

## 5 year Housing Land Supply

Since the discussions at the hearing sessions, the Council has updated various evidence based documents concerning a 5 year Housing Land Supply. All documents are now available on the website.

<http://shropshire.gov.uk/planning-policy/samdev-examination/documents-relating-to-the-hearing/>

Interested parties that made representations on the submission SAMDev Plan concerning five year Housing Land Supply are invited to make further written submissions. It should only be necessary for you to do so if the updated evidence affects your original representation.

In considering the evidence and your response, please note that the following comment from the Council:

*'The Council confirmed in the Hearing session that 31st March 2014 was the base date for sites counted, so new permissions for sites not already in the system were not being counted. On this basis, there is no need to consider permissions lapsing since 31st March. If submitting information on lapsed permissions, the Council would also wish to submit information on new consents granted. The Council will be collating this information as part of the update for 2015, but does not currently have the resources to do an interim review (which would include further site visits and other checks).'*

Please respond to the Programme Officer by 9 February 2015.

### *Comment on the above; by Land Research & Planning Associates Ltd.*

Further to our representations on behalf of two clients expanded in the Hearings in November 2014 at the Shire Hall Shrewsbury we observe as follows.

1. If Shropshire Council had properly dealt with the Local Plan process from 27 March 2012 (nearly 3 years ago) and sought to ensure that all of part 47 of the NPPF was fully considered in terms of both affordable housing and normal housing and allowed new sites to come forward rather than rely upon the historical view of before March 2012; then this would have added to the prosperity of the whole area and jobs in/at the Council would probably not have been lost.
2. Instead the Council appears to have held back development prospects on new land [as proposed by landowners such as our clients for instance] in the very many rural areas (over 500 rural settlements) that are able to be developed and have concentrated on tightly confining the settlement boundaries on both the larger settlements and the smaller settlements; except it seems for Shrewsbury. This extra allocation for here completely unbalances the housing needs/supply for the whole of Shropshire and is completely unacceptable. It is unclear how this has come about.
3. It is submitted that it is totally unacceptable to hold back an interim review on the basis that (the Council) "it does not have the resources" when the whole proposed plan they are seeking Inspector Claire Sherratt

to determine as "Sound" is surely not – one of the main reasons being is because the Council's two senior Planning Officers admitted on 20 November 2014 in front of the Inspector that the provision of Affordable Homes is a problem and they acknowledged that only 179 were likely to be provided in the next 5 years.

4. The NPPF at paragraph 47 is not only about the provision of market housing. Importantly it is also about the provision of affordable housing. The fourth and fifth bullet point states: -

- **for market and affordable housing** (*our emphasis*), illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

5. We appreciate that the development industry, for totally understandable commercial reasons, would prefer their development sites to be less percentage affordable homes as it reduces the sites' values; but that simply compounds the problem the Council finds itself in.

*The difference in whether its figures at 31 March 2014 included, or did not include, lapsed permissions pale into insignificance when considering our points above and below.*

6. It tries to argue the plan is "Sound" but the truth of the matter is, it is not; simply because it is not in accordance with paragraph 47 of the NPPF in that there is a massive deficiency of affordable homes and the Council has sacrificed these in order to attempt to argue that there are sufficient market homes. If the proper percentage of about 40% affordable homes was provided on the larger sites then there would be an improvement in that respect; but in contrast this results in a serious lack of deliverable sites for market housing in the whole area.

7. The Council appears to have three options; a) risk the Inspector finding that the plan is "not Sound" based upon the arguments herewith submitted and having to go back to the start of a new local plan process at a great cost in time and money to the taxpayer; b) gather the required resources urgently and conduct a properly formulated interim review of the greenbelt allocations especially of those allocations such as east/north east of Bridgnorth that we believe includes some 50 plus acres of industrial/commercial land and including 20 plus acres of farm land of limited agricultural value - or c) urgently accept and submit to the Inspector that some of the land outside many of the towns, larger and much smaller settlement boundaries being promoted for extra development [to include a reasonable proportion of affordable homes to accommodate the shortage] is vital to the local plan process.

Submitted 09 February 2015

*Land Research & Planning Associates Ltd.*