

Hearing Statement – Matter 29

On behalf of The Strategic Land Group Ltd (ID: A0073) | 22-185

Shropshire Local Plan Examination: Stage 2
Land at Adderley Road, Market Drayton



Project: 22-185
Site Address: Land at Adderley Road, Market Drayton
Client: The Strategic Land Group Ltd (ID: A0073)
Date: 20 September 2024

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1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as “SLG”) to attend the Shropshire Local Plan Examination. SLG is promoting draft allocation MDR006: Land adjoining Adderley Road.
- 1.2 This hearing statement sets out our response to the Inspector’s Stage 2 Matters, Issues and Questions in relation to Matter 29 - Climate Change (policy DP11). It should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan, the Stage 1 Hearing Statements, and our other Hearing Statements submitted to this stage of examination (Stage 2).



2. SLG response to the Inspectors' questions

DP11 – Minimising Carbon Emissions

Q1. Is the policy justified, effective and consistent with national planning policy?

2.1 We do not consider that the proposed approach is consistent with national policy for the following reasons:

- Paragraph 154(b) of the Framework (2021) states that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. The NPPG¹ goes on to state that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Requirements b, c and d set out in Part 1 of the policy are therefore inconsistent with the Framework as they go beyond this guidance.
- The Written Ministerial Statement (WMS) of 13 December 2023 has the effect of national policy. This states that *"the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."* Whilst the WMS statement continues to identify that local policies can set additional standards subject to certain criteria being met, the clear emphasis of the policy is to avoid a proliferation of standards such as this. The Council has not set out any local reasons why Shropshire should continue to pursue such policies in light of the position clearly set out in the WMS.

Q2. Would implementing this policy affect the viability of sites – is it too onerous on developers?

2.2 The Viability Update Note (GC49) states at paragraph 4.19 that the Council is not seeking standards on energy efficiency above the national standards and that Policy DP11 only encourages such provision. However, Part 4 of the policy implies otherwise. If the intention is merely to encourage then the policy should be amended to reflect this.

2.3 Paragraph 4.23 states:

"Shropshire has not undertaken specific work to establish the costs of moving beyond Building Regulations. The current changing situation is summarised as follows."

¹ Paragraph: 002 Reference ID: 56-002-20160519



2.4 The full impacts of the policy and the further proposed changes by the Government are therefore unknown. Part 7 of the Note does ultimately indicate increases to costs but it has not been demonstrated how these impact the assessments undertaken in Appendices 11 to 18 of the 2020 Viability Study (EV115).

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emery

PLANNING

2-4 South Park Court, Hobson Street
Macclesfield, Cheshire, SK11 8BS

+44 (0)1625 433 881

Regus House, Herons Way
Chester Business Park, CH4 9QR

+44 (0)1244 732 447



[emeryplanning.com](https://www.emeryplanning.com)