

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:	The Strategic Land Group Ltd (ID: A0073)
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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):	Section 8 (accommodating the uplift to the housing requirement)
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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 refer to submitted document titled "22-185 - Reps to Shropshire LP consultation - SLG - June 2024".

(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.

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Paragraph(s): 8.88 – 8.91 (proposed amendments to settlement guidelines)

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Local Plan Representations

For The Strategic Land Group Ltd (ID: A0073) | 22-185

Shropshire Local Plan Additional Information Consultation



Project: 22-185
Site Address: Land at Adderley Road, Market Drayton
Client: The Strategic Land Group Ltd (ID: A0073)
Date: 11 June 2024
Author: Wiktoria Sypnicka
Approved by: John Coxon

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1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as “SLG”) and Bellway Homes Ltd to submit a written response to the further consultation focusing on additional material (GC25, GC44, GC45) prepared in response to the Planning Inspectors’ Interim Findings (ID36 and ID37).
- 1.2 This response should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan, and the Hearing Statements submitted to this examination on behalf of our clients.
- 1.3 SLG has an interest in draft allocation MDR006: Land adjoining Adderley Road and there is an agreement in place for Bellway Homes Ltd to develop the site.



2. Response to consultation

GC44 Updated Additional Sustainability Appraisal Report

- 2.1 We support the methodology and conclusions of the Updated Additional Sustainability Appraisal Report (GC44), subject to our comments below.

GC45 Updated Housing and Employment Topic Paper

- 2.2 The published update to the Housing and Employment Topic Paper (GC45) sets out an increase to the housing requirement from 30,800 to 31,300 dwellings. Whilst we support the approach set out in the Topic Paper in relation to the continuation of the high growth scenario, retention of a housing and employment land contribution to the unmet needs of the Black Country and the urban focussed approach to the distribution of development, we do identify some issues in our representations below.

Securing housing delivery

- 2.3 Whilst we have no objections to the principle of increasing the settlement guidelines as a way of accommodating the uplift to the housing requirement (Section 8 of GC45), it does not allow for the same level of certainty in relation to delivery as sites allocated for housing development. There is therefore increased risk that the housing requirements set out within the plan will not be met. As such, it will be important that the allocations deliver as expected, and for the plan to be monitored to ensure that the housing trajectory is met, both in terms of plan wide and within the individual settlements. This is particularly important for a settlement such as Market Drayton where windfall development has not been significant, and the previous settlement housing guideline set by the adopted SAMDev has not been met. Robust action will be required (such as an immediate early review) if the assumptions turn out to be incorrect and the housing trajectory is not maintained.

Distribution of growth

- 2.4 Notwithstanding that we do not object to the proposed increase to the settlement guidelines, we do not consider that the resulting proposed distribution of growth is balanced having regard to the housing and employment requirements apportioned to each Principal Centre.
- 2.5 As set out at paragraph 2.2 of our Matter 3 Hearing Statement, Whitchurch has already been afforded a much higher percentage increase in dwelling growth compared to other Principal Centres. The Housing and Employment Topic Paper states that the increase to the settlement guideline has been apportioned on the basis of windfall completions at 31 March 2023 against the proposed allowance and 'other relevant



factors'. The deliverability of the windfall allowance in the early stages of the plan does not necessarily mean that the settlement can accommodate further growth, nor that other Principal Centres could not equally support an increased settlement guideline over the plan period. We therefore consider that additional matters, such as availability of sites and affordable housing need, should be taken into account.

2.6 In addition, we would refer to paragraph 2.3 of our Matter 3 Hearing Statement, which assessed the balance of employment and housing land requirements within the Principal Centres. We provide an updated table below, taking into account the proposed housing requirement increase at Whitchurch.

Principal Centre	Employment land requirement (ha)	Housing land requirement	Ratio (dwellings per hectare of employment land)
Bridgenorth	49	1,800	1:37
Ludlow	11	1,000	1:91
Market Drayton	35	1,200	1:34
Oswestry	57	1,900	1:33
Whitchurch	20	1,675	1:84

2.7 The above table shows a clear imbalance between the Principal Centres in relation to the housing and employment requirements, with Whitchurch having the second highest ratio of dwellings per hectare of employment land (this was also the case prior to the proposed increase being applied). This does not appear to have been taken into account when considering potential settlements which could take on the increase to the settlement guideline. It would be logical for the increase to address some of the imbalances in settlements, such as Market Drayton, which are currently proposed to accommodate a significant level of employment growth which is not aligned with the proposed housing requirement.



GC25 Housing Provision for Older People and those with Disabilities

- 2.8 The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs (GC25) reflects requirements 4 and 5 of draft Policy DP1 (Residential Mix). Our client has previously submitted representations in relation to the viability issues surrounding the criteria of the policy.
- 2.9 The concerns raised at paragraphs 2.2 to 2.6 of our Matter 8 Hearing Statement remain. In consideration of what LPAs should take into account when determining whether dwellings should be fully wheelchair accessible or adaptable, the NPPG states¹:

“Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.” (Our emphasis)

- 2.10 The Council’s Viability Study (EV115.01) reflects the guidance in that it assumes that any wheelchair accessible homes will be affordable homes (paragraph 8.15). However, requirement 3 of the draft policy does not specify that this is the case. Instead, it simply states that 5% of the dwellings on sites of 5 or more houses will be built to the M4(3) standard.
- 2.11 As previously outlined, the 5% requirement across all dwellings is likely to impact the viability of residential development. Further, the newly proposed policy introduces a requirement for site allocations to provide at least 10-20% specialist housing (depending on the total number of dwellings being delivered on the site) for older people and/or those with disabilities and special needs, likely to comprise apartments or bungalows (paragraphs 15 to 17). The viability of the proposed housing allocations does not appear to have been reviewed despite the proposed policy having additional cost implications for development.
- 2.12 The delivery of the proposed housing allocations is particularly significant having regard to the increase to the housing requirement by 500 dwellings, as expressed in our representations above to the Updated Housing and Employment Topic Paper. The Viability Study identifies three main areas of Shrewsbury, the North Area and the South Area which are distinct in their viability responses and ability to follow the policy requirements. Paragraph 12.97 of the Viability Study identifies that little development in the North Area is viable at full policy requirements, even without taking into account affordable housing. The differences

¹ Paragraph: 009 Reference ID: 56-009-20150327



between the three key areas are not accounted for within the policy and it is not clear what evidence has been produced to support the divergence from the NPPG and additional specialist housing requirements.

2.13 In conclusion, we maintain the concerns raised through both our Regulation 19 Representations and Matter 8 Hearing Statement and consider that further work is required in relation to viability of the site allocations and any windfall residential development, having regard to the newly proposed policy on Housing Provision for Older People and those with Disabilities and Special Needs. The proposed policy is not in accordance with national policy, in particular paragraph 34 of the Framework and paragraphs 10-001 and 10-002 of the PPG.



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