

Matter 2 – Development Strategy (Policies SP1 – SP10 and SP12 – SP15)

Hearing Statement

Response on behalf of

Persimmon Homes (West Midlands) Limited

MATTER 2

Introduction

- 1) Harris Lamb Property Consultancy are instructed by Persimmon Homes (West Midlands) Ltd (**PH**) to prepare a response to the Inspector's issues and questions in relation to Matter 2. PH are promoting land at Whitchurch for residential development, the majority of which currently benefits from a draft allocation in the draft Local Plan, with an additional area of land that is currently not allocated. Our representations and comments focus on the spatial strategy, housing land supply and the suitability of the proposed allocation which we cover in our responses to Matters 2, 3 and 24.

Q1 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) No comment

Q2 Is it proposed that the overall spatial strategy and broad distribution of growth set out in policy SP 2 will remain the same following the additional work? If not, how would it change and are the changes justified, effective and consistent with national policy? Are there consequential changes to policy SP 2 or the supplementary text required?

- 3) The spatial strategy set out in policy SP 2 seeks to direct growth to Shrewsbury as the main town, then the principal and key centres, along with strategic settlements and strategic sites. The additional work undertaken by the Council resulted in an increase of the housing requirement of 500 dwellings over the Plan Period. In addition, the 1,500 dwellings to meet the needs of the Black Country have been split out and identified as specific contributions on three of the draft allocations within the pre-submission draft plan (BRD030, SHR060, IRN001) whereas previously they have been included as a blended figure as part of the overall requirement (i.e. Shropshire and Black Country's needs).
- 4) The changes arising as a result of how the 1,500 dwellings to meet the Black Country's needs are dealt with do not change the spatial strategy nor the broad distribution of growth as the 1,500 units are all to be provided on sites that were included as draft allocations in the pre-submission plan. They are not new allocations. The capacity for each draft allocation has been split apart identified to meet Shropshire's need and the rest to the Black Country. Hence no changes arise as a result.
- 5) There is a change to the overall spatial strategy and broad distribution of growth as a result of the housing requirement increasing by 500 dwellings albeit that this is

modest due to the size of the increase in the overall requirement. The Council is now proposing that the development guidelines for Shrewsbury, Whitchurch and the strategic site at the former Ironbridge Power Station will increase by 350 dwellings, 75 dwellings and 75 dwellings respectively.

- 6) The increase to the development guidelines of the two settlements and strategic site do not fundamentally alter the spatial strategy as all three were to receive a significant proportion of development as originally proposed in the pre-submission version plan. The increase to the development guidelines do change the broad distribution of growth as it increases the amount of development that three settlements / sites will need to accommodate rather than splitting the increase equally across the various locations of development.
- 7) PH support the increase in the overall housing requirement and specifically the additional housing to be directed to Shrewsbury, Whitchurch and the former Ironbridge Power Station. Shrewsbury and Whitchurch are the most sustainable locations to deliver housing and an entirely sound and considered approach to delivering the additional houses identified.
- 8) However, an increase in the housing target for Whitchurch needs to be accompanied with an increase in the land identified to deliver these additional homes, but this is not the case. Instead the Council are trying to claim these homes will be delivered in the urban area, but this case does not stand up to scrutiny.
- 9) The Pre-submission Plan proposes three new housing allocations in Whitchurch and to accommodate these it is proposed that the development boundary around Whitchurch is amended. It would not have been necessary to release as much land if there was capacity in the urban area to accommodate more houses and with this being the case it brings into question where the Council considers this additional urban capacity for a further 75 dwellings will come from when the urban capacity had already been exhausted. In our representations we have stated that additional sites should be allocated address the increase in the development guideline for Whitchurch.
- 10) In terms of whether the change to the spatial strategy and distribution of growth are justified, Persimmon Homes consider that particularly in respect of Whitchurch, this is the case, as Whitchurch is a sustainable settlement that is well suited to accommodate further housing growth. This is evidenced by its identification as a Principal Centre and by virtue of the existing and proposed housing and employment allocations that are included for it in the Plan. However, in respect of whether the approach is effective PH state that relying on windfalls to deliver the additional housing identified for Whitchurch would lead to housing needs going unmet and the additional 75 dwellings being directed here just numbers on a piece of paper with nowhere to deliver them. Paragraph 23 of the Framework (2021) states that to meet the identified needs set out in strategic policies, plans should allocate sites to deliver the strategic priorities of the area. As it stands, the plan does not do so in full and as such we consider it is not effective, neither is it prepared in accordance with national policy as a result.
- 11) In terms of whether there are any other consequential changes to the wording of policy SP 2 the plan period currently leads to 2038. As the plan is unlikely to be adopted before 2025 the Plan should look ahead over a minimum 15 year period from adoption. In light of this is there a need to amend the Plan Period to account for the additional 2, if not 3 years along with the consequential changes that this would entail in respect of a further housing requirement and where that should be

distributed. We note that this was a matter that was considered within the Matter 1 hearing session.

- 12) The explanatory text to policy SP 2 needs to be updated to reflect the increased housing requirement of 31,300 along with further changes that result to the annual requirement as a result of the increase.

Q3 *Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?*

- 13) No comment

Q4 *Has meeting some of the housing and employment needs of the Black Country lead to the need to release or safeguard more land from the Green Belt? If so, what are the exceptional circumstances for doing this?*

- 14) No comment