



## **LOCAL PLAN REPRESENTATION**

**Prepared and submitted on behalf of  
Shrewsbury Homes & RGS (Timber) Ltd**

in response to the

**Regulation 19 Pre-Submission Draft Shropshire Local Plan 2016 – 2038**

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### **Policy DP1 : Residential Mix**

it is not always going to be feasible to deliver specialist housing for older persons on schemes of over 50 units. Extra care or retirement housing (esp. those with care elements) can generally only be delivered in volume and operators tend to deliver such accommodation as bespoke schemes in their own right. This policy objective might be possible on sites exceeding 200+ units but on smaller schemes such an obligation is likely to render many schemes undeliverable if compelled to deliver this type of accommodation due.

Providing lifetime homes or accessible/adaptable dwellings is quite a different objective.

The Council accept there is a need to deliver specialist (care) housing but fail to make provision in their draft allocations. A separate policy to deliver specialist housing is considered necessary as NPPF Para 61 guides and NPPG recommends in ID63.

This policy is not considered to be SOUND as it is not justified, effective or consistent with national policy.

### **Policy SP9 : Managing Development in Community Clusters**

This policy does not provide for the redevelopment of brownfield sites and must make provision for this. NPPF consistently guides development towards brownfield land (e.g. Paras 117 and 118) yet this has been ignored here.

This policy is not considered to be SOUND as it is not justified, effective or consistent with national policy.

### **Policy S14 Oswestry Place Plan Area**

#### **S14.2 Community Hubs**

The guideline of around 125 dwellings for Ruyton XI Towns and around 155 dwellings for Weston Rhyn could be construed by some as being a maximum. The policy should make it clear that these figures are not meant to be seen as a “cap” but instead be expressed as a minimum.

The “saved” SAMDEV allocation WRN016 (Sawmills at Rhoswiel) is part of the wider brownfield site granted Outline permission under 14/05708/OUT, which was granted based upon a proven highway access solution for up to 64 dwellings.

This site has now been sold subject to contract to Shrewsbury Homes who are looking to submit Reserved Matters and Discharge of Condition applications very soon (prior to the 1 May 2021 expiry of the permission).

The 5-Year Housing land supply position (published March 2020) identifies the site having a capacity for 62 dwellings and that this will be delivered from 2022 through to 2025.

Given the introduction of Shrewsbury Homes we concur with this estimation.

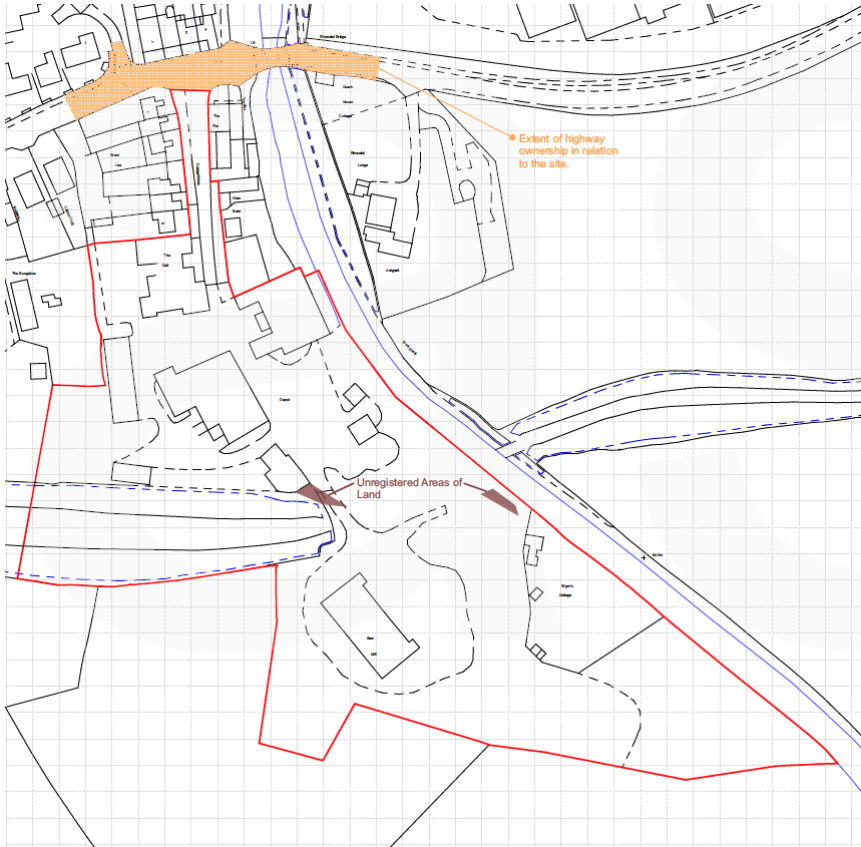
The draft Proposals Map extract is shown below.



However, we must point out that this (SAMDEV) allocation should reflect the extent of the permission which reflects the brownfield extent of the site and as such the Local Plan should identify this and allocate it accordingly.

Additionally, whilst the site lies upon the Councils Brownfield Land Register under the same WRN016 reference this too fails to reflect the “actual” extent of the previously developed site.

These errors must be rectified and the settlement boundary must be extended to include the site as shown on the plan below which reflects the established brownfield extent of the site.



We consider the site to be viable and deliverable having regard to the policy requirements of the Regulation 19 Local Plan : subject to the concerns we have raised, in particularly in relation to policy DP1 and SP9.