

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage Two Hearing Statement

Representor unique Part A Ref *	A122
Matter	1 - Legal / Procedural Requirements (Policy SP3)
Relevant questions	1, 2, 3
Comments as attached	

SHROPSHIRE LOCAL PLAN EXAMINATION Stage Two Hearing Statement

Matter 1 - Legal / Procedural Requirements (Policy SP3)

Reference: A122

Date: 17/09/2024

Updated Sustainability Appraisal

1. *Are the likely environmental, social and economic effects of the Plan adequately and accurately assessed in the updated Sustainability Appraisal (SA)?*

This consultation response is submitted by CEG, which has a preferred site allocation within the draft Local Plan, referenced SHR158. Together with sites SHR060 and SHR161, the site forms part of a wider sustainable urban extension known as Shrewsbury South West.

CEG supports the allocation of this sustainable urban extension in the draft Local Plan as it represents an important opportunity to meet the social, environmental and economic needs of Shrewsbury. We do, however, have concerns over the way in which the site has been appraised in relation to its ability to accommodate unmet need arising from the Black Country.

GC52 sets out the Council's summary of responses to the June 2024 consultation exercise. Its response to CEG's representation (on page 141) references Section 12 of the Sustainability Appraisal (SA). The evidence provided in Section 12 demonstrates that the Black Country has a much stronger relationship with the eastern part of Shropshire than it does with the central part, where Shrewsbury is located. Notably, the Housing Topic Paper (GC4i) states that the Travel to Work Area for Wolverhampton and Walsall is located largely within the place plan areas for Albrighton, Bridgnorth and Shifnal, rather than Shrewsbury.

Figures 12.3 and 12.4 of the SA show that both the Albrighton and Bridgnorth Place Plan areas have a greater share of the authority's Black Country commuters than the Shrewsbury Place Plan area, despite Shrewsbury having a higher population than these two areas combined. Figure 12.1 shows that Shrewsbury is the destination for 13.7% of people migrating to Shropshire from the Black Country. This compares to 25.4% who choose Bridgnorth and 8.7% who settle in Albrighton, despite the substantially lower populations of these two Place Plan areas. On this basis, we do not consider that so much of the Black Country allowance should have been assigned to Shrewsbury. In particular, we

do not agree with the 300 homes apportioned to Shrewsbury South West. Rather, we believe a greater focus should be placed on Bridgnorth and Albrighton as sustainable locations to take growth from the Black Country.

2. *Does the updated SA test the Plan against the preferred options chosen and all reasonable alternatives?*

CEG does not consider that the updated SA tests the Plan against all reasonable alternative locations which could accommodate unmet need from the Black Country. Given that only 11.9% of commuters to the Black Country (Figure 12.4) currently travel from the Shrewsbury Place Plan area as a whole, apportioning 20% of the unmet Black Country need to sites in Shrewsbury would have the effect of increasing the average distance travelled by Shropshire commuters to the Black Country. We consider that further sites in the east of the authority should have been considered before assigning such a large part of the requirement to Shrewsbury.

3. *Have any concerns been raised about the updated SA methodology and what is the Council's response to these?*

As set out in our response to the June 2024 consultation exercise, in relation to Black Country need, we would question whether the methodology has adequately handled the assessment of unconstrained sites available in higher-tier settlements, as well as those sites within the Shrewsbury Place Plan area that score more highly than Shrewsbury South West in relation to this matter.