

25th April 2024 until 11th June 2024

**Response from Oswestry Rural Parish Council
to the following documents:**

- 1) The future of the Empty Homes function - 24 April 2024 until 26 May 2024.
 - 2) Proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.
 - 3) Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.
 - 4) Updated Housing and Employment Topic Paper.
 - 5) Update Green Belt Topic Paper.
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Summary of Responses – Please see also detailed explanations for responses.

The future of the Empty Homes function

The ORPC supports the proposal to end the empty housing function.

However, the Council also notes it is said that *“a small proportion of other officers’ time, estimated to be no more than 0.1 fte, provides support to and management of the function”*.

While this may be a very small proportion of time, the ORPC doubts that there will be a saving as it is anticipated that the officer’s time will be used elsewhere in the organization.

Proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.

Could the council not have found a less chilling title than “People’s Strategy” which has unfortunate overtones?

The Council sets out its policy aims to provide choice and to support people to remain independent within their own homes and within their existing communities and support networks for as long as possible. The ORPC would point out that ‘as long as possible’ may not always be the best option for the person or persons concerned (including family members who may be providing care), and that technology is often poorly represented in Rural Areas, and older persons may not always be able to cope with even low level of technology.

The emerging Shropshire Local Plan is proposing an even greater focus on the delivery of various forms of specialist housing within appropriate locations that will support the achievement of inclusive and multi-generational communities. However as quoted below this might be better phrased as ‘dwellings’, as the draft policy on Housing Provision for Older People and those with Disabilities and Special Needs uses ‘dwellings’, to include apartments which may be a better option for both older persons and developers.

The ORPC suggests that as part of the planning process, housing for older persons and those with disabilities should not be distributed across a development, regardless of whether that development is phased or not.

Where a development IS phased, then it would be even more important to try to ‘cluster’ accommodation, whether bungalows (not usually favoured by developers as they take up more land area) or apartments to allow for what I increasingly popular – retirement communities – which are themselves a form of self-support grouping.

The ORPC would also expect that some imagination would be used by developers to create accommodation which is aesthetically pleasing as well as practical and cost-effective to run. The latter again important for apartments which may be for rent. The ORPC would also urge Shropshire Council to work with a variety of specialist developers (e.g. McCarthy and Stone, Methodist Homes for the Aged et.al) to ensure that the best possible accommodation may be developed on sites where the policy is in force.

ORPC is concerned at the number of policies which are referred to in the documents sent out for consultation. For housing we have the at least three:

- 1) the draft policy on Housing Provision for Older People and those with Disabilities and Special Needs
- 2) the Independent Living and Specialist Accommodation Strategy 2023-2028
- 3) the Shropshire Local Plan

and their multiple cross referencing – which might be difficult enough for persons reasonably familiar with such documents - but would be off-putting to a majority of the electorate. The ORPC would also point out that the Shropshire Plan, draft policy on Housing Provision for Older People and those with Disabilities, and Special Needs and the Independent Living and Specialist Accommodation Strategy 2023-2028 are not always examples of joined up thinking.

Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.

The ORPC notes that the Shropshire Local Plan Additional Sustainability Appraisal Report published in April 2024 contains no-less than 1,296 pages of detail, (322 main report and 10 appendices ranging from 31-348 pages), and that this is a response to Planning Inspectors issued correspondence ID37 16th January 2024. Planning Inspectors clarified the additional work required to identify the need for an SA assessment of the proposed contributions to the unmet housing and employment land needs forecast to arise in the Black Country as “a distinct and separate exercise.”

Therefore, this may largely affect those communities involved most closely. The Council however also suggests that the level and amount of detail would again not encourage public participation and severely impact even on a large Town Council to be able to make any informed response.

Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.

The ORPC notes that the Green Belt in Shropshire lies in the south-east of the County, to the east of the River Severn and south of the A5, forming part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry.

Therefore, ORPC notes that any effect on the allocation of green-belt land to accommodate the needs of the Black County may impact on Alverley, Albrighton, Bridgnorth and Shifnal and believes that their views would have greater relevance.

The ORPC supports the overall aim of Shropshire Council in the Local Plan to underpin the proposed spatial strategy the principles of ‘high growth’ and ‘urban focus’. High growth’ meaning a significant uplift above local housing and employment needs in order to contribute to the achievement of wider objectives and ‘Urban focus’ that the majority of development is directed towards urban areas, which have the most extensive range of services, facilities, and infrastructure to support new development.

Detailed Response to Shropshire Council

GENERAL COMMENTS

1. The ORPC believes that, given the reported scale of reductions needed in spending over the next few years, clear and concise communications are vital. To encourage understanding of the issues and responses from the electorate attention must be given to the language used in policies and documents.
2. The Council, while recognizing the legal duties placed on Shropshire Council suggests that the scale and detail paid to the assessment of changes in policies and services required to cut spending could be counterproductive.

As an example, the Council draws attention to the proposal to end the Empty Homes Function and the *Shropshire Council Equality, Social Inclusion and Health Impact Assessment (ESHIA) Stage One Screening Record 2024*. This contains both the extensive and opaque language referred to above, and extensive, some might consider, excessive assessment.

Language: the following headings are taken from pages 1, 2 and 3.

1	<i>Actions to mitigate likely negative impact or enhance positive impact of the service change in terms of equality and social inclusion considerations.</i>
2	<i>Actions to mitigate likely negative impact or enhance positive impact of the service change in terms of health and wellbeing considerations.</i>
3	<i>Actions to review and monitor the impact of the service change in terms of equality, social inclusion, and health considerations.</i>

Possible alternative wording?

How could the Council respond to any damage caused by the change, to the health and wellbeing of Shropshire residents, or equality and social inclusion?

How could the Council improve on any helpful results caused by the change to the health and wellbeing of Shropshire residents, or equality and social inclusion?

Assessment: the ESHIA it seems is about demonstrating ‘ongoing engagement across groupings’ and showing ‘due regard of the needs of people in Protected Characteristic groupings.’

However, there is no assessment of the time and resources needed to carry this out, in preparing, agreeing, publishing, and analysing responses. Would officer time be better spent in other tasks – and how much engagement and consultation do the protected characteristic groups need (rather than want?).

The document itself says:

..... a Stage One ESHIA would be a recommended course of action before a consultation. This would draw upon the evidence available at that time, and identify the target audiences, and assess at that initial stage what the likely impact of the service change could be across the national Protected Characteristic groupings and our additional local categories. This ESHIA would set out intended actions to engage with the groupings, particularly those who are historically less likely to engage in public consultation e.g. young people, as otherwise we would not know their specific needs.

A second Stage One ESHIA would then be carried out after the consultation, to say what the feedback was, to set out changes proposed as a result of the feedback, and to say where responses were low and what the plans are to engage with

groupings who did not really respond. This ESHIA would also draw more upon actions to review impacts in order to mitigate the negative and accentuate the positive. Meeting our Public Sector Equality Duty through carrying out these ESHIAs is very much about using them as an opportunity to demonstrate ongoing engagement across groupings and to thus visibly show we are taking what is called ‘due regard’ of the needs of people in Protected Characteristic groupings.

The document also goes on to an **initial** equality impact assessment by grouping; and where any impact is seen as HIGH and negative, a further stage TWO EISA assessment would be required.

The following groups are identified, including 3 ‘other’ groups:

- Age
- Disability
- Gender re-assignment
- Race
- Religion or Belief
- Sex
- Sexual Orientation
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Other: Social Inclusion
- Other: Veterans and serving members of the armed forces and their families
- Other: Young people leaving care

In addition to the identification by category, there is a further required assessment by individuals and communities in Shropshire for a range of direct and indirect changes in health and wellbeing.

Will the proposal indirectly impact an individual’s ability to improve their own health and wellbeing?	For example, would it cause ill health, affecting social inclusion, independence, and participation?
Will the proposal indirectly impact an individual’s ability to improve their own health and wellbeing?	For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?
Will the policy have a direct impact on the community - social, economic and environmental living conditions that would impact health?	For example, would it affect housing, transport, child development, education, employment opportunities, availability of green space or climate change mitigation?

Will there be a likely change in demand for or access to health and social care services?	For example: Primary Care, Hospital Care, Community Services, Mental Health, Local Authority services including Social Services?
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ENDING THE EMPTY HOUSING FUNCTION:

The ORPC supports the proposal to end the empty housing function.

However, the Council also notes it is said that “a small proportion of other officers’ time, estimated to be no more than 0.1 fte, provides support to and management of the function”.

While this may be a very small proportion of time, the ORPC doubts that there will be a saving as it is anticipated that the officer’s time will be used elsewhere in the organization.

The ORPC notes that: -

- a. this is a discretionary service and Shropshire Council has the choice whether or not to fund it.
- b. this is currently delivered through two dedicated Empty Homes posts: a 1.0 fte technical officer fixed term post which is due to end on 8 January 2025 and will not be renewed, and a 0.8 fte permanent post to be made redundant. The removal of these two positions is estimated to deliver a saving of £91,660.
- c. that in 2020 approximately 600 of 1,700 homes had been empty for at least 2 years, (35%). By the end of March 2024 while the number of empty properties had increased to 2,004 the number empty for at least 2 years had reduced to 550 (25% of the total).
- d. Shropshire Council states that:it is reasonable to presume that whilst removing the dedicated empty homes resource is likely to mean the number of empty homes will not decrease, it also remains a reasonable assumption that a proportion will continue to be brought back into use.
- e. The Equality, Social Inclusion and Health Impact Assessment (ESHIA) Stage One Screening Record 2024 states that the saving, and the loss of the work undertaken

by those officers is likely to have a neutral to low negative impact for the Protected Characteristic groupings as set out in the Equality Act 2010.

PROPOSED DRAFT POLICY ON HOUSING PROVISION FOR OLDER PEOPLE AND THOSE WITH DISABILITIES AND SPECIAL NEEDS AND ITS EXPLANATION.

The document states that: -

The housing needs of older people and those with disabilities and special needs will be met in a way that provides choice and importantly complements and facilitates the People's Strategy for Shropshire.

A fundamental principle of the People's Strategy for Shropshire is supporting people to remain independent within their own homes and within their existing communities and support networks for as long as possible.

The People's Strategy for Shropshire will be facilitated and complemented through the provision of accessible and adaptable housing and appropriate forms of specialist housing in accordance with the requirements of this Policy.

Paragraphs 11,12 and 13 say: -

However, older people and those with disabilities and special needs living within small rural settlements often have a very strong connection to their community and a clear preference to remain within it. In circumstances where these individuals have support or care needs, the only practicable means of meeting these needs, whilst also respecting their preference to remain within their existing community, is to provide support within their existing home.

As such, in implementing the People's Strategy, where older people and those with disabilities and special needs require support, in the first instance this will be achieved through the provision of appropriate adaptations, equipment, assistive technology and if necessary domiciliary care to support them to continue to live independently within their existing home.

Given the rapid advancements to assistive technologies, it is considered that over the plan period to 2038, the ability to effectively provide support in this way will expand.

Could the council not have found a less chilling title than "People's Strategy" which has unfortunate overtones?

The Council sets out its policy aims to provide choice and to support people to remain independent within their own homes and within their existing communities and support networks for as long as possible. The ORPC would point out that ‘as long as possible’ may not always be the best option for the person or persons concerned (including family members who may be providing care), and that technology is often poorly represented in Rural Areas, and older persons may not always be able to cope with even low level of technology.

Shropshire Council has also published the *Independent Living and Specialist Accommodation Strategy 2023-2028* which states that:

The key principle for the Council and its partners for meeting the care and support needs of older people and those with disabilities and special needs is to seek to support them to remain independent within their own homes..... However, the strategy equally recognises that unfortunately this is not always possible, leaving a role for care homes that provide high-level care.

The ILSAS (above) Section 4 says: -

Adapting the home can increase the useability of the home environment and enable the majority of people to maintain their independence whilst living in their own home. The Council provides financial assistance to help people maintain independence whilst living in their own home. This includes minor or major aids and adaptations, a handy person service and falls prevention advice which can enable people to stay safe in their homes for a longer time. The services provided contribute to the prevention agenda as they reduce reliance on statutory services such as the NHS and Social Care.

And section 5: -

The Council’s Sustainable Affordable Warmth Strategy 2023-2030 sets out the support offered to households to tackle fuel poverty, which is closely linked to affordable warmth and suitable accommodation. Excessive heating expenses, puts a strain on households’ budgets and impacts health. Addressing this involves boosting income, lowering bills and improved energy efficiency. Efficient heating systems and good insulation can help alleviate fuel poverty by retaining heat, reducing the need for excessive heating needs and lowering energy bills. Ensuring homes are energy efficient and affordably warm, the cycle of fuel poverty can be broken, improving the overall quality of life for individuals and families.

When the best option is NOT what the person or persons wishes to choose, preferring to remain in their existing home for family, or family associations, or even from the Council’s financial point of view the more cost-effective solution there will be a dilemma.

While the word ‘reasonable’ may be as difficult to define as ‘possible’ it may be a better choice for a more workable policy.

The strategy also points out that the individual’s preference could be for either *new [or] adaptable and accessible housing or specialist housing including that which supports independent living, for such reasons as moving closer to their wider family or moving to more accessible locations with better provision of services and facilities).*

This seems to be well supported by the Proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and the setting of quotas on development sites: however, while the principle is in line with the Shropshire Local Plan the requirements are confusing.

Proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	ORPC RESPONSE
All housing specifically designed for older people or those with disabilities and special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations.	ORPC SUPPORTS
On sites of 5 or more dwellings, at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and a further 70% of the dwellings will be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations, unless site-specific factors indicate that step-free access cannot be achieved.	<p>ORPC points out that 5% of 5 dwellings is 0.25 of a dwelling. 70% of 5 dwellings is 3.5 dwellings. 20 buildings would have to be erected to gain 1 at M4(3) standard.</p> <p>THEREFORE, this section needs to be reconsidered in terms of number of dwellings to be built to M4(3) / M4(2)</p>
All dwellings on sites of less than 5 dwellings and the remaining dwellings on sites of 5 or more dwellings that are not subject to the requirements of Paragraph 3 of this Policy are strongly encouraged to achieve the M4(2) (accessible and adaptable dwellings) standard within Building Regulations or higher.	ORPC would agree with encouragement, subject to its comments above on %’s
All housing designed to M4(3) (wheelchair user dwellings) standard within Building Regulations must also be designed to be ‘friendly’ to those with dementia and to those with disabilities and special needs.	ORPC would point out that it may be helpful to developers to provide some advice/guidance on these matters and

<p>All housing designed to M4(2) (accessible and adaptable dwellings) within Building Regulations is strongly encouraged to be designed to be ‘friendly’ to those with dementia and to those with disabilities and special needs.</p>	<p>especially where the needs of one group may conflict with the needs of another.</p>
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The emerging Shropshire Local Plan is proposing an even greater focus on the delivery of various forms of specialist housing within appropriate locations that will support the achievement of inclusive and multi-generational communities. However as quoted below this might be better phrased as ‘dwellings’, as the draft policy on Housing Provision for Older People and those with Disabilities and Special Needs uses ‘dwellings’, to include apartments which may be a better option for both older persons and developers.

<p>On developments of 50-149 dwellings</p>	<p>at least 10%</p>	<p>of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs.</p>
<p>On developments of 150-249 dwellings</p>	<p>at least 15%</p>	<p>of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs</p>
<p>On developments of 250 or more dwellings,</p>	<p>at least 20%</p>	<p>of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs</p>

The ORPC suggests that as part of the planning process, housing for older persons and those with disabilities should not be distributed across a development, regardless of whether that development is phased or not.

Where a development IS phased, then it would be even more important to try to ‘cluster’ accommodation, whether bungalows (not usually favoured by developers as they take up more land area) or apartments to allow for what I increasingly popular – retirement communities – which are themselves a form of self-support grouping.

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and their multiple cross referencing – which might be difficult enough for persons reasonably familiar with such documents - but would be off-putting to a majority of the electorate. The ORPC would also point out that the Shropshire Plan, draft policy on Housing Provision for Older People and those with Disabilities, and Special Needs and the Independent Living and Specialist Accommodation Strategy 2023-2028 are not always examples of joined up thinking.

The Shropshire Local Plan will be supporting development in largely (for Shropshire) urban areas and developments of up to 50-149, 150-249 and 250+ will require part of each to have housing for older people and/or those with disabilities and special needs.

In a community cluster, which may be a village in a rural area, the policy on Housing Provision for Older People and those with Disabilities and Special Needs, provides for 5 or more dwellings – presumably up to 49, to be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and a further 70% of the dwellings be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations, unless site-specific factors indicate that step-free access cannot be achieved. Mathematically 5% of 50 is still 2.5!!!!

Equally the document says that “*all housing specifically designed for older people or those with disabilities and special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations*”. Leaving wriggle room for developers to concentrate on the market for single young persons and couples.

The People’s Strategy for Shropshire is supporting people to remain independent within their own homes and within their existing communities and support networks for as long as possible.

The emerging focus on the delivery of various forms of specialist housing within appropriate locations that will support the achievement of inclusive and multi-generational communities seems however to suggest that people will want to move from larger homes which have become or may become a burden to maintain, to accommodation better suited to the needs.

The Independent Living and Specialist Accommodation Strategy says that for persons in rural areas the only practicable means of meeting these needs and respecting their preference to remain within their existing community, is to provide support within their existing home.

Paragraphs 11,12 and 13 say: -

.... older people and those with disabilities and special needs living within small rural settlements often have a very strong connection to their community and a clear preference to remain within it. In circumstances where these individuals have support or care needs, the only practicable means of meeting these needs, whilst also respecting their preference to remain within their existing community, it to provide support within their existing home.

As such, in implementing the People's Strategy, where older people and those with disabilities and special needs require support, in the first instance this will be achieved thorough the provision of appropriate adaptations, equipment, assistive technology and if necessary domiciliary care to support them to continue to live independently within their existing home.

Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.

The ORPC notes that the Shropshire Local Plan Additional Sustainability Appraisal Report published in April 2024 contains no-less than 1,296 pages of detail, (322 main report and 10 appendices ranging from 31-348 pages), and that this is a response to Planning Inspectors issued correspondence ID37 16th January 2024. Planning Inspectors clarified the additional work required to identify the need for an SA assessment of the proposed contributions to the unmet housing and employment land needs forecast to arise in the Black Country as “a distinct and separate exercise.”

Therefore, this may largely affect those communities involved most closely. The Council however also suggests that the level and amount of detail would again not encourage public participation and severely impact even on a large Town Council to be able to make any informed response.

Paragraph 5.8 of DI37 explains that the updated SA assessment should assess “‘significant growth’, ‘high growth’ and ‘productivity growth’, so 3 different growth options” consistent with those previously assessed through the SA process. It is understood that as per the advice for the housing growth options, each option should be considered with and without the proposed 30ha contribution to unmet employment land needs forecast to arise in the Black Country. It is also “important that employment growth aligns with housing growth.”

Paragraph 8.1 of ID37 explains that “The SA should arrive at conclusions on preferred housing and employment land requirements based on the evidence from the SA.” However, it also acknowledged that in identifying proposed housing and employment land requirements “is appropriate to consider this alongside other evidence in, for example your Housing and Employment Topic Paper...”.

Updated Green Belt Topic Paper/ Housing and Employment Topic Paper.

The ORPC notes that these updates, published in April, have been triggered or required, following a letter from Local Plan Inspectors Louise Crosby MA MRTPI and Nick Palmer BA (Hons) BPI MRTPI, raising 10 questions [Appendix 1] which relate to unmet needs forecast to arise in the Black Country for both housing and employment land.

The Green Belt in Shropshire lies in the south-east of the County, to the east of the River Severn and south of the A5. It forms part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry.

Following the additional Sustainability Appraisal work and the updated Housing and Employment Topic Paper prepared in response, Shropshire Council is proposing some amendments to the proposed spatial strategy within the draft Shropshire Local Plan.

The proposed spatial strategy continues to be underpinned by the principles of ‘high growth’ and ‘urban focus’.

High growth’ means a significant uplift above local housing and employment needs in order to contribute to the achievement of wider objectives and ‘Urban focus’ means that the majority of development is directed towards urban areas, which have the most extensive range of services, facilities, and infrastructure to support new development and consist of the proposed Strategic Centre of Shrewsbury, Principal Centres, Key Centres and Strategic Settlements. It continues to include specific contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise in the Black Country.

The ORPC notes that the Green Belt in Shropshire lies in the south-east of the County, to the east of the River Severn and south of the A5, forming part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry.

Therefore, ORPC notes that any effect on the allocation of green-belt land to accommodate the needs of the Black County may impact on Alverley, Albrighton, Bridgnorth and Shifnal and believes that their views would have greater relevance.

The ORPC supports the overall aim of Shropshire Council in the Local Plan to underpin the proposed spatial strategy the principles of ‘high growth’ and ‘urban focus’. High growth’ meaning a significant uplift above local housing and employment needs in order to contribute to the achievement of wider objectives and ‘Urban focus’ that the majority of development is directed towards urban areas, which have the most extensive range of services, facilities, and infrastructure to support new development.