

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	McGowan Grocott Land & Property Ltd
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	8.3 – Options to Accommodate the Proposed Uplift to the Housing Requirement
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

McGowan Grocott Land & Development support Option 1 in increasing the windfall allowance but for the plan to be sound it is considered the settlement boundary needs to be expanded to afford sufficient windfall opportunities.

Inclusion of land off Alkington Road, adjacent Winspur is one such modest amendment which is seen as yielding appropriate housing early in the plan period.

We have ticked the box below suggesting that we would like to appear at the hearing session, but do so only if the issue of capacity of Whitchurch and settlement boundary is to be discussed.

See attached covering letter – REF; 'MGLP – Alkington Road'

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

No, I do not wish to/consider it necessary to participate in hearing session(s)

Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.



Peter Richards & Co.

Crabtree Farm,
Prees Heath, Whitchurch,
Shropshire
SY13 3JY

Planning Policy
Shropshire Council
PO Box 4826
Shrewsbury
SY1 9LJ

10th June 2024

BY EMAIL ONLY: planningpolicy@shropshire.gov.uk

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 McGowan & Grocott Land & Property Ltd

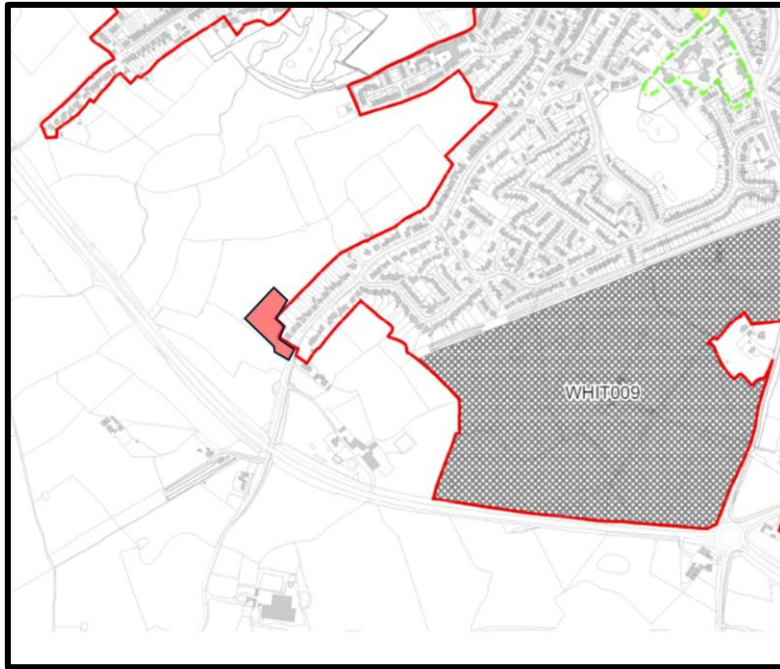
Peter Richards & Co. Ltd is instructed by McGowan Grocott Land & Property (MGLP) to submit representations to the additional material that Shropshire Council is currently consulting on following comments by the Planning Inspectors to the Shropshire Local Plan Examination.

Comments principally focus on the updated **Housing and Employment Land Topic Paper**.

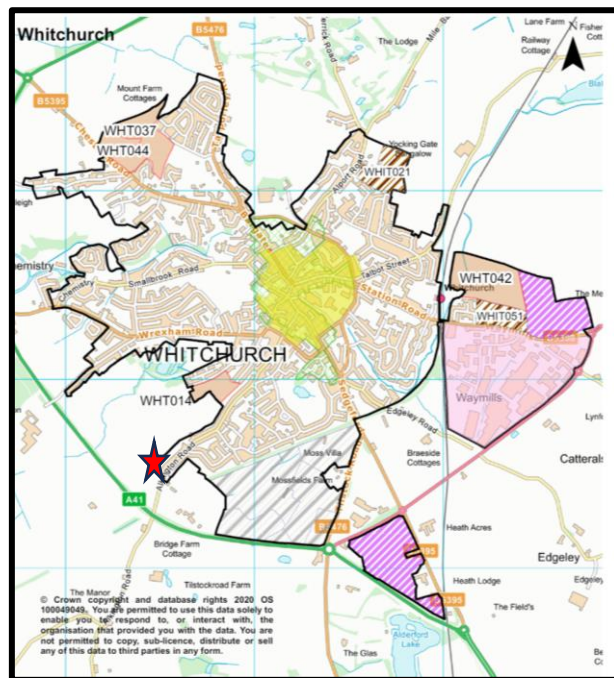
MGLP wish to highlight the opportunity to expand the settlement boundary surrounding Whitchurch to include 1.7 acres adjacent Winspur off Alkington Road, located to the south-east edge of Whitchurch.

The aforementioned site has potential to contribute to the housing numbers for the town, thus it is prudent to highlight the deliverability of this site, particularly as Whitchurch is identified as a settlement catering for additional housing numbers.

Shaded red below, land adjacent Winspur abuts the existing and proposed settlement boundary afforded Whitchurch in the current local plan.



Current SAMDev Plan extract of Whitchurch



Local Plan Review extract of Whitchurch

It is acknowledged that the Council has updated its housing requirement which was originally calculated in 2020, outlined in the Pre-submission version of the 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 their preferred option.

As a result, it is recognised that a housing requirement of 31,300 dwellings over the proposed plan period from 2016 to 2038 equates to an annual average of around 1,423 dwellings.

Thus, it is understood an increase of 500 dwellings for the Council's housing requirement is proposed.

MGLP support 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.

Detailed within the Housing and Employment Topic Paper are four options for how the additional 500 dwellings are to be provided;

- 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. Paragraph 8.7 states that *'Settlement guidelines and associated windfall allowances in the draft Shropshire Local Plan were considered reasonable when proposed, and there is flexibility within the draft Shropshire Local Plan for settlement guidelines to be exceeded. However, there is evidence that in some instances settlement guidelines and associated windfall allowances have been overly cautious'*.

It is recognised that 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.

MGLP recognise that the Council consider that the additional 500 dwellings (table following paragraph 8.91) can be accommodated in Shrewsbury (strategic centre) which will increase the settlement guideline by a further 350 dwellings, with Whitchurch (principal centre) will have its dwelling guideline increased by 75 dwellings. Whilst 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, it is noted that development boundary proposed is drawn tightly around Whitchurch.

MGLP support the Council's preferred approach, albeit question the soundness of the plan without expanding the settlement boundary of Whitchurch to increase the scope for sufficient windfall development.

It is acknowledged that Windfall sites are those which have not been identified within the Local Plan. Paragraph 70 of the NPPF specifies that *“where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”*.

As much of the Council's recent housing supply has been delivered as a result of speculative developments, when the Council couldn't maintain a 5 year land supply, often on sites outside settlement boundaries, caution should be applied when considering historic windfall data.

Thus, it is considered important to the soundness of the plan that the settlement boundary of Whitchurch is reassessed.

MGLP highlight that the modest parcel of land to the south-west of Whitchurch is in agricultural use, contained by established field boundaries and afforded good access onto Alkington Road. It is anticipated that land adjacent to Winspur could accommodate circa. 12-15 dwellings, with the density of development respecting the surrounding built form density.



Land Adjacent Winspur, Alkington Road

The relationship of land adjacent Winspur, the existing settlement boundary and the surrounding built form means development of the land would complement the spatial pattern and ensure a sustainable development accessible to facilities afforded in Whitchurch is provided.

Please note, in promoting this site, MGLP are experienced in land promotion and housebuilding thus confident of delivering this site, which requires minimum infrastructure, early in the plan period.

In summary MGLP support Option 1 being a logical approach in the 'Options to Accommodate the Proposed Uplift to the Housing Requirement' (section 8), albeit question the soundness of this plan if the settlement boundaries are not expanded.

Should you wish to discuss this site please do not hesitate to contact me.

Yours faithfully

P.W. Richards

Peter Richards MRICS
Chartered Surveyor