

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage Two Hearing Statement

Representor unique Part A Ref *	A122
Matter	2 - Development Strategy (Policies SP1-10 & SP12-15)
Relevant questions	2, 3, 4
Comments as attached	

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Matter 2 - Development Strategy (Policies SP1-10 & SP12-15)

Reference: A122

Date: 17/09/2024

Questions

- 2. Is it proposed that the overall spatial strategy and broad distribution of growth set out in Policy SP2 will remain the same following the additional work? If not, how would it change and are the changes justified, effective and consistent with national policy? Are any consequential changes to Policy SP2 or the supplementary text required?*

CEG supports the spatial strategy set out within SP2 of the draft Local Plan, particularly the identification of Shrewsbury as a strategic centre and focus for housing development. We believe this is the right approach, both for Shropshire and for Shrewsbury. We have concerns that the Housing and Employment Topic Paper of April 2024 unbalances the spatial strategy by allocating only 500 additional houses to accommodate unmet need from the Black Country, while acknowledging that 1500 homes are required to serve this purpose. This means that 1000 homes already allocated to meet need arising from within Shropshire would instead be reassigned to meeting Black Country need, potentially leaving Shropshire's own needs unfulfilled.

- 3. Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?*

We consider that Section 12 of the Sustainability Appraisal (SA) shows that the Black Country has a much closer relationship with the eastern part of Shropshire than with the central part, where Shrewsbury is located. Notably, the Housing Topic Paper (GC4i) shows 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, specifically 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.

CEG does not consider that the updated SA tests the Plan in relation to all reasonable alternative locations for accommodating 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, allocating 20% of the unmet Black Country need to Shrewsbury South West 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.

4. *Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt? If so, what are the exceptional circumstances for doing this?*

Our view is that further consideration should certainly be given to the need to release more land from the Green Belt to accommodate unmet need from the Black Country. As set out above, it is clear from the Sustainability Appraisal that there is a much stronger functional relationship between eastern Shropshire and the Black Country than is the case elsewhere in the authority. Releasing land from the green belt would enable housing land to be allocated within the area which has the strongest functional relationship with the Black Country. Given that exceptional circumstances have been demonstrated for the release of land from the green belt to address Shropshire need, the same consideration should be given to the release of land to meet need arising from the Black Country.