

Shropshire Local Plan Examination: Stage 2

Representor Unique Number: A0682

Representor: Miller Homes

Matter: Matter 27 – General Housing Policies, including affordable housing (Policies DP1, DP1A, DP2, DP3, DP4, DP5, DP6, DP7, DP8)

Relevant Question Numbers: Policy DP1 (Questions 1, 2, 3), Policy DP2 (Question 5), Policy DP3 (Questions 1, 2)

Matter 27 – General Housing Policies, including affordable housing (Policies DP1, DP1A, DP2, DP3, DP4, DP5, DP6, DP7, DP8)

Miller Homes (A0682)

1. This Hearing Statement is submitted on behalf of Miller Homes (“Miller”).

Context: South West Shifnal

2. Miller’s representations are made in relation to c.65ha of land it is promoting at “South West Shifnal” as identified on the site location plan at **Appendix 1**.
3. Where references are made to the National Planning Policy Framework (“NPPF”), these are made in relation to the July 2021 version, as confirmed by the Inspectors’ Note dated 19 August 2024 (doc ref: ID44).

Policy DP1 – Residential Mix

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

4. The policy is inconsistent with the NPPF - please see our responses to Questions 2 and 3, below.

2. Is the policy flexible enough?

5. It is recognised that Policy DP1 states at Point 1 that *“Residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, including families with children, older people, people wishing to build their own homes and people with disabilities and special needs, in accordance with Shropshire Council’s Strategic Housing Market Assessment.”* The following Points (2 to 6) each state that new development “will” meet the requirements set out in policy rather than being “expected”.

3. Is there sufficient evidence in relation to the viability of sites with this policy applied?

6. The policy should acknowledge that the final mix of any development will be subject to further negotiation between the applicant and the District Council during the planning application stage. This approach is justified in that demography and market signals will change over the plan period to 2038.
7. Detailed prescription should be avoided in order to not undermine market demand and financial viability, which can put delivery at significant risk. Such factors will ensure the Local Plan responds to Paragraph 124b of the NPPF.

Policy DP2 – Self-Build and Custom-Build Housing

5. Will the implementation of this policy adversely affect delivery of sites?

8. Phasing and legal agreements will have to ensure that the provision of 10% of all homes on a development for self-build / custom-build homes would not have an impact on the delivery and occupation of the wider development. This should be a requirement of any policy to ensure that overall housing need for the District can still be met, most likely through the ability of major housebuilders such as Miller to deliver at scale.

Policy DP3 – Affordable Housing Provision

1. 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)?

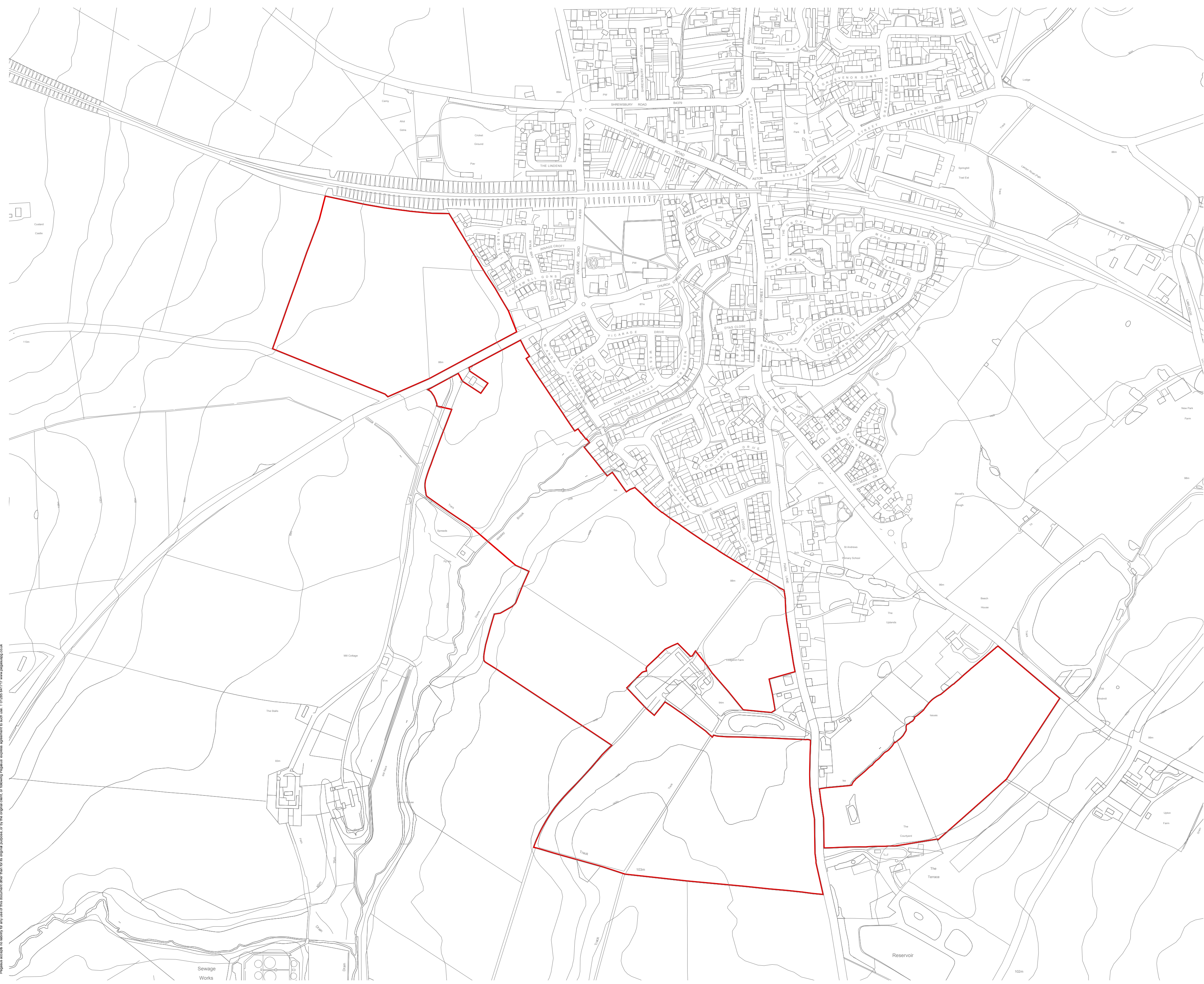
9. The policy is inconsistent with the NPPF - please see our responses to Question 2, below.

2. Is the requirement set out in DP3 1a appropriate and justified?

10. Miller acknowledge Paragraph 20 of the NPPF which states that strategic policies should make provision for housing, including affordable housing.
11. However, the terminology used at Point “B” of Policy DP3 states *“Ensuring that only in exceptional circumstances will either an offsite provision or a financial contribution in lieu of on-site provision be supported on major housing development”* and is not in accordance with Paragraph 63 of the NPPF.
12. Paragraph 63 of the NPPF states that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified. The NPPF does not specify any such definition of *“exceptional circumstances”* for off-site provision or an appropriate financial contribution in lieu. This terminology should be removed from the policy text contained within the Pre-submission Draft Plan.

Appendix 1: Site Location Plan

KEY
Total Site Boundary
64.5 ha / 159.4 acres



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