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Dear Inspectors,

Shropshire Council Response to ID28: Inspectors' Interim Findings Following Stage 1 Hearings Sessions

1. Introduction

- 1.1. Thank you for your correspondence of the 15th February 2023 (ID28) in which you set out your Interim Findings on the Stage 1 Hearing Sessions. Within ID28, you posed a series of questions to the Council and identified areas of further work for the Council to undertake before you proceed with the Stage 2 Hearing Sessions.
- 1.2. Within ID28, you also indicated that your questions and identified further areas of work may result in the identification of additional potential Main Modifications to support the soundness of the draft Shropshire Local Plan.
- 1.3. In our initial response (GC20), the Council indicated our intention to respond to ID28 by the 30th June 2023. However, as we subsequently advised, in order to allow for approval of this response by Shropshire Council's Cabinet, these timescales have been subject to a short extension. The Council very much appreciate your understanding on this matter.



- 1.4. We have now taken the opportunity to reflect on ID28 and in particular the conclusions you had reached, the questions you raised and the further areas of work identified.
- 1.5. Our initial response (GC20), this correspondence, and the accompanying documents represent our full response to ID28.
- 1.6. Between the issuing of ID28 and this response, a further hearing occurred regarding minerals and waste. Following the completion of this hearing the Council provided a schedule of proposed main modifications resulting from this hearing. You have subsequently issued a response (with correspondence reference ID34) requesting that the Council give due consideration to the need for main modifications to address a limited number of very specific issues.
- 1.7. The Council has reflected upon these suggestions and is supportive of the identification of proposed main modifications on all the issues identified. As such, a series of proposed main modifications have been prepared.
- 1.8. The documents which accompany this response include an Updated Schedule of Main Modifications and an Updated Schedule of Minor (Additional) Modifications.
- 1.9. These Schedules have been comprehensively reviewed and updated so that they capture all proposed modifications to date. This includes those proposed in response to ID28, those resulting from the recent hearing session on minerals and waste, and those proposed in response to mineral and waste correspondence ID34.
- 1.10. To aid with the consideration of proposed modifications, they have been re-referenced and re-ordered so that they reflect the structure of the draft Shropshire Local Plan.



- 1.11. For convenience, the Council has also prepared a 'track changes' version of the draft Shropshire Local Plan, which captures all of the proposed Main and Minor (Additional) Modifications to the draft Local Plan to this point in the examination.
- 1.12. *Please Note: The Updated Schedules of Main Modifications and Minor (Additional) Modifications utilise policy references as at the submission of the draft Shropshire Local Plan for examination. The 'track changes' version of the draft Shropshire Local Plan includes hyperlinks on policy references to aid navigation, these update to reflect changes resulting from proposed modifications.*
- 1.13. For ease, the Council has structured the remainder of this response to follow the order of ID28 and where appropriate we cross-refer to relevant paragraphs of ID28.

2. Duty to Cooperate (DtC)

- 2.1. Paragraphs 2-3 of ID28 address compliance with the Duty to Cooperate (DtC). Shropshire Council acknowledges and welcomes the conclusions about our engagement with our duty to cooperate partners, as recorded within these paragraphs of ID28.

3. Next Steps

- 3.1. Paragraph 4 of ID28 addresses next steps. This correspondence and the accompanying documents are intended to provide the information necessary to allow the examination of the draft Shropshire Local Plan to proceed to the Stage 2 Hearing Sessions.



4. Plan Period

- 4.1. Paragraph 5 of ID28 addresses the plan period for the draft Shropshire Local Plan. It identifies two questions for the Council:
- a. Whether the start of the plan period (currently proposed to be 2016) should align with the base date for the Local Housing Needs Assessment (which is 2020) submitted as part of the evidence base that informed the preparation of the draft Shropshire Local Plan?
 - b. What are the implications of aligning these two dates, including in relation to the Housing Requirement in draft Policy SP2 and the settlement guidelines / supply of sites in Policies S1-S20?
- 4.2. Shropshire Council has considered these questions and addresses each in turn.

a. Should the start of the plan period be aligned with the base date for the Local Housing Needs Assessment?

- 4.3. The Council acknowledges there may be advantages to aligning the start of the plan period with the base date for the Local Housing Needs Assessment. However, the Council considers that these advantages would be outweighed by the disadvantages and it is also considered unnecessary to change the plan period to ensure the plan is 'sound'.
- 4.4. The disadvantages resulting from such a change to the plan period, include:
- a. Consultations and discussions with communities undertaken during the preparation of the draft Shropshire Local Plan were predicated on a 2016 start date for the plan period. Changing this date now may cause unnecessary confusion.
 - b. Evidence base prepared to inform the draft Shropshire Local Plan is predicated on a 2016 start date for the plan period. Whilst a change



would not invalidate the evidence, it could again cause some unnecessary confusion.

- c. Change would have 'knock-on' implications for settlement housing and employment land guidelines (see below) which could also cause unnecessary confusion.
- d. It could lead to further debate over whether the start of the plan period should be updated again as the examination process continues. This may cause unnecessary delay and confusion.

4.5. Shropshire Council is concerned that unnecessary confusion has the potential to undermine implementation of the draft Shropshire Local Plan.

b. What are the implications of aligning these two dates?

4.6. If the start of the plan period is aligned with the base date for the Local Housing Needs Assessment, the housing and employment land requirements within draft Policy SP2 would need to be reduced to exclude the housing and employment land completed prior to 2020.

4.7. This is because these proposed requirements were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared. The consultation material produced to inform preparation of the draft Shropshire Local Plan documents this.

4.8. Similarly, the housing and employment land guidelines for all settlements within draft Policies S1-S20 would need to be amended to exclude the housing and employment land completed prior to 2020.

4.9. This is again because these proposed guidelines were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared and this



formed the basis for discussions with communities. Again, documented within the consultation material produced to inform preparation of the draft Shropshire Local Plan.

- 4.10. As such, a range of Main Modifications would be required to the draft Shropshire Local Plan in order to reflect this change. This would include:
 - a. The introduction to the draft Shropshire Local Plan.
 - b. Draft policies, including SP2, SP7, SP13, DP1, DP2, DP3, DP30 and S1-S20.
 - c. The explanation to a number of draft Policies, including those referenced above.
 - d. Appendices 5 and 6 of the draft Shropshire Local Plan.
- 4.11. Again, it could also lead to further debate over whether the start of the plan period should be updated again as the examination process continues.
- 4.12. As such, upon reflection Shropshire Council's clear preference is for the start of the Plan period to remain 2016, unless you consider that a change to 2020 is required to ensure the draft Shropshire Local Plan is 'sound'.

5. Saved Policies

- 5.1. Paragraph 6 of ID28 addresses the means by which relevant policies within the SAMDev Plan would be 'saved'. It requested that the Council provide further information on how this is intended to be achieved.
- 5.2. Within Appendix 1 of GC20 three initial mechanisms were identified to 'save' the relevant policies within the SAMDev Plan – one of which reflected the approach already proposed in the draft Shropshire Local Plan.



- 5.3. Within your response to GC20 (within correspondence referenced as ID33) you provided the following advice:

“Turning now to appendix 1 of your letter, Mrs Dillon and I have looked at this and given it a great deal of thought. Our view is that whilst you can retain policies in your existing plan you cannot save parts of them by striking through text as there is no mechanism for this. To do this you would have to replicate all of the amended policies in an appendices to the emerging plan. This would make the emerging plan very long and difficult for future users to navigate. Moreover, these policies as you know are not before this examination.

Our advice would be to refer to the policies in appendix 2 of the emerging plan as is the case at present, but then add some wording into emerging Policy SP2 to make it clear that the housing and employment land requirement is made up of sites in the emerging plan and sites in appendix 2. You could also consider adding some wording to the beginning of the Place Plans section of the emerging plan as ‘supplementary text’ in order to provide further context to the policy situation for allocations within the Place Plan areas.”

- 5.4. Firstly, Shropshire Council would like to thank you for reflecting upon the initial mechanisms identified by the Council and providing your views on this matter.
- 5.5. Having considered ID33, Shropshire Council is in agreement that the proposed approach is both effective and appropriate.
- 5.6. The Council has identified two proposed modifications to implement this proposed approach, which are to:
- a. Include additional text in draft Policy SP2 of the draft Shropshire Local Plan to explain that the housing and employment land requirements will be implemented using a land supply that



comprises sites within the draft Shropshire Local Plan and sites already allocated within the SAMDev Plan, as identified within Appendix 2 of the draft Shropshire Local Plan.

- b. Include additional text within the introduction to Section 5 of the draft Shropshire Local Plan explaining that 'saved' allocations and new allocations will contribute towards the achievement of the housing and employment land guidelines for settlements. Thereby providing further context to the settlement policies across the 18 Place Plan areas.

5.7. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.

5.8. Shropshire Council considers that these proposed modifications provide greater clarity about the sites that contribute to the achievement of the proposed housing and employment land requirements within the draft Shropshire Local Plan.

5.9. Shropshire Council also considers that these modifications complement:

- a. The existing references to sites already allocated within the SAMDev Plan (as identified within Appendix 2 of the draft Shropshire Local Plan), in both the explanation to draft Policy SP2 and in the draft settlement policies (S1-S18).
- b. The previously proposed modification to Appendix 2 of the draft Shropshire Local Plan to update the list of proposed 'saved' site allocations to exclude sites that have been built out since 31st March 2019 and include the development guidelines and approximate provision figures from the SAMDev Plan for each 'saved' allocation (the location and extent of these 'saved' allocations are already illustrated on the draft Policies Map).



6. Gypsy and Traveller Transit Site Provision

- 6.1. Paragraphs 7-9 of ID28 address Gypsy and Traveller transit site provision. They include the following questions:
- a. Can the Council provide copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site on the examination webpage?
 - b. Can the Council update 'Table 7.9', the conclusion, and the executive summary of the Gypsy and Traveller Accommodation Assessment (GTAA) 2019 Update, as an addendum to this document?
 - c. Can the Council review the supporting text within the draft Shropshire Local Plan in response to the addendum to the GTAA 2019 Update?
 - d. Can the Council consider whether they wish to review the Gypsy and Traveller site needs within the GTAA 2019 Update in the light of the judgment *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022?
- 6.2. Shropshire Council has considered these questions and addresses each in turn.

a. Copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site

- 6.3. Shropshire Council can confirm that copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site to the north of Shrewsbury have been provided to the Programme Officer and have subsequently been made available on the examination webpage as an Examination Stage Document (reference GC21).



6.4. For information, a Planning Application (reference 23/00567/FUL) was submitted for the provision of this new transit site. This was subsequently withdrawn to allow the preparation of further additional technical assessments. It is anticipated that a new Planning Application for this proposal will be submitted shortly.

b. Prepare an Addendum to the GTAA 2019 Update

6.5. Shropshire Council has undertaken a review of Table 7.9, the conclusion, and the executive summary of the GTAA 2019 Update. This was informed by professional advice provided by our consultants Arc4.

6.6. Following this review an addendum to the GTAA 2019 Update has been prepared. This addendum has been provided alongside this correspondence to be made available on the examination webpage.

c. Review of supporting text within the draft Shropshire Local Plan

6.7. Following preparation of the addendum referenced above, Shropshire Council has undertaken a review of the supporting text within the draft Shropshire Local Plan.

6.8. As a result of this review, a number of main modifications are proposed to the explanation of draft Policy DP8, to reflect the additional information set out in the GTAA 2019 addendum. These proposed main modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.

d. Implications of the judgment Lisa Smith v SSLUHC [2022] EWCA Civ 1391 of 31st October 2022

6.9. Shropshire Council recognises the Court of Appeal's judgment in Lisa Smith v SSLUHC [2022] EWCA Civ 1391 of 31st October 2022 about the



interpretation and application of the Planning Policy for Traveller Sites (2015) (PPTS).

- 6.10. Having reviewed it and considered the implications of this case for the Council's published evidence (including the GTAA 2019 Update), the Council considers that it would not change the Council's approach to assessing the accommodation needs of Gypsies and Travellers for the purposes of the Local Plan review.
- 6.11. The Shropshire GTAA 2019 Update assesses the accommodation needs of all Gypsies and Travellers, with those relating to Travellers meeting the Annex A definition in the PPTS identified as a proportion of the total identified cultural need. Thus, the housing needs of all ethnic Gypsies and Travellers are assessed, including those that may be deemed to have permanently ceased to travel and fall outside the definition of Gypsies and Travellers in the PPTS.
- 6.12. This is succinctly documented within the explanation to draft Policy DP8 of the draft Shropshire Local Plan, which includes a brief summary of the GTAA 2019 Update. This notes that it *"includes ethnic gypsies and travellers who fall outside the definition of Travellers in the PPTS who nonetheless are able to demonstrate a right to culturally appropriate accommodation."*
- 6.13. As such, it is not considered that the GTAA 2019 Update needs to be reviewed in the light of the judgment in *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022. However, the Council has separately addressed the required update of the GTAA requested in relation to Paragraph 8 of ID28.
- 6.14. The Council understands that it has a requirement to assess and meet the accommodation needs of all Gypsy and Travellers, irrespective of their travelling status. The conclusions of the GTAA 2019 Update confirm that all cultural need has been assessed and that for the



purposes of the Local Plan Review, it is expected that supply will be sufficient to meet this need.

- 6.15. Thus, the proposed approach to meeting the housing needs of Gypsies and Travellers within the draft Shropshire Local Plan will meet both the needs of those that comply with the definition of Gypsies and Travellers in the PPTS; and the needs of ethnic Gypsies and Travellers that fall outside the definition of Gypsies and Travellers in the PPTS, who nonetheless can demonstrate a right to culturally appropriate accommodation.

7. Unmet Housing and Employment Land Needs of the Association of Black Country Authorities (ABCA) and Policy SP2

- 7.1. Paragraphs 10-27 of ID28 address a range of issues related to housing and employment land.

Housing and Employment Topic Paper

- 7.2. Paragraphs 10-12 of ID28 address housing and employment land needs and requirements and culminate in a request for a Housing and Employment Topic Paper to address these matters.
- 7.3. Paragraph 22 of ID28 relates to the proposed strategy for achieving the housing and employment land requirement. It culminates in a request for the new Housing and Employment Topic Paper to document the proposed strategy.
- 7.4. Shropshire Council has sought to positively respond to these requests and has prepared a new Housing and Employment Topic Paper. This seeks to explain the Council's position with regard to housing and employment land needs and requirements, including the proposed



strategy for the distribution of development to achieve these proposed requirements.

7.5. For the avoidance of doubt, the content of this new Housing and Employment Topic Paper has been directly informed by the wider work undertaken in response to ID28 (particularly the additional Sustainability Appraisal and site assessment work undertaken in responses to paragraphs 17-21 of ID28). The Housing and Employment Topic Paper is enclosed with this response.

7.6. In summary, with regard to the housing and employment land requirements and the approach to the strategic distribution of planned development, the Housing and Employment Topic Paper concludes that:

- a. *Over the proposed plan period from 2016 to 2038, **a minimum of 30,800 new dwellings and a minimum of 300 hectares of employment land will be delivered**, of which 1,500 dwellings and 30ha of employment land are to contribute towards the unmet needs forecast to arise within the Black Country. The proposed housing and employment land requirements equate to around 1,400 dwellings and around 14ha of employment land per annum.*
- b. *To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, **new development will be focused in the 'urban areas'**, which consist of Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements.*
- c. *Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in 'urban areas' will be **complemented by appropriate new development** within Community Hubs, which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or*



enhance their sustainability. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.

- 7.7. This therefore forms the basis for the proposed spatial strategy for the level and distribution of development across Shropshire.

Housing and Employment Land Need and Proposed Contributions to the Black Country

- 7.8. Paragraph 13 of ID28 specifies that *“The Council’s approach to identifying the housing and employment land needs derived within Shropshire itself is sound.”* It also specifies that *“In principle, the Council’s intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC.”* These conclusions are welcome.
- 7.9. Paragraphs 14-16 continue discussion of the unmet needs forecast to arise within the Black Country and conclude that proposed contributions are *“the starting point as there is agreement to revisit the unmet need with a view to providing further assistance once the local plans for the ABCA councils have been examined and adopted.”*
- 7.10. Shropshire Council acknowledges this conclusion and is committed to continued positive engagement through the duty to cooperate with the Black Country Authorities.

Further Sustainability Appraisal (SA) Assessment Work

- 7.11. Paragraphs 17-20 continue to address the proposed contribution to unmet needs forecast to arise within the Black Country, in the context of Sustainability Appraisal (SA). They raise concern about the



consideration of proposed contributions to the unmet needs forecast to arise within the Black Country when undertaking SA assessments.

7.12. Paragraph 20 concludes that *“Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country.”*

7.13. As such, Shropshire Council has undertaken further Sustainability Appraisal (SA) assessment work regarding the proposed housing and employment land requirements, including consideration of a range of reasonable options for each.

7.14. Consistent with ID28, within the additional SA assessment work an explicit distinction is made between Shropshire need and the proposed contribution to unmet needs forecast to arise within the Black Country.

7.15. The conclusions of this additional SA assessment work have been carefully considered and have informed proposals regarding the housing and employment land requirements for inclusion within the draft Shropshire Local Plan. These proposals and the relationship to need is documented within the new Housing and Employment Topic Paper.

Black Country Contribution

7.16. Paragraph 21 of ID28 explains that if the Council intend to contribute towards the unmet needs forecast to arise within the Black Country, for effectiveness this should be set out in the housing and employment land requirements of the draft Shropshire Local Plan.

7.17. As documented within the further SA assessment work and new Housing and Employment Topic Paper, Shropshire Council continues to consider that the proposed contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise within the



Black Country are appropriate and should be included within the draft Shropshire Local Plan.

- 7.18. The draft Shropshire Local Plan includes explicit reference to these proposed contributions within the explanation to draft Policy SP2. However, in seeking to positively respond to ID28, a main modification is proposed to specify that these contributions constitute part of the proposed housing and employment land requirements within draft Policy SP2 itself.

Sites to Accommodate Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country

- 7.19. Paragraph 21 of ID28 also specifies that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work.
- 7.20. Specifically, it states *"...the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan."*
- 7.21. To ensure the effectiveness of the draft Shropshire Local Plan, Shropshire Council has undertaken additional SA and site assessment work to inform the identification of the site or sites to accommodate the proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country.
- 7.22. This scope and conclusions of this assessment work are explained within the enclosed additional SA and site assessment work.
- 7.23. In conclusion, a series of sites have been identified to accommodate the proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country. These



sites and a brief summary of the reasons for their identification are documented within Table 7.1.

7.24. The additional SA assessment work also considered the sustainability of the proposed contributions and approach / sites to accommodate contributions to unmet needs forecast to arise within the Black Country through the updated SA assessment of draft Policy SP2. Reflecting the outcome of this work, a series of proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.



Table 7.1: Sites Identified to Accommodate the Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country

Site Reference	Site Name	Specific Policy	Total Capacity	Black Country Contribution	Summary
BRD030	Tasley Garden Village, Bridgnorth	S3.1	1,050 dwellings 16ha employment land New local centre 20ha of green infrastructure and a 19ha linear park	600 dwellings	<p>Bridgnorth is located in south-east Shropshire with a functional relationship to the Black Country. It benefits from strong road links to the Black Country via the A454 corridor.</p> <p>Bridgnorth is a principal centre and performs a strategic role in the east of Shropshire.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>
SHF018b & SHF018d	Land east of Shifnal Industrial Estate, Upton Lane, Shifnal	S15.1	39 hectares (15.6ha net development)	30ha of employment land	<p>Shifnal is located in east Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 corridor and Shrewsbury-Wolverhampton railway line.</p> <p>Shifnal is a key centre and a focus for investment, employment, housing and development on the M54/A5 strategic corridor.</p> <p>The site constitutes a proposed strategic employment allocation which due to its size and location has the potential to form both a local and regionally important employment centre.</p> <p>The site can accommodate a sizeable contribution towards the unmet employment land needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints. Whilst the site is located within the Green Belt, it is considered that exceptional circumstances exist to justify the release of this land for employment, as documented within the new Green Belt Topic Paper.</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>

Site Reference	Site Name	Specific Policy	Total Capacity	Black Country Contribution	Summary
SHR060, SHR158 & SHR161	Land between Mytton Oak Road and Hanwood Road, Shrewsbury	S16.1	1,500 dwellings 5ha of employment land	300 dwellings	<p>Shrewsbury is located in central Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 / A5 corridor and Shrewsbury-Wolverhampton railway line. Shrewsbury is the strategic centre of Shropshire and the primary focus for new development in the County.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>
IRN001	Former Ironbridge Power Station	S20	Range of local services and facilities Around 1,000 dwellings Around 6ha of employment land Extensive green infrastructure	600 dwellings	<p>The Former Ironbridge Power Station is located in east Shropshire with a functional relationship to the Black Country. It benefits from road access to the M54 / A5 corridor link to the Black Country via either the A4169 / A5523 or A4169 / A442.</p> <p>The Former Ironbridge Power Station is a part brownfield site that benefits from Outline Planning Permission and will form a new strategic settlement, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>

Green Belt Topic Paper

- 7.25. Paragraph 23 of ID28 addresses the role of proposed Green Belt releases in supporting the housing and employment land supply to meet Shropshire needs and proposed contributions to unmet needs forecast to arise within the Black Country.
- 7.26. It culminates in a request for an updated Green Belt Topic Paper, setting out exceptional circumstances for releasing Green Belt land to meet the needs of Shropshire and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.
- 7.27. In seeking to positively respond to this request, Shropshire Council has prepared an additional Green Belt Topic Paper.
- 7.28. However, it is important to note that a comprehensive Green Belt Exceptional Circumstances Statement (EV051) has already been prepared. Furthermore, a previous Green Belt Topic Paper (GC4g) was also prepared to provide a strategic overview of the role and purpose of proposed Green Belt releases.
- 7.29. Additionally, as documented within Table 7.1, through the additional SA and site assessment work four sites have been identified to accommodate the proposed contribution to the unmet needs of the Black Country. Of these, only one: SHF018b & SHF018d is located within the Green Belt – with the intention that it accommodates 30ha of employment land towards the unmet employment land needs forecast to arise within the Black Country.
- 7.30. As such, the new Green Belt Topic Paper seeks to:
- a. Provide a summary of the purpose of each of the proposed releases of land from the Green Belt to meet current or future needs arising



within Shropshire. This is supported by appropriate cross-references to other relevant material where appropriate.

- b. Provide a more detailed explanation of the purpose and exceptional circumstances for the proposed release of land from the Green Belt to accommodate a proposed contribution to the unmet needs forecast to arise within the Black Country.

Need for Consultation

- 7.31. Paragraph 24 of ID28 explains that it is necessary to address the issues raised in paragraphs 10-23 of ID28 in order for the plan to be found sound. Shropshire Council recognises this conclusion and within this response and the accompanying material has sought to positively respond to the conclusions reached.
- 7.32. Paragraph 24 indicates that following the submission of the full response to ID28, you will determine whether there is a need for further public consultation. Shropshire Council appreciates your consideration of this matter and will of course positively respond to your conclusions.

Local Plan Review Mechanism

- 7.33. Paragraph 25 of ID28 addresses the Local Plan review process. It states that such a review *“could be dealt with by way of an early review trigger built into policy SP2 or by relying on the statutory 5-year review process set out in the Framework”* and requests that the Council provide its formal views on these alternatives.
- 7.34. Shropshire Council very strongly favours the use of the statutory 5-year review process set out in the National Planning Policy Framework (NPPF).



- 7.35. There are a number of factors which inform this position. In summary, the statutory 5 year review process:
- a. Is the mechanism that Government has introduced for reviewing Local Plans.
 - b. Is a cycle with which many within the industry and Shropshire's communities are familiar.
 - c. Provides much needed stability and certainty regarding the policy framework in an area for individuals, communities, developers and decision makers. One of the issues with other mechanisms is the considerable uncertainty about whether / when a review will be 'triggered'.
 - d. Provides a better opportunity to focus on post adoption implementation and delivery. This implementation process is crucial, as without it the value of the Local Plan is diminished.
 - e. Is appropriately aligned with the timescales for the preparation of the Local Plans within the Black Country Authorities in order to support ongoing cross boundary discussions.

Monitoring Indicators

- 7.36. Paragraph 26 of ID28 addresses monitoring indicators and concludes that there is a need for indicators associated with the delivery of the proposed contributions to the unmet needs forecast to arise within the Black Country.
- 7.37. Shropshire Council has identified proposed modifications which seek to respond to this conclusion, which are documented within the enclosed Updated Schedule of Proposed Main Modifications.



Main Modifications

- 7.38. Paragraph 27 of ID28 explains that any main modifications resulting from the issues addressed within Paragraphs 10-26 of ID28 need to be appropriately documented and submitted to the examination.
- 7.39. Shropshire Council has identified a series of proposed modifications informed by the additional work undertaken in response to Paragraphs 10-26 of ID28. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications and Updated Schedule of Proposed Minor (Additional) Modifications.

8. Habitat Regulations Assessment

- 8.1. Paragraph 28 of ID28 addresses the Habitat Regulations Assessment (HRA) of the draft Shropshire Local Plan, specifically with regard to the Clun catchment.
- 8.2. It requests that Shropshire Council engages with Natural England and the Environment Agency regarding the Written Ministerial Statement (WMS) entitled 'Statement on improving water quality and tackling nutrient pollution', with a view to updating the prepared Statements of Common Ground (SoCG).
- 8.3. It also asks that following this engagement, the Council should advise on the implications for the latest position in the draft Shropshire Local Plan and whether any outstanding issues might be addressed through further proposed Main Modifications.
- 8.4. Proactive engagement between Shropshire Council and Natural England is currently ongoing with regard to this matter. The Council will provide further updates on this matter in due course.



9. Green Belt – RAF Cosford

9.1. Paragraphs 29-32 of ID28 address RAF Cosford. They explain that you have concluded that RAF Cosford should remain in the Green Belt, because:

- a. There is *“no evidence before us to demonstrate that the site’s Green Belt status has in anyway prevented it being developed in a manner consistent with its use as an RAF base or indeed related activities such as training facilities and domestic accommodation”*.
- b. *“Paragraph 143(b) of the Framework which advises that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open. However, it seems that the site has large areas of undeveloped land which, if developed, could harm openness of the surrounding Green Belt land.”*
- c. *“It would also make it more difficult for the Council to control future non-military related development on the site as other general development management policies would apply.”*

9.2. Whilst of course disappointed, Shropshire Council accepts the reasoning and conclusions in your Interim Findings. As such, appropriate main modifications are proposed. In summary these proposed modifications involve:

- a. The deletion of draft Policy S21 and its explanation.
- b. Appropriate amendments to draft Policies SP11 and S1 and their explanations.
- c. Other necessary amendments for the purpose of consistency.

9.3. Given the extensive built form that exists on the RAF Cosford site and the fact that there are known development aspirations / opportunities, Shropshire Council considers it is important to recognise within the

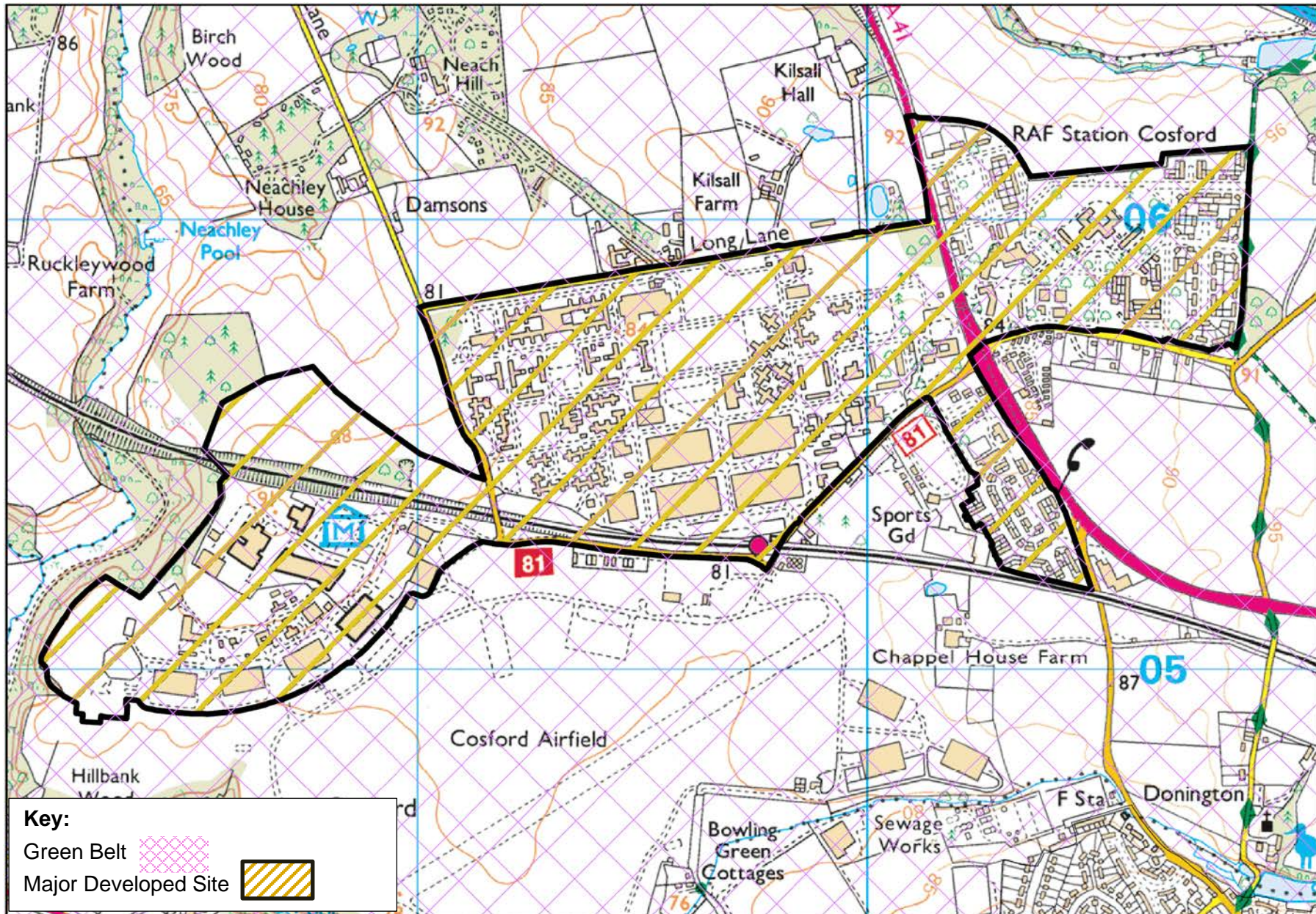


draft Shropshire Local Plan that RAF Cosford is a major developed predominantly brownfield site located within the Green Belt.

- 9.4. It is also important to recognise that this is a consideration when determining whether very special circumstances exist for development within the Green Belt - this position is consistent with that within the adopted Local Plan and is responsive to the conclusions you have reached within your Interim Findings.
- 9.5. As such, it is proposed that this is reflected within the modifications to draft policies SP11 and S1.
- 9.6. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications and Updated Schedule of Proposed Minor (Additional) Modifications.
- 9.7. Modifications will also be required to the draft Policies Map to remove reference to the RAF Cosford Strategic Site and include reference to the RAF Cosford Major Developed Site, this will be undertaken in due course.
- 9.8. For information, the proposed extent of the major developed predominantly brownfield component of the RAF Cosford site, which it is proposed will be reflected on the Policies Map, is identified in Figure 9.1.



Figure 9.1: Extent of the Proposed RAF Cosford Major Developed Site



10. Infrastructure Delivery Plan (IDP) and Strategic Funding Statement (SFS)

- 10.1. Paragraphs 33-34 of ID28 address infrastructure.
- 10.2. Paragraph 33 of ID28 advises the Council to treat the Infrastructure Delivery Plan (known in Shropshire as the Strategic Infrastructure and Investment Plan (GC4t)) as a 'live document' and to continue populating it as further information becomes available.
- 10.3. Shropshire Council recognises the importance of having a robust understanding of the infrastructure required to support development proposals within the draft Shropshire Local Plan. However, the strategic nature of the Local Plan can mean providing detailed assessments will be challenging.
- 10.4. However, Shropshire Council very much recognises the importance of continuing to enhance its understanding of infrastructure requirements across Shropshire, and in particular the infrastructure required to support the development proposals within the draft Shropshire Local Plan.
- 10.5. The Council therefore welcomes the recommendation and strongly embraces the principle of the Strategic Infrastructure and Investment Plan (GC4t) being viewed as a 'live document' that should be continued to be populated as further information becomes available.
- 10.6. Indeed, as documented within the Strategic Infrastructure and Investment Plan (GC4t) itself *"It is important that this Strategic Infrastructure and Investment Plan provides a 'live' framework, enabling the alignment of future planning, prioritisation, and delivery. It can only provide a snapshot in time using the best available data and assumptions from Shropshire's strategic providers. The Plan will be subject to an annual review and agreement via Shropshire's Strategic*



Infrastructure and Investment Network and informed with local intelligence via the annual Place Plan review.”

- 10.7. Shropshire Council would note that reflecting the 'live' nature of infrastructure planning in Shropshire, a comprehensive update of the Place Plans (EV067.01-EV067.18) that identify infrastructure needs and priorities is currently ongoing.
- 10.8. Further information regarding the infrastructure needed to support new development and the infrastructure priorities and investment strategies of the main infrastructure providers in Shropshire are also currently being sought through productive discussions with site promoters and the Strategic Infrastructure and Investment Network. This Network includes representatives from several partner organisations, including the NHS, National Highways, Utility Providers and Network Rail, as well as ongoing contributions from the Council's own Education service in assessing school place planning requirements in response to planned development.
- 10.9. This work will in sequence inform future updates of the Strategic Infrastructure and Investment Plan (GC4t).
- 10.10. Paragraph 34 of ID28 requests timescales for the update of the Strategic Funding Statement, known as the Annual Infrastructure Funding Statement in Shropshire.
- 10.11. Shropshire Council can confirm the Annual Infrastructure Funding Statement for Shropshire was last updated for the period 01/04/2021 - 31/03/2022. This was published in December 2022 and a copy is enclosed with this response.
- 10.12. The Annual Infrastructure Funding Statement (2022) presents an infrastructure list (see pages 9-21) which *“sets out the potential infrastructure projects or types of infrastructure which Shropshire*



Council intends to be wholly or partly funded by the Community Infrastructure Levy (CIL)."

10.13. It should be noted that this list is subject to a number of caveats, including:

"This report will not dictate how Shropshire Council must spend CIL, but will set out Shropshire Council's intentions."

"The intention is for the infrastructure list to be reviewed regularly. Future iterations of the list will include additional infrastructure projects where they are considered necessary to support new development."

"items not included on this infrastructure list can continue to be CIL funded in advance of being included in any future infrastructure list."

"The list refers only to the use of the CIL local and strategic funds by Shropshire Council." As such, it does not include use of the CIL 'neighbourhood fund' which is distributed to Town and Parish Councils.

10.14. The content of the Infrastructure List within the Annual Infrastructure Funding Statement is directly linked to and informed by the Place Plans and Strategic Infrastructure and Investment Plan.

10.15. Shropshire Council envisages that the number of projects and level of specificity within the Annual Infrastructure Funding Statement will increase on completion of the Place Plan updates and the ongoing discussions within the Strategic Infrastructure and Investment Network.

11. Five-year Housing Land Supply

11.1. Paragraphs 35-36 of ID28 address the five year housing land supply.

11.2. Paragraph 35 of ID28 explains your finding that you cannot 'fix' the five year housing land supply in Shropshire. This position and your reasoning is acknowledged by Shropshire Council.



- 11.3. Paragraph 36 of ID28 explains your finding that you might not be able to fully consider our 5-year housing land supply and to come to a conclusion on whether the Council do have a 5-year supply of housing land. This is because the Council are relying on a number of 'saved' site allocations in the SAMDev Plan which are not subject to examination.
- 11.4. The Council would note that the process of determining whether a 5-year housing land supply exists during the examination of a draft Local Plan will inevitably involve the consideration of sites that are not proposed for allocation within the draft Local Plan that is the subject of the examination.
- 11.5. This is because a housing land supply invariably extends beyond sites that are proposed for allocation within a draft Local Plan.
- 11.6. For instance, as summarised within Paragraph 3.8 of the explanation to draft Policy SP2 of the draft Shropshire Local Plan: *"The types of site available to achieve the housing requirement in Shropshire are varied and extensive. They include small, medium and large:*
- a. Sites with planning permission or prior approval;*
 - b. Sites with a 'resolution to grant' planning permission;*
 - c. Saved SAMDev Plan allocations;*
 - d. Local Plan allocations; and*
 - e. Windfall opportunities, where sites comply with the requirements of this Local Plan."*
- 11.7. These sources of housing land supply extend beyond those that are specifically allocated within the draft Shropshire Local Plan. They also extend beyond the proposed 'saved' allocations within the adopted Local Plan.



11.8. This is not considered to be unique to Shropshire or indeed in any way unusual. Ultimately the Council remain keen for the examination to consider the housing land supply identified in Shropshire.

11.9. For information, an updated Five Year Housing Land Supply (2022 base date) based on the housing requirement proposed within the draft Shropshire Local Plan, is enclosed with this document.

12. Housing Requirement

12.1. Paragraph 37 of ID28 addresses the housing and employment land requirements. It explains your finding that the housing and employment land requirements should be expressed as definitive 'minimum' figures for both monitoring purposes and for the effectiveness of the plan.

12.2. Whilst the Council is somewhat surprised by this conclusion, it is accepted. A series of proposed modifications have therefore been identified in order to respond to this conclusion.

12.3. This change to expressing both the housing and employment requirements as minimum figures has been a significant consideration when undertaking the additional work regarding the proposed housing and employment land requirements. The Housing and Employment Topic Paper provides more information on this.

13. Specialist Housing / Older Persons Housing

13.1. Paragraphs 38-41 of ID28 address the requirement to meet the housing needs of older people. In summary, these paragraphs recognise that the Council's evidence indicates a higher proportion of older people residing in the Shropshire Council's administrative area than the national average. Given this, you consider there is clear evidence of a higher-than-average need for specialist housing for older people and



that either the policy should include indicative need figures, or the Plan should contain a specific policy to deal with specialist housing.

- 13.2. Shropshire Council has considered this matter and on reflection has prepared a specific policy to address the housing needs of older people and those with disabilities and special needs, to be included within the draft Shropshire Local Plan. The preparation of this draft Policy has been informed by additional SA assessment work and proactive discussions with colleagues in the Housing and Adult Social Care Teams at Shropshire Council.
- 13.3. It is considered that this policy represents an effective means of ensuring that the housing needs of older people are met in a way that is responsive to both the current Adult Social Care Strategy for Shropshire (2018) and the emerging People's Strategy for Shropshire (currently in development). Crucially, it is also responsive to the geography and characteristics of Shropshire.
- 13.4. This draft policy is appended to this document. Appropriate proposed main modification are also identified within the enclosed Updated Schedule of Proposed Main Modifications.
- 13.5. *Please Note: The version of this draft policy integrated into the track changes version of the draft Shropshire Local Plan includes updated policy cross-references resulting from proposed main modifications. The version within the Appendix of this document and the Updated Schedule of Proposed Main Modifications maintains the policy references as at the submission draft of the Shropshire Local Plan.*

14. Policy SP4 – Sustainable Development

- 14.1. Paragraph 42 of ID28 addresses draft Policy SP4. It notes that during the hearings it was agreed that a Main Modification would be introduced



to delete draft Policy SP4 and instead rely on national policy in the context of the presumption in favour of sustainable development.

14.2. Accordingly, Shropshire Council has identified proposed modifications to the Updated Schedule of Proposed Main Modifications, submitted alongside this correspondence.

14.3. The Updated Schedule of Minor (Additional) Modifications includes proposed amendments to policy titles to reflect this deletion, but the numerous cross references are currently documented as a single entry. However, the 'track changes' version of the draft Shropshire Local Plan includes hyperlinks on policy references to aid navigation, these update to reflect the policy references resulting from the proposed modifications to date.

15. Policy SP5 – High-Quality Design

15.1. Paragraph 43 of ID28 addresses draft Policy SP5. It notes that the Council agreed to consider whether a reference should be included to the National Design Guidance within draft Policy SP5. Shropshire Council considers that it would be appropriate to include a reference to the National Design Guidance within draft Policy SP5.

15.2. The Council also recognises the role of Local Design Codes within the National Design Guidance and the important role that such documents will play in ensuring high-quality design in the future. The Council considers that a specific reference to Local Design Codes within draft Policy SP5 would also be appropriate.

15.3. Shropshire Council has therefore identified appropriate proposed modifications within the Updated Schedule of Main Modifications submitted alongside this correspondence.



16. Policy SP6 – Health and Wellbeing

16.1. Paragraph 44 of ID28 addresses draft Policy SP6. It recognised that the Council had agreed to consider two matters in Policy SP6 and whether to propose any main modifications to the Policy.

16.2. These are:

- a. Should criterion 5a refer to 'improved' health facilities.
- b. What is the expectation of criterion 10 regarding the need for a Health Impact Assessment for all major development proposals and is this appropriate.

16.3. Shropshire Council has considered these questions and addresses each in turn.

a. Criterion 5

16.4. Shropshire Council has reviewed criterion 5a of draft Policy SP6. The intention of this paragraph was to support existing and provision of new health facilities to serve an expanding population.

16.5. On reflection, it is considered that including reference to 'improved' health facilities alongside existing references to 'maintenance' and 'delivery' of health facilities provides greater clarity on this matter. As such, Shropshire Council has identified appropriate proposed modification within the Updated Schedule of Main Modifications submitted alongside this correspondence.

b. Criterion 10

16.6. With regard to the expectations of criterion 10, Shropshire Council has considered three questions:

- a. Is it reasonable to include a policy requirement requiring a Health Impact Assessment (HIA)?



- b. Is the trigger point of 'all major development' being required to undertake a HIA appropriate?
- c. Is the scope of the HIA appropriate – as established within the wider requirements of draft Policy SP6?

16.7. With regard to whether it is reasonable to include a policy requirement to undertake a HIA, The Public Health England Guidance "*Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams*" (October 2020) provides guidance on the use of Health Impact Assessment (HIA) in the planning system.

16.8. It specifies that "*Local authorities are encouraged to adopt policies that require an HIA to be carried out for certain types of developments in their local plan or spatial development processes. Such a requirement may support local health and wellbeing priorities (Annex 2) as well as the local health and wellbeing policy. An HIA policy requirement may also support other health-promoting policies such as those relating to sustainable transport, sport and play, housing, access to healthy and affordable food and green infrastructure.*"

16.9. Furthermore, the National Planning Practice Guidance (NPPG) on Health and Wellbeing (ID53) recognises within paragraph 5 that "*A health impact assessment is a useful tool to use where there are expected to be significant impacts.*"

16.10. As such, it is clear that the principle of requiring a HIA within Local Plan policy is appropriate and consistent with national guidance.

16.11. With specific regard to the 'trigger' for undertaking a HIA, having regard to paragraph 5 of the NPPG (ID53) and the advice provided within the afore-referenced Public Health England Guidance, the trigger in criterion 10 of draft Policy SP6 is also considered to be appropriate.



- 16.12. With regard to the 'scope' of a HIA, having regard to paragraph 5 of the NPPG (ID53), advice provided within the Public Health England Guidance and discussions during the relevant hearing session, it is considered criterion 10 of draft Policy SP6 should be modified to make it clear that the expectation is that major development proposals are required to undertake HIA screening. A full HIA would only be required in circumstances where HIA screening concludes it is necessary.
- 16.13. Shropshire Council has prepared an initial draft template of the HIA screening and associated guidance, which are enclosed with this document.
- 16.14. Reflecting this conclusion, Shropshire Council has identified appropriate proposed modifications to both draft Policy SP6 and its explanation, within the Updated Schedule of Main Modifications submitted alongside this correspondence.

17. Policy SP10 – Managing Development in the Countryside

- 17.1. Paragraph 45 of ID28 addresses draft Policy SP10. Specifically, it addresses the agreed modification to this draft Policy to dis-apply the policy requirements to sites in the countryside that are allocated for development in the draft Shropshire Local Plan or any other adopted Development Plan Document.
- 17.2. Accordingly, Shropshire Council has identified appropriate proposed main modification within the Updated Schedule of Main Modifications submitted alongside this correspondence.



18. Policy SP12 Shropshire Economic Growth Strategy

- 18.1. Paragraph 46 of ID28 addresses draft Policy SP12. Within this paragraph you have expressed concern regarding the effectiveness of this draft policy as *“a great deal of it seems to be more of a vision rather than a strategic policy.”*
- 18.2. Shropshire Council has reflected on this concern and proposed a main modification to delete this policy within the Updated Schedule of Main Modifications submitted alongside this correspondence.
- 18.3. Shropshire Council will regard the Shropshire Economic Growth Strategy as a material consideration in future planning decisions following the deletion of draft Policy SP12.

19. Policy SP13 – Delivering Sustainable Economic Growth and Enterprise

- 19.1. Paragraph 47 of ID28 addresses draft Policy SP13, documenting the agreement to integrate Figure SP13.1 into draft Policy SP13.
- 19.2. Shropshire Council has identified appropriate proposed main modifications within the Updated Schedule of Main Modifications submitted alongside this correspondence.
- 19.3. These proposed main modifications further introduce Figure SP13.1 as a new criterion 8 in Policy SP13. This provides a ‘quality ranking’ of sites within the employment land supply.
- 19.4. The proposed main modifications also include further guidance within the explanation to Policy SP13 on the implications of this ‘quality ranking’ of sites for the implementation of the policy and also that this ‘quality ranking’ of sites will be further explained and monitored annually in the Authority Monitoring Report (AMR).



20. Strategic Settlements and Sites

- 20.1. Paragraphs 48-51 of ID28 address the proposed Strategic Settlements and Strategic Site.
- 20.2. Paragraph 48 confirms that there are no specific comments on draft Policy S20 (Former Ironbridge Power Station) and no further comments on draft Policy S21 (RAF Cosford) already discussed earlier in ID28.
- 20.3. Paragraphs 49 and 50 relate to draft Policy S19 (Clive Barracks, Tern Hill), raising concerns about the viability and deliverability of this proposed allocation and requests further evidence to demonstrate that necessary infrastructure is deliverable.
- 20.4. To respond positively to this request, Shropshire Council has proactively engaged with the site promoter regarding the identified concerns.
- 20.5. Following this engagement both parties have agreed an addendum to the previously submitted Statement of Common Ground (SoCG) between the two parties, which is enclosed with this response.
- 20.6. The SoCG and its addendum demonstrate the site is viable and deliverable and that infrastructure necessary to serve future occupants will be delivered at the appropriate stages in the delivery of this site. This investment will also benefit the surrounding community.
- 20.7. With specific regard to assumptions on delivery timescales, Shropshire Council would note that:
 - a. Delivery timescale assumptions are not a result of concerns about site viability or deliverability, but reflect the timing of site disposal (expected in 2029).



b. Delivery timescale assumptions have been informed by and recognise the need to deliver necessary infrastructure at appropriate stages of the development.

c. Delivery timescale assumptions have been discussed and agreed with the site promoter. This is documented within the SoCG which includes *“Subject to the adoption of the Shropshire Local Plan (2016 – 2038), and determination of the future planning application(s) for Clive Barracks, the below delivery schedule should be used to indicate housing delivery at the site. This schedule has been informed by the evidence base and represents an appropriate and deliverable delivery trajectory for the site.”*

20.8. As also documented within the SoCG and its addendum, the promotion of the site and the Indicative Masterplan that has been prepared have been informed by a suite of technical evidence. This technical evidence provides confidence that infrastructure will be delivered at appropriate points within the development project.

20.9. The SoCG and its addendum again records the agreement reached on this matter, stating *“Any phasing of the delivery of the infrastructure requirements will be agreed with SC and the appropriate stakeholders ahead of and during determination of a planning application. These timescales will appropriately reflect the policy requirements within draft Policy S19 and the wider construction of the site.”*

20.10. Shropshire Council would also note that identification of proposed allocations has been informed by a proportionate and robust site assessment process (summarised within the Appendices of the Sustainability Appraisal and Site Assessment Environmental Report of the Draft Shropshire Local (SD006.01)) and a Delivery and Viability Study (2020) (EV115.01).



- 20.11. Shropshire Council considers Clive Barracks, Tern Hill is viable and deliverable and can deliver a policy compliant development.
- 20.12. Paragraph 51 of ID28 relates to concerns regarding the vagueness of policy wording within draft Policy S19. The intention of draft Policy S19 was to provide sufficient certainty about policy requirements, whilst maintaining flexibility. Furthermore, it is important to note that the wider policies within the draft Shropshire Local Plan expand on the policy requirements within draft Policy S19.
- 20.13. However, Shropshire Council has given this concern due consideration and has identified a series of proposed main modifications. These proposed modifications provide greater clarity on the intention of each policy requirement, including through appropriate cross referencing to other relevant policies within the draft Shropshire Local Plan.
- 20.14. These proposed main modifications are identified within the Updated Schedule of Main Modifications submitted alongside this correspondence.

21. Strategic Flood Risk Assessment

- 21.1. Paragraph 52 of ID28 relates to the Council's Strategic Flood Risk Assessment (SFRA) and requests a note of clarification regarding the methodology and data relied upon with regard to hydraulic modelling and fluvial flood risk.
- 21.2. Shropshire Council has engaged with our consultants (JBA Group) that undertook both the Stage 1 and Stage 2 SFRA's to inform the preparation of the draft Shropshire Local Plan and they have prepared the requested note of clarification.
- 21.3. It is understood from this note that:
- a. The SFRA utilised a cautious and robust methodology.



- b. At the time that the SFRA was undertaken, it was based on best available information.
- c. The hydraulic modelling undertaken within the SFRA is considered to be comprehensive and robust.
- d. The approach to climate change modelling undertaken within the SFRA resulted in allowances that were generally comparable to those provided within the more recent guidance.

21.4. Furthermore, it is important to note that the site guidelines for all sites that contain a portion of the site within Flood Zones 2 and/or 3 specifically include a site guideline specifying that development will be excluded from these portions of the site.

21.5. In addition, draft Policy DP21 includes a requirement to undertake site specific flood risk assessments (FRA) for all development proposals that are:

"a. In Flood Zones 2 and 3;

b. In Flood Zone 1 if the site is 1 hectare or above;

c. In Flood Zone 1 where there are critical drainage problems;

d. On land which either the Shropshire SFRA (Levels 1 and 2) shows, or more recent information indicates, is at increased risk of flooding either now or in the future e.g. through the impact of climate change;

e. On land subject to other sources of flooding (surface water, groundwater, infrastructure/sewer failure, reservoir overflow) where development would introduce a more vulnerable use; and

f. On land in those catchments identified in the Shropshire SFRA Level 2 as being at highest risk from the cumulative impacts of development."
(my emphasis).



- 21.6. Draft Policy DP21 then explains the required scope of a FRA, stating
*“The FRA should demonstrate how flood risk, including residual risk, will be managed now and over the development’s lifetime, **taking climate change into account and with regard to the vulnerability of its users**. It should cover all sources of flooding and be proportionate to the scale and nature of the development and the flood risk involved. The FRA should show how the development has been designed to be resilient to both actual and residual flood risk...”* (my emphasis).
- 21.7. As such, these proposed policy requirements ensure that at the time of a development proposal all relevant sites are subject to FRA informed by the most up to date information at the time of the assessment, which ensures that flood risk is appropriately considered and informs these development proposals.
- 21.8. Within Paragraph 52 you also ask the Council to review the Statement of Common Ground (SoCG) with the Environment Agency (EA) and consider whether it needs to be updated in view of this. It is important to note that the EA were on the steering board for the SFRA. Following the completion of the Regulation 19 Consultation, the EA raised concerns that new climate change figures had emerged since the preparation of the SFRA. However, there is no suggestion from the EA that any site allocations are inappropriate as a result.
- 21.9. Shropshire Council has considered the SoCG with the Environment Agency and given the above, does not consider that it needs to be amended at this time.

22. Local Development Scheme

- 22.1. Paragraph 53 of ID28 addresses the Local Development Scheme (LDS) which provides the ‘Project Plan’ for the preparation of planning policy



documents over the next 3-year period. Within paragraph 52 you have requested that the LDS is updated and kept under review.

22.2. Shropshire Council has prepared an updated LDS enclosed with this response. The Council recognises the importance of keeping the LDS under review and will do so throughout the Local Plan examination.

23. Overall Conclusions

23.1. Paragraphs 54-58 of ID28 provide the overall conclusions. Having carefully considered the various matters you have raised within ID28, Shropshire Council has undertaken additional work and where appropriate identified further proposed modifications.

23.2. When you have considered this information, the Council would welcome your views and discussion of our next steps, including any need to consult on the information provided and the further proposed modifications, the need for further discussion of these matters during a mop-up hearing, and the timescales for the Stage 2 Hearings.

23.3. As recognised within your correspondence reference ID33, all parties are keen to progress to the Stage 2 Hearings as soon as possible.

Yours sincerely

Eddie West
Planning Policy and Strategy Manager
Shropshire Council



Appendix 1

Draft DP Policy: Housing Provision for Older People and those with Disabilities and Special Needs

1. 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.

Accessible and Adaptable Housing

2. 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.
3. 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.
4. 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.
5. 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.
6. 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.

Specialist Housing

7. All specialist housing for older people or those with disabilities and special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and must also be designed to be 'friendly' to those with dementia and to those with disabilities and special needs.
8. Reflecting the People Strategy for Shropshire, and the principle of supporting people to remain independent within their own homes and within their existing communities and



support networks for as long as possible, new specialist housing provision for older people or those with disabilities and special needs will consist of:

- a. The forms of specialist housing which support independent living, including age-restricted housing; retirement/sheltered housing; or extra care housing; or
 - b. Nursing homes providing high-level care for those with dementia and/or complex needs; or
 - c. A combination of the above.
9. All specialist housing provision will integrate into rather than be apart (gated-off) from existing and new communities, recognising the social and sustainability benefits of multi-generational and inclusive communities.
 10. Ideally, specialist housing should be located where future occupiers can benefit from access to existing services and facilities. Where appropriate services and facilities are not already available, a range of supporting services and facilities will need be provided on sites where specialist housing is provided. Any services and facilities provided should be proportionate in scale to the type of specialist housing and ensure the scheme remains affordable.
 11. When providing specialist housing, opportunities to provide appropriate key worker accommodation for any associated care staff should be proactively considered.
 12. Specialist housing designed to meet the diverse needs of older people or those with disabilities and special needs that is consistent with the requirements of Paragraph 8 of this Policy and the requirements of other relevant Local Plan Policies (particularly Policies SP3-SP10, DP3, DP11 and Policies S1-S20) will be supported in appropriate locations within the development boundaries identified on the Policies Map.
 13. Specialist housing schemes that consist of 100% local needs affordable specialist housing for older people or those with disabilities and special needs that is consistent with the requirements of Paragraph 8 of this Policy, the requirements of Policy DP4 and the requirements of other relevant Local Plan Policies will be positively considered.
 14. Specialist housing that is consistent with the requirements of Paragraph 8 of this Policy and is agreed to be Use Class C2 development, will in addition to meeting the housing needs of older people also constitute a secondary employment use. These forms of specialist housing will therefore be considered an appropriate secondary employment use on mixed-use employment sites, where they are consistent with the requirements of Policy SP13; complement the existing and planned wider employment uses of the site; are served by appropriate infrastructure; and facilitate the delivery of the wider employment site, including through the provision of accesses, servicing and other infrastructure.
 15. On site allocations for 250 or more dwellings and all development sites for 250 or more dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 20% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs documented within Paragraph 8 of this Policy.



16. On site allocations for 150-249 dwellings and all development sites for 150-249 dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 15% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs documented within Paragraph 8 of this Policy. At the lower end of this category, it is likely that this provision will consist of age-restricted housing or retirement/sheltered housing in the form of apartments or a small group of bungalows which can be delivered in smaller numbers, as they generally have lower operational and staffing costs and requirements.
17. On site allocations for 50-149 dwellings and all development sites for 50-149 dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 10% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs documented within Paragraph 8 of this Policy. It is likely that this provision will consist of age-restricted housing or retirement/sheltered housing in the form of apartments or a small group of bungalows which can be delivered in smaller numbers as they generally have lower operational and staffing costs and requirements.
18. Specialist housing provided in accordance with Paragraphs 15-17 of this Policy that is consistent with the definition of affordable housing can also represent all or part of the contribution to affordable housing required in accordance with Policy DP4 of the Local Plan. However:
 - a. The mix of specialist housing provided across Shropshire should include both open market and affordable housing.
 - b. Affordable housing provision should not be concentrated only in affordable specialist housing, as it is important that the other forms of affordable housing are delivered, including for key workers such as the care staff for specialist housing.
 - c. As such, if it is considered that completions and commitments of specialist housing is concentrated in affordable tenures or if it is considered that affordable housing completions and commitments are concentrated in forms of specialist housing, specialist housing provision on a site may be required to be open market and similarly the affordable housing provision may be required to be general housing.
19. On site allocations, provision of a level of housing which results in the relevant settlements housing guideline being exceeded and/or the site allocations approximate site provision figure within the relevant Settlement Policy (S1-S20) being exceeded will be positively considered where:
 - a. This over-provision is a direct result of the provision of a significant quantity of specialist housing in excess of that required within Paragraphs 15-17 of this Policy,
 - b. Over provision is specialist housing of a type documented within Paragraph 8 of this Policy,
 - c. The development proposed remains an appropriate form of development on the site having regard to its characteristics and the character of the surrounding area, and



- d. The proposed development complies with the wider policies of the Local Plan, particularly Policies SP3, SP5, SP6, DP1, DP2, DP3, DP11, DP12, DP14-DP17, DP25, DP27, and DP28.
20. Proposals that result in the loss of existing specialist housing designed to meet the needs of older people or those with disabilities and special needs will be resisted unless:
- a. There is no longer an identified need for the existing form of specialist housing in the settlement and Shropshire as a whole; or
 - b. The needs will be met elsewhere within the settlement, preferably close to the existing specialist housing or in a preferential location for specialist housing; or
 - c. Redevelopment would provide an improved quality of a comparable category of specialist housing and associated facilities; or
 - d. Redevelopment would provide an alternative form of specialist housing which is identified within Paragraph 8 of this policy, demonstrably of greater need in Shropshire, and the provision of the specialist housing and associated facilities is of a high quality.

Explanation

Introduction

1. The Strategic Housing Market Assessment (SHMA) for Shropshire demonstrates that there is a higher proportion of older people living in Shropshire than the national average. Furthermore, it anticipates that over the plan period to 2038, the proportion of older people living in Shropshire and the number of single person households will increase at a faster rate than the national average.
2. The health and lifestyles of older people living within our communities inevitably varies and it is expected that this will remain the case in the future. Similarly, the housing needs and aspirations of older people in our communities will also inevitably differ.
3. Those with disabilities and special needs can include those with physical and/or mental health needs. Like older people, their health and lifestyles are diverse and this is reflected in their housing needs and aspirations.
4. The housing needs and aspirations of older people and those with disabilities and special needs will likely include:
 - a. The provision of appropriate adaptations to their homes.
 - b. Moving to new accessible and adaptable general needs housing.
 - c. Moving to an appropriate form of specialist housing.
5. Further information on accessible and adaptable general needs housing and specialist housing is provided later within this Explanation.
6. National Planning Practice Guidance on Housing for Older and Disabled People specifies that *“Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected*



to their communities and help reduce costs to the social care and health systems.” It also specifies that “The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.”

People’s Strategy for Shropshire

7. The People’s Strategy for Shropshire includes the strategy for meeting the care and support needs of older people and those with disabilities and special needs. This strategy is underpinned by the key principle of:
Wherever possible, seeking to support older people and those with disabilities and special needs living in Shropshire to remain independent within their own homes, within their existing communities and with access to their established support networks.
8. This key principle is considered to be consistent with Government’s reform of Health and Adult Social Care, which is underpinned by a principle of sustaining people at home for as long as possible.
9. Importantly, this key principle has also been directly informed by and is responsive to our understanding of the needs and aspirations of the older people living in our communities, including through consideration of the Housing Need Survey undertaken for Shropshire and the ‘Right Home, Right Place Surveys’ undertaken for Parishes in Shropshire.
10. Furthermore, this key principle is responsive to the geography and characteristics of Shropshire. Specifically, Shropshire is a large, diverse and predominantly rural County with a very low population density across much of its geography. As such, the vast majority of our settlements are small both in terms of population and number of households. In these settlements it is not always appropriate to provide new adaptable and accessible housing or specialist housing – due to their size and location.
11. However, older people and those with disabilities and special needs living within these 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.
12. 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.
13. 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.



14. These various measures are generally outside the scope of the planning system. However, by seeking to positively influence the types of housing delivered in the future, the planning system can positively facilitate this strategy moving forwards.
15. Specifically, to facilitate this strategy in the future and also provide genuine choice for those older people and people with disabilities and special needs that require support and do wish to move to alternative general housing, it is essential that new development includes a significant quantity of properties designed to M4(2) (accessible and adaptable dwellings) or M4(3) (wheelchair user dwellings) standard within Building Regulations.
16. The National Planning Practice Guidance on Housing for Older and Disabled People explains that *“Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future. It is better to build accessible housing from the outset rather than have to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes.”*
17. It is considered that this strategy can also be complemented by the provision of appropriate quantities and forms of specialist housing that support independent living, as such provision allows support and care to be provided within the home, albeit not the current home. It also provides genuine choice for those older people and people with disabilities and special needs that require support and wish to move to a form of specialist housing whilst still maintaining independence.
18. However, if accessible and adaptable housing and specialist housing provision is to be capable of accommodating those that require support they must be of the right size, type, tenure and affordability. Crucially it must also be in appropriate locations.
19. Whilst the key principle of the strategy 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 (generally their existing home unless the individuals preference is either new adaptable and accessible housing or specialist housing including for such reasons as moving closer to their wider family or moving to more accessible locations with better provision of services and facilities), the strategy equally recognises that unfortunately this is not always possible.
20. As such, there remains an important role for nursing homes, which provide high level care (including dementia care) for those individuals who cannot be supported to remain independent within their own home.
21. However, conversely it is considered that there will be a reduced role for residential homes that do not provide high level care (including dementia care) in the future – as increasingly more older people and people with disabilities and special needs that would have moved to residential homes will be supported within their own home.



Accessible and Adaptable Housing

22. Part M of the Building Regulations¹ addresses the access to and use of dwellings. It identifies three categories of dwelling, these are:
 - a. M4(1) Category 1: Visitable dwellings.
 - b. M4(2) Category 2: Accessible and adaptable dwellings.
 - c. M4(3) Category 3: Wheelchair user dwellings.
23. M4(1) is mandatory for all new dwellings. M4(2) and M4(3) only apply in instances where a Local Plan introduces such a requirement, as is the case with this policy. The M4(2) and M4(3) standards can be summarised as follows:
24. M4(2): Accessible and adaptable housing provides safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom(s) and kitchen within the home.
25. M4(3): Wheelchair user dwellings achieve the accessibility and adaptability requirements of M4(2) housing, but also include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs.
26. **Guidance on how to achieve these requirements is provided within Part M of the Building Regulations¹.**
27. M4(2) and M4(3) requirements have been introduced in Shropshire for a number of reasons, including:
 - a. There is a higher proportion of older people living in Shropshire than the national average.
 - b. It is anticipated that over the plan period to 2038, the proportion of older people living in Shropshire will increase at a faster rate than the national average.
 - c. The anticipated contribution that growth in older households makes to total household growth in Shropshire.
 - d. The higher prevalence of long-term health problems and/or disabilities amongst older people;
 - e. Within the People's Strategy for Shropshire, a key principle for meeting the care needs of older people and those with disabilities and special needs is supporting them to remain independent within their own homes, within their existing communities and with access to their established support networks wherever possible. Provision of M4(2) and M4(3) housing will directly facilitate this in the future, whilst also providing genuine choice for those older people and people with disabilities and special needs that do wish to move to alternative general housing; and

¹ www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m



- f. Government's aspiration for adult social care is to sustain people at home for as long as possible. Provision of M4(2) and M4(3) housing directly facilitates this strategy.
28. The need for M4(2) and M4(3) housing was specifically considered within the SHMA. It estimated that for the total projected growth in households in Shropshire during the Local Plan period, 13% will require wheelchair accessible dwellings, M4(3) standard and 33% will require accessible and adaptable dwellings to M4(2) standard.
29. However closer inspection of household growth by the age of Household Reference Person, reveals a significantly higher level of household growth in households with a Household Reference Person aged 65 years and over. With a higher prevalence of long-term health problems and/or disabilities amongst older people, the importance of ensuring that the Local Plan does not underestimate the level of need for accessible housing that meets M4(3) and M4(2) standards is very much apparent.
30. As such, the SHMA considers the number of older households (with a Household Reference Person aged 65 years and over) with a long-term health problem or disability that impacts on their housing needs. It estimates that such households will increase by an amount equivalent to 77% of the total growth in older households over the Local Plan period, requiring either M4(2) or M4(3) standard dwellings.
31. The SHMA also estimates that the number of older wheelchair user households is projected to increase by an amount equivalent to 10% of the total growth in older households, requiring M4(3) standard dwellings. This suggests the remaining 67% of older households with a long-term health problem or disability that impacts on their housing needs will require M4(2) standard dwellings, although it is acknowledged that a proportion of this need will be met within specialist housing.
32. Therefore, it is considered appropriate to require that on sites of 5 or more dwellings 5% of dwellings meet M4(3) standard and a further 70% of dwellings meet M4(2) standard, unless site-specific factors indicate that step-free access cannot be achieved.
33. There will be an expectation that M4(3) dwellings within a development will be sited nearest to service provision and maximise the ease of which the household can access public transport and open space. An updated Type and Affordability of Housing Supplementary Planning Document will provide detailed guidance on the siting and integration of M4(3) dwellings into a development.
34. It is also considered appropriate to require all dwellings specifically designed for the elderly or those with disabilities, including specialist housing, to meet M4(3) (wheelchair user dwellings) standard within Building Regulations. If site-specific factors indicate that step-free access cannot be achieved, it is questionable as to whether the site or element of the site should be identified for dwellings specifically to meet the needs of the elderly or those with disabilities and special needs.
35. This policy requirement is consistent with the National Planning Practice Guidance advice on Housing: Optional Technical Standards, which specifies in Paragraph 5



(ID: 56-005-20150327) *“The National Planning Policy Framework (NPPF) is clear that local planning authorities should plan to create safe, accessible environments and promote inclusion and community cohesion. This includes buildings and their surrounding spaces. Local planning authorities should take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need”.*

36. It should be noted that M4(3) (wheelchair user dwellings) standard within Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.
37. Where dwellings are required to meet M4(3) (wheelchair user dwellings) standard within Building Regulations to comply with this policy, they will normally consist of wheelchair adaptable homes. Wheelchair accessible homes will only be required where Shropshire Council is responsible for nominating a person to live in the dwelling.
38. This approach is consistent with National Planning Practice Guidance advice on Housing: Optional Technical Standards, which specifies in Paragraph 9 (ID: 56-009-20150327) *“Wheelchair accessible homes will only be required where the Council is responsible for nominating a person to live in the dwelling”*,
39. **It should also be noted that where references to the Building Regulations in this policy change, the requirement shall be taken to refer to the most up-to-date standard.**

Dementia Friendly Housing

40. Dementia friendly housing is designed to support the independence of and provide a comfortable environment for those living with dementia.
41. The SHMA indicates that as a result of the increase in older people in Shropshire over the plan period, there will also be a significant rise in the number of people with dementia. Specifically, the SHMA concludes that between 2017 and 2035 the number of people aged 65 years and over with dementia is expected to increase by 80%.
42. As a result, it is considered appropriate to require all housing, including specialist housing, designed to M4(3) standard to be dementia ‘friendly’ and to strongly encourage all housing designed to M4(2) standard to be dementia ‘friendly’.
43. Guidance on achieving dementia ‘friendly’ housing is available through such organisations as the Alzheimer’s Society which has produced a Dementia-friendly housing guide available at: https://www.alzheimers.org.uk/sites/default/files/2020-06/Dementia%20Friendly%20Housing_Guide.pdf
44. This guide addresses such issues as consideration of layout, décor, lighting, flooring, furnishings, seating, signage, toilets, navigation, parking, noise and quiet spaces.



45. These measures generally have only a very minimal (if any) additional cost compared to the design requirements to achieve M4(2) and particularly M4(3) housing, but can make a significant difference to the quality of life and independence of those living in the home with dementia.

Types of Specialist Housing for Older People and those with Disabilities and Special Needs

46. The National Planning Practice Guidance on Housing for Older and Disabled People recognises there is a significant amount of variability in the types of specialist housing available to meet the housing needs of older people and those with disabilities and special needs. It identifies four main categories of specialist housing, whilst equally acknowledging that this list is not definitive.
47. The forms of specialist housing identified are as follows:

“Age-restricted general market housing: *This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.*

Retirement living or sheltered housing: *This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.*

Extra care housing or housing-with-care: *This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.*

Residential care homes and nursing homes: *These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.*

48. The key distinctions between the different categories of specialist housing are the level of on-site care and the level of communal facilities available.
49. Developers are encouraged to seek pre-application advice to establish whether their proposal may be classified as Use Class C2 or C3. When determining the Use Class of housing for older people, due consideration will be given to the level of care and scale of communal facilities provided.



50. However, it is important to note that irrespective of the Use Class of the development, all specialist housing constitutes residential accommodation and housing which is subject to all relevant housing policies within the Local Plan. This is clear within the approach taken in the Local Plan itself to such specialist housing, the National Planning Policy Framework and the National Planning Practice Guidance, including the National Planning Practice Guidance on Housing for Older and Disabled People.

Provision of new Specialist Housing for Older People and those with Disabilities and Special Needs

51. The SHMA projects that over the Local Plan period, there will be a need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision in order to maintain current prevalence rates (this being the amount of specialist houses for older people compared to the number of older people).
52. As already documented, the People's Strategy for Shropshire includes the strategy for meeting the care and support needs of older people and those with disabilities and special needs. This strategy is underpinned by the key principle of wherever possible seeking to support older people and those with disabilities and special needs living in Shropshire to remain independent within their own homes, within their existing communities and with access to their established support networks.
53. As also already documented, there are numerous reasons for this approach, including responding to our understanding of the needs and aspirations of older people and those with disabilities and special needs living in Shropshire and importantly the geography and characteristics of Shropshire.
54. This strategy inevitably means that the 'prevalence rates' for specialist housing in Shropshire will be lower than in other areas with either a different strategy for meeting the needs of older people and those with disabilities and special needs and/or with a different geography and characteristics – for instance more urban and densely populated geographies.
55. However, it is recognised that this strategy can be complemented by the provision of appropriate quantities and forms of specialist housing that support independent living (particularly in our larger settlements), which can provide genuine choice for those older people and people with disabilities and special needs that require support. There also remains an important role for nursing homes which provide high level care (including dementia care), for those individuals who cannot be supported to remain independent within their own home.
56. The strategy is however likely to reduce the need for residential homes that do not provide high-level care. This role will be increasingly met by the provision of support within the home.
57. As such, it is considered both necessary and appropriate to introduce a series of measures to ensure the delivery of appropriate types and quantities of specialist



housing in Shropshire – particularly within our larger settlements, which will complement (but importantly must not undermine) the strategy for meeting the care and support needs of older people and those with disabilities and special needs.

58. These measures include providing support for the provision of appropriate forms of specialist housing (as documented within Paragraph 14 of this Policy) that is consistent with the requirements of the Local Plan (particularly Policies S1-S20) in appropriate locations within identified development boundaries. Such locations are more likely to benefit from appropriate access to services and facilities and can be integrated into existing communities, enhancing the social and sustainability benefits of multi-generational and inclusive communities.
59. These measures also include providing support for the provision of appropriate forms of 100% local needs affordable specialist housing, where this provision is consistent with the requirements of the Local Plan (particularly Policy DP4). Provision of affordable (particularly social rent) specialist housing is of particular importance in Shropshire.
60. This is because a significantly higher proportion of households living in social rent properties in Shropshire contain people with long-term health problems or disabilities than other tenures of housing. Specifically, the SHMA concludes that 27.8% of households living in social rent properties contain a person with a long-term health problem or disability, compared to 17.1% of households living in owner-occupied properties, 13.6% living in private rented properties, and 17.9% of households living in any property tenure.
61. Furthermore, older people and those with disabilities and special needs with care and support needs that occupy social rented properties may be more inclined to move to specialist housing than owner-occupiers.
62. Another measure is the provision of support for appropriate forms of Use Class C2 specialist housing being provided as a secondary employment use on mixed use employment sites. Provided that this provision is consistent with the requirements of the Local Plan (particularly Policy SP13) and that such provision complements other existing and proposed employment uses on the site and facilitates the delivery of the wider employment site, including through the provision of accesses, servicing and other infrastructure.
63. Such provision provides the dual benefit of providing appropriate forms of specialist housing and also facilitating the delivery of the wider employment site. Furthermore, these employment sites are generally well-located, allowing appropriate access to services and facilities. The elements of mixed use employment sites that are likely appropriate for specialist housing are also likely to be those closest to other forms of housing, thereby providing opportunities to integrate the specialist housing into existing communities.



64. Another measure is the requirement for proportionate quantities of appropriate forms of specialist housing to be provided on larger development sites, in a way that integrates this provision into the wider development site. Such an approach facilitates the achievement of the social and sustainability benefits of multi-generational and inclusive communities.
65. The thresholds identified for the 'categories' of housing within which proportionate provision of appropriate forms of specialist housing is required are responsive to both our understanding of the nature of development schemes that occur in Shropshire and the concept of achieving multi-generational and inclusive communities.
66. Specifically, developments of 50 or more dwellings are generally considered to represent a 'large-scale' development in a Shropshire context. Development at this scale benefits from economies of scale and have the potential to integrate specialist housing as part of a wider housing mix that encourages multi-generational and inclusive communities.
67. Developments of over 150 dwellings constitute 'significant-scale' development in a Shropshire context. Developments of this scale benefit from significant economies of scale and have the potential to integrate specialist housing as part of a wider housing mix that encourages multi-generational and inclusive communities. Many developments above 150 dwellings will have the potential to provide those forms of specialist housing that require larger numbers of units due to their operating model and the requirement for economies of scale, such as extra-care housing and nursing homes offering high end care (including dementia care).
68. Developments of 250 or more dwellings represent 'strategic-scale' development in a Shropshire context. Developments of this scale benefit from significant economies of scale and the potential to integrate much larger forms of specialist housing provision as part of a wider housing mix, that encourages multi-generational and inclusive communities. On such sites there are particular opportunities for the provision of those forms of specialist housing that require larger numbers of units due to their operating model and the requirement for economies of scale, such as extra-care housing and nursing homes offering high end care (including dementia care). It is expected that these opportunities would be fully explored.
69. The specific thresholds identified for the proportionate 'quantities' of specialist housing are responsive to our understanding of the 'critical mass' required for the various forms of specialist housing, development viability, the level of 'need' that exists in Shropshire, and the concept of achieving multi-generational and inclusive communities.
70. New specialist housing should ideally be located where residents can benefit from access to existing services and facilities. This has the dual benefit of supporting the integration of the specialist housing development and its residents into the



wider community and also supports the long-term sustainability of these existing services and facilities.

71. Where services and facilities are not already available, or there is a need for specific services and facilities on the specialist housing site, this provision should be responsive to the types of services and facilities already available and be proportionate in scale to the type of specialist housing. It is important to ensure that specialist housing remains affordable – recognising that specialist housing occupiers will have to pay both service-charges and care-costs in addition to any rent/mortgage. The greater the level of services and facilities on the site, the greater the risk that the resultant specialist housing becomes unaffordable to many of the older people or people with disabilities and special needs in Shropshire whose needs it is intended to meet.
72. It is important that specialist housing is supported by the provision of an appropriate quantity and quality of open space. Consistent with Policy DP15, consideration will be given to reducing the quantity of open space provided, where a specialist housing development is able to provide a particularly high quality of open space on site which meets the needs of all residents. High quality open space is particularly important for specialist housing as residents may be less able or willing to travel to other open space in the area and recognising the wider value and health benefits of the ability to both access and view open space.
73. Furthermore, any new specialist housing scheme should also give consideration to the potential for the provision of appropriate key worker accommodation for any associated care staff. This is a particularly important consideration in Shropshire, as one of the barriers to the care worker labour force is the availability of affordable housing and yet many specialist housing facilities require a significant number of care workers to ensure their operation. Such provision has the potential to complement the provision of smaller open market housing consistent with the requirements of Policy DP1 and affordable housing consistent with the requirements of Policies DP3-DP7.
74. As documented above, the provision of affordable (particularly social rent) specialist housing is of particular importance in Shropshire. However, there is also a need for market specialist housing and crucially there is a need for affordable general housing.
75. As such, whilst the specialist housing provision required within Paragraphs 15-17 of this Policy can, where it is consistent with the definition of affordable housing, also constitute all or part of the affordable housing required from the development - consistent with the requirements of Policy DP4 of the Local Plan, there is a need to ensure this does not undermine the provision of either market specialist housing or affordable general housing.
76. Therefore, this policy includes the ability to require specialist housing provided in accordance with Paragraphs 15-17 of this Policy to be market provision, if this is



considered necessary in order to ensure the appropriate provision of market specialist housing or affordable general housing.

77. It is recognised that many forms of specialist housing present opportunities to achieve a denser form of development than general housing, whilst still achieving a high-quality design that is complementary to the development site, surrounding character and importantly consistent with wider policies within the Local Plan – including those relating to high-quality design (SP5) and health and wellbeing (SP6).
78. It is also recognised that some forms of specialist housing require a ‘critical-mass’ in order to ensure operational efficiency and viability, which may mean that opportunities arise to provide a significant quantity of specialist housing in excess of that required within Paragraphs 15-17 of this Policy.
79. As such, it is considered important and appropriate to provide further flexibility regarding the approximate site provision figure and overall settlement housing guideline in circumstances where a site allocation is proposing to significantly over-provide the amount of specialist housing provision, above that required within this Policy. Provided that the resultant development remains appropriate to the site having regard to its characteristics and the character of the surrounding area, and the resultant development complies with the wider policies of the Local Plan, particularly Policies SP3, SP5-SP6, DP1, DP2, DP3, DP11, DP12, DP14-DP17, DP25 and DP27-DP28.
80. Such an approach also incentivises the provision of specialist housing as an important and valued component of the housing mix on site allocations and supports the achievement of multi-generational communities.

Retention of Existing Specialist Housing for Older People and those with Disabilities and Special Needs

81. In addition to addressing the provision of new forms of specialist housing for older people and those with disabilities and special needs, this policy also introduced an important requirement for the retention of existing specialist housing, unless any loss is offset through the appropriate replacement with equivalent or better provision or it can be demonstrated that there is no longer a need for the particular form of specialist housing within the relevant settlement and Shropshire as a whole. This approach is considered important given that:
 - a. There is a higher proportion of older people living in Shropshire than the national average.
 - b. There is an expectation that the proportion of older people living in Shropshire will increase at a faster rate than the national average.
 - c. Specialist housing can complement the strategy for meeting the care and support needs of older people and those with disabilities and special needs in Shropshire.



- d. Many of the sites containing specialist housing are well integrated into their community and as such support the principle of multi-generational communities and provide good access to services and facilities. As such, it is important that these locations are retained for specialist housing, even if it is ultimately an alternative form of specialist housing.

