

## **Response to Site Allocations Consultation from Councillor Andy Boddington**

Councillor Andy Boddington  
Shropshire Councillor for Ludlow North  
8 February 2019

### **Introduction**

I have no substantive objections to the site allocations for Ludlow and the neighbouring parish of Ludford. I am very concerned about the lack of strategic planning for Ludlow in the local plan review. Most of Ludlow's indicative housing need for the period to 2036 has been allocated. This is stated as allowing "a period of respite for the foreseeable future" on expansion to the east of the A49 bypass.

This is not a realistic position for a planning authority to take. Some permitted and allocated sites may not be viable. This could lead to a shortfall of as many as 300 dwellings creating pressure to build on out of town greenfield sites. It may not be possible to resist unplanned pressure for unplanned development if Shropshire Council falls short of a five-year land supply tripping the presumption in favour of sustainable development. If developers fail to build out sufficiently quickly, the escalating demands of the housing delivery test could lead to increased supply buffers and, in an unlikely extreme, the presumption in favour of sustainable development.

If the housing market slows, these scenarios could become a stark reality leading to approval by appeal or council acquiescence to development in fear of appeal. We will endure a permitting regime, not a planning regime.

To avoid this, I believe we must take an early strategic view of the long-term development of Ludlow and its expansion into Ludford. The existence of a masterplan, even if not a statutory document, could help steer development to the most sustainable location east of the bypass. We should put an outline masterplan in place quickly. An SPD should follow, though planning processes and capacity will mean that is a few years away.

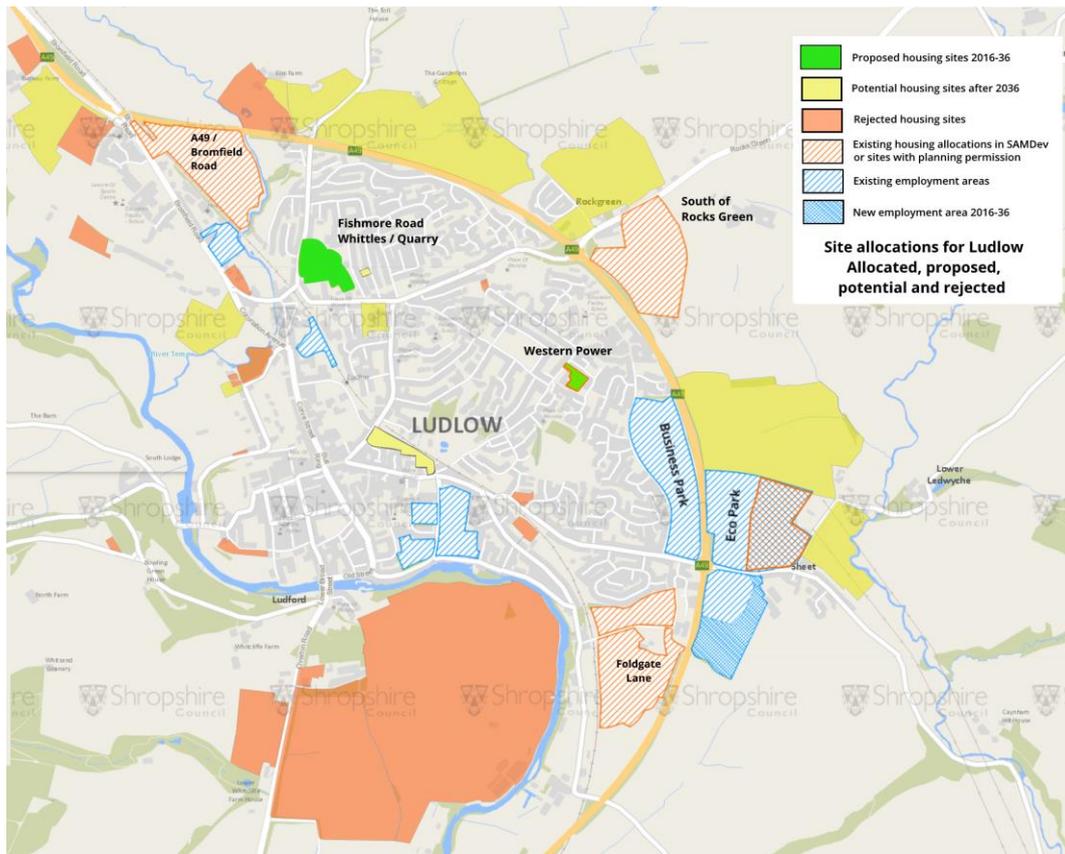
### **Local plan review allocations**

The guideline for development in Ludlow and Ludford to 2036 is 1,000 homes. Of this allocation, 14 dwellings have been built, 840 have planning permission or the sites are allocated in SAMDev. A further 84 will be allocated in this local plan review on Fishmore Road (former depot and quarry, LUD056) and on Ridding Road (Western Power, LUD057). The remaining 62 dwellings will be found through windfall developments.

This does not stack up on the ground.

Two hundred homes are approved in outline and in full at Rocks Green (17/05189/FUL). The 137-home development at Foldgate Lane will get full planning permission shortly. Both developments are viable and both developers have indicated they wish to begin development shortly.

But other developments look doubtful.



The planning application for 74 dwellings on the adjacent former quarry site seems to have stalled (16/03096/OUT). The old quarry is a complex and expensive site to develop because of the requirement for a retaining wall against the quarry face. Despite its sustainable location, it will be challenging to get progress on this site. It is currently for sale. With the level of granted, unbuilt planning permissions elsewhere in Ludlow there will be little incentive for a housebuilder to purchase this brownfield site and commence build out.

The adjacent Whittles site has outline permission for 20 homes. A reserved matters application has recently been filed for 18 homes (19/00242/REM). There is much work to do to improve this application but there are early indications that the scheme lies at the margins of viability.

Nearby on New Road, the building supplies site has outline permission for 24 dwellings and full permission for a further two (14/03091/OUT, 14/03102/FUL). Since these permissions were granted, Huws Grey has built a thriving business on the site. This will benefit from planned development on other sites. I doubt we will see these 26 dwellings built out.

On Bromfield Road, full consent is currently being sought for 213 dwellings (18/05461/REM). This proposed development more than strains the concept of sustainability. It was approved when the unitary authority lacked five-year land supply. Grampian conditions for this development require a full-size roundabout on the A49 and a footbridge over the railway. That's an above £2 million ballpark cost before site preparation, internal infrastructure and CIL. This could undermine the viability of the site unless there is a booming housing market. We are unlikely to see such a boom in a deeply rural town with poor transport connections.

## **The planning context**

Nothing in planning and housebuilding is certain until the keys are handed over for the last house. Housebuilding is prone to market shifts which could undermine viability, housebuilder profits and housing delivery.

This could almost be irrelevant if the government had not introduced the need for a five-year land supply and the housing delivery test.

Shropshire Council's housing plans are ambitious. There is a danger that the council will not be able to meet the commitment to a five-year land supply plus buffer if the market slows and sites become unviable. That will trigger the presumption in favour of sustainable development.

There is an additional danger the council might not meet the targets in the housing delivery test. That will trigger the need for an increased buffer and, although unlikely, the presumption in favour of sustainable development.

Viability and delivery are assessed across the unitary area, not just for the Ludlow place plan area. Areas such as Shrewsbury and Oswestry are expanding quickly but housebuilding in the biggest town could saturate the market in tough economic times. That will leave small towns like Ludlow prone to speculative applications from housebuilders that need to landbank taking advantage of the presumption in favour of sustainable development. That could lead to more unsustainable developments being approved.

I have concerns too that the council has been permitting developments at too low a density and with insufficient emphasis on brownfield. The local plan review's proposal for extensive green belt development in the east of the county could fall foul of the new NPPF at the examination in public. That will create a demand to boost housing development outside the green belt with potential impact on all market towns.

We need a robust local plan that will mitigate the threat of speculative development. We cannot keep sticking estates onto the edge of Ludlow to make the numbers work while disregarding the sustainability of the town. The local plan must set out a clear proposal for a new suburb from Rocks Green to Sheet. The suburb should be built on the highest principles of sustainability.

I favour the concept of a Ludford Garden Suburb. This need not be completed in the plan period to 2036 and almost certainly won't be. But if the concept is included as a clear principle in the renewed local plan, speculative developments under the presumption in favour of sustainable development could become a constructive addition to the town in a future garden suburb rather than incoherent sprawl.

A Ludford Garden Suburb would be ideal for slow build out because it will have low infrastructure costs up front. Slow building will suit a town like Ludlow. We should be thinking 2056 for this suburb not 2036. I see nothing in the NPPF that prevents a long-term vision along with the very specific requirements of delivery in the plan period.

A theme at the Bromfield Road and Foldgate Lane planning inquiries was the lack of a coherent strategy in Ludlow to direct development to the most sustainable locations.

I am conscious that we have a geopolitical issue with expansion of Ludlow. Ludford Parish Council opposes any further development in its parish. But Ludford is not a lone player and is a dependent satellite of Ludlow. We need to plan for all of Ludlow and its hinterland.

We must seriously engage with place shaping and sustainable development for Ludlow and its hinterland. If we get expansion plans right, we will leave a legacy that future generations will be proud of. Or we can just bury our heads in the sand and hope housing development doesn't happen. But we can no more hold back housing than we can the tide.

This is the reason I am frustrated by the site allocations exercise. I understand the limitations of the local plan process and the NPPF. But I think we could be bolder in setting out a long-term strategy for an expansion of Ludlow into Ludford. This need not set out specific site allocations. But we need a policy that designates a zone east of the bypass for long term growth on garden suburb principles.

This will help resist sprawl up the Bromfield Road which will have significant problems of access to the A49 and town services (LUD032, LUD048, LUD049). Of these only LUD048 is flagged as having long potential for development but it could trigger development on the other two sites if access is established.

Further development west and east of the A49 at Elm Lodge will create unsustainable traffic pressure on Fishmore Road (LUD001 rejected; LUD028 & LUD044 long term potential). There is no possibility of access to the A49, which lies in a deep cutting at this point.

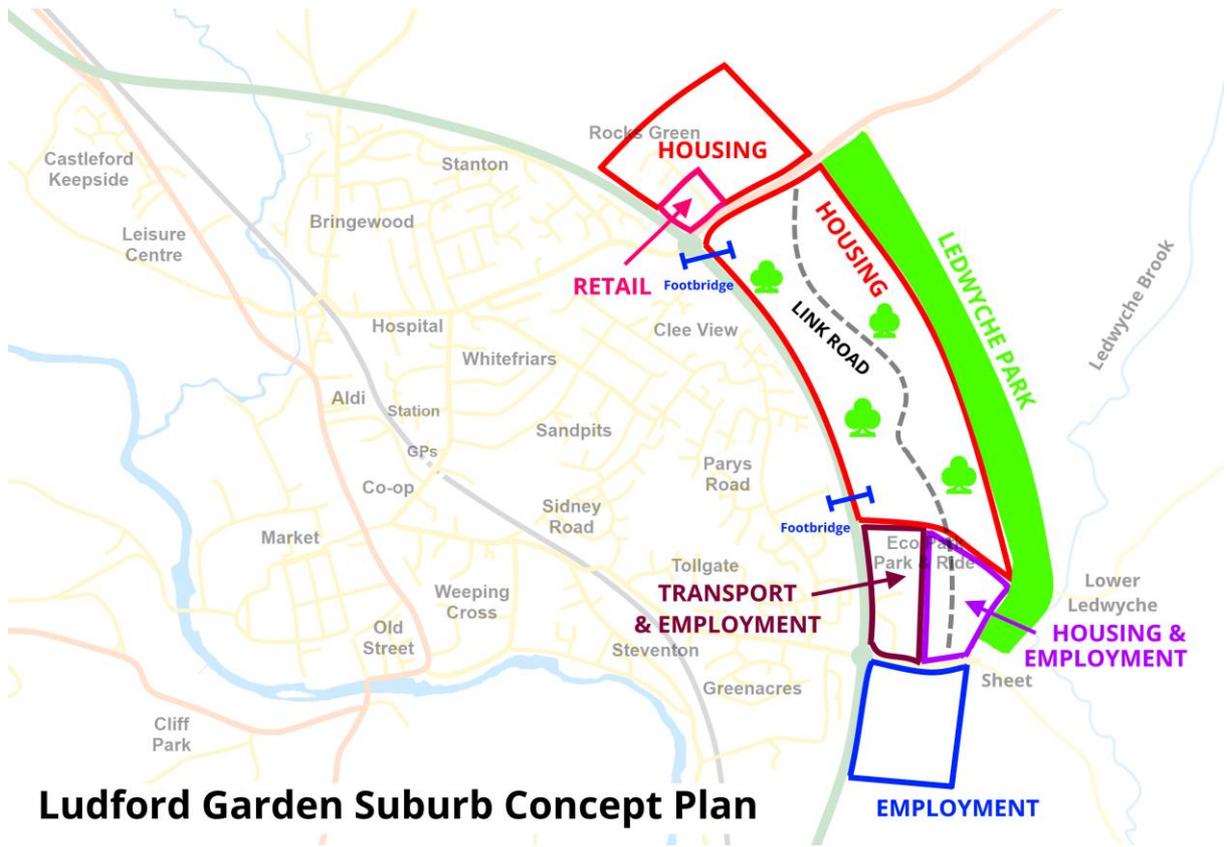
There is a case for LUD019 being a sustainable development, especially if the application for two supermarkets at Rocks Green comes to fruition.

### **Ludford Garden Suburb**

Our primary focus should be to expand south of Rocks Green to Sheet Road from the extant planning permissions. We must not approve further developments in this corridor without any strategic planning to create an eastern suburb of Ludlow. There is no more than a vague idea of developing a masterplan for expansion beyond the bypass. If we continue that approach, it will be to the detriment of future residents and the sustainability of Ludlow and its hinterland.

Sustainable transport will be the key to the success of this plan. On current transport models, a bus link threading through the suburb will reduce traffic pressures on the town centre. By the time the development of the suburb is underway, on demand self-driving cars powered by electric will be part of the mix and possibly other technologies.

The sketch below shows what we could achieve over the next 50 years. To do that we need to engage in strategic planning and ensure the current developer driven permitting regime is subservient to the local development plan.



**Ludford Garden Suburb Concept Plan**