

# Hearing Statement – Matter 27 General housing policies, including affordable housing.

## Tasley Garden Village.

On behalf of Bloor Homes Ltd and Taylor Wimpey UK Ltd.

Date: September 2024 | Pegasus Ref: P20-1800\_R018v1\_PL\_JB/JB

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# TASLEY GARDEN VILLAGE

An architectural rendering of the Tasley Garden Village. The scene depicts a row of multi-story residential buildings with red-tiled roofs and light-colored facades. The buildings are interspersed with large, mature green trees. In the foreground, a paved walkway and a road are visible. A person is walking on the left, and a person is riding a bicycle in the middle ground. The overall atmosphere is bright and sunny, with a clear sky and long shadows cast across the ground.



## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	September 2024	Jonathan Burns	Jonathan Burns	-



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# 1. Introduction.

1.1. Pegasus Group is instructed by Bloor Homes Ltd ('Bloor') and Taylor Wimpey UK Ltd ('Taylor Wimpey') to prepare Statements in respect of their land interests at Tasley Garden Village, Bridgnorth. Tasley Garden Village is identified as an allocation with the draft Shropshire Local Plan as a comprehensive mixed use sustainable urban extension (BRDO30), identified under Policy S3 – Bridgnorth Place Plan Area.

1.2. This Statement deals with Matter 27 General housing policies, including affordable housing (policies DP1, DP1A, DP2, DP3, DP4, DP5, DP6, DP7, DP8) which addresses the following issue:

***Issue – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the provision housing and affordable housing.***

## 2. Matter 27 Questions – Policy DP1 – Residential Mix.

2.1. The following provides a response to some of those questions identified in the Stage 2 Matters, Issues and Questions document (ID40). These are dealt with in the order that they appear within ID40.

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

2.2. The policy wording, as drafted is not considered to be justified or effective.

2.3. Part 1 of the policy requires residential development to deliver a mix of dwelling sizes, types and tenures in accordance with the Shropshire Strategic Housing Market Assessment (SHMA). Whilst this is generally considered an appropriate approach, this is only where SHMAs are kept under review and updated accordingly. In the case of the current Shropshire SHMA (EVO97) this will be around 5 years old by the time the plan is adopted and is informed by data that pre-dates that by a number of years. As such, a failure for the SHMA to be updated through the plan period will result in it becoming out of date and not reflective of the actual housing needs of the County and individual settlements. To ensure that this policy is justified and effective, we would request that the policy text is updated to state; 'in accordance with an up-to-date SHMA'.

2.4. The specific requirements within part 2b of draft Policy DP1 requiring specific housing mix is understood to be derived from the Shropshire SHMA (EVO97). As housing needs will no doubt change over the plan period and be informed by more up-to-date SHMA's it is suggested that this specific housing mix requirement is removed from the policy and instead reference is made to the most recent Shropshire SHMA or equivalent. This will ensure that the policy does not become outdated during the course of the plan period and is able to respond appropriately to changes in housing needs. In this regard, we note that a similar matter was recently considered through the examination of the Warrington Local Plan within the Inspectors' Report (October 2023) requiring an amendment to the housing mix policy through a main modification and confirming at paragraph 239 that:

*'The LHNA identifies a need for a mix of housing types and tenures. Policy DEV2 justifiably reflects the need for such a mix. Main modification MM004 is required to ensure that the policy is effective in recognising that the evidence base on the specific mix needed is likely to change over time and that small sites may not feasibly be able to meet the full range of housing types needed.'*

2.5. In this case, and for ease of reference, the now adopted Warrington Local Plan Policy DEV2 in respect of housing mix reads as follows:

*'Residential development should provide a mix of different housing sizes and types and should be informed by the Borough-wide housing mix monitoring target as set out in the Council's most up to date Local Housing Needs Assessment; and any local target set by a Neighbourhood Plan, taking into account site specific considerations.'*

2.6. Clearly for the policy to be effective a similar amendment to Policy DP1 must be made.

2.7. As set out in our representations to the additional submission documents, the housing mix policy must reflect the amendments to the plan and specifically the recognition that certain sites constitute part of the contribution to the Black Country forecast unmet housing needs. At present the SHMA, and any subsequent Right Home Right Place surveys will only be reflective of housing needs in Shropshire and not those unmet needs from the Black Country. In-migration from the Black Country is generally comprised of working age people and those either likely to have, or look to start families in the near future, and is markedly different from the current age profile of Shropshire. As such, it is clear that providing a housing mix based solely on the Shropshire SHMA data will not meet these needs and would fail to secure the benefits and opportunities associated with accommodating some of this unmet need that is discussed in detailed the Updated Housing and Employment Topic Paper (GC45) at paras 7.35–7.36.

**2. Is the policy flexible enough?**

2.8. For the reasons set out in respect of Question 1, the policy is not considered flexible enough.

### **3. Matter 27 Questions – Policy DP1A – Housing Provision for Older People and those with Disabilities and Special Needs.**

#### **1. Is the policy justified, effective and consistent with national planning policy?**

- 3.1. The policy is not justified or effective for the reasons we have set out in our representations to the additional submission documents. MM033–MM035 do not propose any amendments to the draft policy consulted on in GC25. As such, our previous comments remain of relevance and demonstrate why the policy is not justified or effective.
- 3.2. In addition, the policy suffers from the same issue as Policy DP1 in that it does not respond or take into account the fact that certain sites are intended to accommodate the contribution to the Black Country forecast unmet housing needs. As highlighted in our response in respect of Policy DP1 and our past representations existing; migration patterns from the Black Country to Shropshire have a very different age profile to the existing Shropshire population with this generally being significant younger. This new draft policy does not reflect this contribution to the unmet housing needs of the Black Country.

#### **2. Are the policy requirements clear?**

- 3.3. No. As highlighted in our representations to the additional submission documents; at around 1,500 words and over 3 ½ pages the draft policy lacks the precision or clear unambiguous guidance needed to assist future decision making. This is before even considering the further 91 paragraphs (5,100+ words) of additional explanatory text.
- 3.4. As also set out in previous comments in relation to part 19 of the draft policy; these are, at best, unclear and at worst create a conflicts with Policy SP2 and the identification of a minimum housing requirement. This potential conflict is as a result of the suggestion that certain criteria should be met for developments that result in the level of development exceeding settlement guidelines.
- 3.5. Parts 14–16 of this draft policy are also unclear as to the proportion of dwellings actually sought through the policy. This is because the policy references the calculation of the requirement against the number "houses", rather than dwellings. As such, it could be argued that this requirement would not be calculated against other dwelling types proposed such as apartments.
- 3.6. Finally and to assist, we understand that some of the cross referencing in the policy included as MM033 is incorrect this includes:
- Paragraph 3 – the reference to "Paragraph 3" should read "Paragraph 2"
  - Paragraphs 11–16 – the reference to "Paragraph 8" should read "Paragraph 7".
  - Paragraphs 17–18 – should read "Paragraphs 14–16" rather than "Paragraphs 15–17".
  - Paragraph 19b – should read "Paragraph 7" rather than "Paragraph 8".



**3. Is the policy flexible enough?**

- 3.7. No. Unlike Policy DP1 there appears to be no flexibility built in to allow for local housing needs within settlement areas to be considered in determining the appropriate level of provision.

**4. Has the policy been viability tested to ensure it does not prevent development coming forward?**

- 3.8. As highlighted in our representations to the additional submission documents; the policy requirements have not been tested through the Viability Appraisal.



## 4. Matter 27 Questions – Policy DP2 – Self-Build and Custom-Build Housing.

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

- 4.1. No. The policy is neither effective nor justified. Our original Regulation 19 representations raised a number of issues in respect of the blanket 10% requirement for serviced self-build and custom build developers on all sites of 10 dwellings or more. Whilst these objections and the reasoning behind them remain, given the passage of time the following assesses how the level of provision compares with the most recent data provided by the Shropshire Self-Build Register and the forecasts in the SHMA (EVO97.02) in the absence of any updated SHMA which considers this matter.

Table 1 – Shropshire Self-Build Register data

Reporting Year <sup>1</sup>	Individual and group self-build register applications	SHMA self-build register forecast. <sup>2</sup>	Self-build permissions granted.
15/16	231	–	177
16/17	136	–	31
17/18	127	–	102
18/19	62	–	62
19/20	36	108	36
20/21	59	108	92
21/22	36	108	89
22/23	20	108	72
Total	707	108	661
<b>Average<sup>3</sup></b>	<b>80</b>	<b>108</b>	<b>75</b>

- 4.2. As seen in Table 1, the number of applicants joining the self-build register has continued to fall over the reporting years with just 20 applicants in 2022/23. As such the evidence available in respect of demand is markedly different now than when the policy requirements were first drafted when it was included in the Regulation 18 draft of the plan (August 2020).
- 4.3. This is highlighted by the comparison with the forecasts included in the SHMA (EVO97.0.2) at Table 136 which assumes an average self-build register applications of 108 per annum. To put this into perspective, since the SHMA was published, there have been an average of 38 applications to go onto the register.
- 4.4. Importantly, it is clear that self-build permissions being granted in a 'policy-off' situation are already outstripping the demand evidenced by the self-build register noting that the current SAMDev plan policies do not require the provision of any self-build plots on development sites. Indeed, the actual evidence in the SHMA (EVO97.02) identifies that

<sup>1</sup> All reporting years October 31 to October 30 with the exception of 2015/16 which runs from 14 January 2015 – 30 October 2016 (a 22 month period)

<sup>2</sup> SHMA (EVO97.02) Table 131.

<sup>3</sup> Average makes allowance for 22 month period in first reporting year.

there will be an oversupply of self-build plots based solely on past completions data in a policy off-scenario.

- 4.5. Given this, the further provision of a significant number of additional plots through allocations, undeveloped SAMDev sites and any windfall developments of 10 or more dwellings will far exceed the evidenced demand within the Self-Build Register. As such, the policy approach cannot be considered to be justified.
- 4.6. In terms of the effectiveness of the policy, no evidence has been provided regarding how many of those on the Self-Build Register are actually seeking the serviced plots that the draft policy seeks to deliver. As such, there is no evidence that the policy requirement will even meet the needs of any of those on the Self-Build Register.

**2. Is the timescale for marketing of plots justified?**

- 4.7. No. The policy currently requires a 24-month period for the marketing of plots and this period only starts when they are 'serviced, available for purchase and ready for development'. This impact of this on larger schemes such as Tasley Garden Village is significant. It would leave parts of the development or individual plots incomplete for an extended period of time, even after the occupation of other phases. In the event that there is no market interest, something that appears highly likely given the lack of evidence of demand, this would then require the developer to complete the development at a time when potentially the work has already completed. Such an occurrence would result in significant construction costs associated with restarting work including a need to set up new construction compounds and facilities.

**3. Does the policy or explanation need to be clearer about what a developer needs to do if they have marketed the plots without success before they can sell them as market homes?**

- 4.8. Yes. The requirement for a marketing strategy seems onerous. Instead, the policy should be amended to set out what is required through marketing, which can then be evidenced after the marketing period has expired.

**5. Will the implementation of this policy adversely affect delivery of sites?**

- 4.9. Yes, for those reasons set out in respect of timescales (Question 2).

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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