leisure centre (900m away). These are distances taken from the closest position of the service from within the 90Ha employment land. If the existing employment land cannot be sustainable under Shropshire Council's criteria then it would seem that there is a flaw in the assessment and it should be revised.

Further to this Shropshire Council use the same assessment for residential development to employment development and scores everything as single units with little capability to adjust this score given severity. A single minus for not being 480m to a CP surgery is the same as being 1m away from a SSSI, Conservation Area, World Heritage Site or in Flood Zone 3. This is not a suitable way of assessing every site and creates the potential for sustainable sites to be discounted unnecessarily.

Furthermore, some of the Council's recommended locations for additional growth in Shrewsbury fails to score as "good" by its own assessment without subsequent qualification and mitigation which undermines the value and credibility of the assessment process. The key one of SHR166 which would now be one of the lowest scoring on the whole table, however, they have failed to revise the table with the scoring of the site being within 300m of a scheduled monument in GC44.



Consequently, sites not included in the current plan that meet the relevant sustainability criteria such as the Morris proposal for their land east of Battlefield could achieve a higher sustainability outcome.

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.

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.

Point 2.25 of the GC45 paper states that on top of the 320 hectares required there is now an uplift of 20 hectares on the employment land requirement proposed in the submission version of the Plan. Shropshire Council have brought forward 4 options to accommodate this. None of these options are to allocate further employment land, this appears to be an oversight on their part as it should have been an option for consideration and it should have been concluded to be the most sustainable and sound approach.

With Shropshire Council placing a focus on the urban and Shrewsbury being the strategic centre, sites like SHR195 and SHR044 which are both adjacent to Shrewsbury and act as a natural extension. These two sites would comply with the future policies and provide a substantial contribution to the 20Ha uplift established to be delivered by windfall sites. It would be much more reasonable to sufficiently allocate land instead of relying heavily on windfall sites.



Paragraph 86 of the NPPF states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. Shropshire Council's option to Utilise Settlement Guidelines and Windfall Allowances to deliver a large portion of employment land is not a clear economic vision and for this reason the local plan is not consistent with national policy.

For the reasons stated above it is considered that Shropshire Council should re-evaluate how it is delivering the 20Ha uplift of employment land and the deliverability of SHR166. With this re-evaluation completed it is considered that a conclusion should be reached that there is a need for further allocated sites. The sites under Morris & Co's control have already been assessed as sustainable by part of Shropshire's evidence base and seen as higher scoring than SHR166. These sites would also be delivered by a company who are well known to deliver high-quality sites in a timely manner and as such should be the primary choice in any allocation.

(Please continue on a separate sheet if necessary)

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Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

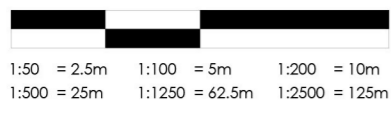
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Yes, I consider it is necessary/wish to participate in hearing session(s)

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DISCLAIMER: This drawing and the building works depicted are the copyright of Pinnegar Hayward Design and may not be reproduced or amended except by written permission. No liability will be accepted for amendments made by other persons. All dimensions are to be checked on site and the Architect is to be notified of any discrepancies prior to commencement. Do not scale. If an accurate dimension is required, please contact the Architect

- Notes
- | No. | XXX | Description: | XXX |
|-----|-----|--|-----|
| 1. | | Subject to topographic survey. Drawing based on OS information provided by others. | |
| 2. | | Subject to wider design team input, review & coordination | |

GENERAL KEY:

- APPLICATION AREA (19.5 ac)
- ▲ VEHICULAR ACCESS POINT
- ▲ BUILDING ACCESS POINT

BUILDING AREA SCHEDULE:

NORTHERN PARCEL	
UNIT 1: B2/B8 (2 Acre Plot)	1,485m ² / 15,984ft ²
UNIT 2: B2/B8	1,085m ² / 11,679ft ²
UNIT 3: B2/B8	1,085m ² / 11,679ft ²
UNIT 4: B2/B8	1,085m ² / 11,679ft ²
UNIT 5: B2/B8	1,085m ² / 11,679ft ²
UNIT 6: B2/B8	1,085m ² / 11,679ft ²
UNIT 7: B2/B8	1,085m ² / 11,679ft ²
SOUTHERN PARCEL	
UNIT A: B2/B8	3,280m ² / 35,305ft ²
GF: FF OFFICES (7.5%)	246m ² / 2,648ft ²
TOTAL:	3,526m ² / 37,953ft ²
UNIT B: B2/B8	3,280m ² / 35,305ft ²
GF: FF OFFICES (7.5%)	246m ² / 2,648ft ²
TOTAL:	3,526m ² / 37,953ft ²
OVERALL TOTAL:	
GF:	14,555m ² / 156,669ft ²
TOTAL INC FF:	15,047m ² / 161,965ft ²
ADDITIONAL PLOTS:	
EV CHARGING HUB:	1.5 Acre Plot
CAFE:	Area required TBC
MICRO-GRID:	1 Acre Plot (More available if required)



Revision	Date	Description

Pinnegar Hayward Design
 87 Carver Street
 Birmingham
 B1 3AL
 Tel: 0121 236 7009
 Email: design@p-h-d.co.uk
 Web: www.p-h-d.co.uk

Client
MORRIS PROPERTY

Project
NEW BUILD MIXED USE DEVELOPMENT

Location
JAGGER LAND, BATTLEFIELD SHREWSBURY

Drawing Title
PROPOSED SITE PLAN

Project Number	3067	Drawing No.	(90)001	Revision	F1
Stage	FEASIBILITY				
Scale	1:1250				
Date	NOV 23				
Drawn	SR				
Checked					
Sheet Number	3067_PHD_X_XX_DR_A_(90)001				

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

Paragraph(s):	See text below
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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.

The consultation response is made in respect of documents GC25, GC44 and GC45 and each is considered further as follows.

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

- 1.1 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.
- 1.2 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.
- 1.3 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.

- 1.4 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.
- 1.5 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.
- 1.6 In addition to the above we consider that the policy should make positive provision for the assessment of retirement villages which would not be delivered on allocated housing sites.
- 1.7 Retirement villages have proven to be a successful model, providing opportunities for residents to move from more independent accommodation to more supported accommodation as their needs change. It can enable couples to remain geographically close even when their needs differ. Furthermore, a concentration of older people supports a good range of specialist services for the elderly that benefits not only immediate residents but those living elsewhere in the town who can travel to use day-care services on site.
- 1.8 Morris & Company Ltd have been promoting a retirement complex which will help deliver Shrewsbury's quantitative and qualitative needs for an ageing population over the plan period. The proposed site shown in figure 1 overleaf comprises 5.4 hectares of land. It was previously assessed by the Council as part of the larger site SHR216 and was included as a preferred allocation in the November 2018 Preferred Options plan for a mix of residential and Health & Care uses. The proposal has now changed to a dedicated retirement village on the 5.4 hectare parcel as a stand-alone scheme.
- 1.9 As a local provider, Morris Care understands the needs of the market and is well placed to help deliver Shropshire's needs for this type of accommodation.
- 1.10 The proposal has now changed to a dedicated retirement village on the 5.4 hectare parcel as a stand-alone scheme. We propose that it is allocated purely for retirement living/ sheltered housing and extra care housing/ housing-with- care. There are two nursing homes in the local area, at Clayton Way and at The Isle, Bicton, that already provide for this type of need.
- 1.11 To distinguish this 5.4ha site from the previous site, we use reference SHR216a.

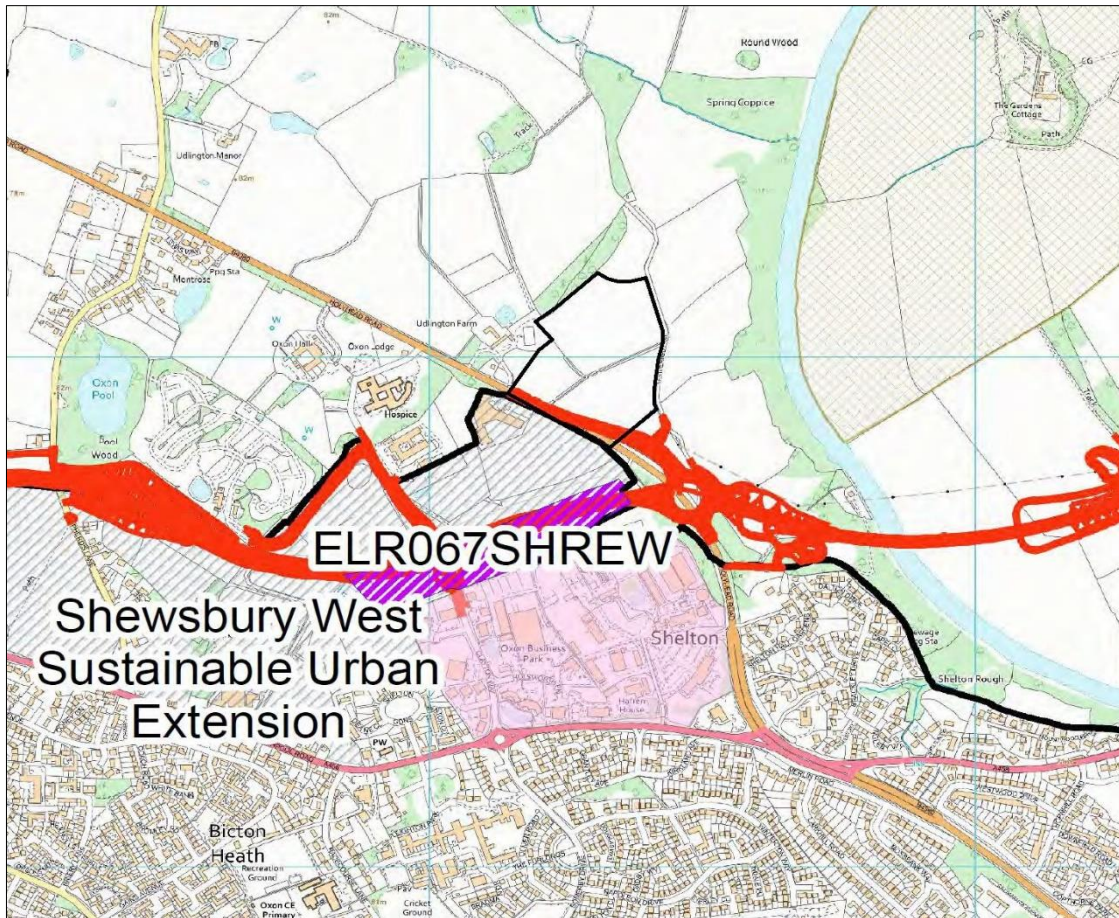


- 1.12 The site is close to complementary services offered by:
- Shrewsbury Hospital
 - The Severn Hospice, Clayton Way
 - The Marches Care Home, Clayton Way
 - Morris Care's Isle Court Nursing Home, Bicton
- 1.13 The proposed allocation is compatible with the existing allocation of land for health/care development between Clayton Way and Holyhead Road, as part of the SAMDev Plan allocation for the Shrewsbury West Sustainable Urban Extension (SUE). The proposed modification to the Policies Map shown in figure 2 will be a natural extension to the SUE.

Figure 1: Proposed Retirement Village, north of Holyhead Road, site SHR216a



Figure 2: Proposed change to the Shrewsbury Development Boundary on the Policies Map



- 1.14 The Council-approved Masterplan for the SUE proposes good pedestrian connections between Holyhead Road and the district centre at Bicton Heath, including the Co-op store south of the Park & Ride, as shown below.

Figure 3: The site in relation to the Shrewsbury West SUE Masterplan



Figure 4: Aerial photograph of the area above



1.15 Land to the south of site SHR216a has been approved as a scheme for 28 extra care apartments, 26 elderly persons bungalows and 2 blocks to provide B1 commercial accommodation linked to the healthcare industry. The layout plan is shown in figure 5 below.

Figure 5: Current development proposals opposite site SHR216a



1.16 The site is well served by public transport with the No. 70 Arriva bus service stopping adjacent to the site, with 15 buses a day into Shrewsbury town centre. The bus stops are opposite The Coppice Shire Living retirement flats, with a pedestrian refuge at the crossing point on Holyhead Road.

1.17 The site benefits from an existing vehicular access, the extent of which is shown in figure 6 below (SA/04/0264/F). This access can easily be re-opened by simply removing the hedge that has grown in front of it.

Figure 6: Planning consent for access (SA/04/0264/F)



- 1.18 The site is well screened in the landscape by mature hedgerows to the south along Holyhead Road and the east along Featherbed Lane. Mature woodland screens views of the site to the north. The site's position close to the countryside provides a good quality of life for older residents, many of whom will be coping with health challenges.
- 1.19 The site lies entirely outside the groundwater source protection zone. It naturally drains eastwards and surface water drainage will consequently have no impact whatsoever on the source protection zone to the north.
- 1.20 In summary, the 5.4ha site north of Holyhead Road would make an ideal allocation for a retirement village, helping deliver a suitable mix of specialist housing including retirement / sheltered housing for those able to live independently and follow-on extra care housing for those needing more assistance. Residents benefit from being able to move easily from one form of housing to another as their needs change, whilst retaining their social contacts and familiarity. The proposal would be of enormous social benefit to Shrewsbury.

1.21 Morris & Company Ltd are a local company that has a good track record for delivery. We can confirm that the site is owned in its entirety by Morris's, is available, suitable and viable and can be delivered within the plan period.

(Please continue on a separate sheet if necessary)

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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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Q1. To which document(s) does this response relate?

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

Paragraph(s):	6.8
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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.

The Updated Additional Sustainability Appraisal's (UASA's) assessment 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.

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

Paragraph(s):	7.61
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

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The Updated Housing and Employment Topic Paper (UHETP) details that the Council wishes to pursue the submission version Plan's preferred 'High Growth' principle. The submission version Plan identifies a housing requirement figure of 31,300 dwellings for the period 2016-2038 (1,400 dwellings per annum). Whilst the UHETP now proposes a housing requirement figure of 31,800 dwellings for the period 2016-2038 (1,423 dwellings per annum). There is, therefore, a 500 dwelling uplift in the housing requirement.

The UHETP provides significant additional evidence in support of the proposed housing requirement and the resultant uplift in the provision of housing is supported.

Nonetheless, it remains unclear how the magnitude of this uplift has been derived. Both the submission version Plan's requirement and requirement now proposed within the UHETP appear to be based upon 2020 LHN data, a 15% 'High Growth' uplift and the same contribution towards the unmet needs of the Black Country.

We concur with the Inspectors previously stated concern that the housing requirement within the submission version Plan and supporting Sustainability Appraisal is seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended that the housing requirement proposed within the UHETP should be in the magnitude of 1,500 dwellings above the submission version Plan's requirement i.e. in the region of 32,800 dwellings or 1,491 dwellings per annum.

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

Paragraph(s):	8.65-8.66
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Q4. Please detail your comments on the specified document(s).

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

- Option 1: Increasing Settlement Guidelines and Windfall Allowances.
- Option 2: Densification of Proposed Site Allocations.
- Option 3: Increasing Site Allocations.
- 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)?

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.



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:	Stuart Thomas (BERRYS) on behalf of Morris & Company Limited
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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 checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input 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):	Table 8.6
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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.

The Updated Additional Sustainability Appraisal's (UASA's) assessment of the 'reasonable' options for the Housing Requirement concludes that a High Growth Option plus contribution to the Black Country Authorities Unmet Housing Needs is the most sustainable of the reasonable options identified and is therefore supported.

Nonetheless, whilst the Updated Housing and Employment Topic Paper (UHETP) provides significant additional evidence in support of the proposed housing requirement it remains unclear why the magnitude of the proposed uplift in housing requirement has been derived as both the submission version Plan's requirement and requirement now proposed within the UHETP appear to be based upon 2020 LHN data, a 15% 'High Growth' uplift and the same contribution towards the unmet needs of the Black Country.

We concur with the Inspectors previously stated concern that the housing requirement within the submission version Plan and supporting Sustainability Appraisal is seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country.

As a consequence, it is contended that housing requirement option 3b should be in the magnitude of 1,500 dwellings above the submission version Plan's requirement i.e. in the region of 32,800 dwellings or 1,491 dwellings per annum.

(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.

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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):	9.10
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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.

The Updated Housing and Employment Topic Paper (UHETP) 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.

The land is identified as sites SMH017 and SMH030 within the local plan review. In addition, representations have been made to the Council through the pre-application process (Ref PREAPP/23/00965). A copy of the Council's response is included in Appendix A.

St Martins is proposed to be designated as a Community Hub within the draft Plan with policy S14.2 identifying a residential guideline of around 355 dwellings over the plan period. This site could and should make a significant contribution to this figure as an allocated site rather than relying upon windfall development to accommodate the need.

St Martins is rated 21st in the Hierarchy of Settlements document produced by Shropshire Council (August 2020) and is the fourth highest rated Community Hub in Shropshire. This demonstrates how sustainable this settlement is with an already significant population 2,693 (2021 census data). Future residential development will help to support housing growth and meet any community needs including the potential to deliver additional affordable housing above and beyond policy requirements as well as a high proportion of bungalows and designated open spaces.

(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.

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Yes, I consider it is necessary/wish to participate in hearing session(s)

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Part B: Your Response

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Name and Organisation:	Stuart Thomas (BERRYS) on behalf of Morris & Company Limited
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d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

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

Paragraph(s):	10.51-10.52
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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.

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.

(Please continue on a separate sheet if necessary)

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d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

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

Paragraph(s):	12.82-12.87
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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.

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

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.

As a consequence, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 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.

The land is identified as sites SMH017 and SMH030 within the local plan review. In addition, representations have been made to the Council through the pre-application process (Ref PREAPP/23/00965). A copy of the Council's response is included in Appendix A.

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