

From: kembertons [mailto:kembertons@aol.com]
Sent: 11 February 2015 16:01
To: Daphne Woof
Subject: Re: Shropshire SAMDev - Affordable Housing

Dear Ms Woof

Shropshire Council
Site Allocations and management of Development Plan – Public Examination
Affect of Ministerial Statement of 1 December 2014

I write on behalf of Sibdon Carwood Parish Meeting, and thank the Inspector for allowing the opportunity to comment on the effect of the Ministerial Statement of 1 December 2015 on the delivery of affordable housing in Shropshire.

The Inspector will be aware that the Parish Meeting objects to the inclusion of Site CRAV002 in the SAMDev plan as an "allocated exceptions site," for a number of reasons, one of which is that no "local need" for the dwellings has been established in Sibdon Carwood Parish, which is where the development is proposed to take place.

The Parish Meeting regards the situation that relates to CRAV002 as part of the overall housing supply situation covered by the SAMDev plan, and believes that the effect of the Ministerial Statement will mean that Shropshire Council will place greater pressure on Parish Councils to accept large "exceptions" sites where there is no justification, that is, in areas where there is no demonstrable local need, simply to make up any shortfall in the provision of affordable housing caused by the restrictions introduced by the Statement and changes to the National Planning Policy Framework and Planning Practice Guidance.

The Parish Meeting sees this situation as a further example of the inadequacy of the policies in the SAMDev in meeting the objectives of the Core Strategy. The strategy for providing the necessary level of affordable housing is unclear, and is severely dented by the Ministerial Statement. It seems to the Parish Meeting that the requirement for "local needs affordable housing" has not been properly assessed in the SAMDev, and that provisions for meeting that need expressed in the SAMDev will not achieve the Core Strategy objective – a situation that will be made worse by the Ministerial Statement.

As the provision of "local needs affordable housing" is an important component in the Core Strategy, the SAMDev cannot be considered "sound" if it likely to fail to produce the number of houses that the Core Strategy requires.

Core Strategy Policy CS11 says that, in order to meet the housing needs of Shropshire residents and create mixed, balanced and inclusive communities, a number of criteria will have to be achieved. One of these is that the Council will "seek" an overall target of 33% "local needs affordable housing" (my underlining) in the first five years of the plan (2011 – 2016).

Para. 5.15 of the Core Strategy explains that the overall target for the provision of affordable housing (though it does not make reference to "local needs") is drawn from the requirement of the Regional Spatial Strategy, having regard to a target for the Housing Market Area Assessment for Shropshire and Herefordshire. The Regional Spatial Strategy no longer has validity, and it is clear that the assessment was not based on any detailed study, at a local level, of the needs of the various communities in Shropshire. Nevertheless, this target figure is used to justify developments such as CRAV002 which far outweigh the actual need in individual settlements or Parishes. The target percentage is also an overall figure and does not suggest any sort of assignment between urban and rural areas or within individual settlements which may well have differing requirements, one from another.

There does not appear to have been a serious attempt to detail the affordable housing requirement during the SAMDev process, the Core Strategy figure, based on the Regional Spatial Strategy, having

been accepted without question. The Council's Response to The Inspector – Policy S7: Craven Arms (which appears to have been prepared by Homepoint) does not, either, give a clear understanding of the requirement for "local needs affordable housing" as referred to in the Core Strategy, as it indicates that the "Waiting List" that it produces comprises people wanting houses "within the Parish" and that the responses in their application forms are used to determine their "degree of housing need." Nevertheless all are included on the Waiting List. The local need element is, then, fairly tenuous, and does not appear to have been assessed in detail in the SAMDev process.

The Parish Meeting notes the figures given by the Council in their "Response to the Inspector's Request for Information" in relation to the Ministerial Statement. It is clear that the effect of the Statement and subsequent changes to the Practice Guidance will be significant, and that it is bound to have an effect on the production of affordable houses. However, the manner in which the money collected by the Council from contributions from qualifying development is actually used is not explained in the SAMDev, and it is difficult to see, in practice, how the spending accurately reflects need that exists in urban and rural communities, and how it is spent to best effect. No reliance can be placed on the Place Plans that were prepared by many Parish or Town Councils, as, for instance, Sibdon Carwood Parish, as part of the Craven Arms Place Plan, indicated that there was no need for affordable housing, and yet the SAMDev seeks to allocate an exceptions site in the Sibdon Carwood area. The distribution of affordable housing, based on the SAMDev, must therefore be questionable, and with money likely to be much restricted as a result of the Ministerial Statement, there will be great uncertainty about where affordable housing might actually be provided. It is likely, in the Parish Meeting's view, that fewer sites will be genuinely "local need" led, and more, as CRAV002, will be geared towards producing greater numbers simply to try to achieve an overall target; the "localism" element claimed by Shropshire Council as the basis for their rural development policies will be further eroded.

In the rural area of the County many of the sites that will be developed for housing will be of less than 10 dwellings, and a good proportion of these will be of less than five dwellings; this is borne out by the figures produced by Shropshire Council in their response on this issue. If it should be that money collected in the rural area will be spent in the rural area then, clearly, the provision of affordable housing in the rural area will decrease in terms of housing for locally generated need. It should also be remembered that the provision of rural housing relies heavily on windfall development (67% of the total). Such development is very likely to be small scale and thus below the 5 units threshold referred to the Ministerial Statement, still further reducing the amount of money available for affordable housing provision. Open market housing

Exceptions sites tend to be either very small, one or two dwellings that are provided specifically to meet a precise, clearly identifiable, local need, or larger developments which are more likely to be carried out by Housing Associations which may not be individually justified, but where they might satisfy the overall supply. The Parish Meeting can see these trends continuing, but with less money collected by the Council, the pressure will grow to provide more large sites, such as CRAV002, that may not be fully justified in terms of an assessment of "local need." This will result in more sites being developed in unsustainable locations – as exceptions to normal restriction – for people who can least-afford to be located in unsustainable situations.

The Parish Meeting, then, considers that the Ministerial Statement will have an effect on the provision of affordable housing in the rural area, and the likely outcome will be further large scale development, that will not "create mixed, balanced and inclusive communities," but will instead become satellite communities in the larger rural area without proper access to local facilities.

The Parish Meeting had no confidence that the SAMDev policies properly addressed the affordable housing needs of the County before the Ministerial Statement, placing development where it is not wanted or needed and not producing appropriate housing where it is needed. They now believe that the SAMDev policies will be even less effective when the Statement is implemented. The conclusion must be, as the provision of affordable housing is central to the policies in the SAMDev plan, that the plan could not be regarded, before the Ministerial Statement, as being sound, but will be increasingly unsound when the Statement begins to take effect. The SAMDev should be revised with a proper assessment of the need for "Local Needs Affordable Housing" (which appears to be different from the

"need" generated from the Waiting Lists) and then a detailed policy for the provision and, importantly, the distribution of those dwellings, introduced into the document.

Yours sincerely

Clive Roberts
On behalf of Mrs E Holden and Sibdon Carwood Parish Meeting

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