

**Shropshire Local Plan
Examination Stage 2 Hearings
Response to Matter 27: General
Housing Policies**

Land at Wolverhampton Road, Shifnal

Catesby Estates

19 September 2024

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1.0 **Introduction**

1.1 This statement to Matter 27 (General Housing Policies) of the examination of the Draft Shropshire Local Plan (‘DSL’P) is submitted by Lichfields on behalf of Catesby Estates (representations formerly submitted under L&Q Estates).

1.2 It follows the submission of representations to the Shropshire Local Plan Examination Stage 1 hearings (June 2022) in respect of land north of Wolverhampton Road, Shifnal, in which Catesby Estates has land interests. For reference, the representations comprising these proposed changes were identified under Representation Reference **A0148**.

1.3 The National Planning Policy Framework (‘NPPF’) outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspectors’ questions which set out why we consider changes to the DSL’P are necessary to ensure the soundness of the Plan.

2.0 **General Housing Policies**

Policy DP1 – Residential mix

Is the policy justified, effective and consistent with national planning policy?

- 2.1 Policy DP1(3) requires that ‘all affordable dwellings will achieve the nationally described space standard’ and that ‘all open market dwellings are strongly encouraged to comply with the nationally described space standard’.
- 2.2 In Catesby Estates previous representations at Regulation 19, it was raised that should the Council wish to apply the optional nationally described space standards (‘NDSS’) to both market and affordable new-build dwellings, this should be done in accordance with Footnote 52 of NPPF Paragraph 135(f): policies may ‘make use of the nationally described space standard, where the need for an internal space standard can be justified.’
- 2.3 In justifying the requirement for NDSS on affordable dwellings, it is noted that an explanation is provided through the DSLP at paragraphs 4.7-4.16. However, whilst the justification makes reference to the SHMA, at paragraph 4.11-4.12, it is noted that the SHMA itself undertakes no assessment or analysis of the need for NDSS on either affordable or market new-build dwellings.
- 2.4 Consequently, it is understood that justification for this policy requirement is set out solely through the DSLP at paragraphs 4.7-4.16.
- 2.5 As set out under Paragraph 31, all policies should be ‘underpinned by relevant and up-to-date evidence’, and ‘should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.’ Additionally, the PPG29 sets out:
‘Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Local planning authorities should take account of [need, viability and timing]’
- 2.6 In this regard, paragraph 4.11 refers to a finding of the SHMA which identified overcrowding in 11% of social rented accommodation. Clearly, social rented accommodation represents only one tenure of affordable housing; such a finding disregards other affordable housing tenures, whereby households in Shropshire may not necessarily experience overcrowding, and thus does not represent the overall trend.
- 2.7 Catesby Estates consider the Council has erroneously conflated the issue of overcrowding with the need for NDSS. Simply put, NDSS assists in mitigating impacts from overcrowding and does not in itself reduce the level of overcrowding. Whilst overcrowding in the region may be an issue requiring tackling, the Council should consider it a symptom of an under-supply of housing¹.
- 2.8 The Council have maintained this position within the main modifications document of the draft Local Plan and do not appear to have taken the previous representations into account. As such, Catesby Estates maintain their stance that the Council should provide an accurate

¹ Wilson & Barton (2020) *Tackling the under-supply of housing in England*, House of Common Briefing Paper No. 07671

local assessment evidencing the case for Shropshire as this has not been demonstrated, and thus the policy requirement fails the test of soundness and should be removed.

Policy DP3 – Affordable Housing Provision

Is the policy justified, effective and consistent with national planning policy, including the 2021 Framework (Paragraph 4.53 of the explanation to the policy refers to the 2019 Framework)?

- 2.9 The approach towards the 15% local housing need uplift is welcomed to help account for acute affordable housing need to help meet the needs of local communities and support new families coming into Shropshire. This uplift accounts for an increase in 125 additional affordable dwellings equating to around 25% of the total housing requirement aligning with PPG ID: 67-008-20190722 is clear that *“an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*
- 2.10 However, the additional provision of affordable dwellings is insufficient to meet the estimated need of 799 affordable dwelling per annum as identified within the Strategic Housing Market Assessment. Catesby Estates still considers further consideration should be given to deliver a greater uplift to its local housing need as the latest evidence to support the plan does not assess whether an increased housing requirement beyond the 31,300 housing requirement would be deliverable in the context of the Plan’s deliverability to the meet the estimated need of 799 dwellings per annum.

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