

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage Two Hearing Statement

<b>Representor unique Part A Ref *</b>	<b>A122</b>
<b>Matter</b>	<b>22 - Shrewsbury Place Plan Area (Policy S16)</b>
<b>Relevant questions</b>	<b>Place Plan Question 1 Site Allocation Questions 1-12</b>
<b>Comments as attached</b>	

## SHROPSHIRE LOCAL PLAN EXAMINATION Stage Two Hearing Statement

### Matter 22 - Shrewsbury Place Plan Area (Policy S16)

Reference: A122

Date: 17/09/2024

#### Place Plan Question (in relation to SHR060, SHR158 & SHR161)

1. *Is the approach taken to development in the Place Plan Area justified, effective and consistent with national policy?*

CEG welcomes the allocation of Shrewsbury South West as a sustainable urban extension. We consider the allocation of its three component sites (SHR060, SHR158 & SHR161) to be justified and we agree with the greater part of the reasoning provided in the Additional Sustainability Appraisal Report of April 2024.

The one part we do not agree with is the identification of Shrewsbury South West as an appropriate location to accommodate unmet need from the Black Country. We consider there are other sites in the authority which would be better placed to accommodate this need; our formal response to the Additional Sustainability Appraisal Report from June 2024 provides detail on this, as do our responses to Matters One, Two and Three.

CEG considers Shrewsbury South West to be a suitable, deliverable and sustainable urban extension. It was allocated in the emerging Local Plan in order to help meet the housing need arising from within Shropshire, and in that respect it remains effective. Its effectiveness is, however, diminished by the requirement to accommodate unmet need from the Black Country.

As originally allocated, Shropshire South West contributes 1,500 homes to meet need arising from within Shropshire. If 300 of these homes were to be reassigned as a contribution to meeting Black Country need, this would leave only 1,200 homes to meet an unchanged level of need arising from within Shropshire. To maximise the effectiveness of the allocation, CEG believes the Black Country need would be better accommodated on sites in the east of Shropshire, particularly those which score more highly than Shrewsbury South West on sustainability in relation to the Black Country.

## Site Allocation Questions (in relation to SHR060, SHR158 & SHR161)

1. *What is the background to the site allocation? How was it identified and which options were considered?*

Shrewsbury South West was identified by Shropshire Council as a potential urban extension in both the Regulation 18 Shropshire Local Plan of August 2020 and the Regulation 19 Local Plan submitted to the Secretary of State in September 2021. It was identified on the grounds of its sustainable location, its relationship to the existing townscape and its ability to provide the full range of supporting infrastructure needed. CEG supports the proposed allocation of the site.

2. *What is the scale and type / mix of uses proposed?*

Shrewsbury South West will be developed as a comprehensive new sustainable urban extension. It will deliver around 1,500 homes, a minimum of five hectares of employment land, green and blue infrastructure, a new, mixed-use local centre plus land for education and healthcare. A park and ride facility will be provided in the north west part of the site.

3. *What is the basis for this and is it justified?*

Shrewsbury South West was included in the Regulation 19 Plan submitted to the Secretary of State in September 2021. The site was originally allocated to meet the need for both market and affordable housing arising from within Shropshire. It provides a sustainable urban extension to the strategic centre of Shrewsbury, which is the authority's primary focus for new development. The non-housing elements of the development are there primarily to support the housing component, though they will also bring benefits to existing workers and residents.

4. *What is the current planning status of the site in terms of planning applications, planning permissions and completions / construction?*

CEG has signed a Planning Performance Agreement with Shropshire Council and is actively engaging with the Council through a pre-application process. A planning application is expected to be submitted in the first half of 2025.

5. *What are the benefits that the proposed development would bring?*

The development will provide a new community of 1,500 homes in a sustainable location, helping to deliver Shropshire Council's housing target. Affordable housing will be provided in accordance with Plan policy. The development will also provide a substantial amount of green infrastructure, a new local centre, land

for education and healthcare uses and a park and ride facility, all of which will be available to people living beyond the new community.

6. *What are the potential adverse impacts of developing the site? How could they be mitigated?*

No objections to the allocation or development of the site have been received from the various statutory bodies. Based upon our initial surveys and assessments, we do not consider there to be any major constraints that would preclude development and/or that could not be suitably mitigated.

CEG is actively engaging with the Council to develop a masterplan for the site. The Council's pre-application advice will set out the surveys and assessments needed to support a future planning application and will advise on the need for an Environmental Impact Assessment. These surveys and assessments will set out any necessary mitigation requirements.

7. *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

CEG has commissioned a Flood Risk Technical Note. The Technical Note confirms that the site is located in the Environment Agency's Flood Zone One, which is defined as land having a low probability of flooding from rivers or seas. It reports that there are no records of fluvial flooding at the site within the Level One SFRA and concludes that the risk of fluvial flooding is expected to be low.

The Flood Risk Technical Note also considers the risk of flooding from rainwater, groundwater, reservoirs and sewers to be low. The precise level of risk will be assessed further as part of a site-specific flood risk assessment, in accordance with the NPPF and with associated planning practice guidance.

8. *What are the infrastructure requirements / costs and are there physical or other constraints to development? How would these be addressed?*

CEG notes that there is a quantum of infrastructure to be provided (see question two above). We have commissioned an infrastructure cost plan to ascertain the cost of providing this infrastructure. The preliminary findings of the infrastructure cost plan demonstrate that the site continues to be viable. There are no physical constraints to development that cannot be overcome or mitigated, and no objections to the allocation or development of the site have been received from the statutory bodies responsible for managing these constraints.

9. *Is the site realistically viable and deliverable?*

CEG considers the site to be realistic, viable and deliverable. We note that there is a quantum of infrastructure to be provided and we have commissioned an infrastructure cost plan to demonstrate that the required items can be delivered whilst maintaining the viability of the site. The preliminary findings of the infrastructure cost plan support our position that the site is both viable and deliverable.

10. *What is the expected timescale and rate of development and is this realistic?*

At this early stage, it is anticipated that construction of the first phase of dwellings will begin in 2026/2027, following adoption of the new Shropshire Local Plan and determination of the requisite planning application(s). Buildout rates are expected to peak at a combined rate of 150 dwellings a year throughout the period from 2029 to 2036, with completion of the residential elements by 2038/2039. This information has been included in the Statement of Common Ground sent to Shropshire Council on 30th August 2024.

11. *Is the boundary of the site appropriate? Is there any justification for amending the boundary?*

The site boundary is appropriate. At this point in time, there is no reason to adjust the boundary.

12. *Are the detailed policy requirements effective, justified and consistent with national policy?*

CEG would like to make the following observations.

Draft Policy DP1A states that site allocations of 250 or more dwellings must provide at least 20% of their homes in the form of specialist housing for older people and/or those with disabilities and special needs. CEG does not consider this level of provision to be justified in relation to Shrewsbury South West, where the requirement would equate to 300 of 1,500 homes. Further information on this is presented under Matter 27.

Schedule S16.1 (i) of the December 2020 Draft Local Plan states that a minimum of five hectares of employment land is to be provided in Shrewsbury South West. CEG considers this to be too open-ended and would argue that it does not provide sufficient certainty for the masterplanning process.

Schedule S16.1 (i) also states that “all necessary improvements to the Local and Strategic Road Networks will be undertaken and funded through the development”. CEG considers this to be imprecise and open ended, and would



prefer an alternative form of words which ensures that only mitigation necessary to accommodate unacceptable impacts of the development on the highway network will be provided or funded by the developer.

Lastly, Schedule S16.1 (i) states that, “a decision on a planning application will not be made until such time [as] a Masterplan for the site has been approved by Shropshire Council...” CEG would request an alternative form of wording which provides greater clarity on the process by which the Council intends to approve a masterplan.