

Hearing Statement – Matter 27

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 27 - General housing policies, including affordable housing. 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

Policy DP1 – Residential mix

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

Part 1

2.1 Part 1 of the policy states that a mix should be provided “*in accordance with Shropshire Council’s Strategic Housing Market Assessment (SHMA)*”.

2.2 Whilst the 2020 SHMA provides a potential starting point for assessing the need for different types of housing, the demographic based projections within it do not accurately reflect market demand or take into account changes in trends. In particular:

- The household growth within the SHMA does not correspond with the proposed housing requirement in the plan. The housing mix is based on the 2014-based Sub-National Household Projections which show:
 - A change of 19,136 households between 2016-2038
 - A resulting estimated housing need of 21,748 dwellings for the period of 2016-2038 (989dpa)

This is significantly below the proposed housing requirement. It cannot be assumed that the mix set out in the SHMA would equally apply to almost 10,000 additional dwellings across the plan period.

- The SHMA provides an assessment of needs across Shropshire, but it does not identify the specific size, type and tenure of housing which may be needed in specific locations or settlements.
- The SHMA fails to take into account the variation in needs within certain household types, and in effect demand. For example, not all single or two person households would wish to accommodate a one or two bedroom property. This reflects not only purchaser preference, but also the need for additional space to accommodate home offices and spare bedrooms for flexible family living. Providing house sizes based on demographic need only places unnecessary strain on the market for larger dwellings (3 beds +).

2.3 Policy DP1 should therefore be amended to be clear that the SHMA is only a starting point when considering the type, tenure and size of new dwellings, and it should clarify that it should be applied flexibly where local needs or market demand indicate so.



Part 2

- 2.4 Whilst we support the Right Home Right Place initiative in principle, the survey is likely to only provide a small snapshot in time and it may not be sufficiently robust to address larger sites which are seeking to meet the wider housing needs beyond a specific Parish area. Furthermore, the survey appears to focus on affordable housing need as it does not seek to disaggregate rents above £650 per month or market value of a property above £180,000. It is therefore not clear how the survey results would assist with identifying the housing mix for market housing. Whilst this could be a starting point in determining the mix of housing, we do not consider that it is appropriate or effective for the policy to stipulate that 50% of the housing should follow the mix derived from such a survey.
- 2.5 In cases where no survey has been conducted, the policy requires that 25% 2-bedroom and 25% 3-bedroom will be provided (Policy DP1.2(b)). It is not clear what the justification for this is, considering the findings of the SHMA which indicate a much higher need for 3-bedroom dwellings.

Q2. Is the policy flexible enough?

- 2.6 Paragraph 8.10 identifies that the housing mix within the policy will not be sought rigidly across all sites. However, the policy implies otherwise.
- 2.7 As indicated above, Policy DP1.1 as currently worded does not provide sufficient flexibility in relation to housing mix as it is required to reflect the SHMA, which does not provide insight into the local needs of specific settlements and areas. It would be appropriate for the policy to make provisions for an alternative housing mix where material considerations justify doing so.
- 2.8 Furthermore, part 2(a) of the draft policy restricts a minimum of 50% of market dwellings to a housing mix identified through the Right Home Right Place survey, if the report is less than 5 years old. We do not consider that the survey would provide a robust representation of the housing need to inform over 50% of a housing mix. The survey should be a starting point only and deviation from the survey should be allowed where there are material considerations which point to a different mix of housing.



Proposed new Policy DP1A - Housing Provision for Older People and those with Disabilities and Special Needs

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

- 2.9 The PPG¹ is clear that 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. Part 2 of the draft policy requires 5% of 'the dwellings' to be built to M4(3) standards and does not indicate that this requirement applies to affordable housing only. Although explanatory paragraphs 4.53 and 4.54 (GC4m, MM034) go on to confirm that the requirement will only be applied where the local authority is responsible for nominating a person to live in the dwelling, we consider that this should be included within the policy itself.
- 2.10 We therefore consider that the policy should be amended to be clear that the 5% provision of M4(3) dwellings applies to dwellings delivered as affordable housing.

Q4. Has the policy been viability tested to ensure it does not prevent development coming forward?

- 2.11 Whilst parts 4 to 6 of the original Policy DP1 reflected the principles of the now proposed Policy DP1A, they did not provide as much detail in respect of the requirements. Specifically, the policy did not previously specify the amount of specialist housing provision for developments of 50 dwellings or more.
- 2.12 Proposed Policy DP1A now requires between 10-20% provision on sites of 50 dwellings or more. The initial Viability Study (EV115) only appears to have tested the requirement for M4(2) and M4(3) dwellings as set out in the former Policy DP1.4-6. The Viability Update Note (GC49) also does not consider the viability impacts of the new policy requirements. The new requirement of a minimum of 10% specialist housing as described in part 7 of the policy will clearly have cost implications for future developments. Explanatory paragraph 4.85 indicates that the thresholds for proportional quantities of specialist housing are responsive to matters including development viability, however no evidence has been provided to support this.
- 2.13 The Viability Study (EV115) identified clear differences in viability between Shrewsbury, the North and the South of the borough. Indeed, the evidence indicates that little development in the North Area is viable at full policy requirements, even without taking into account affordable housing. Therefore, it is not clear how the additional specialist housing requirements will affect future development as the main

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



modifications do not take into account the geographical variances, despite paragraph 4.34 which states that “*crucially it must also be in appropriate locations*”.

Policy DP2 – Self-Build and Custom-Build Housing

Q4. The policy ‘encourages’ the provision of serviced plots for self-build and custom build developers. Is the policy worded strongly enough? Should it ‘require’ rather than ‘encourage’?

2.14 The policy wording as presently drafted is appropriate. Having regard to the evidence of need, the policy should not stipulate that self-build and custom build housing to be delivered on sites. In addition to our comments set out at paragraph 4.25 of our Regulation 19 Representations, there is further evidence that suggests that the supply of self-build and custom dwellings exceeds the demand. The Council’s Self-build Register demonstrates interest levels and the number of self-build permissions granted. We summarise the latest information available for 2020/21 to 2022/23 in the table below.

Year	No. of applications ² (individual & group)	No. of self-build permissions granted
2020/21	59	92
2021/22	36	89
2022/23	20	72

2.15 The number of self-build permissions granted far exceeds the level of interest. Whilst the register may not identify all individuals or groups who are interested in self-build homes, the supply of such housing remains significantly above the subscriptions.

2.16 In addition, the number of applications has steadily decreased since the start of the Self-build Register, from 218 in 2015/16³ to just 20 applications in 2022/23. Table 131 of the SHMA Part 2 estimated that 108 applications would be made per annum for inclusion on the Register from 2019 to 2038. The above table suggests that this is not the case.

2.17 Therefore, whilst the delivery of self-build and custom build housing may be beneficial on some sites and should be encouraged, there is insufficient evidence to support a fixed requirement.

² This indicates the number of subscriptions by those interested in building their own homes

³ NB. this covered a longer period from Jan 2015 to Oct 2016



Policy DP3 – Affordable Housing Provision

Q1. Is the policy justified, effective and consistent with national planning policy, including the 2021 Framework (Paragraph 4.53 of the explanation to the policy refers to the 2019 Framework)?

- 2.18 Yes. SLG supports the Council’s aspirations to deliver affordable housing over the plan period and the considerations given to viability of development in different areas across Shropshire, which has been reflected in policy through distinction between the north and south.

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