

## 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:	Mervyn Eyles – Ruyton XI Towns PC
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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 type="checkbox"/>
<b>b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.</b>	<input 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):	8.5/8.6/8.7
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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.**

Paragraph 8.22 selects Option 1, increasing settlement guidelines and windfall allowances, as the representing the most sustainable of the reasonable options for accommodating an uplift to the proposed housing requirements. The windfall allowance in the total equation is 10%. However, this figure is not applied equally. For the Parish of Ruyton Xi towns the previous Local Plan allocated 100 dwellings on sites with unimplemented planning approvals and 15 dwellings as 'infill' (a term now superseded by 'windfall'). The proposed Local Plan gives an overall target of 125 dwellings of which 34 are allocated to windfall. This is 27% of the target and does not take account of the fact that some of the 19 completions would be also categorised as windfall. (CONTINUED OVERLEAF)

*(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.*

# Draft Shropshire Local Plan

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Name and Organisation : Mervyn Eyles – Ruyton Xi Towns PC

## Q4. Continuation Sheet

(CONTINUED) A small town such as Ruyton Xi Towns has little room for a high percentage of additional infills within the Development Boundary. Whilst, historically, 10% windfall development in large urban areas has been achieved it is difficult to see the logic of applying a higher percentage to a small rural town.

The Parish Council is deeply concerned that the windfall target could only be achieved by opportunistic applications for Exception Sites in the surrounding countryside. If more housing is required in our Parish it is far preferable for this to be on identified sites. We would certainly not wish for developers to quote (in our view optimistic) windfall targets as a justification for development in undesirable locations.

If, in the current financial climate, resources are not available to identify and approved new sites the Parish Council would respectfully request that the windfall target is brought back in line with the average. Given that you have 10% flexibility in your figures (land supply for 34874 dwellings against a target of 31300) this appears not to be problematical.

The Parish Council is also concerned that, in the proposed Local Plan, the requirement for only 10% of housing on approved development sites in North Shropshire to be affordable (as opposed to 20% in South Shropshire) will increase the pressure for Exception Sites in open countryside.

Although it is recognised that policies DP4 through DP7 attempt to regulate this, some of the wording is not precise (“isolated location”, “reasonable access to local services by walking, cycling or public transport”, “appropriate access to a school”) and could encourage speculative applications and appeals based on different interpretations. In areas where windfall targets are also large any appeals could be very difficult to defend.