



Representor unique Part A Ref *	A0129
Matter	1
Relevant questions nos	2, 3, and 4

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement



Shropshire Local Plan Examination - Stage 1 Matters, Issues and Questions

Matter 1 Legal/Procedural Requirements (policy SP3)

Issue Whether the Council has complied with the relevant procedural and legal requirements.

Cerda Planning are retained and instructed by Gleeson Land Limited to prepare and submit Hearing Statements in connection with land at Betley Lane East, Bayston Hill (Council site reference BAY040) (hereafter referred to as the 'site'). The site is located to the immediate west of the A49 Hereford Road, from which access would be taken and has been promoted through the draft Local Plan for residential development. Representations have been submitted to both the Regulation 18 and 19 Local Plan consultations.

This written statement has been prepared to address some of the questions raised by the Inspectors related to Matter 1.

This representation relates specifically to questions 2, 3, and 4 which are set out in *italics* prior to our response

Questions

Sustainability Appraisal

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

In general terms, the wider / strategic effects of the Plan have been appropriately assessed. However, there remain detailed unanswered questions in respect of the scoring of the likely effects which are referred to below.



3. Does the SA test the Local Plan against the preferred options chosen and all reasonable alternatives?

In terms of the three overarching strategic options considered for housing growth - yes. However, this cannot be said for the consideration of reasonable alternatives in the context of proposed sites themselves, in particular consideration of reasonable alternative sites (and often sites which score better than the proposed allocations within the Site Assessments) within the Rural Areas which includes the identified Community Hubs and in particular Bayston Hill.

Whilst a scoring system has been identified, it is clear in particular with our site, that the assessment was undertaken based on out of date information much of which has been carried through from the previous SA's which is not helpful, nor robust in forming an accurate assessment. This is clear in terms of the Bayston Hill site (BAY040) when the site assessment has been based on the development of a significantly larger parcel of land with an identified capacity of 525 when the submitted site is for a much-reduced number of dwellings (circa 250) on a much reduced site, with wider community benefits and notable traffic improvements to the A49 Hereford Road.

As a consequence of this failure to re-assess the site, it is our view that the Council's preferred strategy is fundamentally flawed. The shortfalls within scoring go to the heart of the Council's assessment and must be revisited to assess the Plan appropriately.

To illustrate this point further, as outlined in our Regulation 19 representations the site scores very well against the SA objectives. The Site scores better in the Stage 2b assessment than allocated sites within Bayston Hill. Regard should also have been had for, and account taken of mitigation measures proposed within the Regulation 19 submission for the Bayston Hill site and the previously submitted Vision Document prepared for the site.

Whilst we appreciate this this question is not concerned with specific sites, to illustrate the point we are making; it is our firm view that the Council has failed to properly address reasonable alternatives to the proposed allocations BAY039 and BAY050 within Bayston Hill in clear breach of guidance within the NPPG and SEA Directive. In



conducting their assessment of reasonable alternatives, the Council has failed to consider up to date technical information in relation to site BAY040.

The Sustainability Appraisal and Site Assessments Environmental seeks to illustrate that all sites submitted to the Council has been assessed logically. However, it is our view that the Shropshire Local Plan in its current form fails to conform to the guidance within the NPPF that requires allocations to be based on an adequate, up to date and appropriate evidence base and economic signals which assess the role and function of each settlement and the capacity of these to accommodate new housing and employment growth.

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

As part of our Regulation 19 representations to the Local Plan, a presentation of the inconsistencies is made in response to the implementation of the SA methodology in respect of the Site Assessments (which form part of the SA). These are not proposed to be rehearsed here, but available for the Inspectors in the context of deliverable omission sites.

It is unclear how the SA has informed the preparation of the Local Plan, with options that scored well not being selected, whilst worse performing options have been incorrectly included.

The Councils response to this within GC4a (as with responses to many other representations) does not grapple with the issues raised and the methodology should allow for and require the reassessment of sites put forward in the Plan, especially when some of the assessed sites in particular the Bayston Hill site (BAY040) contained clear errors with the assessment not based on the latest available evidence submitted as part of our previous representations. We would like to emphasise that it scores better than other sites allocated for development within Bayston Hill.