

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Morris and Co Ltd
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="DP1"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Morris & Co. Ltd is a Shropshire-based company. It includes a specialist provider of older persons' accommodation, Morris Care, which provides six specialist care homes in Shropshire, Telford & Wrekin and Cheshire.

Morris & Co welcomes the new Local Plan but consider that the Local Plan currently fails all four tests of soundness in relation to older persons' accommodation:

- The Plan is not positively prepared because it does not specifically seek to meet the identified need for older persons' accommodation;
- The Plan is not justified as it does not reflect the evidence in the SHMA and 2018-based household projections;
- The Plan will not be effective in meeting older persons' accommodation needs; and

- The Plan is not consistent with national policy in failing to adequately plan for this category of housing.

These concerns affect the following 4 policies:

- Policy SP2 Strategic Approach
- Policy DP1 Residential Mix
- Policy SP9 Managing Development in the Countryside
- Policy S16.1 Shrewsbury Strategic Centre

Due to the inter-relationships between the policies, our soundness concerns are replicated for each of these policies. Proposed modifications to each policy are detailed in each respective representation for policies SP2, DP1, SP9 and S16.1.

Not positively prepared

There is consensus that older people will make up an increasing proportion of Shropshire's population over the plan period. Paragraph 4.20 in the Plan notes, *"Growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038."*

Despite this, the Plan does not set any targets for provision of specialist housing for the elderly, either in Policy SP2 or in any other policies. The Plan also has no policies that specifically address the provision of stand-alone C2 accommodation, other than as part of the general housing mix. In this regard the Plan fails the 'positively prepared' test of soundness.

Not justified

The evidence base illustrates Shropshire's ageing population profile, as shown in the extract below from page 35 of the SHMA. The graphs illustrate a dramatic ageing of the county's population over the plan period.

Figure 1. Shropshire's Population Pyramids 2018 and 2038

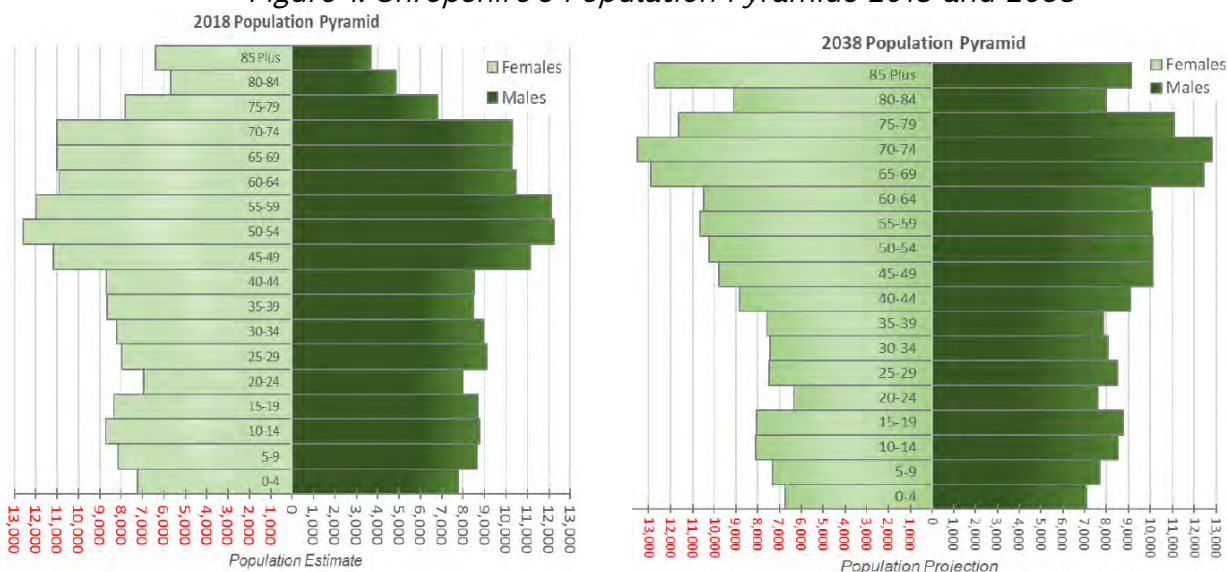


Table 64 in the Strategic Housing Market Assessment (SHMA) estimates the need for 3,063 units of additional sheltered housing, 410 units of extra-care housing and 2,549 extra beds in residential/ nursing homes by 2038, a total of 6,023 additional units of specialist older persons accommodation in Shropshire over the plan period.

Office Use Only	Part A Reference:
	Part B Reference:

Paragraph 4.40 of the Plan translates this into 3,500 units of C3 (independent dwelling) accommodation and 2,500 units of C2 (institutional) accommodation. However the Plan makes no specific provision to deliver this apart from a requirement in Policy DP1 (Residential mix) that large sites provide an appropriate mix of housing. This is inadequate and will not deliver the quantity or quality of older persons' housing needed in Shropshire.

This is surprising given the significant scale of the challenge with the text below policy DP1 noting:

"4.20. Growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038. According to analysis of projections within the SHMA, during the Local Plan period:

a. Households with a Household Reference Person aged 65-84 years are projected to increase by 42.8%...

b. Households with an elderly Household Reference Person (85 years and over) are projected to significantly increase by 130.5%, more than doubling in size from 6,900 households in 2016 to 15,900 by 2038....

The figures in the SHMA rely on 2016-based figures. The forecast growth of the elderly is even greater in the latest 2018-based household projections published by the Office of National Statistics on 29th June 2020, summarised in figure 2 below. For example, paragraph 4.20 in the Local Plan cites growth in the households aged 65-84 years of 42.8% over the plan period, whereas the latest household projections show growth of 59%, rising to 65,072 older households by 2038.

Figure 2. The 2016-based and 2018-based household projections for Shropshire

Age	2016-based SHMA table 48 (SHMA page 76)			% change over plan period	2018-based ONS household projections		
	2016	2038			2016	2038	% change over plan period
One person 65-74	8,300	9,900					
One person 75-84	7,800	12,400					
One person 85+	4,600	10,000					
Two+ persons 65-74	15,400	19,400					
Two+ persons 75-84	9,000	16,300					
Two+ persons 85+	2,400	5,800					
Sub-total 65-74	23,700	29,300	24%	24,155	34,123	41%	
Sub-total 75-84	16,800	28,700	71%	16,869	30,949	83%	
Total 65-84	40,500	58,000	43%	41,024	65,072	59%	
Total 85+	7,000	15,800	126%	6,909	14,951	116%	

The majority of the projected growth is in the older age group 75-84 (83% increase) and age 85+ (116% increase). These older groups are associated with greater care needs.

The Plan does not reflect the evidence in the SHMA and 2018-based household projections and in this regard it fails the 'justified' test of soundness.

Office Use Only	Part A Reference:
	Part B Reference:

Not effective

In its current format, the Plan will fail to deliver enough specialist housing. Policy DP1 will encourage some older persons' housing on larger sites but it is unlikely to fully meet Shropshire's needs for this type of housing, due to the limited number of large developments (50+ dwellings) in the county.

Schedule A7 on pages 352-359 of the Local Plan identifies that 36 of the total 76 allocations will be over 50 dwellings in size. Of these, 20 allocations are for up to 100 dwellings and are therefore unlikely to make significant provision for specialist accommodation amongst the normal mix of 2-bed, 3-bed, 4-bed and 5-bed houses. This leaves only 16 allocations likely to make any significant provision against Shropshire's need for at least 6,000 specialist units. Very few, if any, of the promoters of allocated sites have provided evidence that they will make significant provision for specialist housing on what are largely general housing sites.

The Local Plan will only deliver the quantity and quality that is needed if it is supplemented with specific allocations that specifically cater for these types of housing and includes policies that specifically support sites for 100% specialist housing. In its current format, the Plan fails the 'effective' test of soundness.

Not consistent with national policy

Paragraph 61 of the Framework states that, *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities...)"*

This is elaborated in the National Planning Practice Guidance (NPPG) which states:

"Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period." (Paragraph: 006 Reference ID: 63-006-20190626)

The NPPG encourages specific allocations, stating:

"Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing." (NPPG Reference ID: 63-013-20190626)

The NPPF also requires a positive approach to developments of 100% specialist housing:

"Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need." (Paragraph: 016 Reference ID: 63-016-20190626)

The Local Plan does not include any specific targets for specialist housing within its policies and does not allocate any sites specifically for this purpose. In these regards the Plan currently fails the 'consistent with national policy' test of soundness.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy DP1 Residential Mix

Policy DP1's focus on housing mix considers only the mix of new build developments. It appears blind to the overall mix of housing in a local area, namely the combination of the new and existing housing stock. Where a planning application is received for a 100% specialist housing scheme to help re-balance the local housing stock, policy DP1 does not provide any guidance on how such planning applications will be considered.

Unless there is specific policy support, specialist housing has to compete with general market housing when acquiring sites. To significantly boost provision requires positive policies in the Local Plan that enable specialist housing to obtain planning consent in locations barred to more profitable family housing.

Policy DP1 fails the following tests of soundness:

- it is not positively prepared - the policy will not meet the county's needs for specialist housing for the elderly;
- it is not justified - the policy does not reflect the evidence and also does not provide any justification for its assumption that Shropshire's needs can be met entirely by developments on larger sites;
- it is not effective - the policy does not help deliver specialist accommodation on smaller sites; and
- it is not consistent with national policy - the Plan is silent on planning applications for specialist housing that is not part of a larger site.

We suggest the following additional section 7 to policy DP1 in order to make it sound:

7. Specialist housing developments will be considered positively on sites within settlement development boundaries. Where there is a shortage of specialist housing relative to recognised needs, proposals outside but adjoining development boundaries will be considered positively.

This approach will significantly increase the amount of older persons' housing in the county, helping meet the growing need for this type of accommodation.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Office Use Only	Part A Reference:
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Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Morris & Co wish to attend the examination hearings that relate to older persons' accommodation. As they are a key provider of specialist housing for the elderly in Shropshire, they can make a strong contribution to ensuring that the plan is sound in relation Shropshire's burgeoning elderly population.

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Signature:

H. Howie

Date:

21/01/2021

Office Use Only

Part A Reference:

Part B Reference:

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S16.1"/>	Site:	<input type="text" value="SHR216a"/>	Policies Map:	<input type="text" value="Shrewsbury"/>
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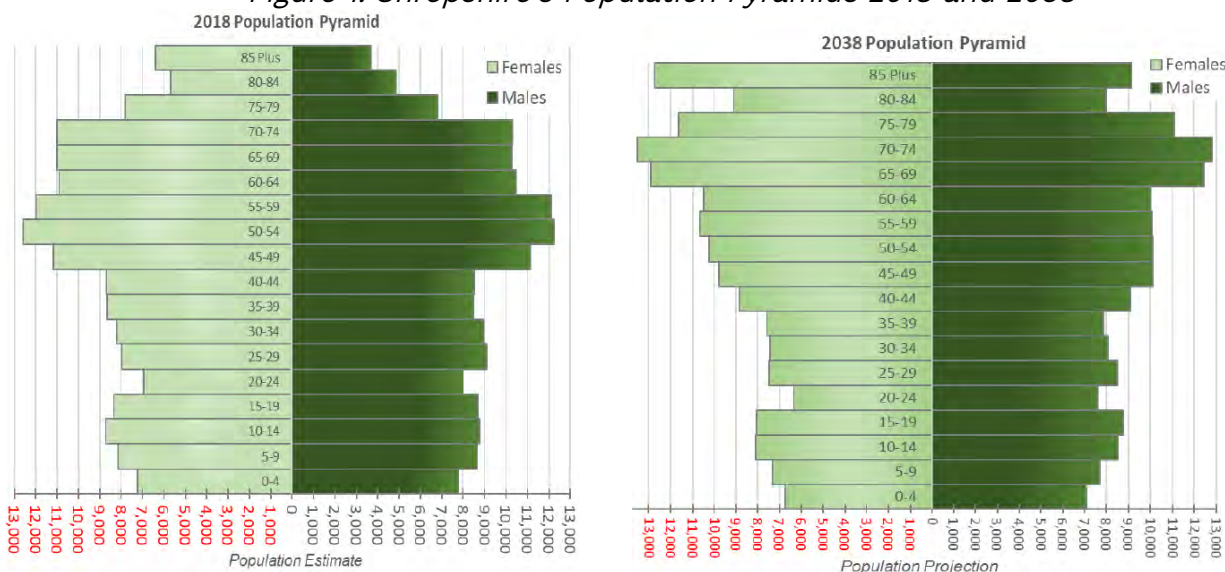


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Office Use Only	Part A Reference:
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	Part B Reference:

Not effective

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"Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need." (Paragraph: 016 Reference ID: 63-016-20190626)

The Local Plan does not include any specific targets for specialist housing within its policies and does not allocate any sites specifically for this purpose. In these regards the Plan currently fails the 'consistent with national policy' test of soundness.

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Office Use Only	Part A Reference:
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Settlement Policy S16.1 Shrewsbury Strategic Centre and Policies Map

If Shropshire's need for 3,500 units of C3 specialist accommodation and 2,500 units of C2 specialist accommodation is divided among the towns in proportion to their proposed settlement housing targets, Shrewsbury with 28% of the county's housing provision would need to deliver 980 specialist C3 units and 700 specialist C2 units. However Policy S16.1 and site allocations schedule S16.1(i) make no specific provision for Shrewsbury's significant need for specialist housing for the elderly. In this respect the Plan fails the following tests of soundness:

- it is not positively prepared - the Plan fails to meet Shrewsbury's needs for specialist C2 and C3 accommodation;
- it is not justified - the Plan does not reflect the evidence in the SHMA regarding the need for specialist accommodation;
- it is not effective - the policy does not help deliver specialist accommodation in Shrewsbury; and
- it is not consistent with national policy - the Plan is silent on planning applications for 100% specialist housing.

To make the Plan sound, a site should be allocated specifically to meet the identified need.

Morris & Co propose a specialist Retirement Village comprising a range of types of older persons' housing including bungalows, assisted living and extra care housing, located opposite the recent development of retirement flats at Shire Living on Holyhead Road at the site shown in figure 1 of Appendix 1 to this representation.

The site's allocation would be accompanied by the changes to the Policies Map shown in figure 2 of Appendix 1 to this representation.

The following additions are suggested to Schedule S16.1(i) on page 270 of the Local Plan:

Schedule S16.1(i). Residential and Mixed Use Allocations: Shrewsbury Strategic Centre		
Site Allocation	Development Guidelines	Provision
<u>Land north of Holyhead Road, Shrewsbury (SHR216a)</u>	<u>Appropriate vehicular access will be provided off Holyhead Road with separate pedestrian routes across the site.</u>	<u>Up to 300 units of specialist older persons' accommodation</u>

Office Use Only	Part A Reference:
	Part B Reference:

	<p><u>Existing mature trees and hedgerows will be retained. The site will be attractively landscaped to provide net environmental gain.</u></p> <p><u>Development will incorporate sustainable drainage and will be designed to ensure no adverse impact on groundwater resources.</u></p>		
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(Please continue on a separate sheet if necessary)

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Signature:

H. Howie

Date:

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	Part B Reference:

APPENDIX 1: PROPOSED RETIREMENT VILLAGE

As a local provider, Morris Care understands the needs of the market and is well placed to help deliver Shropshire's needs for this type of accommodation. Morris Care already provide six specialist homes in Shropshire and Cheshire¹, namely:

- Isle Court Nursing Home, Bicton, Shrewsbury
- Radbrook Nursing Home, Off Bank Farm Road, Shrewsbury
- Morris Care Centre, Holyhead Road, Telford (comprising three linked centres at Wrekin Court, Wellington Court and Ercall Court)
- Corbrook Park Nursing Home, Audlem, Cheshire
- Oldbury Grange Nursing Home, Oldbury, Nr. Bridgnorth
- Stretton Hall Nursing Home, All Stretton, Shropshire

Retirement villages have proven to be a successful model, providing opportunities for residents to move from more independent accommodation to more supported accommodation as their needs change. It can enable couples to remain geographically close even when their needs differ. Furthermore, a concentration of older people supports a good range of specialist services for the elderly that benefits not only immediate residents but those living elsewhere in the town who can travel to use day-care services on site.

The proposed retirement complex will help deliver Shrewsbury's quantitative and qualitative needs for an ageing population over the plan period.

The proposed site shown in figure 1 overleaf comprises 5.4 hectares of land. It was previously assessed by the Council as part of the larger site SHR216 and was included as a preferred allocation in the November 2018 Preferred Options plan for a mix of residential and Health & Care uses.

The proposal has now changed to a dedicated retirement village on the 5.4 hectare parcel as a stand-alone scheme. We propose that it is allocated purely for retirement living/ sheltered housing and extra care housing/ housing-with-care. There are two nursing homes in the local area, at Clayton Way and at The Isle, Bicton, that already provide for this type of need.

To distinguish this 5.4ha site from the previous site, we use reference **SHR216a**.

The site is close to complementary services offered by:

- Shrewsbury Hospital
- The Severn Hospice, Clayton Way
- The Marches Care Home, Clayton Way
- Morris Care's Isle Court Nursing Home, Bicton

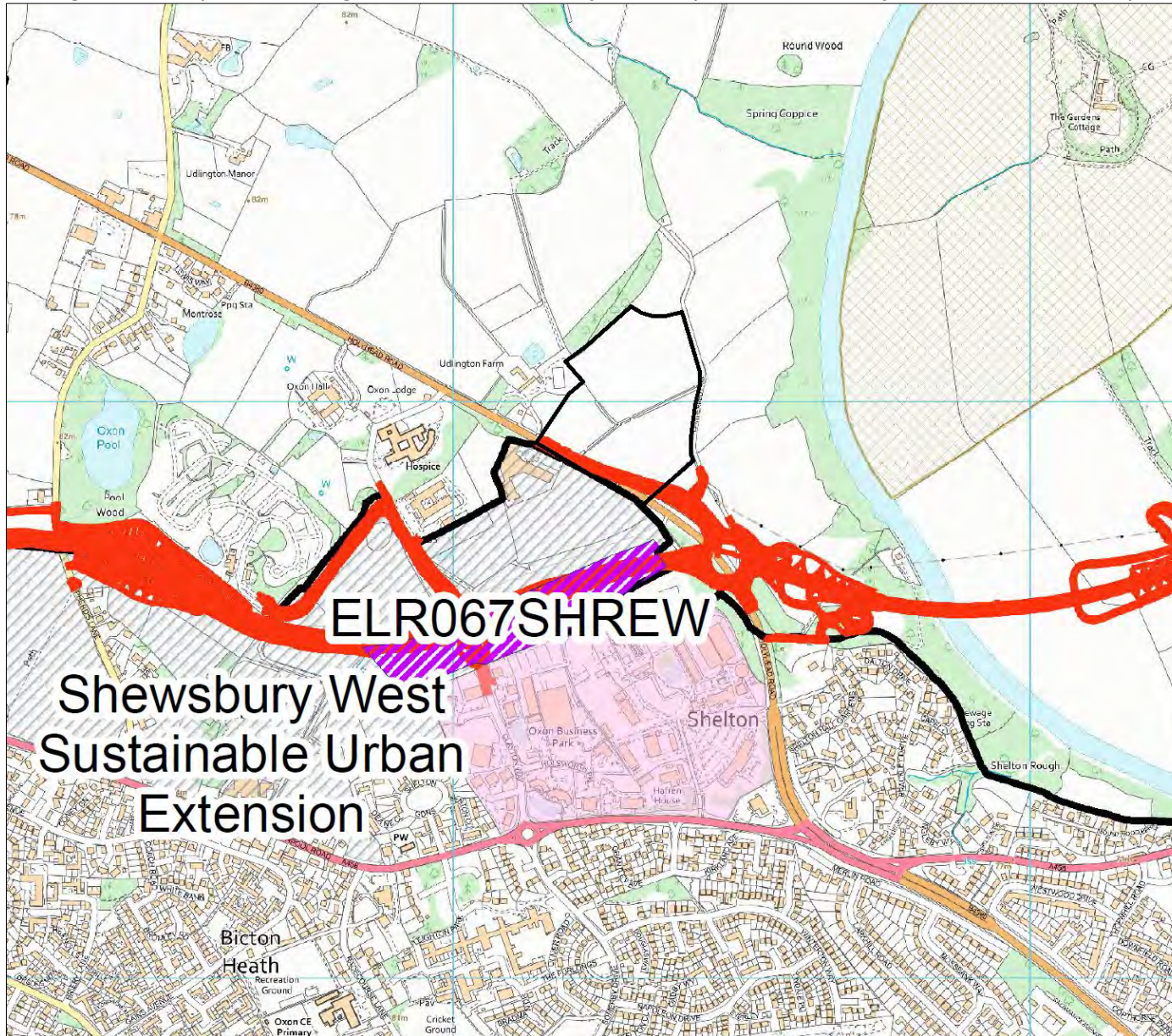
The proposed allocation is compatible with the existing allocation of land for health/care development between Clayton Way and Holyhead Road, as part of the SAMDev Plan allocation for the Shrewsbury West Sustainable Urban Extension (SUE). The proposed modification to the Policies Map shown in figure 2 will be a natural extension to the SUE.

¹ <https://www.morriscare.co.uk/our-homes>

Fig 1. Proposed Retirement Village, north of Holyhead Road, site SHR216a



Figure 2. Proposed change to the Shrewsbury Development Boundary on the Policies Map



The Council-approved Masterplan for the SUE proposes good pedestrian connections between Holyhead Road and the district centre at Bickton Heath, including the Co-op store south of the Park & Ride, as shown below.

Figure 3. The site in relation to the Shrewsbury West SUE Masterplan



Figure 4. Aerial photograph of the area above



Land to the south of site SHR216a is currently the subject of a hybrid planning application submitted by Jessup in November 2020 (20/04544/OUT), comprising 28 extra care apartments, 26 elderly persons bungalows and 2 blocks to provide B1 commercial accommodation linked to the healthcare industry. The submitted layout plan is shown in figure 5 below.

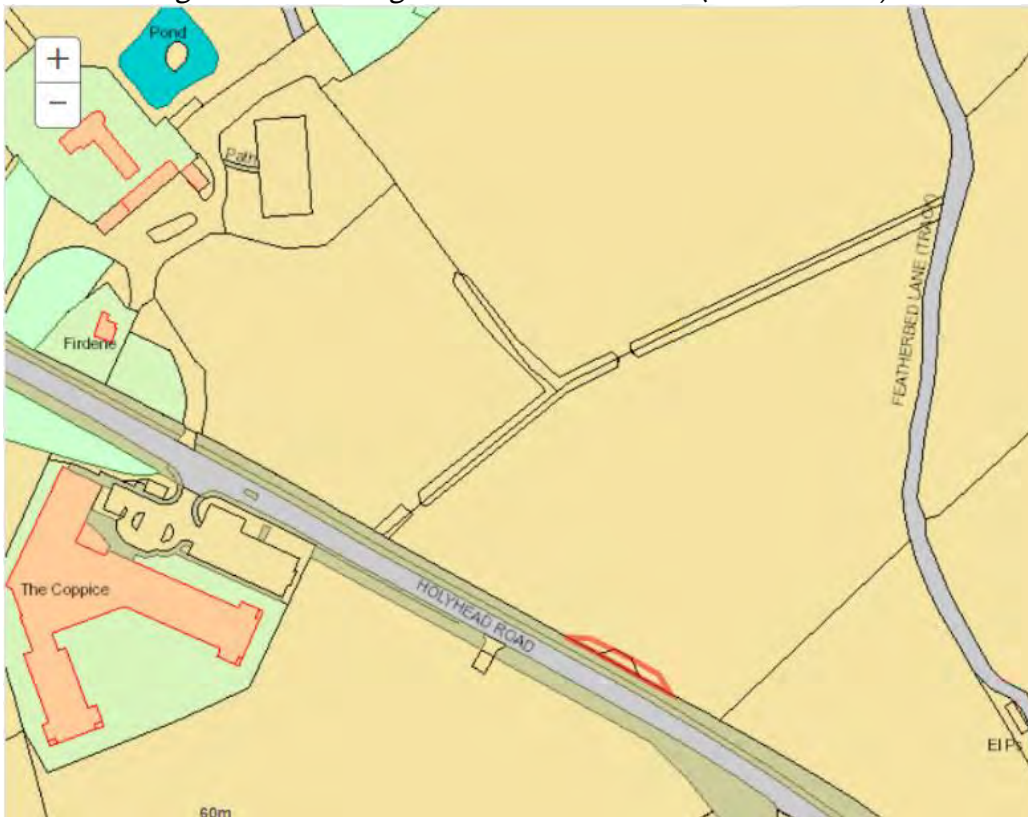
Figure 5. Current development proposals opposite site SHR216a



The site is well served by public transport with the No. 70 Arriva bus service stopping adjacent to the site, with 15 buses a day into Shrewsbury town centre. The bus stops are opposite The Coppice Shire Living retirement flats, with a pedestrian refuge at the crossing point on Holyhead Road.

The site benefits from an existing vehicular access, the extent of which is shown in figure 6 below (SA/04/0264/F). This access can easily be re-opened by simply removing the hedge that has grown in front of it.

Figure 6. Planning consent for access (SA/04/0264/F)



The site is well screened in the landscape by mature hedgerows to the south along Holyhead Road and the east along Featherbed Lane. Mature woodland screens views of the site to the north. The site's position close to the countryside provides a good quality of life for older residents, many of whom will be coping with health challenges.

The site lies entirely outside the groundwater source protection zone. It naturally drains eastwards and surface water drainage will consequently have no impact whatsoever on the source protection zone to the north.

In summary, the 5.4ha site north of Holyhead Road would make an ideal allocation for a retirement village, helping deliver a suitable mix of specialist housing including retirement / sheltered housing for those able to live independently and follow-on extra care housing for those needing more assistance. Residents benefit from being able to move easily from one form of housing to another as their needs change, whilst retaining their social contacts and familiarity. The proposal would be of enormous social benefit to Shrewsbury.

Morris Property are a local company that has a good track record for delivery. We can confirm that the site is available, suitable and viable and can be delivered within the time period 2020-2030 (with reference to Local Plan Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations).

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Morris and Co Ltd
------------------------	-------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Morris & Co. Ltd is a Shropshire-based company. It includes a specialist provider of older persons' accommodation, Morris Care, which provides six specialist care homes in Shropshire, Telford & Wrekin and Cheshire.

Morris & Co welcomes the new Local Plan but consider that the Local Plan currently fails all four tests of soundness in relation to older persons' accommodation:

- The Plan is not positively prepared because it does not specifically seek to meet the identified need for older persons' accommodation;
- The Plan is not justified as it does not reflect the evidence in the SHMA and 2018-based household projections;
- The Plan will not be effective in meeting older persons' accommodation needs; and

- The Plan is not consistent with national policy in failing to adequately plan for this category of housing.

These concerns affect the following 4 policies:

- Policy SP2 Strategic Approach
- Policy DP1 Residential Mix
- Policy SP9 Managing Development in the Countryside
- Policy S16.1 Shrewsbury Strategic Centre

Due to the inter-relationships between the policies, our soundness concerns are replicated for each of these policies. Proposed modifications to each policy are detailed in each respective representation for policies SP2, DP1, SP9 and S16.1.

Not positively prepared

There is consensus that older people will make up an increasing proportion of Shropshire's population over the plan period. Paragraph 4.20 in the Plan notes, *"Growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038."*

Despite this, the Plan does not set any targets for provision of specialist housing for the elderly, either in Policy SP2 or in any other policies. The Plan also has no policies that specifically address the provision of stand-alone C2 accommodation, other than as part of the general housing mix. In this regard the Plan fails the 'positively prepared' test of soundness.

Not justified

The evidence base illustrates Shropshire's ageing population profile, as shown in the extract below from page 35 of the SHMA. The graphs illustrate a dramatic ageing of the county's population over the plan period.

Figure 1. Shropshire's Population Pyramids 2018 and 2038

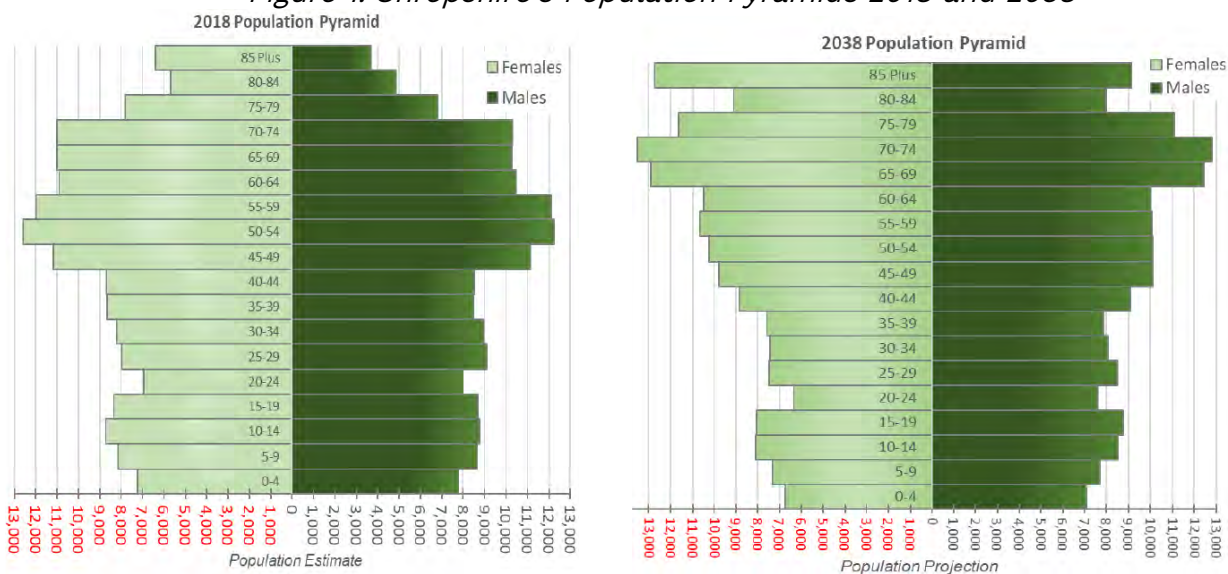


Table 64 in the Strategic Housing Market Assessment (SHMA) estimates the need for 3,063 units of additional sheltered housing, 410 units of extra-care housing and 2,549 extra beds in residential/ nursing homes by 2038, a total of 6,023 additional units of specialist older persons accommodation in Shropshire over the plan period.

Office Use Only	Part A Reference:
	Part B Reference:

Paragraph 4.40 of the Plan translates this into 3,500 units of C3 (independent dwelling) accommodation and 2,500 units of C2 (institutional) accommodation. However the Plan makes no specific provision to deliver this apart from a requirement in Policy DP1 (Residential mix) that large sites provide an appropriate mix of housing. This is inadequate and will not deliver the quantity or quality of older persons' housing needed in Shropshire.

This is surprising given the significant scale of the challenge with the text below policy DP1 noting:

"4.20. Growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038. According to analysis of projections within the SHMA, during the Local Plan period:

a. Households with a Household Reference Person aged 65-84 years are projected to increase by 42.8%...

b. Households with an elderly Household Reference Person (85 years and over) are projected to significantly increase by 130.5%, more than doubling in size from 6,900 households in 2016 to 15,900 by 2038....

The figures in the SHMA rely on 2016-based figures. The forecast growth of the elderly is even greater in the latest 2018-based household projections published by the Office of National Statistics on 29th June 2020, summarised in figure 2 below. For example, paragraph 4.20 in the Local Plan cites growth in the households aged 65-84 years of 42.8% over the plan period, whereas the latest household projections show growth of 59%, rising to 65,072 older households by 2038.

Figure 2. The 2016-based and 2018-based household projections for Shropshire

Age	2016-based SHMA table 48 (SHMA page 76)			% change over plan period	2018-based ONS household projections		
	2016	2038			2016	2038	% change over plan period
One person 65-74	8,300	9,900					
One person 75-84	7,800	12,400					
One person 85+	4,600	10,000					
Two+ persons 65-74	15,400	19,400					
Two+ persons 75-84	9,000	16,300					
Two+ persons 85+	2,400	5,800					
Sub-total 65-74	23,700	29,300	24%	24,155	34,123	41%	
Sub-total 75-84	16,800	28,700	71%	16,869	30,949	83%	
Total 65-84	40,500	58,000	43%	41,024	65,072	59%	
Total 85+	7,000	15,800	126%	6,909	14,951	116%	

The majority of the projected growth is in the older age group 75-84 (83% increase) and age 85+ (116% increase). These older groups are associated with greater care needs.

The Plan does not reflect the evidence in the SHMA and 2018-based household projections and in this regard it fails the 'justified' test of soundness.

Office Use Only	Part A Reference:
	Part B Reference:

Not effective

In its current format, the Plan will fail to deliver enough specialist housing. Policy DP1 will encourage some older persons' housing on larger sites but it is unlikely to fully meet Shropshire's needs for this type of housing, due to the limited number of large developments (50+ dwellings) in the county.

Schedule A7 on pages 352-359 of the Local Plan identifies that 36 of the total 76 allocations will be over 50 dwellings in size. Of these, 20 allocations are for up to 100 dwellings and are therefore unlikely to make significant provision for specialist accommodation amongst the normal mix of 2-bed, 3-bed, 4-bed and 5-bed houses. This leaves only 16 allocations likely to make any significant provision against Shropshire's need for at least 6,000 specialist units. Very few, if any, of the promoters of allocated sites have provided evidence that they will make significant provision for specialist housing on what are largely general housing sites.

The Local Plan will only deliver the quantity and quality that is needed if it is supplemented with specific allocations that specifically cater for these types of housing and includes policies that specifically support sites for 100% specialist housing. In its current format, the Plan fails the 'effective' test of soundness.

Not consistent with national policy

Paragraph 61 of the Framework states that, *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities...)"*

This is elaborated in the National Planning Practice Guidance (NPPG) which states:

"Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period." (Paragraph: 006 Reference ID: 63-006-20190626)

The NPPG encourages specific allocations, stating:

"Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing." (NPPG Reference ID: 63-013-20190626)

The NPPF also requires a positive approach to developments of 100% specialist housing:

"Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need." (Paragraph: 016 Reference ID: 63-016-20190626)

The Local Plan does not include any specific targets for specialist housing within its policies and does not allocate any sites specifically for this purpose. In these regards the Plan currently fails the 'consistent with national policy' test of soundness.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound in relation to provision of older persons' accommodation, a target is required in policy SP2. The following addition is necessary to make the Policy sound:

Over the plan period, at least 3,500 units of additional specialist older persons accommodation (class C3) and 2,500 extra units of residential care provision (class C2) will be delivered.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Morris & Co wish to attend the examination hearings that relate to older persons' accommodation. As they are a key provider of specialist housing for the elderly in Shropshire, they can make a strong contribution to ensuring that the plan is sound in relation Shropshire's burgeoning elderly population.

(Please continue on a separate sheet if necessary)

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Signature: H. Howie

Date: 21/01/2021

Office Use Only

Part A Reference:

Part B Reference:

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Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP10	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Click or tap here to enter text.

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- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
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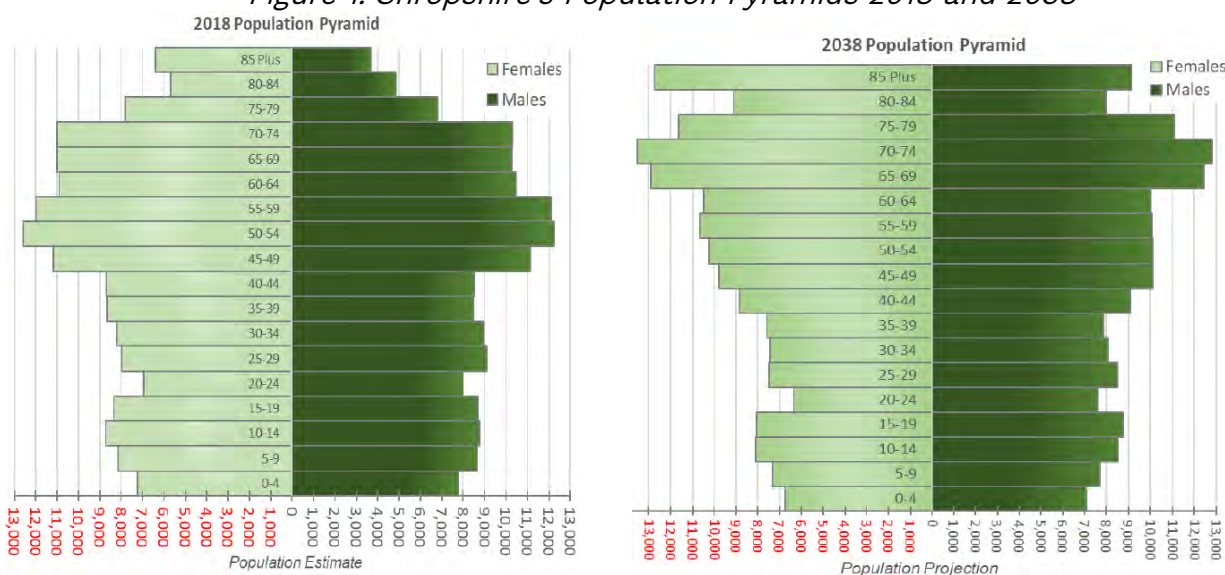


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Office Use Only	Part A Reference:
	Part B Reference:

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The Plan does not reflect the evidence in the SHMA and 2018-based household projections and in this regard it fails the 'justified' test of soundness.

Office Use Only	Part A Reference:
	Part B Reference:

Not effective

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Part A Reference:

Part B Reference:

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To make the Plan sound we suggest the following addition (underlined) to section 4 of Policy SP10 (Managing Development in the Countryside):

"4. New market housing will be strictly controlled outside the development boundaries of the Strategic Centre of Shrewsbury, the Principle Centres, the Key Centres, the new Strategic Settlements and the Community Hubs. Within Community Clusters only new market housing which meets Community Cluster Policy SP8 criteria will be acceptable. Outside these areas, subject to the further controls that apply in Green Belt, residential development proposals will be positively considered where they meet all the relevant requirements of Local Plan policies and relate to:"

....

h. specialist housing such as retirement living or sheltered housing; extra care housing or housing-with-care; and residential care homes and nursing homes where there is a shortage of provision locally.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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No, I do not wish to participate in hearing session(s)

Office Use Only	Part A Reference:
	Part B Reference:

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Signature: H. Howie

Date: 21/01/2021

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Part A Reference:

Part B Reference: