

**Shropshire Local Plan
Examination Stage 2 Hearings
Response to Matter 25: Five
Year Housing Land Supply**

Land at Wolverhampton Road, Shifnal

Catesby Estates

19 September 2024

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1.0 Introduction

- 1.1 This statement to Matter 25 (Five Year Housing Land Supply) 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 **Five Year Housing Land Supply**

Would the Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?

2.1 The Council's latest 5 year housing land supply (5YHLS) statement published in March 2024 provides data up towards the 31st March 2023.

2.2 With regard to the Council's deliverable housing land supply (as of 1 April 2023), the assessment concludes that deliverable dwellings in Shropshire are calculated based on:

- Sites with extant Planning Permission at 31st March 2023.
- Sites with an extant Prior Approval decision at the 31st March 2023.
- Selected sites with a resolution to grant at 31st March 2023.
- Selected sites allocated for development within the adopted Local Plan which are likely to be deliverable within five years.
- Selected sites proposed for allocation for development within the draft Shropshire Local Plan which are likely to be deliverable within five years.
- Selected sites from the Strategic Land Availability Assessment (SLAA) which are likely to be deliverable within five years.
- Affordable housing sites, including Homes England (HE) funded sites.
- Windfall sites.

2.3 As stated within Annex 2 of the NPPF, the definition of deliverable is as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*

2.4 A summary of the deliverable housing land supply as at 1st April 2023, for the five year period from 2023-24 to 2027-28 comprises the following:

Figure 1 Summary of the Deliverable Housing Land Supply

Category	Net Dwellings
(A) Dwellings on sites with Planning Permission*	5,958
(B) Dwellings on sites with Prior Approval*	72
(C) Dwellings on selected sites with a 'resolution to grant'* Planning Permission	10
(D) Dwellings on allocated sites estimated to be completed within 5 years*	1,274
(E) Dwellings on selected proposed allocated sites estimated to be completed within 5 Years*	0
(F) Dwellings on SLAA Sites deliverable within 5 years*	124
(G) Dwellings on emerging affordable housing sites deliverable within 5 years *	247
(H) Dwellings on windfall sites**	598
Total: (A) + (B) + (C) + (D) + (E) + (F) + (G) + H	8,283

Source: Shropshire 5 Year Housing Land Supply Statement 2024

- 2.5 As part of the main modifications document, the housing requirement for the plan period has been updated to around 1,423 dwellings per annum instead of 1,400 as previously proposed when the 5 YHLS was published in March 2024. Therefore, the total housing requirement has been adjusted to 7,115 dwellings. Based on this requirement and the identified supply in figure 1, Shropshire Council currently claim to have a **5.82 years' supply** of deliverable housing land against the proposed housing requirement within strategic policies within the draft Shropshire Local Plan.
- 2.6 However, Catesby Estates have concern regarding the delivery of the identified supply within the next 5 year period.
- 2.7 For Category E 'dwellings on allocated sites estimated to be completed within 5 years' outlined in appendix D, site allocations BRID001, BRID020a, BRID020b and allocation CRAV004 & CRAV010 are optimistic in considering they will start delivering within the next 5 years.
- 2.8 Allocations BRID001, BRID020a, BRID020b has only recently been approved outline permission in March 2024, therefore, the trajectory appears out of date considering a reserved matters application has not been submitted to date and pre-commencement conditions are yet to be discharged. Based on Lichfields Start to Finish insight, it is anticipated a site containing over 500 dwellings can take on average 3 years before its first home is built. As currently presented this allocation will deliver 209 dwellings within the next 5 years, however, this delivery rate is inaccurate and should be pushed back three years. Therefore, based on the trajectory 189 dwellings should be removed from the supply.
- 2.9 In regard to allocations CRAV004 & CRAV010, permission has not yet been obtained for phase 2, as such, the proposed 60 dwellings that are anticipated to be delivered within the 5 year period should be removed.
- 2.10 Therefore, based on the two referenced allocations, it is considered a total of 249 dwellings should be discounted from the Council's five-year supply of housing in accordance with the NPPF's definition of deliverable.

- 2.11 Appendix H provides evidence supporting the deliverability of each emerging affordable housing site (Category G). However, it is worth noting that the majority have not yet prepared a scheme. It is therefore considered acceptable to discount these sites (247 dwellings) from the deliverable supply of housing.
- 2.12 In regard to the delivery of windfall development, the 5YHLS statement indicates over the previous five year period (2018/2019 - 2022/2023) the average number of net dwellings completed on windfall sites equates to 937 dwellings per annum. In the last year recorded year (2022/23) 1,158 dwellings were delivered via windfall developments.
- 2.13 In terms of future supply, it is proposed in figure 1 that small sites windfall allowance of 598 comprising 299 dwellings per annum in the last two years of the five year period. In this respect, this approach is considered overly cautious and the Council do not provide any evidence in regard to the deliverability of these sites. It is therefore suitable to also discount these sites (598 dwellings) from the Council's supply in accordance with the NPPF's definition of deliverable.
- 2.14 Based on a combination of potential shortfall from categories E, G and H, there is a potential supply shortfall of 1,094 dwellings reducing the overall supply to 7,189. Therefore, the Council could only demonstrate a 5YHLS position of **5.04 years**. Although this provision will demonstrate a five year supply on adoption, it provides limited flexibility should a particular supply line not deliver as anticipated. As such, there is concern from Catesby Estates that the 5YHLS position is not as strong as indicated in the latest 5 YHLS Statement from April 2024.
- 2.15 As such, it may be appropriate for further land to be allocated within the draft Shropshire Local Plan to increase the provision the Council 5YHLS position, in particular Land between Revells Rough, Lamledge Lane and the eastern rail line, Shifnal as this is considered suitable, available and deliverable for housing in the short term as demonstrated in evidence d provided within the matter 2 statement.

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