

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage 1 Hearing Statement

<b>Representor unique Part A Ref *</b>	<b>A0455</b>
<b>Matter</b>	<b>4</b>
<b>Relevant questions nos</b>	<b>1, 7</b>

\*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-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

# Shropshire Local Plan 2016-2038 Hearing Statement

## Matter 4 – Housing and Employment Land Needs (Policy SP2)

### Land at Clive Barracks

Prepared by Fisher German LLP on behalf of The Defence Infrastructure Organisation

May 2022

### Project Title

Land at Clive Barracks, Tern Hill, Shropshire

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# 1. Introduction

1.1 This Hearing Statement has been prepared by Fisher German on behalf of the Defence Infrastructure Organisation (DIO) in respect of Ministry of Defence land at Clive Barracks, Tern Hill, as illustrated at Figure 1 below.

1.2 The land is a proposed Strategic Settlement allocation within the emerging Local Plan under Policy S19.

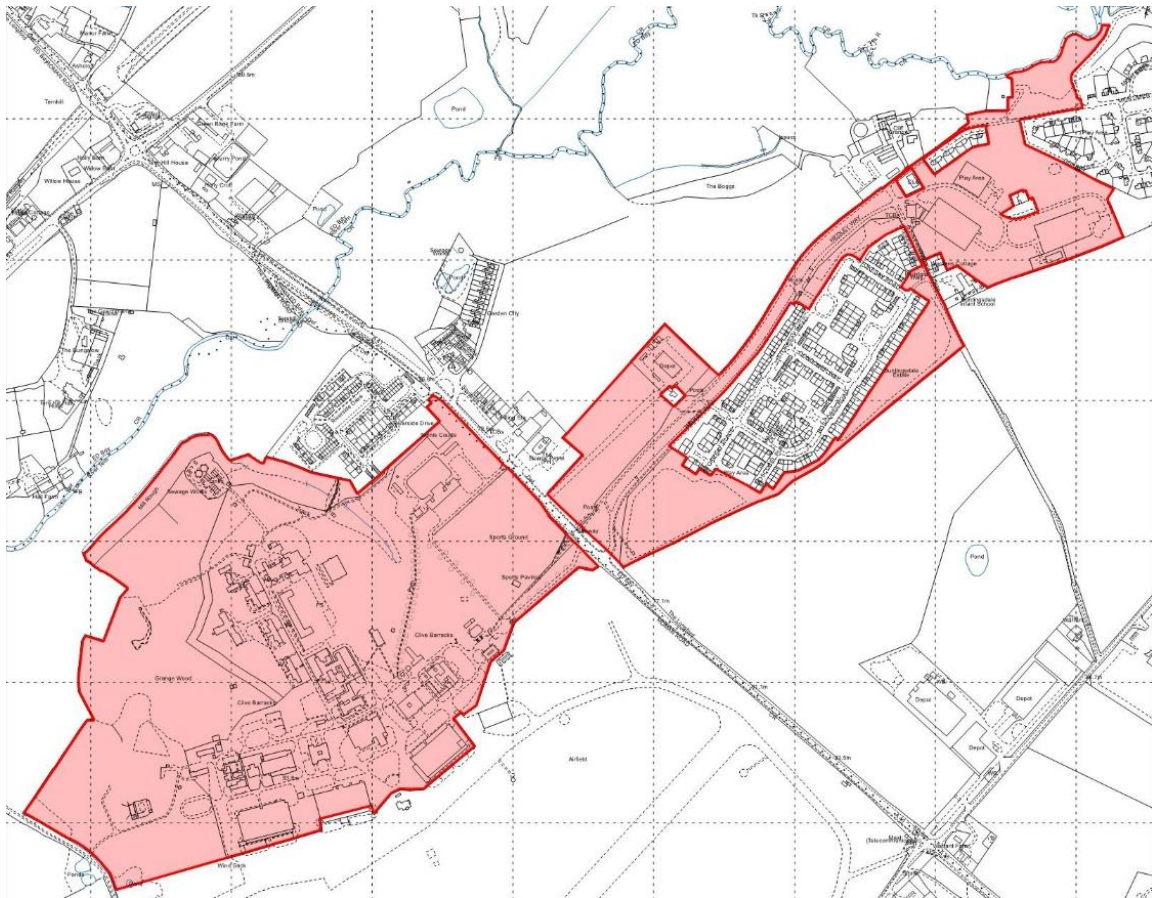


Figure 1: Land at Clive Barracks, Tern Hill

1.3 The proposed allocation is supported and the DIO remain fully committed to the delivery of housing and employment at Clive Barracks and recognise the role of the site in the delivery of housing during the Local Plan Review plan period and beyond.

**Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for housing and employment land.**

## 2. Question 1

Is the preferred approach to housing growth and the housing requirement set out in Policy SP2 of 30,800 dwellings (1,400 dwellings per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

- 2.1 In determining the minimum number of homes needed, paragraph 61 of the NPPF states that strategic policies should be informed by Local Housing Need (LHN) as derived from the Standard Methodology. In addition, to the local housing need figure paragraph 61 of the Framework is clear that any needs that cannot be met in neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 2.2 The PPG is clear that when establishing a housing requirement "*the standard method for assessing local housing need provides a **minimum starting point** in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates*" [our emphasis] (Paragraph: 010 Reference ID: 2a-010-20201216). Examples of scenarios which may justify an increase of housing requirement include growth strategies, the delivery strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority.
- 2.3 The 30,800 dwelling requirement proposed by the Plan represents a 'high growth scenario', above the 25,894 dwelling Local Housing Need figure derived from the Standard Methodology. This higher housing figure is supported and will provide flexibility in the supply and ensure sufficient homes can be provided to support the Council's wider aim of increased economic growth and productivity during the plan period (which is also complemented by the Council's overprovision of employment land).
- 2.4 The housing requirement also delivers 1,500 dwellings to support the housing needs of the Black Country. This contribution has been agreed in a Statement of Common Ground (SoCG) between the Black Country Authorities and Shropshire Council. This approach of planning for the Black Country's unmet needs is wholly in accordance with paragraph 61 of the NPPF.

- 2.5 Moreover, paragraph 35 of the NPPF outlines that in order for plans to be 'positively prepared' they must as a minimum seek to meet the area's objectively assessed needs; but also be "*informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated **where it is practical to do so and is consistent with achieving sustainable development***" [added emphasis]. The Council's approach of integrating the additional 1,500 homes to their wider housing requirements for Shropshire is consistent with achieving sustainable development, as it ensures that the homes will be delivered in accordance with the proposed spatial strategy.

### 3. Question 7

Is the preferred "balanced growth" approach and the resulting employment land requirement set out in Policy SP2 of around 300 hectares (14ha per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

- 3.1 As outlined within DIO's response to Matter 3, Question 18, the employment land requirement of 300 hectares (ha) is based on robust evidence and other wider planning considerations which make it a justified approach, consistent with national policy.
- 3.2 The employment land requirement also includes the provision of 30 ha of land towards the employment needs of the emerging Black Country Plan, where existing evidence demonstrates that delivery is severely constrained. As noted by the Council's Economic Development Needs Assessment (April 2021) (EVO46), the overall employment land requirement for Shropshire is a range is between 128 ha and 234 ha, with the former relating to 2014-based projections and the latter representing historic take up. The total proposed employment requirement, which comprises an 'over-provision' when compared to local need, has been positively prepared to ensure that unmet need from the Black Country has been accommodated in a way that is informed by agreement with the Black Country Authorities and consistent with achieving sustainable development (as is required by NPPF paragraph 35). In addition, it provides choice and competition in the market for employment land.
- 3.3 As set out within DIO's response to Matter 3, Question 18, paragraph 82 of the NPPF states that planning policies should "*be flexible enough to accommodate needs not anticipated in the plan*". The overprovision of employment land means the Plan is 'future-proofed' should there be further economic demands that are not currently anticipated. This is particularly pertinent given the issues

around the larger West Midlands conurbations who are struggling to meet their own needs. This plan can respond positively should the other areas fail to deliver suitable growth. In the context of other authorities becoming difficult to operate businesses in, due to lack of available land, there presents an opportunity for positive and ambitious authorities such as Shropshire to maximise levels of inward investment, providing new jobs and housing, bringing high earning jobs and people into the area.

- 3.4 The Council's proposed employment land requirement is also justified as it ties into the aims of the Shropshire Economic Growth Strategy (SEGS). As outlined within the Council's Employment Strategy Topic Paper, the primary aim of the SEGS is to deliver a 'step change' in the performance and productivity of the Shropshire economy. The planned supply of 300 ha of employment land will help the Council ensure this step change can be achieved.