

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:	Plas Foxen Homes 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):	8.7 - Settlement guidelines and associated windfall allowances
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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.

The soundness of the plan is questioned in respect of the reliance on windfall housing.

Plas Foxen Homes Ltd support the high growth option favoured by the council and it is acknowledged that a further 500 dwellings are targeted. It is queried however if the housing guidelines attached to settlements can be achieved with particular regard to Gobowen, within the Oswestry place plan.

The soundness of paragraph 8.7 of the housing topic paper is questioned, as it is evident the guideline for housing delivery in Gobowen remains high, but the contraction of the settlement boundary reduces the scope for windfall development.

PFHL proposed the settlement boundary to remains as per the SAMDev plan, thus increasing the capacity for windfall development, subject to robust assessment of technical constraints.

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

(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.

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Planning Policy
Shropshire Council
PO Box 4826
Shrewsbury
SY1 9LJ

11th June 2024

BY EMAIL ONLY: planningpolicy@shropshire.gov.uk

Dear Sir/Madam

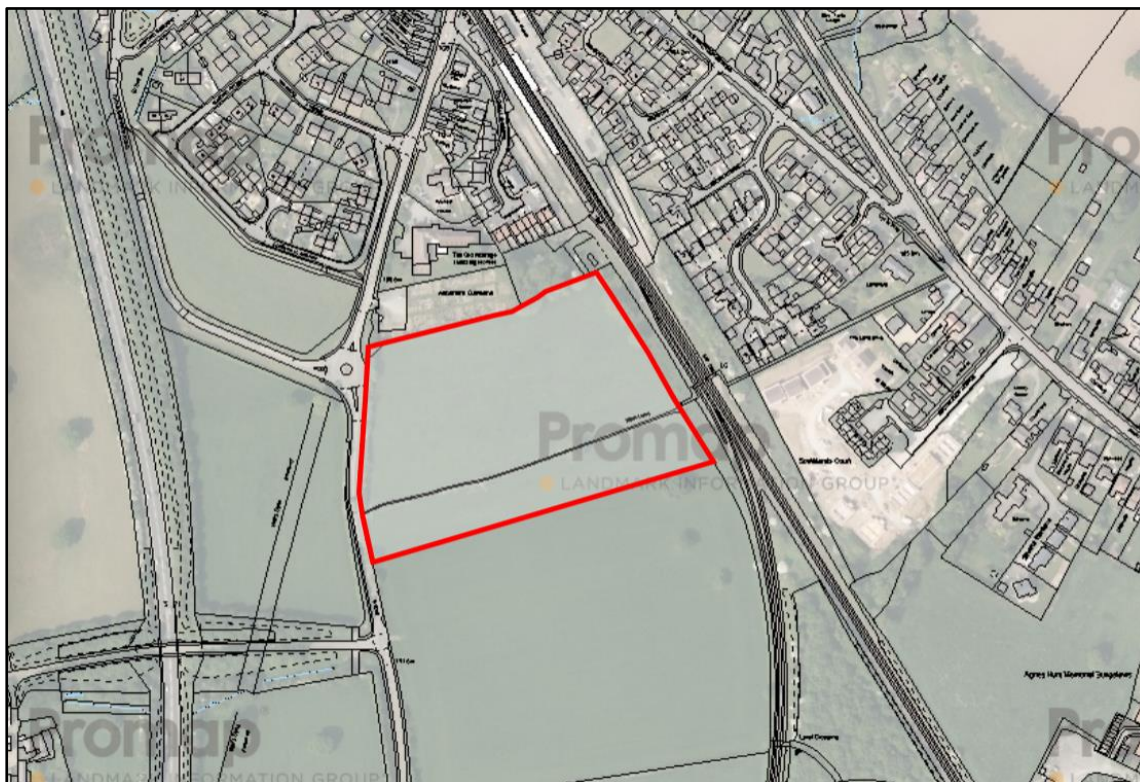
**Shropshire Local Plan Examination:
Further Consultation Focusing on Additional Material Prepared in Response to the
Planning Inspector's Interim Findings Response on Behalf of Plas Foxen Homes
Limited**

Peter Richards & Co. Ltd is instructed by Plas Foxen Homes Limited (PFHL) 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.

Plas Foxen Homes Limited have provisionally agreed to purchase land south of Gobowen, part of Pentre Wern Farm, which includes circa. 8 acres of land currently within the Development Boundary of Gobowen.

It is acknowledged that the land is currently located within the settlement boundary of Gobowen, thus a windfall opportunity, however it is noted the proposed settlement boundary in the draft plan will see it excluded, if adopted.

The subject land is shown in context with surrounding land below.



Plas Foxen Homes Ltd (PFHL) are a family run development company local to the Oswestry area. Having recently completed a successful development at Four Crosses they are actively seeking new opportunities for development. Land south of Gobowen is identified by PFHL as being suitable to accommodate up to 80no. dwellings.

PFHL recognise that the site is identified as being in Flood zone 3, albeit they are working closely with a specialist flood risk consultant to undertake detailed modelling of the site and thus challenge the zoning. Recent development on nearby land has seen site specific assessments accurately assess the flood constraint and allow planning consent to be obtained.

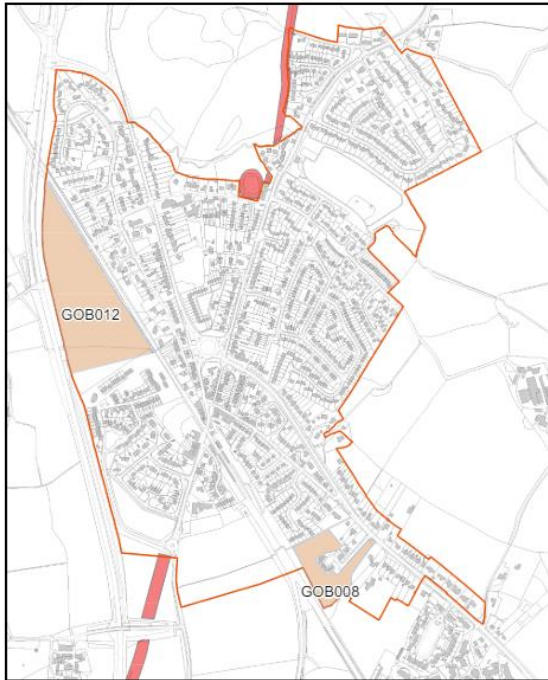
Status of Gobwen – Adopted SAMDev vs Emerging Local Plan - Gobowen is currently a Community Hub with a development boundary. Whilst it is proposed that this status will remain under the Emerging Local Plan, a tightening up of the development boundary is proposed to exclude this site. This will reduce the scope of windfall development in this settlement.

In reviewing settlements guidelines it is noted in the current SAMDev plan it specifies that Gobowen as a community hub which will provide for future housing growth of about 200 dwellings over the period to 2026 (S14.2(i)); delivered through the development of two specific sites (GOB008 – 20 dwellings & GOB012 – 90 dwellings) together with development by infilling, groups of houses and conversions on suitable sites within the development boundary identified on the Policies Map.

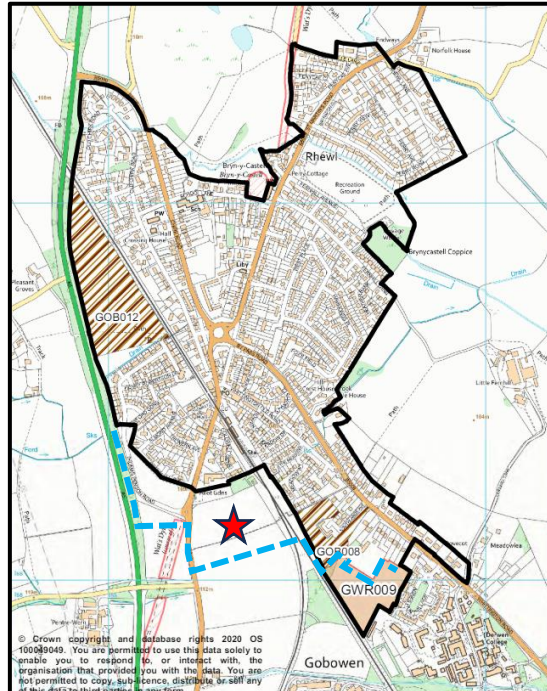
Whilst it is understood that allocation GOB008 is being developed with 38no. dwellings (22/00201/FUL), planning history for allocation GOB012 indicates that no application has been made for development of this land, despite it being allocated for close to 9 years.

Thus, there appears an evident shortfall against target numbers and delivery.

In the emerging plan it is acknowledged that Gobowen, as a community hub, will have a housing guideline of 360no. dwellings but it is proposed to reduce the extent of the settlement boundary and add only one additional allocation; GWR009 (25 dwellings).



Current SAMDev Settlement Boundary



Proposed settlement boundary

On the extract of the proposed settlement boundary the Blue Line shows the current position of the development boundary, which incorporates land being promoted by PFHL, which is evidently proposed to be omitted.

It is acknowledged that the subject site has no reference under the SHLAA and so has not been previously considered by Shropshire Council, but, in light of PFHL's recent interest in this site they are keen to actively promote this opportunity.

Comments upon Housing and Employment Land Topic Paper (published April 2024) -

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.

The Council adopted a high growth option is supported and 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.

It is not the intention of this letter to reiterate all the points raised with the Topic Paper and all the options related to achieving the 500-dwelling uplift, but it is acknowledged however that 4 options have been considered in paragraph 8.3;

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

Paragraph 8.7 advises 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.*'

In respect of Gobowen, the soundness of the statement made in 8.7 is questioned. It is evident the guideline for housing delivery in this settlement remains high, but the contraction of the settlement boundary reduces the scope for windfall development.

It is proposed that the settlement boundary for Gobowen is retained as per the current SAMDev plan, which (subject to addressing flood constraint) would allow appropriate windfall development assisting the target housing numbers be delivered.

We would welcome the opportunity to participate at a further hearing session in relation to the housing capacity for Gobowen and the suitability of the settlement boundary.

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

Yours faithfully

P.W. Richards

Peter Richards MRICS
Chartered Surveyor