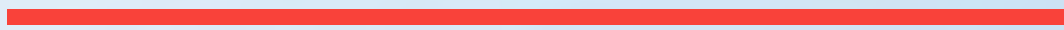


Appendix 1.2.1

HOUSING NEED ASSESSMENT





Raby Estate

HOUSING NEED ASSESSMENT

Representations to Regulation 18: Pre-submission Draft of the Shropshire Local Plan





Raby Estate

HOUSING NEED ASSESSMENT

Representations to Regulation 18: Pre-submission Draft of
the Shropshire Local Plan

REPRESENTATIONS (VERSION) PUBLIC

PROJECT NO. 70077055-HNA

OUR REF. NO. 70077055.RPT.004.GM

DATE: SEPTEMBER 2020



Raby Estate

HOUSING NEED ASSESSMENT

Representations to Regulation 18: Pre-submission Draft of
the Shropshire Local Plan

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WEST LANCASHIRE LOCAL PLAN 'PLAN B' POLICY RS6



EXECUTIVE SUMMARY

This Housing Need Assessment has been prepared on behalf of the Raby Estate in support of representations to the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan (August 2020). It highlights the approach the Shropshire Council is required to follow by the Government; assesses an appropriate housing requirement figure for Shropshire and recommends changes necessary to make the plan 'sound'.

The Raby Estate

The Raby Estate in Shropshire is situated between Shrewsbury and Telford to the south of the A5. It comprises a mixture of in hand and let farming businesses, residential homes, woodland, environment and commercial business space.

The aim for the Raby Estate is to develop a sense of place, building new and renovating existing property to nurture a community for Shropshire providing new work opportunities, homes, including affordable homes, creating spaces for people to visit, learn and exercise, to help with the health and wellbeing of people in the County.

The Estate has been promoting three main interests throughout the preparation of Shropshire Local Plan Review:

- A sustainable new strategic settlement founded on Garden Village principles at **Beslow** (comprising 3,500 homes alongside 17 hectares of employment land, community uses and infrastructure);
- Adding vitality to **Cressage** through the provision of 80 homes in a mix of tenures;
- Meeting the existing and future housing needs of the **Whole Estate** and its tenants and their businesses and families.

National Policy

The **National Planning Policy Framework** requires the planning system to be genuinely plan led with succinct and up-to-date plans providing a positive vision for the future of an area. It supports the Government's objective of significantly boosting the supply of homes.

Local Plans must pass four 'tests of soundness' in order to be found 'sound' and adopted:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred; and
- **Consistent with national policy** – enabling the delivery of sustainable development.

Planning Practice Guidance sets out a standard method for setting a minimum housing requirement figure. The Government is currently consulting on **Changes to the current planning system**, including changes to the standard method consistent with the aim of delivering 300,000 new homes each year across England, which are expected to come into effect in Autumn 2020.

The Government has also consulted on its '**Planning for the Future**' **White Paper** which sets out more significant changes to overhaul the planning system, but these are not expected to come into effect in the immediate short-term.

Assessing Shropshire's Future Housing Need

Shropshire Council is pursuing a housing requirement figure of **1,400 homes per year** over the plan period (between 2016 and 2038). A range of other figures have been identified and considered throughout the plan's preparation, equating to an average of 1,452 homes per year.

However, the Government's proposed changes to the standard method would result in a minimum housing requirement figure of **2,120 homes per year** – above recent average completion rates of 1,876 homes per year.

Shropshire Council has agreed to accommodate **1,500 homes** from the Association of Black Country Authorities, but there are unmet needs totalling 13,620 homes still that need to be met within Shropshire or elsewhere within the West Midlands and Black Country conurbation.

The **Economic Growth Strategy for Shropshire** sets out a commitment and ambition to grow the economy of the County to reduce levels of out-commuting, retain employment and skills locally, increase productivity and address housing affordability issues.

Affordability is a serious issue for Shropshire, particularly in the more rural areas. There is an identified need for between **469 to 997 affordable homes per year** alone.

Meeting Shropshire's Future Housing Need

We have identified a number of areas requiring improvement with the approach set out within the Pre-Submission Draft of the Shropshire Local Plan (August 2020), including:

1. The proposed changes to the standard method identify at least a 52% increase in Shropshire's housing requirement figure;
2. The strategic approach (including the proposed settlement hierarchy and distribution of development) is not fit for purpose;
3. An inadequate contribution towards meeting unmet needs of neighbouring authorities;
4. An over reliance on windfalls;
5. The lack of a meaningful 'safety buffer' of additional sites to meet Shropshire's own needs;
6. An unambitious approach towards strategic sites and new settlements; and
7. The artificial suppression of need in rural areas preventing them from being able to grow organically.

To address these, we recommend Shropshire Council make a number of changes to the plan:



We recommend **revisiting the strategic approach**, specifically the proposed settlement hierarchy and distribution of development, as it does not currently meet the minimum housing requirement set out by proposed new standard method – there is a shortfall of 16,038 dwellings over the plan period.

We recommend **accommodating more unmet need from the Association of Black Country Authorities**, as there is a lack of transparency behind why Shropshire can only accommodate 1,500 homes – in reality, it can support much more. It is unambitious and does not match the County's economic growth aspirations.

We recommend placing **less reliance on windfalls**, as currently they represent 22% of the residual housing requirement. The Council ought to be allocating a greater number of sites to ensure there is a truly plan-led approach to development in the County.

We recommend **identifying an additional buffer of sites**, as currently there is a 1% 'safety buffer' which places the plan at significant risk of failure. We have identified four potential options to increase confidence in the plan (in order of preference) – allocating additional sites for development within the plan period; allocating 'Plan B' sites that can be released for development when needed; identifying broad Areas of Search; or committing to an early/immediate plan review.

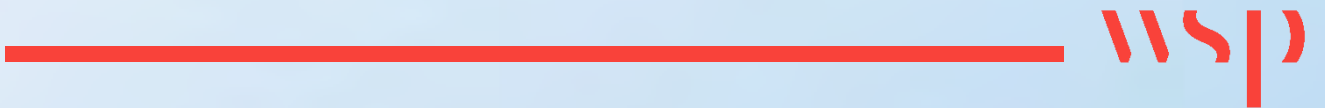
We also recommend **allocating more strategic sites and new settlements**, including at Beslow to ensure that the housing requirement will indeed be met over the plan period.

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1

INTRODUCTION



1 INTRODUCTION

- 1.1.1. This Housing Need Assessment (HNA) examines the future housing requirements for Shropshire Council over the period 2016 to 2038. It has been prepared to inform the submission of representations to the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan (August 2020) on behalf of the Raby Estate.
- 1.1.2. The contents of this HNA should be borne in mind by Shropshire Council when weighing up the need for further changes to the emerging Local Plan.

THE RABY ESTATE

- 1.1.3. Raby Estate business operations include in-house farms, let farms and residential property, visitor attractions, holiday lets/hotel and sporting enterprises across three estates in County Durham and Shropshire.
- 1.1.4. The Shropshire Estate has been held by the Vane family since the beginning of the 19th Century. The estate is situated between Shrewsbury and Telford consisting of leasehold farms from where the Estate's tenants run their own farming businesses, cottages where people make their homes and holiday lets. The estate comprises around 6,500 acres including 3,900 acres of let land, 1,800 acres of land farmed by the estate and 800 acres of mixed amenity and commercial woodland.
- 1.1.5. The current Raby Estate is situated between Shrewsbury and Telford to the south of the A5. The Estate encompasses the summit and greater part of the Wrekin and extends from the A5 in the north, the Wrekin in the east, Cressage and its rural surrounds towards Kenley in the south and the River Seven in the west.
- 1.1.6. Raby Estate covers the Wroxeter and Uppington Parish, Cressage Parish and Kenley Parish Parts of Uppington, Rushton, Eyton, Dryton, Cressage and Kenley settlements are all under the stewardship of the Raby Estate.
- 1.1.7. The aim for the Raby Estate is to develop a sense of place, building new and renovating existing property to nurture a community for Shropshire providing new work opportunities, homes, including affordable homes, creating spaces for people to visit, learn and exercise, to help with the health and wellbeing of people in the County.
- 1.1.8. The Estate has a long-term view, good location, ownership of natural capital and valued built assets. Under the strong management of the team, this will provide economic growth in line with Shropshire's objectives.
- 1.1.9. Development will of course provide economic growth for Raby which is vital and important to provide funding for future investment. The Estate's development will enhance the quality of life and natural capital to ensure local economic growth.
- 1.1.10. Raby Estate is currently assessing opportunities around the rural settlements within its Estate to provide new employment and retail services to key rural cluster settlements such as Uppington,

Rushton, Aston and Longwood, supplying a new housing development in Cressage and leisure and tourism opportunities on The Wrekin.

- 1.1.11. Financial sustainability is key for the local community, Shropshire and Raby Estate to build its businesses and create a sense of place for cohesive economic growth. Raby feels this will be achieved through sympathetic development to create places that will provide opportunities for those living and working in Shropshire. This can only be achieved by meeting common goals and working in partnership.
- 1.1.12. Raby Estate is a responsible landowner of natural capital and can help meet Shropshire's objective for improving the environment. New development on the Raby Estate will allow places for natural capital, the environment, tourism and wellbeing to grow. This will be achieved by providing spaces and attractions for people to explore the wider Raby Estate.

PREVIOUS REPRESENTATIONS

- 1.1.13. The Raby Estate has submitted numerous representations to previous stages of the Shropshire Local Plan Review raising concerns with the Council's approach taken to housing requirements and supply, and are requesting a more proactive and collaborative approach.
- 1.1.14. Representations have been submitted to the following stages of preparation:
 - Local plan partial review – Issues and Strategic options consultation (March 2017)
 - Local plan review – preferred scale and distribution of development (December 2017)
 - Consultation on Preferred Sites (February 2019);
 - Consultation on Strategic Sites (July 2019).
- 1.1.15. In doing so, the Estate has been promoting three main interests:
 - A sustainable new strategic settlement founded on Garden Village principles at Beslow;
 - Adding vitality to Cressage through the provision of high-quality housing;
 - Meeting the existing and future housing needs of the Whole Estate and its tenants and their businesses and families.
- 1.1.16. This HNA and the supporting representations submitted to this consultation build on those previous representations.
- 1.1.17. The Raby Estate and its team are very keen to explain their plans and develop them in collaboration with the Council, as they truly believe they can have a transformational and positive impact for the County. The estate has been engaging with officers, the local community and local members concerning its proposals since 2017 and this is ongoing.

DOCUMENT STRUCTURE

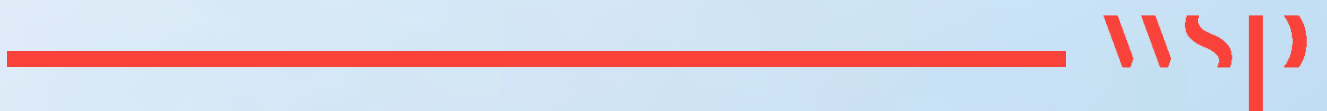
- 1.1.18. The document is structured as follows:
 - **Section 2 (National Policy)** – highlighting the approach that Shropshire Council is required to follow by the Government;
 - **Section 3 (Assessing Shropshire's Future Housing Need)** – identifying and assessing important factors that influence the setting of an appropriate housing requirement figure for Shropshire;
 - **Section 4 (Meeting Shropshire's Future Housing Need)** – a critique of the approach taken by Shropshire Council and identification of key failings; and



- **Section 5 (Conclusion)** – setting out the changes necessary to make the plan ‘sound’.

2

NATIONAL POLICY



2 NATIONAL POLICY

- 2.1.1. This section of the HNA sets out relevant parts of national policy which should be followed by Shropshire Council when identifying and establishing its future housing requirement as part of preparing its Local Plan. It highlights the key points that should be borne in mind before progressing to the Regulation 19 stage.

2.2 NATIONAL PLANNING POLICY FRAMEWORK

Achieving sustainable development

- 2.2.1. Published in February 2019, The National Planning Policy Framework (NPPF) makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development – by meeting the needs of the present without compromising the ability of future generations to meet their own needs (paragraph 7).
- 2.2.2. At the heart of the NPPF is the presumption in favour of sustainable development ('the presumption') (paragraph 11). For plan making, this means:
- plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
 - strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Plan-making

- 2.2.3. The planning system should be genuinely plan led with succinct and up-to-date plans providing a positive vision for the future of an area (paragraph 15).
- 2.2.4. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs (OAN) over the plan period, in line with the presumption. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (paragraph 23).
- 2.2.5. Preparation and review of local policies should be underpinned by relevant and up-to-date evidence (paragraph 31). This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 2.2.6. When examining plans, there are four 'tests of soundness' that must be passed in order to be found 'sound' by the Planning Inspectorate (paragraph 35). Plans should be:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's OAN, and is informed by agreements with other authorities, so that unmet need from neighbouring

areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred; and
- **Consistent with national policy** – enabling the delivery of sustainable development.

Delivering a sufficient supply of homes

- 2.2.7. The NPPF supports the Government's objective of significantly boosting the supply of homes (paragraph 59). It is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 2.2.8. To determine the number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in Planning Practice Guidance (PPG), unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market trends and market signals (paragraph 60). In addition, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 2.2.9. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (paragraph 61).
- 2.2.10. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (paragraph 65).
- 2.2.11. Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability (paragraph 67). Planning policies should identify a supply of:
- Specific, deliverable sites for years one to five of the plan period; and
 - Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 2.2.12. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply (paragraph 70).
- 2.2.13. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (paragraph 72).
- 2.2.14. In rural areas, planning policies should be responsive to local circumstances and support housing developments that reflect local needs (paragraph 77).
- 2.2.15. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities (paragraph 78). Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where

there are groups of smaller settlements, development in one village may support services in a village nearby.

- 2.2.16. Planning policies should avoid the development of isolated homes in the countryside unless there is an essential need for a rural worker to live permanently at or near their place of work in the countryside (paragraph 79).

2.3 PLANNING PRACTICE GUIDANCE

Housing and economic needs assessment

- 2.3.1. First published on 20 March 2015, this section of PPG has been updated several times to reflect changes in Government policy over time. Most notably it has been updated to reflect the introduction of the standard method by the revised version of the NPPF in September 2018, and again to reflect a slight tweak to the standard method in February 2019.
- 2.3.2. The Government considers the standard method calculation represents the minimum housing need for an area. Paragraph 002 (Reference ID: 2a-002-20190220) states [emphasis added]: *“The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure”*.
- 2.3.3. Whilst following the standard method to set a housing requirement is not mandatory, the Government essentially casts doubt over authorities taking alternative approaches. Paragraph 003 states that *“if it is felt that circumstances warrant an alternative approach...authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances”*.
- 2.3.4. PPG sets out three steps in calculating the minimum annual local housing need figure through the standard method. In short, step one uses the Office for National Statistics (ONS) published household projections as a baseline starting point and then step two multiplies the average annual household projected growth over a ten year period by a factor determined by the local authority area’s housing affordability ratio (the average house price of the area divided by the average individual earning). Step three then applies a cap so that the resultant figure cannot be more than either 40% more of the current local plan housing target where the plan is no more than five years’ old, or 40% more than the baseline average annual household projection figure.
- 2.3.5. The precise formula is as follows:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

- 2.3.6. Paragraph 008 (Reference ID: 2a-008-20190220) stresses that *“authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate. The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities”*.

- 2.3.7. Paragraph 010 (Reference ID: 2a-010-20190220) highlights that *“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area...there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates”*.
- 2.3.8. PPG identifies that such circumstances might include:
- Growth strategies for the area that are likely to be deliverable;
 - Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
 - An authority agreeing to take on unmet need from neighbouring authorities, as set out in Statement of Common Ground.
- 2.3.9. Paragraph 015 (Reference ID: 2a-015-20190220) states *“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point”*.
- 2.3.10. However, *“Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination”*.

Housing needs of different groups

- 2.3.11. Paragraph 001 (Reference ID: 67-001-20190722) acknowledges *“The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups”*.
- 2.3.12. Therefore, this section of PPG, published in July 2019, sets out advice on how authorities should identify and plan for the housing needs for particular groups of people, including:
- Private rented sector;
 - Self-build and custom housebuilding;
 - Student housing;
 - Affordable housing;
 - Rural housing.
- 2.3.13. A separate part of PPG specifically deals with the need for housing for older and disabled people.
- 2.3.14. Paragraph 001 goes on to state that authorities will need to take into account:
- The overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
 - The extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
 - The anticipated deliverability of different forms of provision, having regard to viability.
- 2.3.15. In terms of rural housing, paragraph 009 (Reference ID: 67-009-20190722) recognises that *“people living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities*.

Strategic policies will need to be informed by an understanding of these needs and opportunities... A wide range of settlements can play a role in delivering sustainable development in rural areas”.

- 2.3.16. Paragraph 010 (Reference ID: 67-010-20190722) also considers how the need for isolated homes in the countryside for essential rural workers can be assessed.

Housing supply and delivery

- 2.3.17. This section of PPG has similarly been updated to reflect changing Government guidance and caselaw over time. It was last updated in July 2019.
- 2.3.18. Paragraph 001 (Reference ID: 68-001-20190722) again stresses that “*Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach*”.
- 2.3.19. It goes on to set out the policies in place to encourage local authorities to promote a sufficient supply of land for housing and support delivery – specifically through demonstrating a forward looking five year housing land supply (5YHLS) and backwards measurement of the previous three years’ of delivery through the Housing Delivery Test (HDT).
- 2.3.20. Beyond five years, paragraphs 019 (Reference ID: 68-019-20190722) and 020 (Reference ID: 68-020-20190722) explain what authorities need to demonstrate to identify specific developable sites or broad locations for housing growth.

2.4 PROPOSED CHANGES TO THE CURRENT PLANNING SYSTEM

- 2.4.1. In August 2020, the Government published a consultation on its proposed changes to the current planning system aimed at helping to speed up the delivery of new homes. The changes would be implemented through amendments to PPG and are expected to come into force by the end of the calendar year, most likely announced in the Autumn Statement in November.
- 2.4.2. One of the main proposals is a change to the standard method for assessing housing numbers in strategic plans (‘the standard method’). As well as being a proposed short-term change to the current planning system, this also has relevance to more fundamental proposals for future planning reforms set out in the Government’s ‘Planning for the Future’ White Paper (as discussed further below).
- 2.4.3. The revised standard method follows well-documented criticisms of the existing approach first introduced in 2018 and tweaked in 2019. The key criticisms with the current standard method included identified needs across England falling well below the Government’s target for 300,000 new homes per annum and more locally specific anomalies, including where negative housing growth being identified in some areas where housing demand is extremely high.
- 2.4.4. In response, the revised proposed formula attempts to address some perceived issues with the current formula by:
- Using the most up to date ONS projections, but applying an alternative baseline of 0.5% of the existing dwelling stock of the local authority area if the projections are low – to avoid the issues that occurred with the current methodology (such as in Cambridge where negative household growth was forecasted);
 - Applying an adjustment factor based on the affordability of housing in the local authority area as per the existing methodology, but including an additional adjustment to account for the change in affordability over the previous ten years;

- Removing the 40% cap where an increase in needs is identified.

2.4.5. There are proposed transition arrangements for authorities that are currently preparing local plans, which will come into effect when the revised guidance and new standard method is published:

- Authorities already at the Regulation 19 stage will be given six months to submit their plan to the Planning Inspectorate for examination;
- Authorities close to publishing their Regulation 19 stage plan will be given three months to publish their plan and then a further six months to submit their plan to the Planning Inspectorate.

2.5 PLANNING FOR THE FUTURE WHITE PAPER

2.5.1. In parallel with the above consultation, but to greater fanfare, the Government also published its 'Planning for the Future' White Paper for consultation in August 2020. There are some very significant and well-documented proposals to reform the current planning system, which will take much longer to implement through new legislation and policy changes. The proposed changes have been met with a mixed reception.

2.5.2. With respect to establishing and delivering housing needs, there is an ambition to introduce “*A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built*”. The future application of the formula proposed in the parallel consultation on changes to the current planning system (discussed above) will therefore be considered in context of the White Paper's proposals.

2.5.3. However, unlike the current standard method, the method in the White Paper “*...would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met*”.

2.5.4. Effectively this means that a top-down 'policy on' figure would be provided by the Government – and be binding on authorities. The approach advocated by the Government is in response to concerns that setting housing requirements through local plans has been a time-consuming process which ultimately has not led to enough land being released where it is most needed and worsening affordability.

2.5.5. The new method will be a means of distributing the national housebuilding target of 300,000 new homes annually, having regard to:

- The size of the existing urban settlements;
- The relative affordability of places;
- The extent of land constraints (including the presence of designated areas of environmental and heritage value, the Green Belt and flood risk);
- Opportunities to better use existing brownfield land for housing;
- The need to make an allowance for land required for non-residential development; and
- Inclusion of an appropriate buffer to ensure enough land is provided to account for the drop off rate between permissions and completions as well as offering sufficient choice to the market.

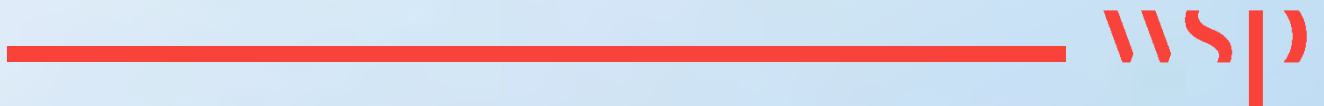
2.5.6. The responsibility would then remain for authorities to allocate land suitable to meet the housing requirement, including through more effective use of existing residential land, greater densification, infilling and brownfield redevelopment, extensions to existing urban areas, or new settlements.



- 2.5.7. It would also be possible for authorities to agree an alternative distribution of their requirement in the context of joint planning arrangements.
- 2.5.8. Consultation on the White Paper closes on 29 October 2020. Any changes would need to be introduced through new primary and secondary legislation and are not expected to come into effect in the immediate short term.

3

ASSESSING SHROPSHIRE'S FUTURE HOUSING NEED



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3.1 SPATIAL PORTRAIT

- 3.1.1. Shropshire is a large, diverse, predominantly rural inland County, situated in the far western corner of the West Midlands Region, on the border with Wales. It has a close relationship and strong sub-regional ties with neighbouring Herefordshire, and Telford and Wrekin will continue to influence the eastern part of Shropshire. As well as being adjoined by several authorities, there are areas beyond this which Shropshire shares a functional relationship with, including Birmingham and the Black Country.
- 3.1.2. A large proportion of the southern part of the County is designated as an Area of Outstanding Natural Beauty (AONB) and the eastern part, to the east and south east of Telford and Wrekin is designated Green Belt.
- 3.1.3. Shrewsbury is the County town and the largest settlement and contains about a quarter of the total population. It is the main commercial, cultural and administrative centre for Shropshire, with a catchment that extends into mid Wales.
- 3.1.4. The main Market Towns of Oswestry, Bridgnorth, Market Drayton, Ludlow and Whitchurch are much smaller and together contain about 20% of the total population. They provide a range of facilities and services for their resident communities and surrounding rural hinterlands. There are a further 13 smaller Market Towns and Key Centres.
- 3.1.5. Outside the Market Towns and Key Centres, the population is spread widely and sparsely with many small settlements, hamlets and dispersed dwellings within the countryside. Overall, around 36% of the population live in rural areas. Rural communities have been affected by the loss of local services such as village shops, post offices, garages and pubs.

3.2 OBJECTIVELY ASSESSED NEED

- 3.2.1. As highlighted in the previous section, paragraph 60 of the NPPF makes clear that to determine the number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method in PPG, unless there are exceptional circumstances that justify an alternative approach.
- 3.2.2. Shropshire Council has been preparing its Local Plan Review since around 2016. Over this time, it has attempted to gather a supporting evidence base to help establish and consult on a suitable housing requirement in the context of changing Government guidance and new projections. We have therefore undertaken an analysis of the various housing requirement figures that have been identified and evolved through subsequent stages of local plan preparation, before benchmarking them against the August 2020 draft standard method.

Adopted Core Strategy (2011)

- 3.2.3. As background context, the current adopted Core Strategy (March 2011) set a requirement of 27,500 dwellings between 2006 and 2026. This target was derived from the emerging (at that time) but now abandoned West Midlands Regional Spatial Strategy. Policy CS10 sets out phasing

measures to enable the managed release of housing land and varies the annual housing requirement by five year time bands.

- 3.2.4. The current requirement is **1,390 dwellings per annum** (dpa) between 2016 and 2021, rising to 1,530 dpa between 2021 and 2026. This equates to an average annualised figure of 1,375 dpa between 2006 and 2026.

Full Objectively Assessed Housing Need (July 2016)

- 3.2.5. Shropshire Council undertook a Full Objectively Assessed Housing Need (FOAHN) in July 2016, using the best practice guidance available at the time to inform the Local Plan Review.
- 3.2.6. The results of this assessment were published in July 2016 and indicated a need for 25,178 dwellings between 2016 and 2036 (**1,259 dpa**).

Issues and Strategic Options (January 2017)

- 3.2.7. The Local Plan Review Issues and Strategic Options published in January 2017 took the FOAHN as a starting point and then presented three different housing requirement options (between 2016 and 2036) for consultation:
- 'Moderate Growth' – 26,250 dwellings (**1,325 dpa**);
 - 'Significant Growth' – 27,500 dwellings (**1,375 dpa**);
 - 'High Growth' – 28,750 dwellings (**1,437 dpa**).

Preferred Scale and Distribution of Development (October 2017)

- 3.2.8. Since the FOAHN assessment was published, the Government subsequently published for consultation a proposed 'standard methodology' on how authorities should calculate housing need.
- 3.2.9. For the consultation on Preferred Scale and Distribution of Development in October 2017, it was calculated that under the Government's proposed draft methodology (at that time) was applied, this would result in a housing need for 25,400 dwellings between 2016 and 2036 (**1,270 dpa**). It was acknowledged that this correlates very closely with the Council's assessment of need in the FOAHN.
- 3.2.10. However, the Council proposed to adopt a 'high growth' housing requirement of 28,750 dwellings between 2016 and 2036 (an average of **1,430 dpa**). This amount exceeded the Government's standard method (at that time) housing need figure by 3,350 homes. It represents the 'high growth' option from the Issues and Strategic Options stage.
- 3.2.11. It was stated that the 'high growth' figure of 1,430 dpa will help support the long term sustainability of the County and provides an opportunity to respond to specific development opportunities, increase the delivery of family and affordable housing, support wider aspirations such as increased economic growth and productivity and increased education opportunities and up-skilling of communities. It was considered that the housing requirement will have a significantly positive impact on supporting the delivery of the County's Economic Growth Strategy (July 2017), reinforce Shropshire's role within the wider region and help support the delivery of the objectives of the West Midlands Combined Authority.
- 3.2.12. Following the close of consultation, in September 2018 the Government introduced the original standard method formula in PPG. This coincided with ONS publishing the 2016-based household projections. For Shropshire, this resulted in generating a housing requirement figure of **1,853 dpa**.

Preferred Sites (November 2018)

- 3.2.13. In November 2018, the Council consulted on the Preferred Sites document which proposed to carry forward the 'high growth' housing requirement of 28,750 dwellings between 2016 and 2036 (an average of 1,430 dpa) from the Preferred Scale and Distribution of Development document.
- 3.2.14. There was no reference within the document to the introduction of the original standard method formula in September, which suggested a higher housing requirement figure of 1,853 dpa.

Strategic Sites (July 2019)

- 3.2.15. In July 2019, the Council consulted on the Strategic Sites document which set out its preferred strategic sites (large sites of more than 25 ha in size) which are not associated with meeting the growth needs of any particular settlement and contribute to achieving the aspirations of the Economic Growth Strategy for Shropshire. However, this document did not revisit the housing requirement figure (November 2018) previously published within the Preferred Sites consultation in November 2018.
- 3.2.16. In the intervening period between Preferred Sites (November 2018) and Strategic Sites (July 2019), the Government made a short-term change to the standard method introduced through changes to the NPPF and PPG in February 2019. This advocated the use of the 2014-based household projections, rather than the 2016-based projections which mainly predicted lower household growth. The change was apparently made to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. The resulting figure for Shropshire from the 'tweaked' or 'current' standard method is 1,177 dpa.
- 3.2.17. Subsequent to the consultation on Strategic Sites, in February 2020, the Council agreed to extend the emerging Local Plan Partial Review plan period by a further two years to 2038.

Regulation 18 Pre-Submission Draft Local Plan (August 2020)

- 3.2.18. Policy SP2 of the Pre-Submission Draft of the Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings, equating to around **1,400 dpa**.
- 3.2.19. The Council recognises that this represents a marginally lower growth level than that proposed in the Preferred Scale and Distribution of Growth consultation in October 2017 (1,430 dpa).
- 3.2.20. The Council states that this level of housing growth proposed across the 22 years covered by the plan period seeks to respond in the first instance to the most up-to-date calculation of housing need in the County as a basis, currently 25,894 dwellings over the plan period (1,177 dpa), and then accommodates an additional uplift in this capacity in order to respond positively to the overall 'high growth' strategy.

Local Housing Need Assessment (August 2020)

- 3.2.21. In the supporting evidence base accompanying the plan is a Local Housing Need Assessment (August 2020). At paragraph 1.9 of this report, it states "*Shropshire Council considers that it is appropriate to use Government's standard methodology to assess [Local Housing Need] for Shropshire, as it supports the stated objectives of this methodology... to:*
- *Provide a clear and transparent process for local people and other interests to understand;*
 - *Base the assessment of publicly available data;*

- *Ensure the assessment is realistic and reflects the actual need for homes in each area, taking into account the affordability of homes locally.”*

- 3.2.22. The calculations within Shropshire’s Local Housing Need Assessment report appear to have been undertaken before the Government published its consultation on the proposed change to the standard method (also in August 2020), as there is no reference to the Government’s suggested new approach.
- 3.2.23. Notwithstanding this, the report follows the current (i.e. February 2019) approach to the standard method and confirms that the figure is 25,894 dwellings over the plan period (1,177 dpa), based on the 2014 sub-national household projections. For comparison purposes, the report also applies the 2016 household projections to calculate a similar figure of 25,905 dwellings over the plan period.
- 3.2.24. By way of background context, the report also sets out the five calculations of local housing need that have been undertaken by Shropshire Council over time. We note that the latest calculation following the current standard method undertaken in April 2020 (1,177 dpa) generated the lowest local housing need figure. In comparison, the highest figure identified was 27,947 dwellings over the plan period (1,270 dpa) and the average of all five figures was 27,137 (1,233 dpa).

THE PROPOSED STANDARD METHOD (AUGUST 2020)

- 3.2.25. Paragraph 60 of the NPPF makes clear that to determine the number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method in PPG, unless there are exceptional circumstances that justify an alternative approach.
- 3.2.26. In August 2020, the Government published a consultation on proposed changes to the standard method. As highlighted in the previous section, the revised method attempts to respond to well-documented criticisms of the current standard method – chiefly that it failed to meet the Government’s target for delivering 300,000 dpa across England.
- 3.2.27. For Shropshire Council, the 2020 proposed standard method results in requirement of **2,129 dpa**. When applied to the plan period between 2016 and 2038, this equates to a requirement of 46,838 dwellings (2,129 dpa x 22 years). This is a significant step-change in the requirement for the County and if taken forward in its current form, would be a game changer for the Local Plan Review.

Table 3-1 – Comparison of the proposed 2020 Standard Method with other requirements

Shropshire Council	2020 Standard Method (Proposed)	Adopted Core Strategy requirement	Emerging Local Plan requirement	2019 Standard Method (Current)	2016-2019 Average Delivery
Annual requirement	2,129 dpa	1,375 dpa	1,400 dpa	1,177 dpa	1,876 dpa
<i>Difference</i>	-	+754 dpa	+729 dpa	+952 dpa	+253 dpa
Plan period requirement (2016-2038)	46,838	30,250	30,800	25,894	41,272
<i>Difference</i>	-	+16,588	+16,038	+20,944	+5,566
<i>Change</i>	-	+55%	+52%	+81%	+13%

Source: Ministry of Housing, Communities & Local Government (August 2020); Shropshire Council

- 3.2.28. In Table 3-1 we have undertaken a comparison of the 2020 proposed standard method for Shropshire against four other benchmark figures. The most relevant being the 52% increase above the housing requirement figure proposed by the Pre-Submission Draft Local Plan (1,400 dpa). Over 22 years of the plan, the cumulative difference between the two figures equates to an additional 16,038 dwellings, or the equivalent of 12 years' of the 1,400 dpa housing requirement figure.
- 3.2.29. As context, the increase between the existing and the 2020 proposed standard method is 81% or a total of 20,944 dwellings (952 dpa) over the plan period. When compared against the current adopted Core Strategy requirement, there is an increase of 55% or a total of 16,588 dwellings (754 dpa).
- 3.2.30. Interestingly, when compared against recent delivery (between 2016 and 2019), the proposed 2020 standard method only results in an increase of 13% or 253 dpa above those average completion rates (1,876 dpa). Furthermore, we note that there were 1,910 net completions in Shropshire in 2016/17 – which illustrates that the housing market, even operating under existing policies, can potentially sustain delivery rates of this magnitude.
- 3.2.31. Although the standard method is under consultation and is subject to change, it is anticipated that the final method will be implemented through changes to PPG by the end of 2020, most likely announced in the Autumn Statement in November. Shropshire Council therefore needs to carefully consider how it proceeds with its Local Plan Review in light of these changes, mindful of the transitional arrangements (which themselves may be subject to change).

3.3 UNMET NEED FROM NEIGHBOURING AREAS

- 3.3.1. Paragraphs 11, 35, 60 and 65 of the NPPF make clear that housing requirement figures should as a minimum meet the authority's own OAN as well as any needs that cannot be met within neighbouring areas, and that this need should be accommodated where it is practical to do so and is consistent with achieving sustainable development. PPG emphasises that agreements between authorities should be set out within a Statement of Common Ground (SoCG). This is one of the key 'tests of soundness' – in demonstrating that plans must be 'positively prepared'.
- 3.3.2. Shropshire is a large County which forms part of the West Midlands region and is adjoined by several authorities, and there are areas beyond this which Shropshire shares a functional relationship with. It is understood that officers have been engaged in discussions with these areas over the course of the plan preparation process and that a series of SoCGs will be prepared and agreed with Shropshire's neighbours ahead of the proposed submission of the Local Plan in January 2021.

Black Country Authorities Unmet Housing Need

- 3.3.3. Based upon the discussions to date, Shropshire Council identifies that the only cross boundary issue requiring recognition and intervention in the Local Plan Review is with the Association of Black Country Authorities (ABCA) as part of the ongoing preparation of their joint Black Country Local Plan. The issue relates to the lack of capacity in the ABCA area to accommodate all their defined housing and employment needs in their area in a sustainable manner. This has resulted in ongoing discussions and agreement with a number of their neighbouring authorities (including Shropshire) to accommodate varying amounts of this unmet need.

- 3.3.4. At a meeting of its Cabinet on 20 July 2020, Shropshire Council resolved to agree the principle of accepting up to 1,500 dwellings from ABCA as part of the Duty to Cooperate, and for these to be incorporated into Shropshire's overall housing requirement up to 2038 and to be distributed in accordance with the overall strategic approach to the distribution of growth (outlined in Policy SP2). The Council considers that this offer responds positively and constructively to the needs of ABCA, an area with close links to Shropshire.
- 3.3.5. It is proposed that the Shropshire housing requirement of 30,800 dwellings incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, resulting from constraints to their housing supply opportunities to 2038.
- 3.3.6. It is understood that this unmet need stems from an Urban Capacity Study published by the ABCA in December 2019 which identified a shortfall of about 26,920 homes which cannot be accommodated in the region and outlined a need to build houses in neighbouring authorities.
- 3.3.7. This need stems from an Urban Capacity Study published by the ABCA in December 2019 which identified a shortfall of about 26,920 homes which cannot be accommodated in the region and outlined a need to build houses in neighbouring authorities.
- 3.3.8. The Black Country is surrounded by the following authorities: Birmingham; Lichfield; Cannock Chase; South Staffordshire; Telford and Wrekin; Shropshire; Wyre Forest; and Bromsgrove. We have undertaken a review of their adopted and emerging plans to understand the ability of those authorities to accommodate an element of ABCA's unmet housing need.

Birmingham

- 3.3.9. The Birmingham Development Plan (BDP) 2031 was adopted by Birmingham City Council on 10 January 2017. There are no current plans to prepare a new Local Plan. Birmingham was unable to meet its own housing needs and therefore surrounding authorities were required to meet some of the Council's own unmet needs.

Lichfield

- 3.3.10. The Lichfield District Local Plan Review was published in November 2019. The draft Plan states that Lichfield will make provision for at least 11,800 dwellings between 2018 and 2040. This equates to an annual requirement of 536 dpa. This will contribute to the delivery of the Council's local housing need of 331 dpa and its contribution of 4,500 dwellings to assist in meeting the unmet needs arising from the housing market area.

Cannock Chase

- 3.3.11. Cannock Chase Local Plan Issues and Options consultation (May 2019) proposes that the Plan will test accommodating between 500 and 2,500 homes of unmet need from the housing market area.

South Staffordshire

- 3.3.12. South Staffordshire published its Local Plan Spatial Housing Strategy and Infrastructure Delivery in October 2019. The Council remains of the view that planning for its own housing needs, plus a contribution of up to 4,000 dwellings towards unmet needs in the wider housing market area is the most appropriate housing target for the Local Plan Review at this point in time.
- 3.3.13. The latest consultation document identifies an area of search for a new settlement to be delivered beyond the plan period which would be established along the A449 corridor. This recognises the

potential longer-term opportunities in this location which may be explored following the plan's adoption, through reviews of the Local Plan or a separate Garden Village Development Plan Document (DPD).

Telford and Wrekin

- 3.3.14. The Telford and Wrekin Local Plan was adopted in January 2018. It did not accommodate any unmet need from neighbouring authorities. Consultation on the Issues and Options of the Local Plan Review is expected in October 2020.

Wyre Forest

- 3.3.15. Wyre Forest published its revised Local Plan Pre-Submission document for public consultation in September 2019. It is not planning to meet any unmet needs from ABCA.

Bromsgrove

- 3.3.16. Bromsgrove District Council published its further Local Plan Issues and Options consultation in September 2019. The consultation reaffirmed the Council's intention to allocate the unmet need of 2,300 dwellings from the West Midlands conurbation.

Residual unmet need

- 3.3.17. In total, those authorities which intend to provide for unmet housing needs arising from the West Midlands and Black Country conurbation include provision for a total of 13,300 dwellings.
- 3.3.18. Taking into account the unmet need of ABCA of 26,920 dwellings, this leaves a remaining requirement of 13,620 dwellings that will need to be met elsewhere. The contribution by Shropshire of up to 1,500 dwellings makes only a relatively small (11%) contribution towards this residual need.

3.4 ECONOMIC GROWTH

Economic Growth Strategy for Shropshire (July 2017)

- 3.4.1. The Economic Growth Strategy for Shropshire (2017-2021) published in July 2017 sets out Shropshire Council's commitment and ambition to grow the economy of the County. The strategy identifies the need for a 'step change' in Shropshire's economy to:

- Reduce levels of out-commuting;
- Retain employment and skills locally;
- Increase productivity; and
- Address housing affordability issues.

- 3.4.2. The aim of the Economic Growth Strategy is to provide the vision and ambition that will direct the actions Shropshire Council will take to achieve increased economic productivity and a prosperous and resilient economy. Shropshire Council is committed to growing the local economy.

- 3.4.3. The Council's Economic Growth Vision for Shropshire is:

'To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high quality assets.'

- 3.4.4. The strategy states that Shropshire is a high quality location and has a generally well performing economy. It has one of the best natural and historic environments in England. It already has a reputation for being a fantastic place to live and having an economically active population with higher levels of qualifications than the national or regional average. Shropshire communities enjoy an exceptionally high quality of life and environment, with vibrant historic market towns, an Area of Outstanding Natural Beauty, and one of the highest concentrations of historic monuments and buildings in the country.
- 3.4.5. The strategy states that the Council will use these assets to attract investment and will continue to nurture them to ensure they are sustained for current and future generations to enjoy.
- 3.4.6. The strategy recognises that a step change is needed in Shropshire's economic productivity. It has significant potential to do more and do it better. To realise the Council's ambition to facilitate sustainable economic growth, it states that it will be focused and committed to achieving maximum economic productivity from the assets and opportunities across the County.
- 3.4.7. This will be based on three key objectives, namely to:
- Support and grow new and existing businesses;
 - Attract inward investment; and
 - Develop and retain talent and skills
- 3.4.8. To deliver against its vision, the Council has identified six priority actions. These are to:
1. Target actions and resources where there are economic opportunities;
 2. Enable businesses to start, grow and succeed;
 3. Deliver infrastructure to support growth;
 4. Meet skills needs of businesses and people's aspirations for work;
 5. Promote Shropshire to investors; and
 6. Build its reputation as a Council that is 'good to do business with'.
- 3.4.9. In order to achieve Shropshire Council's ambition for growth, and to support the Marches LEP ambitions and targets to build 70,000 new homes and create 40,000 new jobs by 2031, together with the West Midlands Combined Authority's ambitious plans for growth, the Economic Growth Strategy sets the following targets in Shropshire over the next five years (to 2021):
- Increase GVA (currently £6 billion) by 12%;
 - Secure £300 million of private sector investment into the County;
 - At least 3,700 new jobs;
 - 1,375 new homes per annum.
- 3.4.10. The Economic Growth Strategy identifies a number of key opportunities in Shropshire.
- Major employment sites and growth corridors
- 3.4.11. The strategy identifies a number of strategic corridors and growth zones. These include the M54/A5 East growth corridor which is linked to investment in Telford and the clustering and supply chain opportunities from existing and future companies in this part of the County. This is a key road and rail transport corridor which reinforces Shropshire's proximity to the West Midlands.

Target growing and under-represented sectors

- 3.4.12. Shropshire and the Marches have a number of sectors that are performing well with extremely successful companies. The Council's strategy includes working with companies in these sectors to support their growth and ongoing success. The Council will support innovative and advancing solutions in these sectors to enable their growth in an ever competitive global economy.
- 3.4.13. The Council has identified six existing sectors where there is growth potential, particularly with an emphasis on technologies and innovation:
- Advanced manufacturing including engineering, agri-food and agri-tech;
 - Food and drink processing;
 - Health and social care;
 - Visitor economy (and heritage based businesses);
 - Environmental science and technologies; and
 - Creative and digital industries.
- 3.4.14. The Economic Growth Strategy identifies a number of immediate and short/medium term actions that it will focus on delivering to realise the potential of the key opportunities above. These include:

Immediate actions

- Prepare a coherent visitor economy strategy alongside the sector, including those which provide a heritage based offer, that clearly sets out the ambitions and opportunities and is clear on the Council's role within it.

Short/medium term actions

- Promote a strategic 'plan-led' approach to housing and employment development and use the local plan review to support this;
- Support growth opportunities in the agri-tech sector by working with Harper Adams University and partners to become leaders in this field and develop the agri-tech West proposition;
- Strategically understand Shropshire's natural and historic environment assets, knowledge and expertise, and the ways in which they can be used as resources;
- Support the University Centre Shrewsbury ambitions to become a centre of excellence for environmental sciences, technology and management and create an environmental innovation hub.

Regulation 18 Pre-Submission Draft Local Plan (August 2020)

- 3.4.15. Policy SP2 (Strategic Approach) sets out a requirement of 300 hectares (ha) of employment land between 2016 and 3038, equating to around 15 ha per annum.
- 3.4.16. The supporting text states that this requirement seeks to implement the aspirations of the Economic Growth Strategy for Shropshire and provide a sufficient scale of employment land to deliver enough jobs to achieve a sustainable balance with the housing requirement.
- 3.4.17. Policy SP10 (Shropshire Economic Growth Strategy) part 5 states that the delivery of employment will be supported by investment in housing of the right type, quality, tenure and affordability, in the right locations with jobs, services, facilities and leisure to make Shropshire a good place to live, work and play.

3.5 HOUSING SUPPLY

Historic dwelling completion rates

- 3.5.1. Shropshire’s latest Five Year Housing Land Supply Statement (31 March 2019) published 16 March 2020 states that a total of 16,531 dwellings were completed over the period 2006/07 to 2018/19. This equates to an average delivery rate of **1,272 dpa**.
- 3.5.2. However, we attach limited weight to this figure as the number of net completions witnessed reflects the supply of housing development sites in the County which were found to be in compliance with adopted planning policy (at the time). It therefore represents a supply based (i.e. ‘policy on’) requirement, rather than a requirement which is based on housing need. Nonetheless, it provides a useful contextual benchmark of housing delivery.

Housing Delivery Test

- 3.5.3. The latest HDT 2019 results were published by the Government in February 2020. They provide an analysis of an authority’s performance against housing requirements over a previous three year period. Shropshire’s results are shown in Table 3-1.

Table 3-2 – Housing Delivery Test Results 2019

Shropshire	2016/17	2017/18	2018/19	Three Year Total	Three Year Average
Homes delivered	1,910	1,876	1,843	5,629	1,876
Homes required	1,003	1,013	1,263	3,278	1,093

Source: Ministry of Housing, Communities & Local Government (February 2020)

- 3.5.4. The figures confirm that over the three year period between 2016/17 and 2018/19, a total of 5,629 dwellings were completed. This equates to an average delivery rate of **1,876 dpa**.
- 3.5.5. When compared against the historic dwelling completion rates (above), these represent a higher rate of delivery than has been witnessed over the longer-term. This gives confidence that the housing market within Shropshire can sustain higher rates of delivery. However, we still attach limited weight to this figure as it still represents a supply based (i.e. ‘policy on’) requirement, and indeed covers a short period of time.
- 3.5.6. Incidentally we note that Shropshire’s 2019 HDT performance was 172% – anything above 100% represents good performance as, in simple terms, it means that more dwellings have been delivered than were ‘required’. As such, the Government currently require no action to be taken by the Council, but this position will change over time. We note that the 2020 HDT results are due to be published in November each year (albeit they have been published late in the last two years – in February).
- 3.5.7. However, we would caution that this perceived good performance is due to the way that HDT results are calculated following transitional arrangements in the published HDT Measurement Rule Book (July 2018). This stipulates that the minimum annual local housing need figures in years 2016/17 and 2017/18 are replaced by 2012-based and 2014-based household projections respectively, which are lower than both the adopted Core Strategy requirement and the current standard method, so it presents an artificial picture of ‘good’ delivery.

3.6 AFFORDABILITY

- 3.6.1. A Strategic Housing Market Assessment (SHMA) Report (Part 1) was published by Shropshire Council in March 2020. It was produced in response to the requirement in PPG to build a clear understanding needs in the area. There is no explanation as to what Part 2 of the SHMA will contain, but at this stage we have been unable to obtain a copy as at the time of writing it was not available within the Council’s online published evidence base.
- 3.6.2. Paragraph 3.15 of the Regulation 18 Pre-Submission Draft Local Plan states the SHMA 2020 “...for Shropshire concluded that during the Local Plan period from 2016 to 2038 an estimated 799 households per year will require affordable housing”. However, there is no further explanation of how this figure translates into a number of dwellings. We therefore assume the Part 2 SHMA contains the calculation of the level of affordable housing need and the size and tenure of all dwellings within the OAN – but to not publish this alongside the plan for consultation is a clear omission.
- 3.6.3. Therefore, to build our understanding of the level of affordable housing need within Shropshire, we have turned to the older (now outdated) SHMA published in March 2014. Table 4.4 of the 2014 SHMA identifies an estimated affordable housing need is between **469 to 997 dpa**. This equated to an equivalent of between 34% to 72% of Shropshire’s adopted housing requirement – 1,390 dpa from the 2011 Core Strategy.
- 3.6.4. PPG and the Government’s recent ‘Changes to the current planning system’ (August 2020) consultation place emphasis on the importance of affordability ratios. Using this metric, it is considered that Shropshire struggles to provide affordable housing for those on low incomes, which indicates that a higher level of affordable housing is needed amongst lower income households compared to similar authorities, and nationally. This is recognised and highlighted in part one of the SHMA (2020).
- 3.6.5. When considering the Place Plan Areas, Much Wenlock is considered far less affordable than the rest of Shropshire, and the country. The SHMA indicates that Much Wenlock needs higher levels of affordable housing if it is to reduce its affordability ratio (9.5) to be in conformity with the rest of Shropshire (8.7).
- 3.6.6. Increasing the overall number of dwellings required would place the Council in a much better position to meet its affordable housing target – as a proportion of new homes delivered. Therefore, an increase in houses delivered will mean an increase in affordable houses delivered. This increased supply in both affordable and market housing will increase the availability housing for those on low incomes or are trying to get onto the housing ladder. As identified, Much Wenlock (including the settlement of Cressage and the wider Raby Estate) is one such place where housing is considered unaffordable, therefore this would be a logical area to increase housing provision.

3.7 SUMMARY OF IDENTIFIED HOUSING NEED

- 3.7.1. Table 3-1 and Figure 3-1 provide a summary of the various housing requirement figures that have been identified in this HNA. The housing requirement figures have been ranked in the chronological order in which they were identified – starting with the adopted Core Strategy figure of 1,375 dpa, right up to the 2020 proposed draft standard method figure of 2,129 dpa.

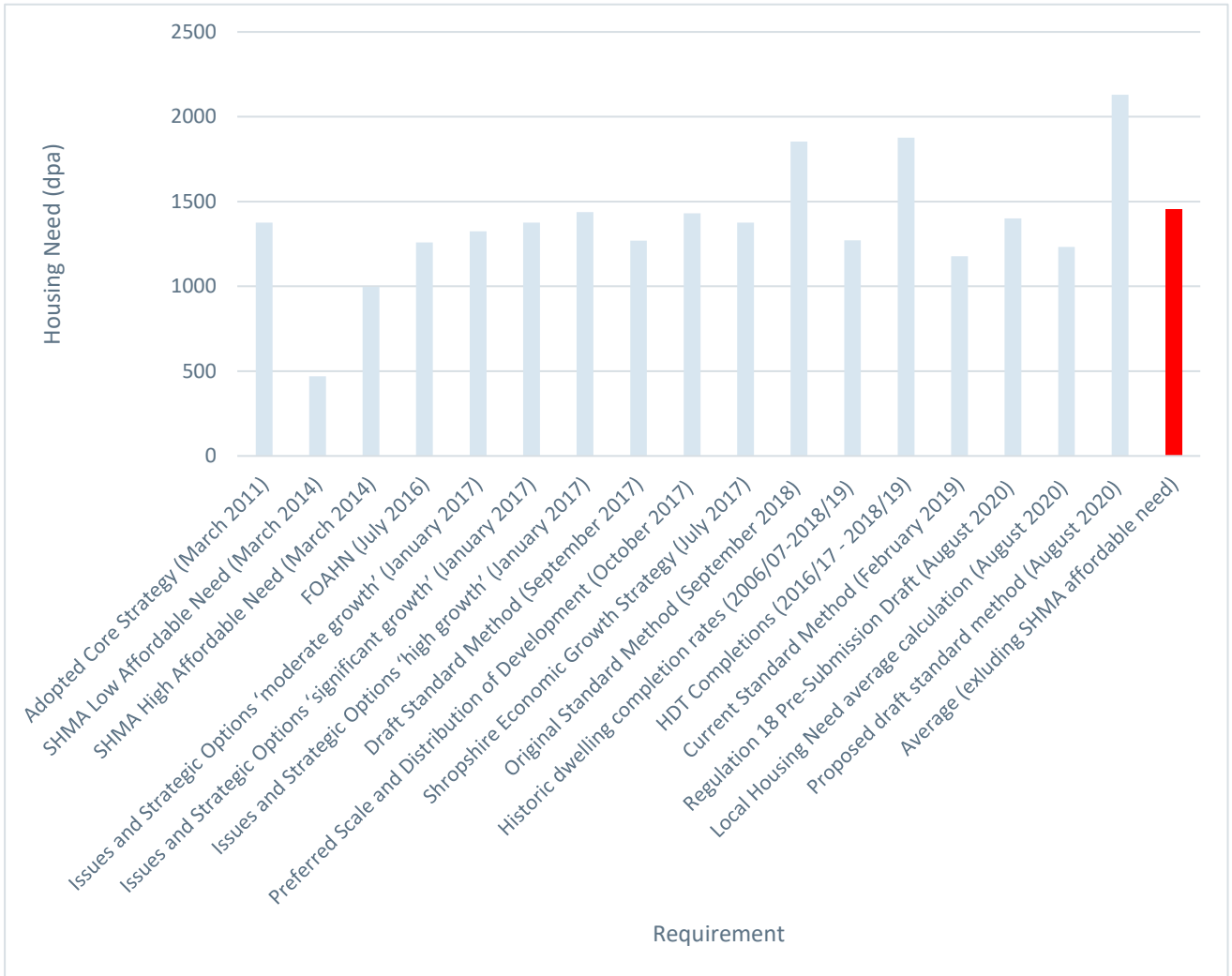
3.7.2. It is relevant to note that the average of all these figures (excluding the SHMA affordable need figures, which only represent one component of the County’s overall housing need) is still higher than the proposed housing requirement figure of 1,400 dpa.

Table 3-3 – Summary of Identified Housing Requirements for Shropshire

Housing Requirement	Housing Need (dpa)
Adopted Core Strategy (March 2011)	1,375
SHMA Low Affordable Need (March 2014)	469
SHMA High Affordable Need (March 2014)	997
FOAHN (July 2016)	1,259
Issues and Strategic Options ‘moderate growth’ (January 2017)	1,325
Issues and Strategic Options ‘significant growth’ (January 2017)	1,375
Issues and Strategic Options ‘high growth’ (January 2017)	1,437
Draft Standard Method (September 2017)	1,270
Preferred Scale and Distribution of Development (October 2017)	1,430
Shropshire Economic Growth Strategy (July 2017)	1,375
Original Standard Method (September 2018)	1,853
Historic dwelling completion rates (2006/07 - 2018/19)	1,272
HDT Completions (2016/17 - 2018/19)	1,876
Current Standard Method (February 2019)	1,177
Regulation 18 Pre-Submission Draft (August 2020)	1,400
Local Housing Need average calculation (August 2020)	1,233
Proposed draft standard method (August 2020)	2,129
Average (excluding SHMA affordable need figures)	1,452

Source: Ministry of Housing, Communities & Local Government; Shropshire Council

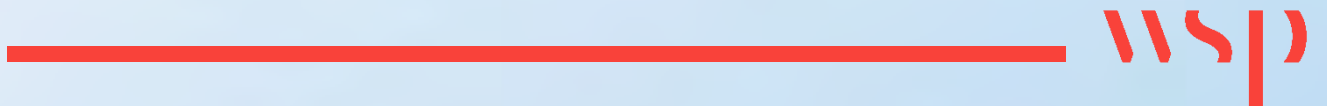
Figure 3-1 – Summary of Identified Housing Requirements for Shropshire



Source: Ministry of Housing, Communities & Local Government; Shropshire Council

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MEETING SHROPSHIRE'S FUTURE HOUSING NEED



4 MEETING SHROPSHIRE'S FUTURE HOUSING NEED

4.1 REVISITING THE STRATEGIC APPROACH

- 4.1.1. Policy SP2 (Strategic Approach) of the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares (ha) of employment land. This equates to around 1,400 dpa and 15 ha of employment land per annum.
- 4.1.2. The supporting text to the policy states that the Council has undertaken a local housing need assessment using the Government's current standard method, which indicates a need of 25,894 dwellings over the plan period from 2016 to 2038 (1,177 dpa). It states that the housing requirement for Shropshire of around 30,800 dwellings over the plan period between 2016 and 2038 (1,400 dpa) will meet housing need and support the long-term sustainability of the County.
- 4.1.3. The Council also considers that the 1,400 dpa requirement provides some flexibility to respond to changes to housing need over the plan period and an opportunity to:
- a) Respond positively to specific sustainable development opportunities;
 - b) Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;
 - c) Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;
 - d) Support the diversification its labour force; and
 - e) Support wider aspirations, including increased economic growth and productivity.

The Raby Estate's concerns with the strategic approach

- 4.1.4. We are concerned that the proposed strategic approach does not reflect the latest proposed 2020 standard method figure of 2,129 dpa. The new standard method represents a 52% increase in housing requirements above the emerging Local Plan figure (1,400 dpa) which raises significant doubts over the soundness of the current strategic approach set out in Policy SP2. This should be addressed before the plan proceeds to Examination.
- 4.1.5. Paragraphs 11, 35, 60 and 65 of the NPPF make clear that housing requirement figures should as a minimum meet the authority's OAN. In our view, the minimum figure that ought to be provided in Shropshire over the plan period between 2016 and 2038 is the one set out by the proposed 2020 standard method of 2,129 dpa.
- 4.1.6. Although the standard method is under consultation and is subject to change, it is anticipated that the final method will be implemented through changes to PPG by the end of 2020, most likely announced in the Autumn Statement in November. Shropshire Council therefore needs to carefully consider how it proceeds with its Local Plan Review in light of these changes. In our view, there would be a very significant risk to the examination and hence adoption of the plan proceeding if the Council did not pause preparation to consider the implications of the changes on the plan and its strategy, and then re-consult on a revised approach prior to the Regulation 19 stage.
- 4.1.7. If the plan is taken forward in its current form, then over the plan period (between 2016 and 2038), the deficit between the two requirements will result in a total shortfall of 16,038 dwellings that will not

be provided. This represents the equivalent of 12 years of the proposed requirement (1,400 dpa) which Shropshire will be failing to meet. The existing approach therefore does not deliver a significant quantum of housing within the plan period to meet these identified needs.

- 4.1.8. In addition, the difference between the current and the 2020 proposed standard method is 81% or an increase of 20,944 dwellings (952 dpa) over the plan period. Given that the standard method is a minimum figure, Shropshire Council would potentially need to uplift the 2,129 dpa figure even further if it is to realise its 'high growth' aspirations set out within the Economic Growth Strategy for Shropshire.
- 4.1.9. A higher housing requirement figure would also help contribute towards the delivery of a greater number of affordable housing.
- 4.1.10. In our view, Shropshire Council should take advantage of the publication of the new standard method to pause, take stock and revisit its proposed strategic approach. Specifically, it should consider and consult on the opportunity that the Raby Estate provides to help meet the identified increase in the housing requirement through a revised strategic approach.
- 4.1.11. As highlighted in our separate representations, the Raby Estate provides the following opportunities to help meet a higher housing requirement:
- Beslow – creation of a new settlement of up to 3,500 dwellings alongside 17 ha of employment land, community uses and infrastructure;
 - Shore Lane, Cressage – provision of up to 80 dwellings with a mix of tenures;
 - Whole Estate – delivery of small-scale housing to meet needs arising across the Whole Raby Estate.
- 4.1.12. However, if Shropshire decides to proceed with its existing approach and tries to progress the plan through Examination and adoption under the proposed transitional arrangements (which themselves are subject to change), it does so at significant risk. It is likely that the Examination will be dominated by lengthy debates over the appropriate housing requirement figure that should be applied and how Shropshire ought to have a strategy that properly deals with it. We expect that further justification, evidence and consultation would be required, leading to more delay – the exact opposite of what the Government are trying to achieve.
- 4.1.13. In our view, a short pause to reconsult on a new strategy to take into account the above would be far preferable to delaying the Local Plan Review indefinitely in anticipation of the 'Planning for the Future' White Paper proposals, given that it may take a number of years before the relevant legislation and guidance comes into effect. In the meantime, the requirement to update plans every five years will still apply – acknowledging the Core Strategy was adopted in March 2011. The intention should still be to progress the current plan swiftly, albeit one that properly addresses the housing requirement supported by a balanced new strategic approach.
- 4.1.14. In addition, from a supply perspective, there is a very real risk that the Council would not be able to demonstrate a 5YHLS against the new standard method figure, if it were to come into effect for decision making. This leaves Shropshire potentially open to unfavourable applications being submitted (on open countryside, valued green spaces within urban areas, existing employment sites or sites allocated for other uses), which ultimately may need to be approved due to the 'tilted balance' in favour of housing development in 'the presumption in paragraph 11 of the NPPF. In our view, it would be much more logical to allocate additional sites that the Council has control of in the plan making stage, rather than fighting 5YHLS applications and planning by appeal.

SETTLEMENT HIERARCHY AND DISTRIBUTION OF DEVELOPMENT

- 4.1.15. In terms of the proposed settlement hierarchy and distribution of development, Policy SP2 states that:
- a) **Shrewsbury** – will act as a focus for well-designed new housing and employment development;
 - b) **Principal and Key Centres** – will accommodate significant well-designed new housing and employment development, supported by necessary infrastructure;
 - c) **Strategic Settlements** – at Clive Barracks (Tern Hill) and Former Ironbridge Power Station will form successful, well-designed and sustainable communities, delivering new housing and employment development;
 - d) **RAF Cosford Strategic Site** – will form a centre of excellence for aviation and engineering, meet military personnel accommodation needs and support the aspirations of the Ministry of Defence, the RAF Museum and the Midlands Air Ambulance Charity.
- 4.1.16. Policies S1 – S18 contain the settlement policies. These policies are grouped by areas which reflect approximate functional zones of influence (known as Place Plan Areas). Place Plan Areas generally consist of a main centre, its surrounding settlements and rural hinterland.
- 4.1.17. However, it is not clear how the Place Plan Areas (within Policies S1-S18) fit in with this hierarchy, or indeed how much and what proportion development is to be directed to them – whether this be through existing consents, existing allocations, proposed new allocations or a windfall allowance. In our view, this undermines the Place Plan Area approach, which is not entirely justified.

The Raby Estate's concerns with the settlement hierarchy and the distribution of development

- 4.1.18. We have set out concerns with the proposed housing requirement above, which illustrates that the strategic approach is now undermined in light of the proposed 2020 standard method. Clearly, the way that the strategic approach proposes to distribute housing growth will not be sufficient to meet a figure of 2,129 dpa – an additional 16,038 dwellings, or 12 years' worth of housing, is required. A completely new approach to distributing development within the County over the plan period will therefore be required.
- 4.1.19. Even if the existing housing requirement figure of 1,400 dpa is taken forward and accepted by the Inspector, we have significant doubts over Shropshire's ability to meet it through the growth that is currently proposed to be directed to Shrewsbury, Principal and Key Centres and Strategic Settlements (in Policy SP2) alone.
- 4.1.20. We note that Appendix 5 and 7 of the Pre-Submission Draft Local Plan attempt to provide a breakdown of the quantum, proportion and phasing of development proposed, but this is not easily interpreted. There does not appear to be a comprehensive condensed table which summarises the intended strategic approach to the settlement hierarchy and distribution of development within Shropshire. For instance, it is unclear how growth is being directed to the Place Plan Areas, under Policies S1-S18.
- 4.1.21. Notwithstanding this, we have we have attempted to consolidate the proposed distribution in Table 4-1. However, we would like to emphasise that it has not been possible analyse this at a more granular level for the Place Plan Areas.

Table 4-1 – Pre-Submission Draft Local Plan housing breakdown (total)

Supply category	No.	%
Completions since 2016 (as at 31 March 2019)	5,629	18%
Sites with PP (as at 31 March 2019)	10,083	32%
SAMDev Allocations without PP (as at 31 March 2019)	3,626	12%
Proposed allocations	7,495	24%
Proposed Ironbridge Strategic Settlement	1,000	3%
Proposed Clive Barracks, Tern Hill Strategic Settlement	750	2%
Windfall Allowance	2,551	8%
Total	31,134	100%

Source: Shropshire Regulation 18 Pre-Submission Draft Local Plan (August 2020)

- 4.1.22. Based on the above, the Council has identified a total of 31,134 dwellings to be delivered in Shropshire in the plan period (between 2016 and 2038). Compared to the proposed plan requirement of 30,800 dwellings identified in Policy SP2, this supply equates to a **surplus of just 334 dwellings** or 1%. Clearly this is a dangerously low ‘safety buffer’ which places the plan at risk of failure. The issue is compounded further when the identified supply is compared against the 2020 proposed new standard method – there would be a supply **shortfall of 15,704 dwellings** or 34% against a plan period requirement of 46,838 dwellings (2,129 dpa x 22 years).
- 4.1.23. In addition, given that the proposed strategy places trust in 13,709 dwellings or 44% of the total supply being delivered at the same quantum and phasing as envisaged by existing planning permissions and allocations, in our view is a significant risk to the achievement of the overall housing requirement.

Table 4-2 – Pre-Submission Draft Local Plan housing breakdown (residual)

Supply category	No.	%
Proposed allocations	7,495	64%
Proposed Ironbridge Strategic Settlement	1,000	8%
Proposed Clive Barracks, Tern Hill Strategic Settlement	750	6%
Windfall Allowance	2,551	22%
Total	11,796	100%

Source: Shropshire Regulation 18 Pre-Submission Draft Local Plan (August 2020)

- 4.1.24. Notwithstanding this, we calculate that there is a potential total of 11,462 dwellings remaining to be delivered by the end of the plan period in 2038. 5,629 dwellings have already been completed since the start of the plan period (between 1 April 2016 and 31 March 2019), a further 10,083 dwellings

have planning permission and 3,626 dwellings are already allocated by the Site Allocations and Management of Development (SAMDev) Plan. Table 4-2 summarises how the Pre-Submission Draft Local Plan proposes to deal with the residual requirement.

- 4.1.25. Based on the above, 22% of the residual supply is anticipated to be delivered by windfall sites, which is a significant proportion. Given that this is only an estimated source of supply based on historic trends being projected forward, it cannot be counted as a meaningful and reliable source of supply. Whilst we critique the windfall allowance below, we note that the surplus of 334 dwellings represents 13% of the total windfall allowance of 2,551 dwellings. Such a large windfall allowance increases the risk of the plan's failure.

4.2 ACCOMMODATING MORE UNMET NEED FROM ABCA

- 4.2.1. ABCA have been in discussions with its neighbours to ascertain who can accommodate a proportion of its unmet housing needs. Shropshire Council has resolved to meet up to 1,500 dwellings from ABCA and that these are incorporated into the requirement for 30,800 dwellings over the plan period (1,400 dpa).

The Raby Estate's concerns with meeting unmet need from ABCA

- 4.2.2. Whilst we support the principle of meeting unmet needs from neighbours, we have two main concerns with the approach that Shropshire is taking:
1. There is no detail or justification as to why Shropshire can only accommodate 1,500 homes; and
 2. We suspect that it is simply a result of the current standard method figure of 1,177 dpa (i.e. the 'minimum' that Shropshire has to provide) being rounded up to 1,400 dpa and being repackaged as meeting unmet housing needs of ABCA.
- 4.2.3. As we examined in the previous section, only the authorities of Shropshire, Lichfield, Cannock Chase, South Staffordshire, Bromsgrove are proposing to contribute towards meeting the unmet needs arising from the West Midlands and Black Country conurbation. However, this leaves a remaining residual requirement of 13,620 that will need to be met elsewhere.
- 4.2.4. The additional 1,500 dwellings being accommodated in Shropshire over a 22 year plan period equates to an additional 68 dpa. In our view, this is unambitious given there are sites (such as those within the Raby Estate's ownership and control) that could accommodate more unmet needs and also help achieve Shropshire's aspiration for 'high growth'.
- 4.2.5. In our view, the position Shropshire is taking on unmet need from ABCA fails to meet the tests of soundness as it is not positively prepared. In order to arrive at an appropriate figure, the Council ought to have undertaken some sort of assessment into the capacity or constraints of the County to accommodate unmet needs, and consideration the positives and negatives. We believe that such an approach should have been consulted on and published in the public domain.
- 4.2.6. Without such evidence supporting the proposed ceiling of 1,500 dwellings, at best the Council risks being requested to accommodate more of ABCA's unmet needs, and at worst risks being found 'unsound'. This remains a very significant possibility when such a large proportion of homes remains unmet in the region. Whilst the Duty to Cooperate might be shown as procedurally met, if the outcome is for no provision being made for unmet need, and the inherent unsustainability in social, economic and environmental terms of that, then the Inspector may pause the examination and seek the matter be addressed.

- 4.2.7. We are aware that a similar instance occurred recently in Surrey whereby an Inspector required Waverley Borough Council to accommodate 50% of neighbouring authority Woking's unmet housing need. Despite a legal challenge by CPRE, the Court of Appeal recently considered the Inspector's approach to be lawful.
- 4.2.8. Given the inability of Birmingham to meet its own housing needs, it is likely that neighbouring authorities to the west of the Black Country, such as Shropshire, will be expected to take on a proportion of unmet need.
- 4.2.9. In this instance, the Inspector would have two courses of action:
- Postpone the examination and request that the Council works up a revised plan to demonstrate how it will meet the unmet housing need and reduce the reliance on windfalls; and/or
 - Allow the Plan to proceed to adoption but require the Council to undertake an immediate review of the Local Plan to identify additional sites to meet the unmet need.

4.3 LESS RELIANCE ON WINDFALLS

- 4.3.1. Paragraph 70 of the NPPF states that *"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends"*.
- 4.3.2. We note that there is a proposed windfall allowance of 2,551 dwellings over the plan period (between 2016 and 2038). Over a 22-year plan period, this equates to an annual windfall allowance of 116 dpa.
- The Raby Estate's concerns with the reliance on windfalls**
- 4.3.3. Whilst we acknowledge that there is historic evidence of windfall delivery in Shropshire, in our view, the ability of windfalls to sustain this level of delivery will diminish over time and such a reliance should not be used as a reason to not allocate sufficient sites to meet the identified housing requirement.
- 4.3.4. Paragraph 15 of the NPPF reminds us that the planning system should be genuinely 'plan-led' and provide a positive vision for the future of an area. Furthermore, paragraphs 11, 23 and 67 require authorities to allocate sufficient sites to bring land forward at a sufficient rate to address OAN and to deliver the strategic priorities of the area. Shropshire Council should therefore allocate a greater number of sites to ensure there is a truly plan-led approach to development in the County.
- 4.3.5. However, in contrary to the spirit of this goal, **22%** of the residual housing requirement of 11,796 dwellings (i.e. excluding completed dwellings, dwellings with planning permission and those already allocated by the SAMDev Plan) is expected to be delivered on windfall sites (see Table 4-2). Whilst we do appreciate that windfalls can and do play a part in meeting housing requirements (particularly in the more rural areas), such a heavy reliance on windfalls in this case, in our view, increases the risk of the plan's failure as it undermines its robustness.
- 4.3.6. This was acknowledged in the Inspector's Report for the SAMDev Plan (30 October 2015), who remarked that *"Reliance on windfalls to achieve the housing requirements of the area clearly does not provide the same level of certainty and commitment as secured through planned allocated sites"*.

- 4.3.7. In particular, we have concerns that the windfall allowance may not be achievable given the tight boundaries drawn around settlements (such as Cressage) which limits opportunities for such windfalls from occurring.
- 4.3.8. As we have identified above, when comparing the proposed housing requirement of 1,400 dpa against the identified supply (including the windfall allowance), there is an ‘identified’ surplus of just 334 dwellings or 1%. Even if the windfall allowance is accepted, in the situation where the housing requirement is to be uplifted to the 2020 proposed standard method figure of 2,129 dpa, then the windfall allowance on its own will not be sufficient to ‘plug the gap’ – more site allocations will be required.
- 4.3.9. In addition, windfall sites may not necessarily be in the most sustainable locations or have good access to local services and facilities. Their development can sometimes be at odds with other policies, be at the expense of competing land uses, lead to the loss of valued assets or may not be aligned with the community’s aspirations.
- 4.3.10. Therefore, in our view, the Council should place much less reliance on meeting its housing requirements from windfall sites and should instead identify and allocate a sufficient supply and mix of sites in sustainable locations.

4.4 IDENTIFYING AN ADDITIONAL BUFFER OF SITES

- 4.4.1. Policy SP2 part 2 states *“This Local Plan ensures that sufficient land is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available”*.
- 4.4.2. The supporting text to the strategic approach in Policy SP2 of the Pre-Submission Draft Local Plan highlights the Council’s apparent confidence in its ability to deliver 1,400 dpa over the plan period. Paragraph 3.10 states *“Whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will ‘balance out’ to ensure that the housing requirement is achieved”*.
- 4.4.3. Paragraph 3.13 explains how supply will be monitored and what action might be taken, if there are any ‘issues’ (although such issues are not defined). It states *“The annual assessment of the five-year housing land supply will also highlight any issues with the supply or delivery of new dwellings, and whether there is a need to respond through such measures as preparation of a Housing Delivery Action Plan or Local Plan Review”*. However, this statement stops short of saying that such a response will actually be actioned.

The Raby Estate’s concerns with the lack of an additional buffer

- 4.4.4. As mentioned above, when comparing the proposed housing requirement of 1,400 dpa against the identified supply (including the windfall allowance), there is an ‘identified’ surplus of just 334 dwellings or 1%. Clearly this is an inadequate ‘safety buffer’ which places the plan at significant risk of failure.
- 4.4.5. In our view, the non-committal statement in paragraph 3.13 of the Pre-Submission Draft Local Plan could be strengthened to allay our fears that the appropriate action will be taken at the appropriate time (i.e. to remedy any issues with the supply or delivery of new dwellings). In our view, there is a very high risk that the surplus of 334 dwellings could quickly be eroded, and so we would like more comfort within the plan that Shropshire will indeed undertake a five-yearly review to address this.

4.4.6. As we see it, the Council has a few alternative options available to give greater confidence that Shropshire's identified housing requirement will indeed be met within the plan period (in order of preference):

- Allocate additional sites for development within the plan period;
- Allocate 'Plan B' sites that can be released for development when needed;
- Identify broad Areas of Search;
- Commit to an early/immediate plan review.

4.4.7. However, the Raby Estate has land within its ownership and control that could be released to quickly meet an identified shortfall, without the need for a lengthy Local Plan Review and examination process.

Allocate additional sites

4.4.8. As highlighted above, clearly our first preference is for Shropshire Council to allocate additional sites to provide a greater 'safety buffer' to provide greater confidence that the housing requirement will indeed be met over the plan period. This would also be required if the Council properly applies the higher 2020 proposed standard method figure and takes on additional unmet need from ABCA.

4.4.9. There is no definition within the NPPF of what an appropriate buffer ought to be when allocating sites – just reference to allocating a sufficient supply and mix sites to bring land forward at a sufficient rate. However, there is logic from the requirement in paragraph 73 relating to demonstrating a 5YHLS that could be applied to allocating land.

4.4.10. The lowest buffer of 5% referenced in paragraph 73 of the NPPF when applied to the plan period requirement of 30,800 dwellings between 2016 and 2038 would equate to an additional buffer 1,540 dwellings needing to be allocated. However, we would advocate a higher and more robust buffer of 15% should be applied, which would equate to an additional 4,620 dwellings needing to be allocated. This would provide far greater certainty that the Local Plan and its strategic approach would not fail.

'Plan B' sites

4.4.11. Alternatively, our second preference would be for Shropshire Council to allocate effectively an additional pot of back-up 'Plan B' sites. These sites would be treated in a similar fashion as safeguarded land in terms of Green Belt policy in paragraph 139 of the NPPF – i.e. they would not be allocated for development immediately. However, unlike the Green Belt approach, they would be able to be developed within the plan period if a certain trigger were met – e.g. if the delivery of housing was not as expected, or if a new housing requirement figure emerges.

4.4.12. This is a pragmatic step and would enable sites to be quickly brought on-stream to address a land supply issue, without needing to trigger an outright Local Plan review, which could be extremely costly and take a long period of time to conclude.

4.4.13. We are aware of other authorities which have taken this approach and been found 'sound' by an Inspector – for example the West Lancashire Local Plan 2012-2027, which was adopted in October 2013.

4.4.14. The Inspector in his report (26 September 2013) helpfully summarises the approach taken by West Lancashire in Policy RS6 (A "Plan B" for Housing Delivery in the Local Plan"):

“139. Chapter 10 of the submitted Plan sets out a “Plan B”, which would require five-yearly reviews of the housing land supply position, and the release of safeguarded land for development if the supply were found to have fallen below a defined trigger-point. While the site allocations have been rigorously tested in the Examination and ought to provide an adequate housing land supply, Plan B is intended to provide a further safeguard should unexpected circumstances lead to one or more of the larger allocated sites not coming forward as anticipated. It is a constructive response to the uncertainty inherent in planning for housing provision”.

- 4.4.15. The supporting text to the policy elaborates that this approach is useful in the following scenarios:
- What if a key site or location cannot be delivered? Ultimately, this leaves the housing requirement target not being met, unless a viable alternative can be found;
 - As the Local Plan covers a long period (15 years), it is not unreasonable to expect some change in evidence potentially resulting in new targets over that period. Therefore, the Local Plan should be flexible enough to address these changes, as well as any other reasonable change in circumstance, without a wholesale review of the Plan.
- 4.4.16. Ultimately the Inspector concluded that this approach was ‘sound’. A copy of Policy RS6 is enclosed (**Appendix A**). We would be happy to discuss a similar approach with more appropriate triggers and actions with Shropshire Council if required.

Areas of Search

- 4.4.17. Paragraphs 23 and 67 open the door for broad locations for growth (i.e. ‘Areas of Search’) for meeting housing needs in the longer term. We are aware that Area of Search policies are used by numerous authorities in their plans and have been found sound through examination. We have These are used to identify potential opportunities that are subject to future consideration in future plans or supporting development plan documents where precise details are not yet known or as a fall-back position to identify how future housing needs could be met.
- 4.4.18. We recommend that the Council considers this approach as a means to identify how the additional housing need (and employment) arising from the unmet need from the Black Country could be accommodated should the Local Plan Inspector require them to do so.
- 4.4.19. This could identify several areas of search within the County (such as the broad area around Beslow, and any other locations) as potential options subject to further assessment.
- 4.4.20. Examples of how such measures are currently being used are outlined below.
- **South Staffordshire Council** – identifies an Area of Search for a new settlement in its emerging Local Plan. This does not allocate the land for a new settlement now but recognises the potential longer-term opportunities in a particular location which may be explored following the plan’s adoption, through reviews of the Local Plan or a separate Garden Village Development Plan Document (DPD);
 - **Reading Borough Council** – identifies a broad Area of Search to the south of Reading to accommodate large scale development. The plan makes it clear that no development is proposed or allocated at this stage, but it essentially puts a marker in the sand for future review and assessment of potential development options in the broad area to accommodate wider housing needs;

- **Hart District Council** – has included an Area of Search policy for potential new settlements. This is because a failure to plan for longer term housing requirements now could mean a gap in housing supply later in the plan period. If this were to happen the Council would be vulnerable to planning applications for alternative sites that are not in accordance with the Council's Spatial Strategy. Therefore, the Local Plan includes Policy SS3 which identifies a new settlement to be located within an Area of Search in the area of Murrell Green/Winchfield within the District.

Policy SS3 sets out broad policy criteria for the new settlement and identifies that it will be taken forward through a stand-alone DPD to be prepared which would be started on adoption of the Local Plan: Strategy and Sites. The precise location, scale and nature of the new settlement will therefore be detailed through this subsequent DPD. This approach allows the Council to undertake further work in respect of a longer-term strategy for meeting future housing needs, including full and proper consideration of the location of a new settlement and its broader implications. The Key Diagram and Proposals Map for the Plan includes a broad area where a new settlement could be considered in future planning documents.

In this instance, the Council did not need to rely on the new settlement to meet housing needs and as such it was removed before adoption.

However, had the Council needed to find sites for more housing to meet either its own needs or the unmet needs of neighbouring authorities, then a reference to the need to consider new settlements as part of a future plan could have been considered acceptable alongside other forms of development such as urban extensions and high-density development in urban locations.

Include a commitment to an early/immediate plan review

- 4.4.21. Should the Council decide not to proceed with the above options (which we consider are more appropriate, in the order presented), it would be sensible to include a firmer commitment to an early review of the Local Plan to explore the options on how the Council may address any identified shortfall.
- 4.4.22. This would enable the Council to fully explore the available options and prepare the supporting evidence base required to support future allocations for one or more new settlement proposals (and other allocations) that will be required to address the significant number of extra homes needed. This is the least preferable option as it provides least clarity that the unmet need can be accommodated sustainably, but if it sets out a range of options that will be explored, then provides some comfort that such a review has the potential to meet needs – much more so than the wording of the current policy.
- 4.4.23. We appreciate the political sensitivity of pausing progress on the Local Plan Partial Review whilst work on identifying additional sites is undertaken. However, due to the risks identified above, this may actually result in securing an adopted Local Plan quicker than proceeding to examination and then having the plan found unsound by the Inspector.

4.5 ALLOCATING MORE STRATEGIC SITES AND NEW SETTLEMENTS

- 4.5.1. The Pre-Submission Draft Local Plan proposes to allocate three strategic settlements/sites at the following locations:

- Clive Barracks, Tern Hill (Policy S19) – a new strategic settlement (750 dwellings and 6 ha of employment land) contributing towards strategic growth aspirations in the north east of the County;
- The Former Ironbridge Power Station (Policy S20) – a new strategic settlement (1,000 dwellings and 6 ha of employment land) contributing towards strategic growth aspirations in the east of the County; and
- RAF Cosford (Policy S21) – will facilitate MOD use and associated activities, complementing and enabling growth aspirations in the east of the County.

4.5.2. As part of the Strategic Sites consultation in summer 2019, the Council confirmed it was considering the potential inclusion of land north of Junction 3 on the M54 within the Local Plan. The land, which covers around 400 hectares and lies wholly within the Green Belt, is being actively promoted to include around 3,000 dwellings and 50 ha of employment land, as well as the inclusion of local facilities and services. Whilst the Strategic Sites consultation in 2019 clearly established the site was not at that stage preferred for development, given the scale of the proposal the Council nevertheless considered it was important to seek community views.

4.5.3. In weighing up the site-specific considerations, both positive and negative, and giving consideration to the consultation responses on this matter, the Council has concluded that there is insufficient justification to progress an exceptional circumstances argument for the release of this land from the Green Belt. The site is therefore not included within the Pre-Submission Draft Local Plan.

The Raby Estate's concerns with strategic sites and new settlements

4.5.4. Firstly, it is our view that the inclusion of RAF Cosford as a strategic site within the Local Plan is effectively a red herring. Whilst Policy S21 proposes to release 221 ha of land from the Green Belt for military and charitable operational and development needs, any homes provided on the site will not contribute to meeting housing needs and so do not count towards the County's overall requirements.

4.5.5. Therefore, the strategic approach set out in Policy SP2 focuses on bringing forward two new strategic settlements at Clive Barracks and the Former Ironbridge Power Station for a total of 1,750 dwellings. Together, these new settlements represent around 5% of the total housing supply (see Table 4-1) or 15% of the residual housing supply (see Table 4-2).

4.5.6. In our view, this is an unambitious strategy. The provision of a maximum of 1,000 dwellings with 6 ha of employment land on one site in our view does not provide the critical mass required to form a more self-sufficient new settlement in as envisaged by paragraph 72 of the NPPF.

4.5.7. Having regard to the other sites proposed to be allocated by the Pre-Submission Draft Local Plan (as set out in Schedule A7 of the plan), we note that urban extensions are proposed which are larger than the proposed new settlements – 1,050 dwellings at Tasley Garden Village, Bridgnorth and a total of 1,900 dwellings at Mytton Oak Road and Hanwood Road, Shrewsbury. We would therefore expect a much larger quantum of dwellings to be provided, complemented by higher provision of employment land and supporting services and facilities, to form a new settlement.

4.5.8. We are also concerned that the reliance on two new settlements is also risky – should one of them fail to be delivered, or come forward at a slower rate than anticipated, then this leaves the plan at significant risk of failure. As we have explored above, there is an 'identified' surplus of just 334 dwellings or 1%, which is an inadequate 'safety buffer'.

- 4.5.9. In addition, should the proposed 2020 standard method figure of 2,129 dpa be applied as Shropshire's minimum housing requirement (which we strongly expect to be the case), then the Council will need to identify and allocate sufficient sites to plug the shortfall of 16,038 dwellings.

Beslow New Settlement

- 4.5.10. We would like to take this opportunity to reaffirm Raby Estate's commitment to the proposal for the Beslow New Settlement and wish to continue to develop the proposal in collaboration with the Council, as we truly believe it can have a transformational and positive impact for the County. The Estate is enthusiastic about this exciting opportunity and consider that an early stage of development before 2038, allied to future development beyond 2038, can collectively allow the creation of an enduring and sustainable new settlement founded on the architectural and planning traditions of Shropshire.
- 4.5.11. A sustainable new strategic settlement founded on Garden Village principles at Beslow can provide up to 3,500 dwellings alongside 17 ha of employment land, community uses and infrastructure. The inclusion of this site within the plan would provide the added flexibility and 'safety buffer' that is currently lacking. It would also help plug some of the shortfall when the proposed 2020 standard method figure is applied to the housing requirement.
- 4.5.12. In our view, the inclusion of Beslow as a new settlement would not form a new policy direction or matter that would require a major overhaul of the plan and its evidence base. It would merely require alignment of the evidence base and supporting documents to assess the option. Earlier drafts of the plan have referred to potential new Garden Village settlements in strategic locations forming a key part of the distribution of development in Shropshire.
- 4.5.13. Therefore, given it is likely that the Council will be required to pause, take stock and revisit its proposed strategic approach in light of the proposed 2020 standard method, we consider there is time available to consider and consult on this option alongside the other additional sites that will undoubtedly be required.

5

CONCLUSION



5 CONCLUSION

5.1 CHANGES REQUIRED TO THE PLAN

5.1.1. We have identified a number of problems with the approach set out within the Pre-Submission Draft of the Shropshire Local Plan (August 2020). To address these, we recommend Shropshire Council make a number of changes to the plan:

- **Revisit the strategic approach** – specifically the proposed settlement hierarchy and distribution of development, as it does not currently meet the minimum housing requirement set out by proposed new standard method – there is a shortfall of 16,038 dwellings over the plan period.
- **Accommodate more unmet need from ABCA** – as there is a lack of transparency behind why Shropshire can only accommodate 1,500 homes – in reality, it can support much more. It is unambitious and does not match the County’s economic growth aspirations.
- **Place less reliance on windfalls** – as currently they represent 22% of the residual housing requirement. The Council ought to be allocating a greater number of sites to ensure there is a truly plan-led approach to development in the County.
- **Identify an additional buffer of sites** – as currently there is a 1% ‘safety buffer’ which places the plan at significant risk of failure. We have identified four potential options to increase confidence in the plan (in order of preference) – allocating additional sites for development within the plan period; allocating ‘Plan B’ sites that can be released for development when needed; identifying broad Areas of Search; or committing to an early/immediate plan review.
- Allocating more strategic sites and new settlements – including at Beslow, to ensure that the housing requirement will indeed be met over the plan period

5.1.2. As highlighted in our separate representations, the Raby Estate provides the following opportunities to help address the above issues:

- **Beslow** – creation of a new settlement of up to 3,500 dwellings alongside 17 ha of employment land, community uses and infrastructure;
- **Shore Lane, Cressage** – provision of up to 80 dwellings with a mix of tenures;
- **Whole Estate** – delivery of small-scale housing to meet needs arising across the Whole Raby Estate.

5.1.3. We believe these changes are necessary to ensure the plan meets the ‘tests of soundness’, i.e.:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred; and
- **Consistent with national policy** – enabling the delivery of sustainable development.

Appendix A

WEST LANCASHIRE LOCAL PLAN
'PLAN B' POLICY RS6

7.59 Although some temporary accommodation will not require planning permission, in most cases permission will be required. Operators should always check with the Council's Planning Department, but normally planning permission is required in the following cases:

- If the workers will be housed for longer than a normal planting, growing, or picking season;
- If caravans and other related buildings (e.g. canteens and toilets) are to be kept on site permanently;
- If a change of use to an existing building is involved; or
- If hardstandings and permanent services (e.g. water supply or septic tank) need to be constructed.

7.60 The Council wishes to assist in supporting a healthy rural economy within the context of national and local planning policies. Permanent buildings or caravans which are kept on site for a number of months can reduce the open character of the Green Belt and have an adverse impact on the landscape and the amenity of local residents. Therefore, the above policy has been introduced to limit the impact of this type of development on the local area.

7.61 The Council has also produced Supplementary Planning Guidance on Accommodation for Temporary Agricultural Workers, which is relevant to the implementation of this policy.

Other Local Planning Policy and supporting documents

- Accommodation for Temporary Agricultural Workers SPG (2007)

7.6 Policy RS6: A "Plan B" for Housing Delivery in the Local Plan

Context

7.62 Policy GN2 sets out several sites across the Borough that are safeguarded from development for the needs of a "Plan B", should it be required. Appendix E sets out the key issues in relation to delivery and risk for each individual policy. For Policies SP1 and RS1, these delivery issues often revolve around a similar concern – what if a key site or location for residential development cannot be delivered? Ultimately, this leaves the outcome of the locally-determined target for residential development not being met, unless a viable alternative can be found.

7.63 Therefore, while it is hoped that all aspects of the Local Plan will be deliverable, and they have been selected because the Council believes that they are, it is prudent to have a "Plan B" prepared in case a key site(s) for residential development does not come forward for development during the plan period. Policy RS6 provides the Council with the ability to enact such a "Plan B" should it become apparent through monitoring that the Local Plan's residential targets are not being met.

7.64 An additional consideration is the fact that the Local Plan covers a long period (15 years) and, in relation to the locally-determined targets, it is not unreasonable to expect some change in the evidence for those targets over the 15 years, potentially resulting in new targets. Therefore, the Local Plan should be flexible enough to address these changes, as well as any other reasonable change in circumstance, without a wholesale review of the Plan.

Policy RS6

A "Plan B" for Housing Delivery in the Local Plan

The "Plan B" sites safeguarded in Policy GN2 will only be considered for release for housing development if one of the following triggers is met:

- Year 5 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- Year 10 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 10 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- The housing target increasing as a result of new evidence

If, at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from that safeguarded from development for "Plan B" to make up the extra land supply required to meet the new housing target for the remainder of the Plan period.

Justification

7.65 The Council believe that the locally-determined targets that have been set in this Local Plan are fair and reasonable in light of all the available evidence at this time. However, it is possible that targets for residential development will rise, meaning that new locations for development would need to be identified, and so in this situation the "Plan B" would also provide the flexibility required to accommodate this rise.

7.66 In essence, the Council's "Plan B" for the Local Plan involves the release of land from the Green Belt and its allocation as safeguarded land under Policy GN2. This land would be safeguarded from development until the above triggers in Policy RS6 are reached. Until these triggers are reached the land will be protected from development in a similar way to Green Belt (see Policy GN2) and in such a way as to not prejudice the possible future development of this land if the "Plan B" is triggered.

7.67 The supply of land safeguarded from development for the “Plan B” in Policy GN2 (which has a total capacity of 830 dwellings) is more than sufficient to allow for at least 15% extra on top of the 15-year housing target being proposed in the Local Plan (15% of 4,860 dwellings = 729 dwellings). This percentage is based on the need to ensure that even the largest of the housing allocations in the Local Plan is covered by the flexibility of the “Plan B”, should it fail to be delivered.

7.68 Ongoing monitoring of housing delivery in the Plan period will enable the Council to be prepared for any trigger points in Policy RS6 being reached. If it is anticipated a year before any trigger point is reached (i.e. at the end of Years 4 and 9 of the Plan) that housing delivery is at risk of triggering the “Plan B”, the Council will commence a review of the level and nature of any undersupply compared to housing requirements. This review will also review the “Plan B” sites themselves in order to identify which site(s) are most suitable to release for development at that time (if any, depending on the nature of, and reasons for, the undersupply), should the level of undersupply ultimately trigger the “Plan B” in April of the following year. The quantum of release will be sufficient to meet the identified shortfall in housing delivery compared to the housing requirements.

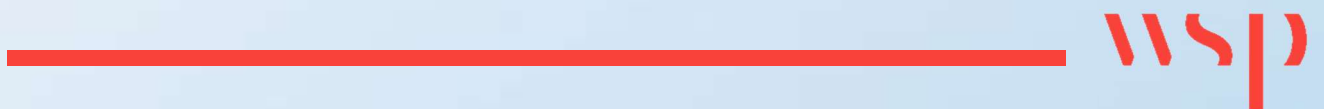


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Appendix 2.2.1

**REG 18 REPRESENTATION –
BESLOW GARDEN VILLAGE**





Shropshire Council,
Planning Policy & Strategy Team,
Shirehall,
Abbey Foregate,
Shrewsbury,
Shropshire,
SY2 6ND

Our Ref: 70077055.LTR.001.GM

16 September 2020

Dear Sir/Madam,

**Beslow - Raby Estate
Representations to Regulation 18: Pre-submission Draft of the Shropshire Local Plan**

Shropshire Council is currently consulting the Regulation 18: Pre-submission draft of the Local Plan. This draft includes the proposed allocation of strategic sites (large sites of more than 25ha in size) which are not associated with meeting the growth needs of any particular settlement and contribute to achieving the aspirations of the Economic Growth Strategy for Shropshire. Based upon this, these representations seek to respond to draft policies SP2, S19 and S20.

The current preferred strategic sites that have been identified in the document are:

- Clive Barracks, Tern Hill;
- Former Iron Bridge Power Station; and
- RAF Cosford.

None of these options identified are particularly transformational, nor do they have the potential to generate the 'step change' to Shropshire's economy that was outlined in the Economic Growth Strategy for Shropshire (2017-2021).

The Raby Estate has a substantial landholding which is centrally located in Shropshire and covers a significant portion of the area that is considered to be the most suitable for strategic development which can offer the most benefits to Shropshire. Representations have previously been submitted in favour of the Beslow site, and these current representation aims to highlight the merits of the site, and that it is still available for development.

THE VISION FOR BESLOW

The Raby Estate proposes a vision for a new settlement within Raby Estate's sole ownership which seeks to create an enduring and sustainable new settlement founded on Garden Village principles and the architectural and planning traditions of Shropshire. This is the Beslow site.

Representations have been submitted in favour of the site previously which have identified the benefits of development in this area. As previously outlined an initial proposal has been developed which identifies that the site could be delivered in two phases providing up to 3,500 homes in total alongside 17ha of employment land, community uses and infrastructure.



The Beslow site is well placed to provide a new, sustainable, development that provides benefits above other potential options, these benefits (highlighted in the Vision Document at **Appendix 1**) are as follows:

- 1 It is strategically located within the county, between Shrewsbury and Telford, allowing it to meet county wide needs
- 2 It can deliver a significant amount of new housing including a significant proportion of affordable homes alongside supporting community
- 3 It can help deliver the aims and objectives of the Economic Growth Strategy in that it will provide the new employment opportunities within the county and help facilitate the growth of underrepresented sectors such as advanced manufacturing including engineering, agri-food and agri-tech in a location closely linked with agriculture with a landowner who is willing to facilitate growth in this area
- 4 It lies outside of the Green Belt and AONB and is relatively unconstrained
- 5 It is in single ownership, with a responsible owner that takes a long-term view with legacy a driving principle. The site's single ownership will also assist in the deliverability of the site
- 6 It is well located for the Parkway station at Preston and has the ability to enhance public transport in the corridor from Shrewsbury to Telford
- 7 It can be brought forward more quickly than other options which are reliant on the availability of land or the need for significant mitigation and site preparatory works.

ALTERNATIVE SITE ASSESSMENTS

We have previously provided evidence that the site at Beslow is the most sustainable site, when compared to those that are proposed for allocation. A summary of this can be found below, which highlight that when compared to the Beslow proposal, they do not have the potential to provide the levels of sustainable economic and social development that could be provided by Beslow.

CLIVE BARRACKS (S19)

The indicative masterplan illustrates the mixed-use redevelopment of the (72ha) site to provide local services and facilities; around 5.75ha of employment land; around 750 homes; and green infrastructure. The constraints of the site are highlighted below:

- The site is expected to deliver 300-450 homes within the plan period, but this means that much of the site will not meet the County's current need
- Reliant on the private car, with the nearest railway station 11km away;
- Ecological/ environmental constraints including ancient woodland, local wildlife sites and Flood Zones 2 and 3; and
- Due to the scale of the site (750 dwellings) it is legitimate to question whether the critical mass could be generated to support local services, facilities and infrastructure, which are central to sustainable development.

FORMER IRON BRIDGE POWER STATION (S20)

The Former Ironbridge Power Station is a 140ha partly brownfield site comprising the former Power Stations and its associated uses. The emerging proposals for the site would involve a mixed-use development, including around 1,000 dwellings.

Questions can be raised about the deliverability of 1,000 dwellings on the site within the plan period and whether it is possible to minimise the landscape and visual impact. Constraints of the site are considered to be:

- The demolition and decontamination of the site; and



- The impact on heritage and environmental designations. The impact the site is expected to have on these make it the worst scoring site in the Sustainability Appraisal.

RAF COSFORD

The use of RAF Cosford is expected to be for military use or non-profit making uses rather than acting as a contribution to meeting Shropshire's future housing and economic growth needs.

SUSTAINABILITY

Based on the Council's own Sustainability Appraisal scoring criteria, the site scores more favourably than the strategic options identified by the Council, and by consequence should be considered as a more suitable alternative to the proposed options.

HOUSING NEED

In addition to the view that the site should be allocated instead of one of current proposed strategic sites, there is a recognition that the site could be proposed for allocation in addition to the three sites currently in the consultation document. The reasoning behind this is threefold:

- 1 Shropshire will be required to increase their housing requirement by 1,500 dwellings due to the agreement between Shropshire Council and the Association of Black Country Authorities.
- 2 The plan currently heavily relies on windfall development to meet its housing requirement targets,
- 3 The proposed changes to the standard method for calculating housing need.

These factors are likely to increase the number of dwellings that Shropshire is required to provide beyond those identified in draft Policy SP2. Based upon this, the site at Beslow could contribute significantly to ensuring that the County can provide the housing it is obliged to provide, in a sustainable manner. Information to support this can be found at Appendix 2 of these representations

SUMMARY

While it is recognised that the site is currently not a preferred site, based upon the evidence in the Housing Need Assessment (found at **Appendix 2**), there is a case to be made which suggests that Shropshire Council could be required to provide significantly more housing, due to the ABCA's unmet need, the overreliance on windfall sites and the proposed changes to the standard method. If this is the case, the Beslow site will be available to be brought forward for development to ease these pressures and provide much needed housing for Shropshire.

As noted in these representations, there is a case for the Beslow site being allocated in addition to, or instead of, both of the draft preferred allocations, due to highlighted issues with draft policies SP2, S19 or S20. But, the Housing Need Assessment (**Appendix 2**) identifies an additional way that could lead to the plan being found sound, this is via the use of 'Plan B' sites.

The 'Plan B' approach is the approach whereby the site becomes available for development following certain triggers (ie if the delivery of housing did not progress as expected). This approach has previously found sound by the Inspector and would provide a safeguard for the Council in the event of under delivery. We would be happy to discuss a similar approach with more appropriate triggers and actions with Shropshire Council if required.



The Raby Estate envisage the new settlement to become a model new settlement for the twenty-first century which fosters a vibrant and successful community and puts Shropshire at the forefront of planning for a positive future.

Yours faithfully

Guy Maxfield
Associate Director

Encl. Appendix 1 – Beslow Vision document, Appendix 2 Housing Need Assessment

Appendix 2.2.2

BESLOW GARDEN VILLAGE SUMMARY DOCUMENT



BESLOW

NEW SETTLEMENT

RABY

SUPPORTED BY





WHY BESLOW?

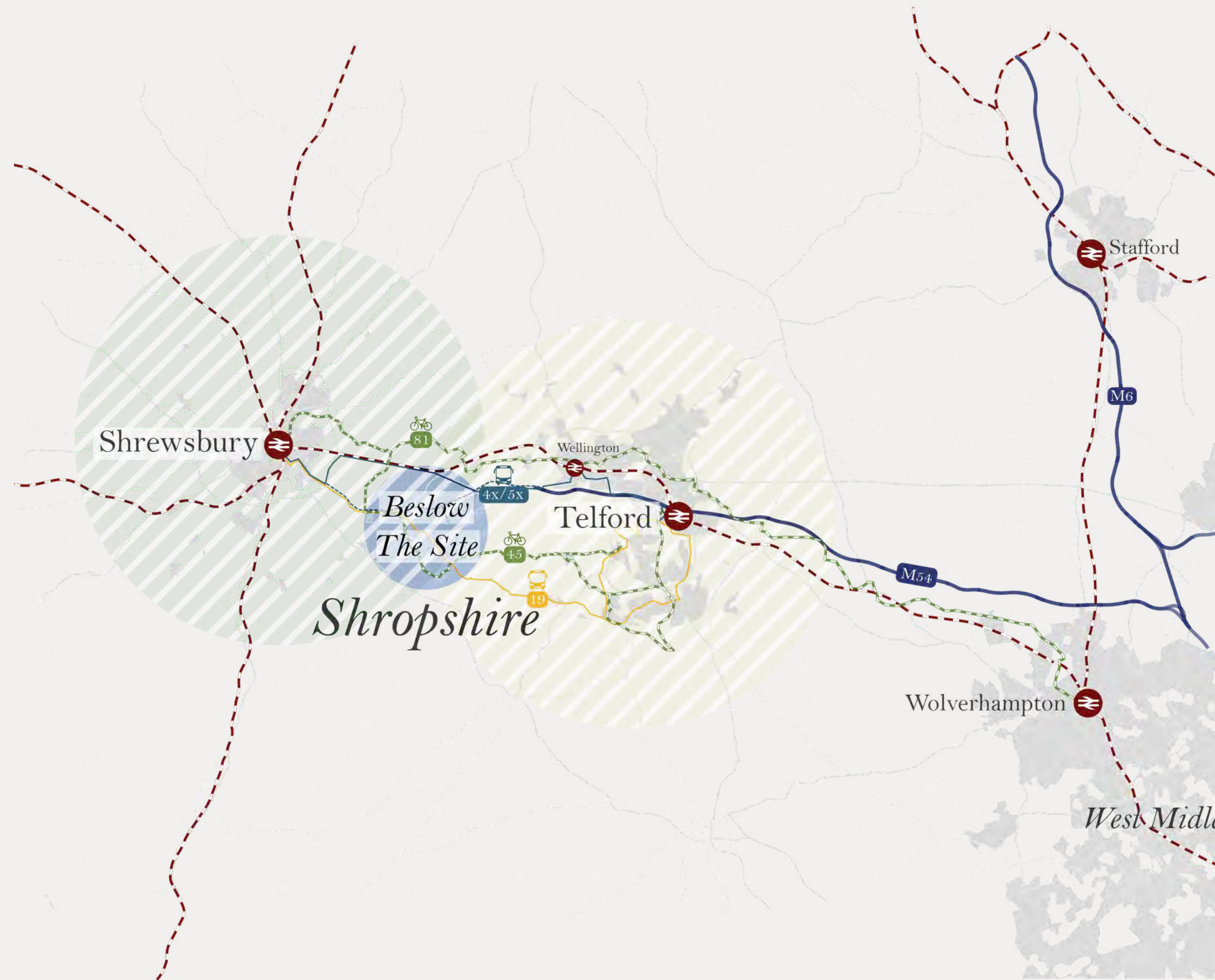
Shropshire must plan to meet future housing and employment needs. These are significant and increasing. Strategic sites offer an opportunity of sustainably delivering development in a planned way alongside infrastructure. However, deliverability is also key, and with a single owner, who has the vision and ambition to achieve high quality development and manage its legacy, Beslow is perfectly placed.

Beslow lies in the Shrewsbury to Telford and West Midlands strategic growth corridor, an area identified for economic investment. This means it is extremely well placed to deliver new homes, employment and community uses which can not only meet Shropshire's economic and social needs for the next decade and beyond, but do so at a location that can yield and retain wider benefits in the County. Beslow is the missing piece in Shropshire's social and economic jigsaw.

It is located at the heart of existing and proposed infrastructure networks, so can connect with these networks and support them.

It can provide new infrastructure to integrate with wider aspirations, such as cycling and walking routes, public transport networks and highway connections. Beslow is also well related to the rural heart of Shropshire, so can support the economy via new business space and the delivery of much needed local housing and affordable housing.

The site has limited constraints, is located outside of the Shrewsbury Hills AONB and the Green Belt, and is not within or near to a conservation area. It has many opportunities, and provides a real alternative to meeting growth needs in a transformational way through an exemplar new community that Shropshire can be proud of.



A once in a generation opportunity for a thriving and inclusive community with a strong sense of place, form and character

This image is of Raby's latest development in County Durham. The development, crafted by award winning architect Ben Pentreath is a unique proposal, designed to respond to its setting; responding to the vernacular is the approach that Raby is committed to following for Beslow.





1. LEGACY AND DESIGN

Building better, building beautiful

Building a new settlement is about more than just bricks and mortar; it's about communities. Beslow New Settlement will be a long-term commitment for the Estate, with a focus on sustainable growth at every stage of the process. The proposed new settlement will embody Garden Village principles, with a focus on place-making, quality design, and providing positive outcomes for people and the environment.

An example of how we will incorporate good design into Beslow comes via the inclusion of 'The Stray'. The stray is a circular park around the settlement centre. It is inspired by the Stray in Harrogate, pictured opposite, which started off as common land but is now a series of parks linking the town's attractions.

Garden Villages form an important part of Britain's urban development history. The original Garden Villages were based on a strong foundation of industry and employment, with their developers seeking to create well designed, healthy places and genuinely affordable homes, including starter homes suitable for first time buyers. We believe that the Garden Villages built today should apply the same principles, but in a 21st century context, to create vibrant, diverse and affordable communities that promote inter-generational living.

To achieve these ambitions, our development principles include:

- Strong vision, leadership and community engagement;
- Community ownership of land and long-term stewardship of assets;
- Land value capture for the benefit of the community.

As long-term landowners, Raby Estate's ambitions for Beslow, like similar historic estates such as Tornagrain in Scotland, are underpinned by Patient Capital and Stewardship. This is an approach to development that helps to ensure quality, legacy and heritage. You can find out more about these concepts in the Building Better, Building Beautiful Commission's report '[Living with Beauty](#)'.

2. A COMMUNITY FOR THE FUTURE

Placemaking for the long term

We believe that placemaking by design, and creating spaces that last the test of time, will ensure the delivery of a new community that Shropshire can be proud of in the long term. By establishing community assets, including accessible public spaces, green lungs and a sense of pride and purpose, Beslow will promote people's health, happiness and well-being.

There are several ways this can be achieved:

- Delivering beautifully and imaginatively designed homes with gardens, combining the best of town and country;
- Establishing a wide range of local jobs within easy commuting distance of the homes;
- Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains;
- Design that incorporates zero-carbon and energy-positive technology to ensure climate resilience;
- Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods; and
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

Additionally, this focus on the future will enable Beslow to be responsive to global changes to the way we live, work and play. This includes in respect of climate change, and the targets set by the Government and global bodies to help reduce carbon emissions.





3. BESLOW AS AN ECONOMIC DRIVER

Driving the economy locally and regionally

By delivering a holistic community, which encourages local employment opportunities at the forefront of its design, Beslow would deliver smart growth within the post-COVID economy.

Strategic development in this part of Shropshire provides an opportunity for the Council to meet the 'step change' in the local economy as outlined in the Economic Growth Strategy for Shropshire (2017-2021). By focusing development and employment opportunities at a location already embedded in the economy, growth in the six growth sectors identified in the Growth Strategy is more likely. This includes advanced manufacturing, such as agri-food and agri-tech.

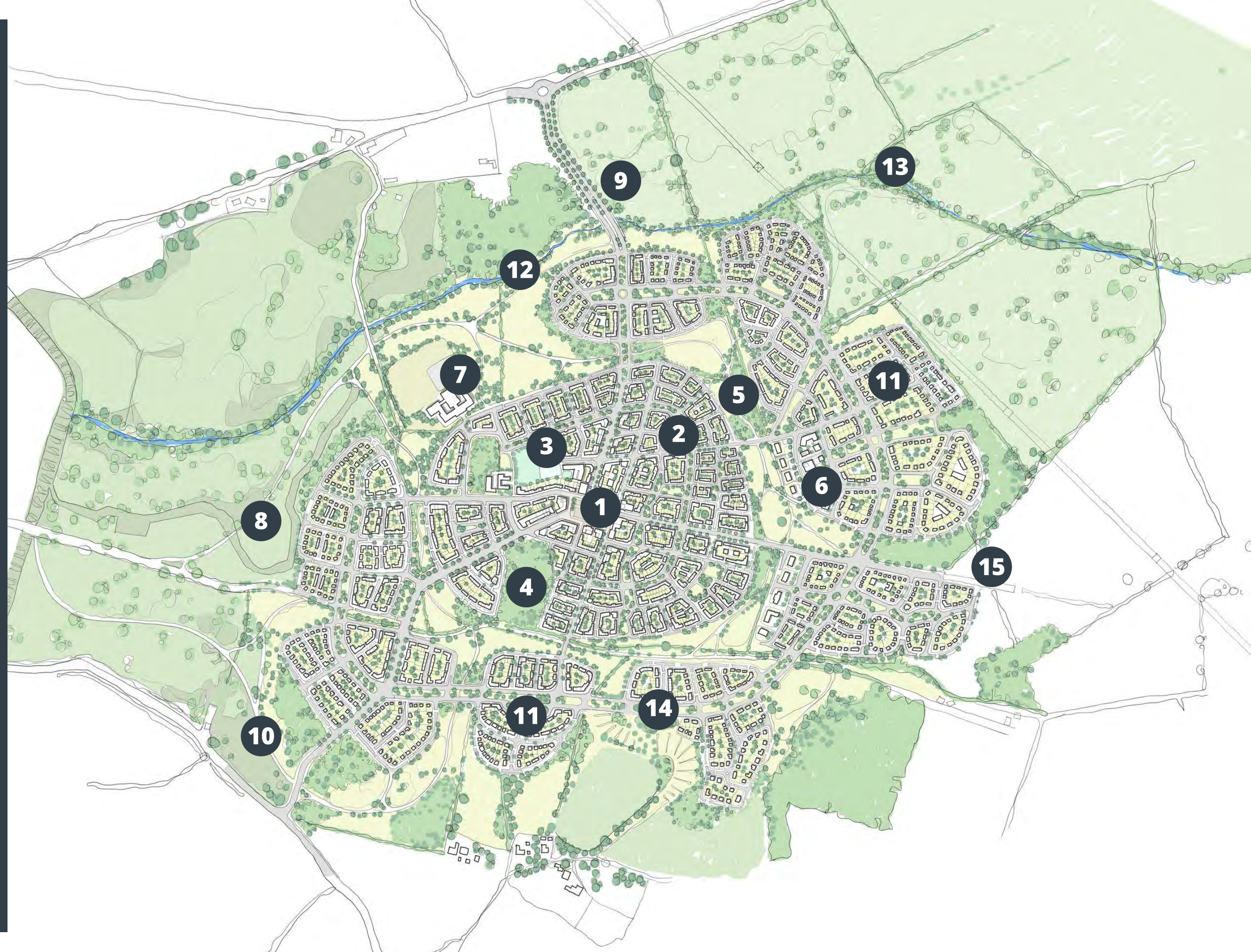
In addition, Beslow would:

- Reduce levels of out-commuting by focusing development in an area with good links and proximity to the sub-regional centre of Shrewsbury and Telford. Development in other parts of the County, such as the North East, East and North West Spatial Zones would lead to an increase in out-commuting to the North West and West Midlands conurbations;
- Retain employment and skills locally by providing new homes and opportunities within the heart of Shropshire, in an accessible location. Alongside the new homes, we anticipate that approximately 7,000 new jobs will be created as a result of the Settlement; and
- Address housing affordability issues through the delivery of new market and affordable homes in an area with strong land values and strong developer interest. The area benefits from not requiring significant new infrastructure or land remediation costs which can impact on the economic viability of delivering policy compliant levels of affordable homes.



CONCEPT MASTERPLAN

1. **A new town square** with shops on slightly higher ground with a landmark clock tower;
2. **A mixed use town centre** with 1,750 homes and ground floor employment use amounting to around 9,000m²;
3. **Community space** fronting onto the town square;
4. **Retained areas of woodland**;
5. **The 'Stray'** a loop of open space encircling the mixed use centre as part of 52 ha of recreational open space;
6. **Further employment space** amounting to 10,000 m² bringing the total employment to around 7,000 jobs;
7. Potential site for additional **community space**;
8. **A new country park** linked to the Wroxeter Roman City;
9. **Road access** from Roman Road to the north;
10. **Access from the B4380** to the south;
11. A series of **lower density satellite suburbs** (all within 10 minute walk of the centre) with 1,750 homes bringing the total to 3,500;
12. **A Capability Brown lake** formed by inserting a weir on Bell Brook, with a bridge to enter the site. The Lake would form part of the SUDS network;
13. The **rewilding** of the surrounding agricultural fields;
14. **The Avenue**: a tree lined avenue linking the suburbs and carrying the local bus route;
15. **A ceremonial axis** pointing from the town square to a view of the Wrekin.





- Settlement Core
- Neighbourhood Areas
- Community Uses
- Primary Street
- Secondary Street
- Bridge
- The Stray
- Access to Green Space
- Parkland
- Woodland

EMERGING MASTERPLAN DESIGN PRINCIPLES

IN THE SPOTLIGHT: DAVID RUDLIN



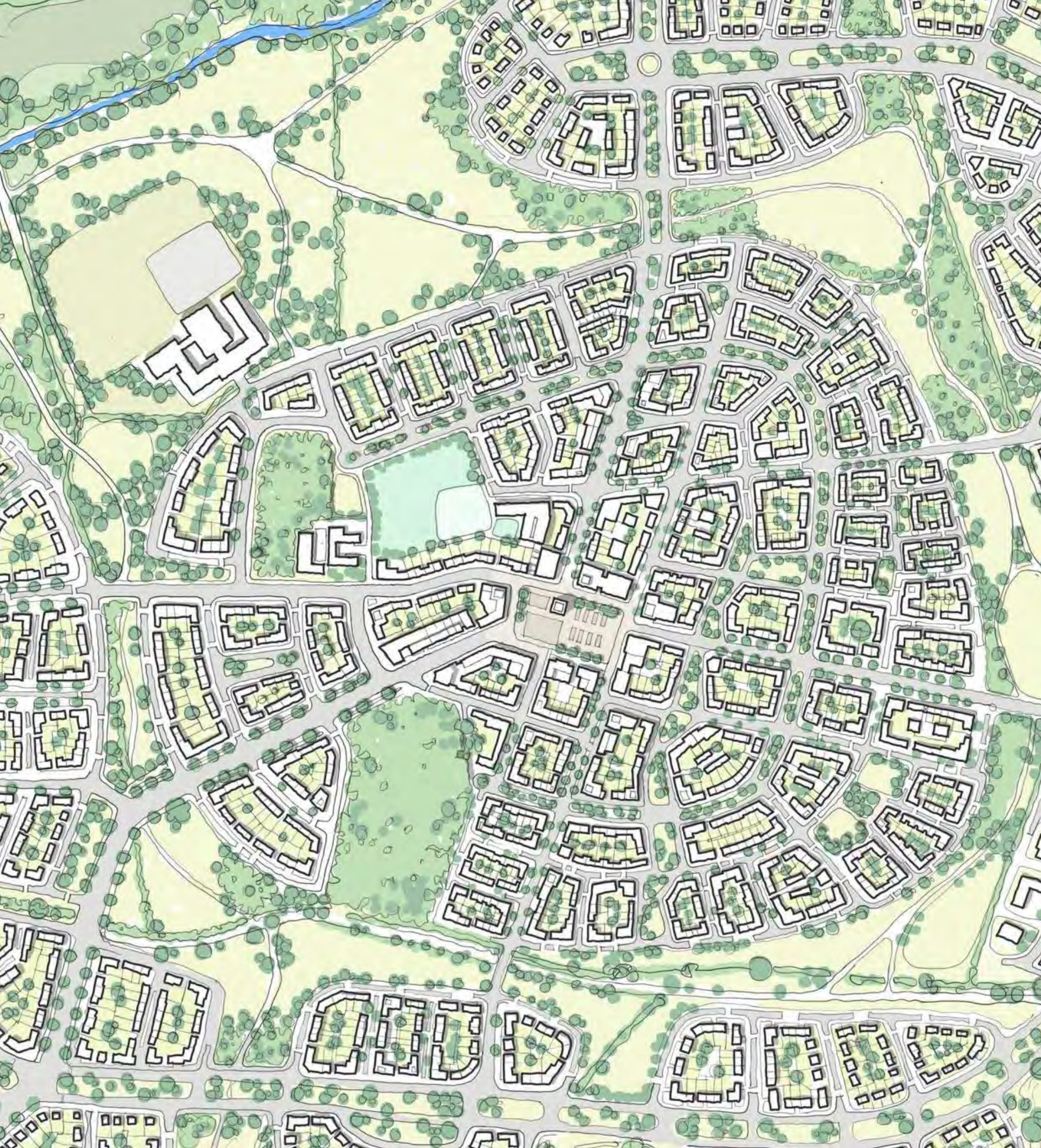
David Rudlin is Principal and a director of URBED (Urbanism Environment and Design), past Chair of the Academy of Urbanism and an Honorary Professor at Manchester University. In 2014 he was also the winner of the Wolfson Economics Prize, the second most valuable economics prize in the world after the Nobel Prize.

He joined URBED in 1990 and has been responsible for a range of high-profile consultancy projects across the UK. He is the author of a number of research reports including '21st Century Homes' for the Joseph Rowntree Foundation, 'Tomorrow: A peaceful path to urban reform' for Friends of the Earth and 'But would you live there?' for the Urban Task Force. David has been a member of the CABI design review committee and has been a judge for the Congress of New Urbanism and the Carbuncle Cup. He is a regular columnist for Building Design Magazine.

Speaking regarding Beslow, David said:

"I am delighted to have been appointed to assist with the design of a project which has such a distinct commitment to legacy and heritage. New settlements should stand the test of time, whilst being capable of dealing with the demands of the 21st century and beyond and these are the principles I have brought to Beslow's design."





*We thank you for your interest
and hope we can work together
to deliver something exceptional
for Shropshire.*

RABY

For more information, please contact:

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