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Dear Sir/Madam

Shropshire Local Plan Examination: Further Consultation Focusing on Additional Material Prepared in Response to the Planning Inspector's Interim Findings Response on Behalf of Persimmon Homes

Harris Lamb Planning Consultancy ("**HLPC**") is instructed by Persimmon Homes ("**PH**") to submit representations to the additional material that Shropshire Council is currently consulting on following comments by the Planning Inspectors to the Shropshire Local Plan Examination. PH have previously submitted representations to the emerging Plan and at Pre-submission stage principally in relation to land that it is promoting at Liverpool Road, Whitchurch (WHT014) which is included in the Pre-submission Plan as a draft allocation for 70 houses. PH are also promoting additional land at Whitchurch as a housing omission site which lies immediately adjacent to the draft allocation. Please see the attached site location plan. We previously attended the Local Plan Examination Hearing Sessions and now welcome the opportunity to comment further in relation to the additional material that has now been published. Our comments principally focus on the updated Housing and Employment Land Topic Paper.

Updated Housing and Employment Topic Paper

The Council has updated its housing requirement which was originally calculated in 2020 and which was set out in the Pre-submission version Plan. The re-worked housing requirement has used the same percentage uplifts (5%, 10% and 15%) as well as making a contribution of 1,500 dwellings to meet the unmet needs of the Black Country. The Council conclude that Option 3B: high growth plus a 1,500 dwelling contribution to the Black Country authority's unmet housing need is the preferred option that the Council wish to pursue. This results in a housing requirement of 31,300 dwellings over the proposed plan period from 2016 to 2038 which equates to an annual average of around 1,423 dwellings. This presents an increase of 500 dwellings for the housing requirement that was proposed in the pre-submission version of the Plan that was submitted for examination. PH supports the Council's continued focus on the high growth option seeking to achieve a 15% uplift on local housing need whilst also still making an allowance for meeting the unmet needs of the Black Country authorities.

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The Housing and Employment Topic Paper then proceeds to address how the additional 500 dwellings are to be provided and then assesses the options for delivering the 1,500 dwellings for the unmet needs of the Black Country. Turning to meeting the needs of Shropshire first four options are tested. These included:

- a) Option 1 : Increasing settlement guidelines and windfall allowances;
- b) Option 2 : Densification of proposed site allocations;
- c) Option 3 : Increasing site allocations; and
- d) Option 4 : A combination of 2 or more of the other options.

Option 1 seeks to allow greater room for development within the strategic, principal, key centres and/or strategic settlements to provide additional capacity for windfall development. The Council consider at paragraph 8.7 that settlement guidelines and associated windfall allowances in the draft Plan were considered reasonable when proposed and that there is flexibility to allow for settlement guidelines to be exceeded. Furthermore, the Council considers there is evidence that in some instances settlement guidelines and associated windfall allowances have been overly cautious.

Turning to Option 3: increasing site allocations, the Council acknowledges that there may be opportunities to extend the site area of the proposed allocations to increase their capacity and/or opportunities to identify additional site allocations including identification of new site allocations associated within existing settlements.

The Council conclude that Option 1 is the preferred option and that as a result the Council will seek to rely on the additional 500 dwellings being delivered through additional windfall development in strategic, principal, key centres and/or strategic settlements to provide the additional capacity. PH object to this approach and consider that Option 3: increasing site allocations should be the preferred option instead. PH consider that in a plan-led system identification of site allocations would provide greater certainty that the housing requirement would be met through the identification of specific sites that would be confirmed as deliverable. Clearly, the Council considers that there is available capacity within the existing strategic, principal and key centres for these sites to come forward as windfalls. PH contend that if this is the case then these sites should be identified as allocations.

The Council then go on to consider where the additional 500 dwellings that are proposed can be accommodated. The table following paragraph 8.91 confirms that Shrewsbury as a strategic centre will increase the settlement guideline by a further 350 dwellings, whilst Whitchurch as a principal centre will have its dwelling guideline increased by 75 dwellings. The remainder of 75 dwellings will be provided at the former Iron Bridge power station (strategic settlement). In identifying Whitchurch as being one of only 3 locations that additional growth is to be directed PH note that Whitchurch is already subject to a number of draft allocations including the land at Liverpool Road (WHT014). In the representations that PH submitted at the pre-submission stage further land adjacent to the draft allocation was submitted to the Council as a proposed extension to the allocation in case there was a need for further land for housing. This is now confirmed as being the case. The additional land that PH are promoting could accommodate an additional 30 dwellings above the draft allocation figure of 70. Whilst the additional land that PH are promoting will not meet the full additional dwelling requirement that is proposed for Whitchurch it could meet approximately half of this. It is noted that additional sites are also promoted around Whitchurch and included within the latest SHLAA should the Council need to identify the balance to meet the additional 75 dwellings.

PH, therefore, consider that increasing the size of the allocation at Liverpool Road would provide greater certainty in meeting the increased housing requirement for Whitchurch. Furthermore, the representations submitted in respect of the draft allocation at Liverpool Road confirmed that the site is not subject to any technical, physical or environmental constraints

that would have prevented its development. The same is true of the additional land that is being promoted. Furthermore, the site is being promoted by a national housebuilder with a track record of delivery which would ensure that houses could come forward early in the plan period. There are no legal or ownership issues and the site is under the control of a national housebuilder, which all provide greater certainty that the site would be delivered should it be allocated.

We note that whilst the Council have stated that their preferred option is to rely on additional windfalls coming forward to meet the additional housing requirement for Shropshire it is proposing to identify strategic allocations to meet the needs of the Black Country (1,500 dwellings). The Council clearly sees the benefit in identifying allocations to meet the specific need arising outside of their administrative area although the same cannot be said for meeting the additional need that is required to meet the housing needs of Shropshire. As such we do not consider that Option 1 is a sound approach and that through the identification of additional allocations would provide greater certainty that the housing needs of the country will be met through the Local Plan. Our previous representations set out the merits of the additional land at Liverpool Road and again we wish to reiterate these to the Inspectors and Officers.

We would welcome the opportunity to participate at a further hearing session in relation to the revised housing requirement and approach to meeting this need.

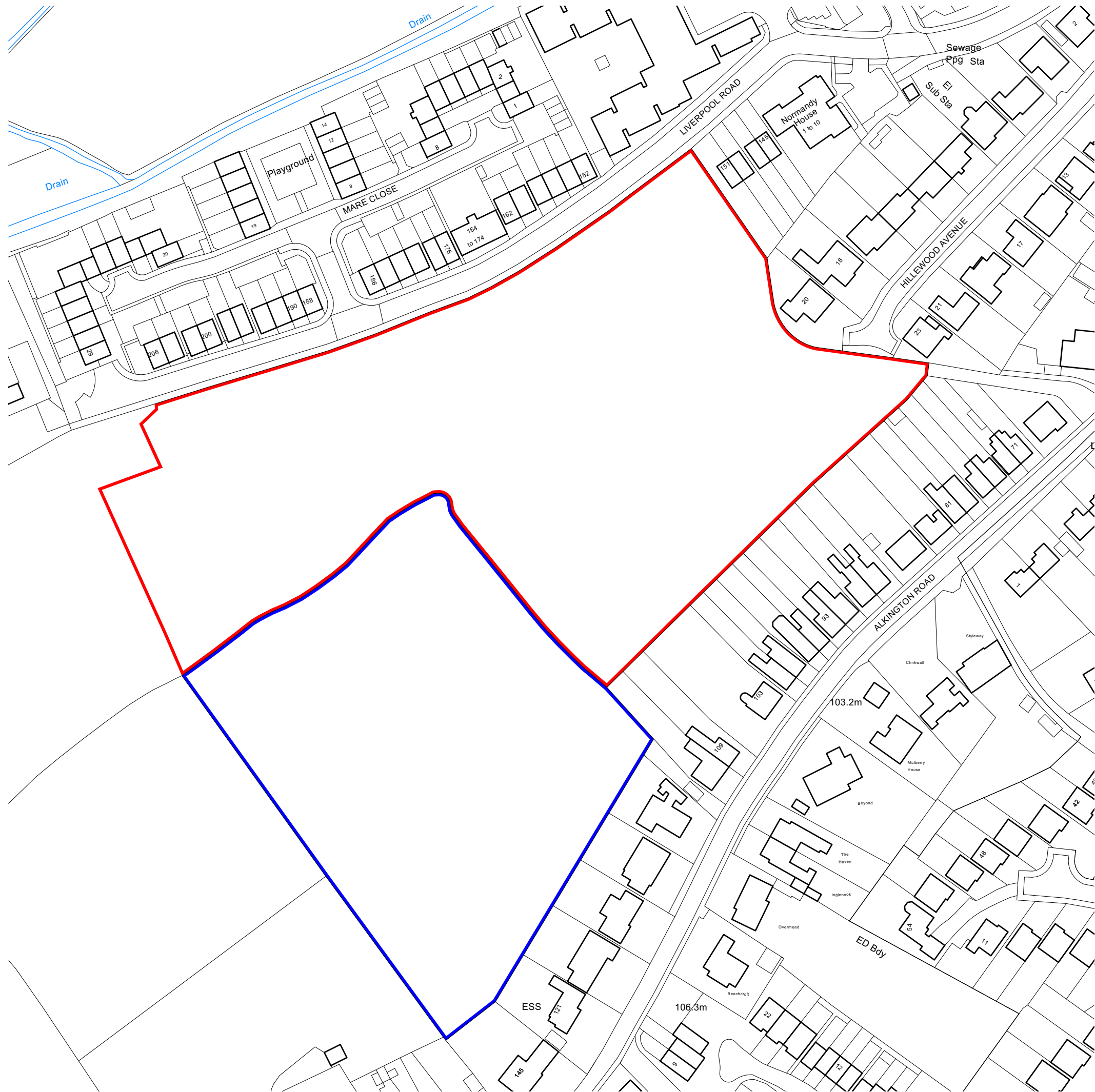
Should you have any questions about the above or need to discuss please do not hesitate to contact me.

Yours faithfully

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Enc.

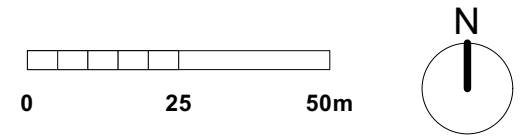
CC: A Stewart – Persimmon Homes



NOTES

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KEY

- Draft Allocation Site Boundary
- Option Land Site Boundary

P01	30/05/2024	First issue.	JDD	KMN
rev	date	description	drm	chk



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client
Persimmon Homes Midlands

project
**Liverpool Road
 Whitchurch**

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Location Plan

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