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Planning Policy & Strategy Team
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11 June 2024

Dear Planning Policy & Strategy Team,

Response to consultation on GC45 – Updated Housing and Employment Topic Paper (updated April 2024) & GC44 - Additional Sustainability Appraisal (Updated April 2024): Pre-submission draft of the Shropshire Local Plan

Strutt & Parker acts on behalf of the Leverhulme Hesketh Trust (“the Landowner”) in promoting Land adjacent to the primary school and The Grove, Hodnet, which are allocated sites (HHH001 & HHH014) in the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038.

We write in response to the current consultation and, specifically, to provide comments in relation to document GC45 – Updated Housing and Employment Topic Paper (updated April 2024) (the ‘HETP’) and document GC44 - Additional Sustainability Appraisal (Updated April 2024) (the ‘SA’).

The HETP states that the 2020 base date assessment of Local Housing Need concluded that local housing need in Shropshire was some 25,894 dwellings over the 22-year plan period from 2016-2038, equating to an average of 1,177 dwellings per annum.

Shropshire Council has undertaken discussions with the Black Country Authorities to address the unmet housing need which is forecast to arise. Subsequently, the SA assessed two options; Option 1: No Contribution and Option 2: 1,500 dwelling contribution, concluding that Option 2 was the most sustainable.

In light of the above, the HETP states that the proposed housing requirement is therefore a minimum of 31,300 dwellings over the 22-year plan period from 2016-2038, equating to an average of 1,423 dwellings per annum. This includes an uplift of 500 dwellings on the housing requirement proposed in the



submission version of the Plan; and a contribution of 1,500-dwellings towards the unmet need in the Black Country.

Meeting the 500-dwelling uplift in housing requirement

The SA assessed four options for accommodating the 500-dwelling uplift in housing requirement:

- Option 1: Increasing Settlement Guidelines and Windfall Allowances.
- Option 2: Densification of Proposed Site Allocations.
- Option 3: Increasing Site Allocations.
- Option 4: A Combination of Two or More of the Other Options.

The SA concluded that Option 1 was the most sustainable option. To meet the 500-dwelling increase on the housing requirement proposed in the submission version of the Plan, adjustments to settlement guidelines and windfall allowance in Shrewsbury, Whitchurch and the Former Ironbridge Power Station are proposed.

We contend that it would in fact be more appropriate to pursue an option that spreads housing distribution more evenly across the county in sustainable settlements and intensification of existing draft allocations.

This allocation (HHH001 & HHH014) as drafted for 40 dwellings is suitable, available, and achievable. However, the density as drafted across these sites taken together equates to circa 13/14 dwellings per hectare. It is therefore considered that additional densification on this allocation (HHH001 & HHH014) is more than possible and would not affect the site’s suitability, availability, and achievability, but in fact would improve its contribution to the increased housing requirement.

Pursuing Option 2 would allow for the need to be met throughout the county, reducing the need to uplift the dwelling numbers in just three areas: Shrewsbury, Whitchurch, and the Former Ironbridge Power Station. The below table provides comments on the SA findings with regards to Options 1 and 2.

Sustainability Objective	Option 1	Option 2	Comment
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1: Protect and enhance the range of plants and animals in Shropshire and the quality and extent of wildlife habitats	1	2	It is not clear how increasing the density across existing draft allocations would result in more harm than increasing the dwelling numbers in just three areas.
2: Encourage a strong and sustainable economy throughout Shropshire	1	2	It is contended that spreading housing distribution more evenly across the county would meet this objective better, as it would encourage a strong and sustainable economy “throughout” Shropshire, not just in three locations.
3: Provide a sufficient amount of good quality housing which meets the needs of all sections of society	1	1	No comment.
4: Promote access to services for all sections of society	1	2	It is unclear how there is any discernible difference in meeting this objective between Options 1 and 2.
5: Encourage the use of sustainable means of transport	1	2	No comment.
6: Reduce the need of people to travel by car	1	2	No comment.
7: Support active and healthy communities	1	2	It is unclear how there is any discernible difference in meeting this objective between Options 1 and 2.
8: Protect and improve soil quality	1	2	It is unclear how there is any discernible difference in meeting this objective between Options 1 and 2. Increasing density on draft allocations will not cause any greater impact on the soil quality of those sites than as currently drafted.
9: Conserve and enhance water quality in Shropshire and reduce the risk of water pollution	1	2	It is unclear how there is any discernible difference in meeting this objective between Options 1 and 2.
10: Reduce flood risk and improve flood management	2	1	Option 2 performs better than Option 1.
11: Conserve and enhance Shropshire’s air quality and reduce the risk of air pollution	3	1	Option 2 performs significantly better than Option 1.
12: Reduce carbon dioxide emissions	1	2	It is unclear how there is any discernible difference in meeting this objective between Options 1 and 2.
13: Promote adaptation and mitigation to climate change	2	1	Option 2 performs better than Option 1.
14: Promote efficient use of natural resources	1	2	It is unclear how there is any discernible difference in meeting this objective between Options 1 and 2.
15: Conserve and enhance features and areas of heritage value and their setting	3	1	Option 2 performs significantly better than Option 1.
16: Conserve and enhance landscape character and local distinctiveness	1	1	No comment.

Meeting the 1,500-dwelling contribution towards the Black Country unmet need



As set out in the Inspectors' Interim Findings (ID38), any proposed contribution to the Black Country's unmet housing need would need to be provided on a specific site or sites. In light of this, the Council proposes to meet the 1,500-dwelling increase on just three allocations - *BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings; SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings; and IRN001 - Former Ironbridge Power Station: 600 dwellings.*

To inform the selection of sites to accommodate the proposed contribution of 1,500-dwellings, an appropriate geographic location, within which reasonable options for sites to accommodate the proposed contribution to the unmet housing need, was identified. This included a consideration of transport links, migration patterns and commuting patterns. This concluded that "*reasonable options for sites to accommodate the proposed contributions to unmet housing need forecast to arise within the Black Country are in the east and central parts of Shropshire at the larger settlements where housing growth is proposed, and potential strategic settlements/sites*" (GC45, para 9.6).

However, despite the Council assessing 450 sites that met this geographical requirement, only three sites have been chosen to meet this unmet need. As set out above, we contend that it would, in fact, be more appropriate to spread this unmet need more evenly across numerous sites in sustainable settlements and through the intensification of several existing draft allocations, not just three. The addition of such a large quantum of dwellings on already significantly large draft allocations has the potential to slow down the delivery of these homes. Spreading the need more evenly will allow for sites to be built out faster to meet this pressing need.

The Leverhulme Hesketh Trust would also like to make verbal representations regarding the Development Guidelines for the HHH001 & HHH014 allocation at the Stage 2 hearings.

Thank you for taking our comments into consideration. Please get in touch using the details at the top of this letter if you have any queries.



Yours faithfully,

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Strutt & Parker