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Planning Policy  
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SENT BY E-MAIL ONLY TO  
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8<sup>th</sup> February 2019

Dear Sir / Madam

## **SHROPSHIRE LOCAL PLAN REVIEW (LPR) – PREFERRED SITES CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following answers in response to the Council's consultation document.

The Council's Preferred Development Strategy (consulted on October / December 2017) seeks to make the best use of the strategic advantages of Shropshire's geographic location to support a sustainable pattern of future growth over the period 2016 - 2036 and to support the growth aspirations of neighbouring areas, particularly in the north and east of the County. The preferred strategy will help support the 'step change' in economic productivity and quality of employment as set out in the new Economic Growth Strategy. The key proposals of the Preferred Development Strategy are :-

- housing growth of 28,750 dwellings (1,430 dwellings per annum) as existing housing completions, commitments and allocations amount to circa 18,500 dwellings an addition of approximately 10,250 dwellings will be required ;
- an urban focused distribution of development of circa 30% in the Strategic Centre of Shrewsbury, circa 24.5% in the Principal Centres of Bridgnorth, Ludlow, Market Drayton, Oswestry & Whitchurch, circa 18% in Key Centres and circa 27.5% in Rural Areas ;



- development at strategic sites such as Ironbridge Power Station and Clive Barracks together with potential new Garden Village settlements in strategic locations ;
- potential release of Green Belt land to support long term sustainability ;
- identifying named Community Hubs with individual housing number guidelines, development boundaries and site allocations where appropriate ;
- maintaining existing and creating new Community Clusters where Parish Councils have chosen to 'opt-in' where criteria-based policies to manage development will be applied ;
- continuing to strictly control new market housing in the countryside whilst supporting new affordable housing for local needs and small scale employment opportunities in appropriate locations.

The current Preferred Sites consultation :-

- outlines a housing policy approach to improve the delivery of local housing needs ;
- establishes development guidelines and development boundaries for Shrewsbury, Principal & Key Centres and each proposed Community Hub ;
- sets out the preferred sites to deliver the preferred scale and distribution of housing and employment growth for the period 2016 – 2036.

### **Delivering local housing needs**

**Do you think Shropshire Council should introduce a cross-subsidy exception site policy, allowing an element of open market housing to support the delivery of affordable housing?**

The proposal for a cross-subsidy exception site policy is supported. All households should have access to different types of dwellings to meet their housing needs. The 2018 National Planning Policy Framework (NPPF) sets out that housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). The Council may also wish to consider a similar rural exception sites policy approach for self / custom build housing.

### **Settlement Strategies**

**Do you agree with the preferred housing guidelines?**

If the Council's proposed housing guidelines are summarised (see Table below) it is confusing that the total proposed housing guidelines of 25,784 dwellings is less than the Council's preferred housing requirement of 28,750 dwellings as set out in the Preferred Development Strategy. Furthermore the proposed guideline figures do not follow the preferred housing distribution pattern set out in the Preferred Development Strategy. The summary also illustrates that the Council is not allocating enough housing sites to meet the Preferred

Development Strategy housing requirement but instead proposes to rely upon windfall allowances. The Council should provide further explanation for these anomalies.

Settlement	Proposed Housing Guideline 2016-36	Dwellings Completed in 2016-17	Existing Commitments & Allocations	Additional Provision Required	Capacity proposed allocations	Windfall Allowance
Strategic Centre	8,625	733	4,246	3,646	2,150	1,496
Principal Centres	7,100	194	4,424	2,482	2,199	283
Key Centres	5,150	455	2,948	1,747	1,316	431
Community Hubs	4,909	241	2,330	2,338	1,729	609
<b>TOTAL</b>	<b>25,784</b>	<b>1,623</b>	<b>13,948</b>	<b>10,213</b>	<b>7,394</b>	<b>2,819</b>

As set out in the 2018 NPPF the LPR should include strategic policies which address the Council's identified strategic priorities for the development and use of land in the plan area (para 17). These strategic policies should set out an overall strategy for the pattern, scale and quality of development (para 20). The LPR should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The LPR should identify a sufficient supply and mix of housing sites after taking into account availability, suitability and economic viability. The LPR should provide enough opportunities to allow identified housing needs to be met in full by providing a clear framework that ensures policies in the Plan can be effectively applied.

As the Council is allocating insufficient sites to deliver the Preferred Development Strategy housing requirement there is also no contingency within the Council's overall proposed Housing Land Supply (HLS). HLS should not be planned to a minimum with no flexibility to respond to changing circumstances. The LPR should provide some headroom within the Council's overall HLS. LPR should build in a flexibility allowance to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum figure and to provide choice as well as competition in the land market. There is no numerical formula to determine the appropriate quantum for a flexibility contingency but where the HLS is highly dependent upon one or relatively few large strategic sites and / or specific settlements / localities then greater numerical flexibility is necessary than if the HLS is more diversified. The HBF always suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the LPR Examination any of the Council's assumptions on lapse rates, windfall allowances and delivery rates are adjusted or any proposed housing site allocations are found unsound then any proposed contingency also reduces.

**Do you agree with the proposed development boundaries?**

The HBF repeats the submitted comment to the Preferred Development Strategy consultation that the Council's proposed development boundaries should not be drawn too tightly. As stated in answer to the previous question the Council is allocating insufficient sites to meet the Preferred Development Strategy housing requirement and the Council's HLS includes no contingencies. The Council should provide some headroom within its overall HLS. HLS should not be planned to a minimum with no flexibility to respond to changing circumstances. Therefore the Council should consider a permissive policy approach to sustainable development adjacent to as well as within development boundaries.

**Do you agree with the preferred housing allocations?**

The HBF submit no comments on the selection of individual preferred housing allocations. The HBF repeats the submitted comment to the Preferred Development Strategy consultation that there should be a broad portfolio of sites. For the Council to maximize housing delivery the widest possible range of sites by size and market location is required so that small local, medium regional and large national house building companies have access to suitable land in order to offer the widest possible range of products.

**Do you agree with the preferred area's of safeguarded land?**

The HBF submit no comments on the selection of individual preferred area's of safeguarded land.

**Do you agree with the identification of Community Hubs / Community Clusters?**

The HBF repeats the comments submitted to the Preferred Development Strategy consultation that the Council's preferred spatial strategy and housing distribution should recognise the needs of both urban and rural communities.

**Do you consider that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline?**

The reliance on a windfall allowance means depending upon an unplanned rather than planned HLS. A plan led system should be planned including contingencies (see answers to previous questions above). As set out in the 2018 NPPF (para 70) any windfall allowance should be based on compelling evidence that such sites have consistently become available in the past and will continue to do so.

**Conclusion**

It is hoped that these representations are of assistance to the Council in preparing the next stages of the Shropshire LPR which to be found sound under the four tests of soundness as defined by the 2018 NPPF should be positively

prepared, justified, effective and consistent with national policy (para 35). If the Council requires any further assistance or information please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**

A handwritten signature in blue ink, appearing to read "Susan E Green", written in a cursive style.

**Susan E Green MRTPI**  
**Planning Manager – Local Plans**