



EXAMINATION OF THE SHROPSHIRE LOCAL PLAN

HEARING STATEMENT - MATTER 2

Development Strategy (policies SP1-10 & SP12-15)

On behalf of:
Manor Oak Homes
Respondent Reference ID: A0379

Date:
September 2024

Reference:
01518/LP Examination Matter 2 (2nd Round)

1.0 Introduction

- 1.1 This statement is prepared on behalf of Manor Oak Homes in relation to **Matter 2 – Development Strategy** and provides their brief response to **Question 1** raised by the Inspectors in respect of the policies comprising the plan’s growth strategy.
- 1.2 This submission is made in the context of Manor Oak Homes’ own land at Battlefield Farm (Site SHR197a), a site that was previously identified as a draft employment allocation in the Regulation 18 draft of the plan and one which is therefore demonstrably suitable and deliverable for employment uses. As will be explained in this statement, our client’s accompanying statements on Matters 4 and 26 the plan as currently drafted constrains the delivery of a site which has been consistently marketed for employment uses since mid-2020 and has during this time generated significant interest from prospective investors and prospective occupiers.
- 1.3 What has prevented the progression of our client’s site towards a planning application submission and the inward investment that would be generated by this is the constraining nature of the Council’s proposed development strategy and the exacerbation of this through the high bar set for qualifying applications by the draft plan.
- 1.4 Our additional concerns in respect of the proposed development strategy, not otherwise raised within our response to the initial Matter 3, and how they relate to the economic aspirations of the plan are set out in the following section.

2.0 Response to the Inspectors' Questions

Issue: Whether the Development Strategy is justified, effective and consistent with national policy.

1. Do any of the policies in the Plan require updating as a result of changes in national planning policy since the previous hearings in July 2022?

- 2.1 The single main deficiency of the plan is its period 2016 to 2038. The National Planning Policy Framework (NPPF), published in December 2023, requires positive planning for a period in exceedance of this as clearly stated by paragraph 22 which clarifies:

"Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."

- 2.2 The Framework does provide transitional arrangements for plans at examination. However, these do not apply to the draft Shropshire Local Plan. Paragraph 227 states that the *"policies of the original National Planning Policy Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019"* (our emphasis). The Council's plan was submitted for examination after this date, in September 2021. A minimum 15-year period from adoption will be required.
- 2.3 On this basis, the end date of 2038 is clearly inadequate (presumed to be April of this year to coincide with the Council's monitoring period). With the last of the scheduled hearings into the Shropshire Local Plan falling on 5th December 2024, it would be unrealistic to expect an adoption date prior to April 2025. On this basis there is a *prima facie* case that the plan period should extend to 15 years (minimum) beyond this date, to 2040. This would require an addition of a further two years to the current period, with an uplift in the development targets of the plan to go with it.
- 2.4 Currently the draft plan's housing target is based on Shropshire's Local Housing Need (LHN) figure as at April 2020, resulting in a need of approximately 1,177 dwellings per annum, or 25,894 dwellings over the current 22-year plan period of 2016 to 2038. This baseline has already been found to be sound by the Inspector (ID36) and is therefore accepted. Having reflected on the various components of the housing land supply and best available information regarding likely timescales for their delivery, past rates of delivery, past trends within the market, known factors which may influence the housing market and housing delivery rates in the short to medium term the annual requirement has been subject of an uplift to 1,400 dwellings per annum, albeit this includes the 1,500 additional homes required to satisfy the unmet needs of the Black Country.

- 2.5 The Council's Updated Housing and Employment Topic Paper (April 2024) has further reviewed this approach, assisted by the updated Sustainability Assessment, and now advocates a 'High Growth' strategy which recommends planning for a baseline of 1,423 dwellings per annum, once again including the 1,500 additional homes required by the Black Country Authorities. This results in an amended plan target of 31,300 dwellings. We do not dispute the Council's housing calculations.
- 2.6 However, this must now be further enhanced to accommodate an additional two years' worth of supply to cater for a 2016-2040 plan period. **Accordingly, the housing target for the plan would be 34,250 dwellings (rounded) which would result in a significant deficit in the Council's current supply as planned. Additional allocations will be required with new directions of growth explored.**
- 2.7 Then, the employment land figure must also be similarly adjusted. In line with the Council's housing strategy, which adopts the 'High Growth' option, the Council is similarly planning for the provision of an enhanced level of employment land per annum, one which predicts a 15% uplift on the economic baseline for the plan period (albeit a little lower than the approximate 20% uplift in new homes). Factoring in the additional 30ha required by the Black Country Authorities to meet their unmet economic development needs this results in an employment land requirement of 14.5 hectare per annum.
- 2.8 This figure must also be enhanced to accommodate an additional two years' worth of supply to cater for a 2016-2040 plan period. **Accordingly, the employment land target for the plan would be 350ha (rounded), an increase from the current 320ha (including the Black Country requirement). As with the housing target, additional sites would need to be identified to meet this uplift alone – this on top of the further deficit we identify in our Matter 26 statement resultant of the undeliverable allocations at Shrewsbury.**