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Planning Policy & Strategy Team
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Ref: SH/212121

11th June 2024

Dear Planning Policy & Strategy Team,

Response to further 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 Metacre (“the site promoters”) and Beth Wilson, Jennifer Martin-Jones, Benjamin Brown and Georgina Bright (“the landowners”) in promoting land at Snatchfield Farm, Church Stretton, identified as site CST021 in the previous Regulation 18 Pre-submission draft of the Shropshire Local Plan. We write in response to the Shropshire Local Plan Examination and to provide comments on the current further consultation focusing on additional material prepared by the Council in response to the Planning Inspectors’ Interim Findings.

Specifically, we write 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 spoken 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 and other housing requirement analysis work, the HETP states that the proposed housing requirement is now 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 needs arising from the Black Country.

We support the increase to the housing requirement, although we question whether the proposed solution for meeting the additional requirement is sound as set out in the further comments below.

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 allowances in Shrewsbury, Whitchurch and at the Former Ironbridge Power Station are proposed.

We contend that it would in fact be more appropriate and sound to pursue one or more options that spread housing distribution more evenly across the county in sustainable settlements via the densification of proposed site allocations and increasing site allocations more generally.

Church Stretton has already been identified as a sustainable settlement with new residential development supported at this key settlement as part of the submission version of the Plan. However, no allocations have been made to deliver this growth with the Council instead relying upon windfall developments to come forward, which we have previously made representations on at the Regulation 19 stage examining the soundness of this strategy. While the current further consultation arising from the Inspectors' Interim Findings does not directly touch upon Church Stretton, we contend that identifying new site allocations would be worthwhile to support the delivery of the increased housing requirement, with our clients' land

at Snatchfield Farm, Church Stretton being available now and offering a suitable location for around 70 new homes.

Meeting the 1,500-dwelling contribution towards the Black Country's 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 some existing 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.

Thank you for taking our comments into consideration. We do not believe it is necessary for us to attend a hearing session on the papers the subject of this further consultation, although we continue to want to participate in the Stage 2 hearing sessions, particularly any relating to Church Stretton.

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