

**ID 10**

## **SHROPSHIRE LOCAL PLAN EXAMINATION**

<b>Representor unique Part A Ref *</b>	<b>A0623</b>
<b>Matter</b>	<b>Matter 4</b>
<b>Relevant questions nos</b>	<b>2, 3, 4 &amp; 6</b>

### **Stage 1 Hearing Statement**

\*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

# Shropshire Local Plan examination – Matter 4 (Housing and Employment Land Needs (policy SP2) hearing statement

Vistry Homes Limited (respondent no: A0623)

May 2022

1.1 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).

1.2 We respond to question 2, 3, 4 & 6.

## **Q2: Is the housing requirement in the Local Plan appropriately aligned with forecasts for jobs growth?**

1.3 The Shropshire Economic Development Needs Assessment (EDNA, Final Report by Lichfields, 2021) (Item ref: EV043) sets out that 1,400 dwellings per annum (as established by Policy SP2 of the Pre-submission draft Plan) will equate to a requirement for 151ha of employment land (Table 8.17), whilst 16,700 new jobs are forecast in Shropshire between 2016 and 2038 (Table 8.3).

1.4 Notwithstanding this, Policy SP2 establishes that around 300 hectares of employment land (circa 14ha per annum) will be delivered over the plan period, in combination with delivery of 1,400 dwellings per annum.

1.5 Policy SP2 effectively doubles the amount of employment land to be delivered through the Plan period when compared with the amount of employment land identified as established by the EDNA. However, the housing requirement is not the subject of an equivalent increase, remaining as 1,400 dwellings per annum.

1.6 Although it is appreciated that the employment land to be delivered through the Plan will partly serve regional needs, it is not considered that the significant amount of additional employment land as identified by Policy SP2, when compared with the need identified by the EDNA, aligns with the housing requirement. Additional housing will be required to respond to the new employment opportunities created and this should be recognised by the Plan.

1.7 Furthermore, the location of new homes proposed for allocation does not align with where employment growth is to be located. Policy S21 allocates 214ha of employment growth at RAF Cosford, yet no additional housing is proposed for allocation in the surrounding area to meet this need. Instead, the plan is relying on 'small scale' windfall development at Albrighton to respond to this need, as per part 4 of draft policy S1.1. The level of growth proposed at Albrighton does not reflect the opportunity presented by

the continued growth of RAF Cosford, or the housing need new employment in the area will result in. This approach conflicts with paragraph 93 of the NPPF which encourages an integrated approach to considering the location of housing, community facilities and services to enable healthy communities, whilst also ensuring development is well located in respect of employment opportunities.

**Q3: What provision is made within the Local Plan to fulfil the identified unmet housing needs of the Black Country, and will the Local Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?**

- 1.8 The plan is not clear where any growth identified to meet any of the Black Country's unmet housing needs will be located. As per our response to Matter 3 in respect to climate change, new homes should be located in the most sustainable locations, near to services, facilities and employment. In terms of the Black Country unmet needs, this should be located near where the need arises, at settlements such as Albrighton.

**Q4: The soundness of proposals for the land allocations in the Local Plan will be considered at Stage 2 of the Examination. However, given that many 'saved' sites which are not before us are included in the housing land supply, is it realistic that this examination can determine if the Council have a 5-year supply of deliverable housing land?**

- 1.9 The Shropshire Site Allocations and Management of Development (SAMDev) Plan was adopted in 2015. Sites identified by the SAMDev Plan have been 'saved' in the new Local Plan without interrogation of the reasoning why these sites have not been delivered since the plan's adoption, although some sites have been deleted.
- 1.10 In light of this, it is considered that the Inspector should review sites contained within the SAMDev Plan, currently proposed for inclusion in the emerging Local Plan, which do not benefit from an extant planning permission, to determine the likelihood of delivery on these sites.
- 1.11 In the context of these uncommitted sites, the presumption should be that they cannot be relied upon by the new Plan, given the passage of time since the adoption of the SAMDev Plan and lack of delivery, alternatives should therefore be sought to meet housing needs.

**Q6: Should the Local Plan include a housing trajectory showing the expected rate of delivery of housing land?**

- 1.12 Yes, a housing trajectory should be provided to establish when delivery will take place on different sites across Shropshire, including those which have been saved from the SAMDev Plan. The data input for a trajectory should be readily available to the Council since they should already have an understanding of the delivery timings for the sites they are relying upon in the draft plan.