

Shropshire Local Plan Examination (Stage 2) – Matter 25 Five Year Housing Land Supply - Hearing Statement

Vistry Homes Limited (respondent no: A0623)

September 2024

1. This Hearing Statement is submitted on behalf of Vistry Homes Limited in respect to their land interests at land to the west of Albrighton (SLAA Ref. ALB015).
2. We respond to questions 2, 3, 4 and 5.

Question 2: Would the Plan realistically provide for a five-year supply on adoption? Will a five-year supply be maintained? AND Question 3: Is the five-year supply made up of deliverable sites (the definition of deliverable is set out in Annex 2: Glossary to the NPPF)? AND Question 5: Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

3. Having regard to the Five Year Housing Land Supply Statement (April 2024), the supply (at 1st April 2023) over a 5 year period is calculated as 9,761 dwellings. This is dependent on delivery from several sources of supply, including:
 - 10% of dwellings being delivered on sites with planning permission (5,958 dwellings)
 - “saved” sites proposed for allocation in the draft plan (1,274 dwellings)
 - windfall sites (598 dwellings)
 - other proposed allocations in the draft plan (1,491 dwellings).
4. This represents a significant overreliance in particular on “saved” sites and windfall sites. As set out in the hearing statement submitted in respect of Matter 3, the “saved” sites formed part of the SAMDev plan, a part 2 plan which was adopted in October 2015, nearly 9 years ago, and as yet, these sites have not been delivered. The likelihood of these sites now delivering in the first 5 years of the plan period, is a significant risk. Furthermore, as commented in our other hearing statements, the plan is considered to be over reliant of windfall sites coming forward for development.
5. On this basis, broadly excluding the sites which currently do not have planning permission included in the supply identified in the Five Year Housing Land Supply Statement (April 2024), the revised supply is calculated as 6,040 dwellings. When considering this against the annual requirement of 1,423 dwellings, the supply figure **falls below 5 years**. This represents a worst case scenario and assumes that none of the sites otherwise identified by the plan as allocations or those “saved” sites rolled forward from the SAMDev would be granted planning permission or start delivering in the first 5 years of the plan. This notwithstanding, it is not realistic to assume

that all of the sites otherwise included in the 5 year supply, currently not benefitting from planning permission, could start delivering in the next 5 years. The identification of additional available, suitable and deliverable sites would help to ensure a robust supply of sites could come forward early in the plan period.

6. As set out in respect of our hearing statements for Matters 2 and 3, the proposed changes to the Standard Method as established by the July 2024 consultation draft National Planning Policy Framework (NPPF), would almost double the LHN for Shropshire. It is anticipated that the draft NPPF update will be formally published at the end of this year and will therefore be in effect as of January 2025 (accounting for one month post publication). Although the plan is being examined in accordance with the 2018 NPPF, when undertaking monitoring updates of the housing land supply, the Council will need to consider the revised Standard Method derived LHN. It is expected that this will reduce the housing land supply, given the significant increase proposed against the current standard method derived figure. As such, and in response to question 5, **the plan should include a trigger for early review to ensure the local housing need can be properly planned for.**
7. This notwithstanding, the transitional requirements set out at Annex 1 of the consultation version of the NPPF will require the immediate review of the Local Plan under the new plan making system when it comes into effect, given the significant difference between the LHN being planned for and that which is calculated by the new standard method. A clear trigger in policy is still encouraged however and would be good practice.

Contact

Jessica Herritty

18 September 2024