

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:	
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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.	
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):

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 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 Local Plan

Consultation

Land to the South of Stanton Road, East of Shifnal

Morris & Company Limited

June 2024

Shropshire Local Plan Consultation

Land to the South of Stanton Road, Shifnal

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1. Introduction

- 1.1. These representations have been prepared by Maxfield Bros. Ltd on behalf of Morris & Company Limited. They are prepared in response to the additional consultation by Shropshire Council on the following development plan documents:
 - GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.
 - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.
 - Updated Housing and Employment Topic Paper.
 - Updated Green Belt Topic Paper.
- 1.2. The representations are written in the context of Morris & Company's land interests in Shifnal which are being promoted for mixed-use development. Morris & Company is a substantial landowner and business in Shropshire and an experienced care developer. It seeks a residential-led mixed-use allocation that incorporates significant specialist housing for older people on Site ref SHF018a - Land to the South of Stanton Road, East of Shifnal.
- 1.3. In our view the local plan fails the tests of soundness because the development plan documents, are:
 - **Not positively prepared** - the plan does not fully meet the housing needs for different groups within the community.
 - **Unjustified** - the plan's strategic approach is not appropriate: it does not take account of reasonable alternatives and is not based on proportionate evidence.
 - **Ineffective** - the plan is undeliverable over the plan period.
 - **Inconsistent with national policy** - the plan does not maximise opportunities for sustainable development.
- 1.4. We set out our views in detail below and make recommendations as to how the development plan documents should be amended to ensure the plan meets the test of soundness.
- 1.5. Section 2 reviews the draft policy for Housing Provision for Older People and those with Disabilities and Special Needs.
- 1.6. Section 3 reviews the Sustainability Appraisal.
- 1.7. Section 4 reviews the updated Housing and Employment Topic Paper.
- 1.8. Section 5 reviews the updated Green Belt topic paper.

Site SHF018a - Land to the South of Stanton Road to the East of Shifnal
- 1.9. The Site is located in the east of Shifnal and is shown in blue on Figure 1-1 below. It is identified on the draft Shifnal place plan area inset maps (SD00515) as

safeguarded land to be removed from the Green Belt for future needs beyond the current Local Plan period.

- 1.10. The southern boundary (west of the site) adjoins a residential development site that was granted permission for 99 dwellings on 14 May 2018 and has now been completed. This formed part of SAMDev saved sites identified on the Shifnal place plan area inset maps and identified as SHIF004a, SHIF004b and ELR021. These sites are shaded brown and labelled on the Figure 1-1 below.
- 1.11. To the south of the site is Lamledge School, an independent school that works with students aged 5-19 with social, emotional and mental health (SEMH) needs, as well as other learning needs. Also, to the south of the site, is a protected employment site.
- 1.12. To the east of the site are proposed site allocations: SHI018b and SHI018d. These sites have been identified as land for meeting the unmet employment needs of the Black Country.

Figure 1-1 SHF018a Context Plan



2. Draft DP Policy

Introduction

The draft policy is not in accordance with the NPPF and requires amendment

- 2.1. The overall objectives of the policy are welcomed by Morris & Company. However, the policy requires amendments to deliver on its objectives to meet the tests of soundness. There is no evidence that the policy will support the delivery of specialist housing for older people, people with disabilities and special needs at the scale necessary to meet the strategic objectives of the local plan.
- 2.2. In locations where: (a) most of the residential development proposed for the plan period has already been delivered without being subject to the proposed policy, and; (b) high levels of windfall development is proposed, the policy will fail to bring forward specialist housing. This is due to the low threshold of requirement for bringing forward specialist housing contained within the policy, and the criterion that only those sites that are allocated are subject to the policy requirements of bringing forward specialist housing.
- 2.3. The policy would therefore fail to deliver on the People’s Strategy for Shropshire to support older people and those with disabilities to remain within their existing communities. It also fails to meet the requirement of the NPPF to provide a choice of housing for older people.
- 2.4. The policy requires adjustment to ensure that it satisfies the tests of soundness.

Specialist housing Shifnal

The policy will not deliver the choice of homes required by the NPPF - specialist housing will amount to less than 2% of housing delivery in Shifnal over the plan period

- 2.5. Set out below, is a case study demonstrating the ineffectiveness of the draft policy.
- 2.6. The Draft Local Plan Proposed Residential Guideline (2016-2038) for Shifnal is 1,500 dwellings. Of which 1,187 dwellings have been completed and 16 dwellings have permission approved. 230 dwellings are proposed to be delivered on allocated sites¹. Windfall development is also allowed for in the residential guideline for Shifnal².
- 2.7. Shifnal has three allocations (SHF013 (65 dwellings), SHF015 & SHF029 (65 dwellings) and SHF022 & part SHF023 (100 dwellings)).
- 2.8. The sites are all have a projected yield of less than 150 dwellings. §17 of the draft policy requires that a minimum of 10% of specialist housing is delivered on site allocations with a yield of up to 150 dwellings. The allocated sites would yield around 24 specialist housing dwellings. The policy does not require unallocated

¹ Schedule S15.1(i) of Draft Shropshire Local Plan

² Table 8.1 of GC46 Updated Green Belt Topic Paper – April 2024

windfall sites to deliver specialist housing.

- 2.9. This means that, in Shifnal, less than 2% of the residential guideline of housing would be specialist housing. This would not provide the choice required of the policy itself (§1 of the draft policy), nor would it meet the requirement of the NPPF quoted at §6 of the policy explanation.
- 2.10. The policy cannot act retrospectively but consideration should be given to how the objectives of the policy must be realised particularly in locations where a substantial proportion of the housing supply of the local plan period has already been delivered leaving little opportunity to deliver specialist housing. The policy therefore needs adjustment to meet the test of soundness.
- 2.11. Evidence of an acute need for specialist housing in Shifnal is highlighted in the Shifnal Neighbourhood Plan (Ref: EV084). At Section 2.10 it sets out the profile of the community. The adopted neighbourhood plan includes a specific policy on providing care homes and homes suitable for older people.

Proposed amendments

- 2.12. Two alternative options are suggested for making an adjustment to the local plan to ensure the plan is sound and so that the *'housing needs of older people and those with disabilities and special needs [are] met in a way that provides choice'* (draft policy §1).
- 2.13. **Option 1:** As an exception, apply criteria within the policy supporting residential development with a high proportion of specialist housing (e.g. >20%) to be brought forward outside of settlement boundaries of Key Centres (such as Shifnal) and other (higher order settlements in the settlement hierarchy) on unallocated sites.
- 2.14. The criteria to be met for housing to be supported would be: (a) that the site adjoins the settlement boundary; and (b) that the forecast for specialist housing (considering allocated sites in the settlement, their scale, and settlement residential guidelines) would be less than 5% of the overall settlement residential guideline.
- 2.15. We suggest that these criteria would be restricted to settlements that are Key Centres or larger settlements in the settlement hierarchy. It would be inserted as a separate paragraph after Paragraph 19 of the policy. A paragraph would also need to be inserted within Policy DP10 with a cross reference allowing housing outside of settlement boundaries where it meets the criteria described. An amendment to Policy SP11. Green Belt and Safeguarded Land would be required to state that such development would constitute very special circumstances.
- 2.16. **Option 2:** Allocate additional sites for development to provide support for the delivery of specialist housing for older people, people with disabilities (as per Section 3.6 of the Draft Local Plan).
- 2.17. In Shifnal, allocating SHF018a, for mixed use development with the purpose of bringing additional specialist housing forward in the settlement so that the objectives of the policy are met. This would deal with the specific circumstances

in Shifnal and would require an adjustment to Policy S15 (Schedule S15.1) with an appropriate development guidelines explanation that requires the development to be brought forward with >20% provision of specialist housing.

3. Sustainability Appraisal

Section 6 and Section 7 of the SA: Contributing to unmet needs in Black Country

- 3.1. The Sustainability Assessment (SA) does not assess all reasonable alternatives for contributing to the unmet needs forecast to arise in the Black Country. The plan is therefore unjustified and unsound.
- 3.2. The principle of a contribution to the unmet needs of the Black Country has been agreed through the duty to cooperate process. Therefore, at this late stage in the plan making process, the no contribution scenario is not a reasonable alternative.
- 3.3. However, given the emerging evidence from the Black Country Authorities of the scale of unmet needs, assessing a number of options for the scale of Shropshire's contribution would be reasonable alternatives. Failure to assess these reasonable alternatives renders the plan unsound.
- 3.4. To be sound, the SA should be amended to include an assessment of a contribution of 3,000 dwellings and 50 hectares of employment land towards the unmet needs forecast to arise in the Black Country. The Duty to Cooperate correspondence with the Black Country Authorities supported a 3,000-dwelling and a 50-hectare employment land contribution in May 2019:

“...the ... 50ha of employment land, supported by provision of 3,000 homes to contribute towards meeting both the employment and housing needs of the Black Country would therefore make significant quantitative headway in addressing unmet needs for both employment land and housing in the Black Country.” (Ref: EVO41.04)

Section 8 and 9: Options for housing and employment requirements

- 3.5. Having failed to assess reasonable alternatives for the quantum of contribution towards the Black Country's unmet needs, Sections 8 and 9 of the SA, likewise fail to include all reasonable alternatives. To be sound, the Moderate, Significant and High Growth options for housing requirement should be assessed with the reasonable alternatives that should have been identified at Sections 6 and 7 i.e. including an assessment of a contribution of 3,000 dwellings and 50 hectares of employment land.
- 3.6. Morris & Company welcomes the conclusions of Sections 8 and 9 of the SA that an uplift of housing and employment land is required but for the reasons above, the SA should have assessed other reasonable alternatives.
- 3.7. The updated SA should assess options for having the flexibility to respond to updates to the forecast of unmet needs arising from the Black Country.
- 3.8. The SA should also assess options for building flexibility into the plan to respond to changes to local housing need over the plan period and maximising opportunities to deliver more affordable housing, specialist housing and support

the diversification of the labour force (as set out at 3.6 of the draft local plan).

- 3.9. The SA should have considered options for identifying an additional buffer of sites through allocating ‘Plan B’ sites that can be released for development in the event that a new housing requirement figure emerges or evidence emerges that Shropshire must contribute more to the unmet needs of the Black Country.

Section 10 & 11: Options for accommodating uplift

- 3.10. The SA’s method for assessing options for accommodating the uplift in housing and employment requirements at Section 10 & 11 appears to be a tactic to avoid allocating additional sites as part of the process of assessing options for accommodating the unmet needs of the Black Country. Rather, conveniently, it concludes that all housing and employment uplifts can be accommodated through windfall allowances.
- 3.11. The Planning Inspectors stated at §21 of ID28 that, *“if the Council chooses to pursue the same growth option as before”* then *“the housing and employment land requirements will increase, and more sites will be required.”* (Emphasis added).
- 3.12. This is an unequivocal instruction by the planning inspectors and yet it is avoided through a creative assessment method that impacts the planning judgements made about unallocated sites as part of the site assessment exercise.
- 3.13. The assessment exercise undertaken at Section 10 & 11, is carried out ahead of the assessment of the options for accommodating the Black Country’s unmet needs. The site assessment exercise reported at Section 12 is likely to have been predetermined by the preferred option that uplifts in housing and employment would not be accommodated via additional site allocations but by increasing windfall allowance.
- 3.14. In Section 12, §12.66, §12.77 and §12.83, the SA emphasises that the site assessment process did consider unallocated sites for accommodating Black Country unmet needs. However, the site assessment work summarised at Section 12 excludes an adequately detailed assessment approach to assessing environmental, economic and social factors used to identify sites. At §12.84 the SA states that it is unsurprising that sites identified to accommodate the proposed contributions to unmet needs forecast to arise in the Black Country constitute existing proposed allocations because of a proportionate and robust site assessment process. However, it is more the case that it is unsurprising because the SA work (summarised at Section 10) arrived at a conclusion that the uplifts required can be found without the need to find additional sites.
- 3.15. The result of carrying out two separate and unconnected exercises: (a) accommodating the uplift; and (b) accommodating the unmet needs of the Black Country is that the SA proposes an inappropriate strategy and fails to consider appropriate alternatives. The plan is therefore unjustified and unsound.
- 3.16. Section 3.6 of the Local Plan sets out that the proposed housing requirement provides flexibility and opportunity to (inter alia):
- increase the delivery of family and affordable housing to meet the needs of

- local communities and support new families coming into Shropshire; and
 - support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;
- 3.17. Windfall development is specifically excluded from the requirements of the new draft policy on housing for older people, people with disabilities and special needs. The draft policy requires only sites that are allocated to deliver specialist housing. See paragraphs 15, 16 and 17 of that draft policy.
- 3.18. Increasing windfall allowance will therefore not maximise opportunities for increasing delivery of specialist housing.
- 3.19. The SLAA (EV106) provides evidence that between 2006 and 2017 windfall developments of less than five dwellings contributed an average of 382 dwellings per annum. Figure 8.1 of the updated housing and employment topic paper shows that small windfall site completions, <5 dwellings, averaged 334 dwellings per year. Policy DP3 of the draft local plan only requires new residential development on sites of 10 or more dwellings to provide affordable housing.
- 3.20. Increasing windfall allowance will not maximise opportunities to deliver affordable housing.
- 3.21. Despite this, the assessment (see Table 10.1 and Table 10.5 of the SA), positively assesses increasing windfall allowances against sustainability objective 3: *provide a sufficient amount of good quality housing which meets the needs of all sections of society.*
- 3.22. To be sound, and to result in a justified and appropriate strategy, the SA should not assess accommodating the uplift as a separate exercise to assessing sites the unmet needs of the Black Country.

Section 12: Geographic scope

- 3.23. At Paragraph 21 of the ID28, the Planning inspectors stated:
- “Consideration will also need to be given to the distribution of development since accommodating some of the unmet needs may result in more sites being required in the part of Shropshire nearest the Black Country.” (emphasis added)*
- 3.24. This statement is a clear direction from the planning inspectors that weight should be given in the decision making to proximity to the Black Country when considering sites accommodating its unmet needs.
- 3.25. The SA does not provide any evidence of what weight, if any, has been given to proximity to the Black Country in the selection of settlements for accommodating needs.
- 3.26. The SA identifies settlements for accommodating the Black Country’s unmet needs (12.30). However, it does not assess the settlement alternatives against any sustainability objectives. Nowhere in the SA are the alternatives of providing for unmet needs in Shifnal sustainability-assessed against providing for unmet needs in e.g. Shrewsbury. Had there have been such an assessment, Shifnal would have

been identified as a more suitable location for accommodating unmet needs.

- 3.27. Criteria for selecting settlements is identified at Sections 12.7 to 12.28 of the SA, no performance against these criteria is applied. For example, no evidence is provided for what weight geographic proximity is given in the selection process as opposed to location of the settlement on a main road and/or other transport link.
- 3.28. Shifnal's functional relationship to the Black Country is discussed, at length, in the updated housing and employment topic paper (Section 16) to justify why Shifnal is an appropriate location for accommodating unmet employment needs of the Black Country. However, there is no evidence of any assessment of alternatives in respect of housing in the SA.
- 3.29. The updated housing and employment topic paper says:

“Geographic proximity is considered to be particularly important in the context of identifying an appropriate location for the provision of a contribution in Shropshire to the unmet employment land need forecast to arise in the Black Country.”

This is because an employment land contribution to an unmet need, is intended to:

a. Provide land for organisations that would have previously sought such opportunities in the location where the need had arisen, i.e. the Black Country.

b. Provide employment opportunities for those that would previously have sought such opportunities in the location the need had arisen.

- 3.30. It can equally be said that geographic proximity and connectivity is also particularly important for identifying suitable locations for housing. This is because housing land contributions to an unmet need, is intended to:
- Provide housing for people who would have previously sought such opportunities in the location where the need has arisen, ie the Black Country
 - Provide housing opportunities for those who are currently employed in the location the need has arisen.
- 3.31. Morris and Company agrees with the conclusion, at 12.30 of the SA, that Shifnal is a suitable settlement for accommodating the unmet needs of the Black Country. However, given the combination of proximity, functional relationship, connectivity via main road and sustainable transport links to the Black Country, Shifnal is a more suitable location than Bridgnorth, Shrewsbury or Ironbridge where the sites for identifying unmet housing needs have been identified.
- 3.32. Furthermore, Shifnal is now identified as the location for meeting employment needs of the Black Country and therefore will have a strengthened functional relationship with the Black Country in the future as it is proposed to accommodate employment land needs of organisations that would have previously sought such opportunities in the Black Country.
- 3.33. Historic migration trends and commuting trends should be given less weight in determining the location of housing and employment to meet the Black Country's

needs than connectivity and proximity.

- 3.34. NPPF §72 refers to the supply of large numbers of new homes. It is therefore relevant to the unmet needs of the Black Country. §72 of the NPPF says:

“working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.”

- 3.35. It would have been appropriate for Shropshire Council to have collaborated with the Black Country authorities. There is no evidence in the SA that there was any collaboration to identify the suitable locations for their unmet needs.

Section 12: Site Assessment exercise

- 3.36. As set out above, in our view, the site assessment exercise should have included a refinement of the geographic scope using sustainability-assessed criteria. This is an essential step in carrying out a site assessment exercise that compares sites in close proximity to the Black Country (such as in Shifnal) with those further away (such as Shrewsbury).

- 3.37. The National Planning Guidance on undertaking SA requires that:

“The scoping stage [of SA] ... should set out the ... approach of the assessment; and identify relevant environmental, economic and social issues and objectives.”

- 3.38. No assessment approach is identified within the scope of the site assessment exercise (§12.42 to §12.59).

- 3.39. At §12.78, the SA makes it clear that:

“The decision regarding appropriate sites to accommodate ... unmet housing and employment land needs ... were ultimately ones of professional judgement.”

- 3.40. The scope of the site assessment of the SA does not provide detail of the tools used to make the professional judgements. In any assessment that requires consideration of environmental, economic and social issues it is normal to see some form of assessment criteria on which the professional judgements are made about the effects of a particular course of action.

- 3.41. The planning inspectors had expected the sites that were to be identified to accommodate the Black Country’s needs would be in areas closest to the Black Country.

SHF018a site assessment

- 3.42. The Site Assessment for site ref SHF018a states that:

“it is considered that there are other more appropriate sites upon which to accommodate these proposed contributions.”

- 3.43. However, this site immediately adjoins the SHF018b and SHF018d, that are identified as sites for meeting the unmet employment needs of the Black Country.

- 3.44. The principle of the suitability of the location for meeting unmet needs of the Black Country is therefore established as part of the site assessment process and robust evidence is set out in the topic paper as discussed above
- 3.45. This conclusion is elaborated more fully in the housing and employment topic paper which assess SHF018b and SHF018d against alternative options.
- 3.46. The site SHF018a has residential development located on its southern boundary, community use (Lamledge School) to the south, the proposed employment allocation to the east and a defensible boundary (Stanton Road) to the north. It's allocation would link SHF018b and SHF018d more coherently with Shifnal.
- 3.47. In order to carry out an appropriate assessment of SHF018a, in the comparison to alternative sites (such as those further away in Shrewsbury or Ironbridge) greater weight should have been given to the connectivity and proximity of the site in relation to the Black Country. The inappropriate site assessment process, based on unproportionate evidence renders the plan unsound. The site assessment process should be carried out again applying appropriate assessment criteria as set out above.
- 3.48. Factors that should have been taken into account in the assessment of SHF018a as a suitable mixed-use residential-led site contributing to Black Country needs are (inter alia):
- Proximity to the proposed employment allocation for accommodating Black Country's unmet needs;
 - Proximity to the Black Country;
 - Connectivity to the Black Country;
 - The need to deliver housing in Shifnal to meet the diverse needs of the community including specialist housing.
- 3.49. It should be noted that SHF018a is referred to under the heading of SHF037, however, it refers to SHF018a being a large 80-hectare site. The incorrect reference has clearly been applied. This is confusing and must be updated and amended.

4. Updated Housing and Employment Topic Paper

Section 8: Feasibility and Deliverability of residential windfalls

- 4.1. As discussed above, the SA assesses the options for accommodating a 500 dwelling uplift in the housing requirement.
- 4.2. Section 8 provides further detail on the feasibility and deliverability of meeting housing needs through windfall delivery.
- 4.3. Where an allowance is to be made for windfall sites as part of anticipated supply, the NPPF §70 says that *“there should be compelling evidence that they will provide a reliable source of supply”*.
- 4.4. Figure 8.1 indicates a downward trend over the last five years in all windfall site completions. There were 1,283 completions in 2018/2019 with a fall, year-on-year to 2022/23 when there were 766 windfall completions.
- 4.5. Small windfall site completions of <5 dwellings have remained consistent but medium and large windfall site completions have reduced significantly over time. This indicates that the ability of windfalls to sustain a consistent level of delivery is diminishing over time. A reliance on windfalls should not be used as a reason to not allocate sufficient sites to meet the identified housing requirement.
- 4.6. §15 of the NPPF requires that the planning system should be ‘plan led’ and provide a positive vision for the future of an area. The plan should place much less reliance on meeting its housing requirements from windfall sites and should instead identify and allocate a sufficient supply and mix of sites in suitable locations.
- 4.7. In particular, in relation to meeting the forecast unmet needs of the Black Country, the plan should allocate additional sites near the Black Country.

Section 15: Feasibility and Deliverability of employment land windfalls

- 4.8. No evidence is provided of the historic delivery of employment land via windfall allowance to determine whether accommodating the required uplift in employment land via windfall allowance is an appropriate strategy.
- 4.9. The plan should set out a clear economic vision and strategy which *“positively and proactively encourages sustainable economic growth.”* (NPPF §81 (a).)
- 4.10. To protect against plan failure an additional buffer of employment land should be provided for on allocated sites.

Section 16: accommodating unmet employment land needs of the Black Country in Shifnal.

- 4.11. Morris & Company welcomes the justification for accommodating proposed contribution to the unmet employment need forecast to arise in the Black Country

in Shifnal in principle.

- 4.12. The residual housing requirement is now less than 300 dwellings. The proposed allocation of employment land to meet the Black Country's requires an appropriate balance of housing, ideally, in close proximity to it.
- 4.13. Site Ref SHF018a is available and deliverable within the plan period and is the most suitable site for providing the balance of housing needed to support the employment allocation.

5. Green Belt Topic Paper

Section 9: Green Belt release in Shifnal

- 5.1. Morris and Company broadly agrees with the justification for Green Belt release in Shifnal in principle. However, it does not agree with the extent of the Green Belt release.
- 5.2. For the reasons set out above, the conclusions regarding extent and location of Green Belt release should be reviewed following recommended amendments to the Sustainability Appraisal. Such amendments are necessary to ensure the plan follows an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence.
- 5.3. The location and extent of the release should also include land interests of Morris & Company (Site ref SHIF018a) to provide for a contribution to the unmet needs of the Black Country. The justification for Green Belt release for SHIF018b and SHIF018d equally applies to the release of SHIF018a.

