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:	Amy Henson Berrys on behalf of Mr & Mrs Redge

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.	☒
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	☒
c. Updated Housing and Employment Topic Paper.	☒
d. Updated Green Belt Topic Paper.	☐

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

Paragraph(s):	Please see text below and paragaraph numbers in bold

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 Mr & Mrs Redge who engaged with the Council through the regulation 19 stage of the local plan preparation process with specific reference to site allocation Minsterley MIN018.

These representations considered the following policies:-

Policy: Strategic Policy SP2 'Strategic Approach'

Policy: Settlement Policy SP7 'Managing Housing Development'

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 Mr & Mrs Redge 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 MIN018 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 hub settlements such as Minsterley 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.

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.

Minsterley has been recognised as a Community Hub settlement for development and site MIN018 designated as a proposed allocation in the draft Local Plan. The allocation of site MIN018 would contribute to meeting Shropshire's housing needs and also ensure that Minsterley 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 so 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 is, 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 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.

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 only 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).

(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.