

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage Two Hearing Statement

<b>Representor unique Part A Ref *</b>	<b>A122</b>
<b>Matter</b>	<b>27 - General Housing Policies, Including Affordable Housing (Policies DP1-DP8)</b>
<b>Relevant questions</b>	<b>Proposed New Policy DP1A - 1, 2, 3, 4</b>
<b>Comments as attached</b>	

## SHROPSHIRE LOCAL PLAN EXAMINATION Stage Two Hearing Statement

### Matter 27 - General Housing Policies, Including Affordable Housing (Policies DP1 - DP8)

Reference: A122

Date: 18/09/2024

#### Proposed New 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?*

Paragraph 63 of the NPPF states that '*...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*'. Older people are listed as one of the groups to whom this applies. The NPPF does not state how this assessment should be conducted, nor the planning policies that should be applied as a result.

Draft Policy DP1A states that site allocations of 250 or more dwellings must provide at least 20% of their homes in the form of specialist housing for older people and/or those with disabilities and special needs. In the case of Shrewsbury South West, which comprises proposed allocations SHR060, SHR158 and SHR161, this would equate to 300 of 1,500 homes, which is a significant proportion.

CEG does not consider this level of provision to be justified, particularly when the same policy permits a lower percentage on smaller allocations. It is unclear as to why a higher *percentage* of specialist housing is required in larger allocations. Applying broadly the same percentage across all allocations would ensure a better geographical spread of specialist housing around the authority and would ensure that rural, as well as urban, areas benefit from it. Given that Draft Policy DP1A was introduced late in the plan preparation process, CEG would question whether it has benefitted from the same level of testing and appraisal as have the other allocation policies.

CEG is also concerned about the practicalities of delivering such a large volume of specialist / older people's housing in a concentrated location over a relatively short space of time. We understand from speaking to property agents involved in this field that there is presently no excess of demand over supply for care homes and sheltered housing in Shrewsbury. While we would expect demand

to grow over time, this will be a gradual process across the town as a whole, rather than a surge in demand for a large volume of accommodation in a single location.

Specialist and older people's housing is delivered by a small number of providers and developers. With the typical size of a care home being approximately seventy bedspaces, our concern is that the delivery of around 300 bedspaces on a site such as Shrewsbury South West would require three or four of these specialist developers to deliver their respective schemes within a short timeframe and in a highly-concentrated location. If Draft Policy DP1A were to be adopted, these same providers would likely be choosing between these and other sites elsewhere in the town at the same time. Our understanding from property agents is that the providers do not believe there is capacity for more than one specialist housing development within Shrewsbury at a time and that they are not taking on sites where they know a rival developer has acquired a site nearby. DP1A could, therefore, impact on the overall delivery rates of larger sites - such as Shrewsbury South West - and could lead to some sites becoming unviable.

2. *Are the policy requirements clear?*

CEG considers most elements of the policy to be clear. However, we would welcome more clarity around the application of the policy to phased developments i.e. whether the Council will seek to apply the 20% requirement to each phase of a development or only in relation to the overall total.

We would also like to clarify whether homes that meet M4(2) or M4(3) design standards for 'accessible and adaptable dwellings', as set out in Part M Volume One of the Building Regulations, will be classed as meeting the requirements of Policy DP1A, given that these homes make provision for people with disabilities. If this is the case, this would make delivery of the policy easier to achieve.

3. *Is the policy flexible enough?*

As written, CEG considers the policy to be prescriptive rather than flexible. We would welcome a more flexible approach which allows specialist housing to be spread across the authority's area according to identified local need. As it stands, many rural allocations fall below the 50-home threshold for this policy and will not, therefore, have to provide any specialist housing. This will increase the pressure on larger sites and will concentrate supply into fewer settlements, limiting choice for potential buyers.

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

We are not aware that Draft Policy DP1A has been viability tested. We would welcome a robust testing process to ensure the policy does not prevent or delay development, or adversely affect the viability of allocated sites.