

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor unique Part A Ref *	A0682
Matter	1
Relevant questions nos	2, 3, 4, 17

Stage 1 Hearing Statement

Matter 1 Hearing Statement: Legal/Procedural Requirements (Policy SP3)

Miller Homes (A0682)

1.1 This Hearing Statement is submitted on behalf of Miller Homes (Miller).

Context: South West Shifnal

1.2 Miller's representations are made in relation to c.65ha of land it is promoting at "South West Shifnal" as identified on the site location plan at **Appendix 1**.

1.3 Policy SP11 will release this land from the Green Belt and safeguard it for future development needs. Miller strongly supports the designation of South West Shifnal under SP11 as safeguarded land.

1.4 The Draft Local Plan acknowledges that South West Shifnal will eventually comprise a *"...strategic housing extension capable of creating a new community..."* and explicitly lists benefits and infrastructure improvements (Paragraphs 5.215 and 5.216).

1.5 No other safeguarded site has been similarly identified in the Draft Local Plan which properly reflects its credentials as a sustainable site which can deliver strategic benefits for Shifnal, as recognised in Paragraph 5.217 of the Draft Local Plan.

1.6 The whole site (SHF034) was assessed in the "Strategic Sites Assessments" of the Sustainability Appraisal (Appendix T, SD006.21), achieving an overall sustainability score of -2 and therefore rated "Good" at Stage 2a (for housing); this score was the highest for all strategic sites at Shifnal and the best of all safeguarded land adjoining the town.

1.7 Each of the individual parcels, forming SHF034, were assessed. Appendix P (SD006.17) includes individual assessments of sub-parcels of the site (SHF019, P15b west, SHF019VAR, SHF017 and P16a) and Stage 3 recommended that all these parcels be removed from the Green Belt and safeguarded. The 'strategic considerations' and 'reasoning' sections of the Stage 3 assessments considered each of the parcels contribution to wider proposed site (SHF034) and provided justification for their contribution towards the safeguarded site.

1.8 Miller's responses to Matter 1 Questions 2, 3, 4 (Sustainability Appraisal) and 17 (plan period) are set out below.

Sustainability Appraisal

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

- 1.9 The Regulation 19 Sustainability Appraisal and Site Assessment Environmental Report (“the SA”) (SD006.01) demonstrates that the SA of the Draft Local Plan has been undertaken in accordance with legislation, regulations and guidance and has informed each of the six principal stages of Local Plan preparation.
- 1.10 Chapter 11 presents the likely significant effects for policies and site allocations.

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

- 1.11 The SA has tested the preferred options chosen against all reasonable alternatives.
- 1.12 Three strategic distribution options were considered for accommodating development requirements:
- Strategic Distribution Option A – Current Policy ‘Rural Rebalance’;
 - Strategic Distribution Option B – Urban Focus with 75% of growth allocated to Shrewsbury and the key centres; and
 - Strategic Distribution Option C – Balanced Growth.
- 1.13 The SA identified that Option B is likely to provide a number of significant benefits for various sustainability objectives over the alternative options (pages 72 to 81 of SD006.01), including protection and enhancement of biodiversity and landscape, economic benefits, sustainable transport, active/health communities, water quality conservation and reduced carbon emissions.
- 1.14 Miller supports the urban focussed Development Strategy, although questions how this will be delivered in real terms given that “saved” SAMDev housing allocations are proposed to make up a considerable portion of the supply in the plan period (please refer to Miller’s Matter 3 Hearing Statement).

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

- 1.15 All concerns have been addressed in the Council's Response to ID1 and ID2 (GC4). As is common for most Local Plan reviews, the concerns centre upon the scoring/rating of individual sites, in terms of:
- Alleged scoring/rating inaccuracies – the Council have reviewed the representations but consider that ratings would not alter and point out that the SA is but one factor in the Evidence Base to inform site selection/allocation;
 - Requests for additional site-specific factors to be taken into account in assessments – the assessment criteria comply with the regulations; and/or
 - Perceived inconsistencies in the assessment process or a perceived lack of compliance with legislation, regulations or guidance – Each SA Report prepared at the various stages of Local Plan Review detailed any changes made to the methodology for site assessment and it has been carried out consistently at each stage.
- 1.16 We concur with the Council in that it has complied with the SA requirements in legislation, regulations and guidance. Albeit Miller contend that South West Shifnal should be allocated for development during the plan period.
- 1.17 In relation to the identification of sites for allocation and safeguarding, we concur with Paragraph 18 of GC4 which states *"the Council considers that whilst the SA rating for a site is an important consideration in the wider site assessment process, the overall decision on allocation takes a number of other factors into account as well. Thus, the SA rating is not the sole determinant."*

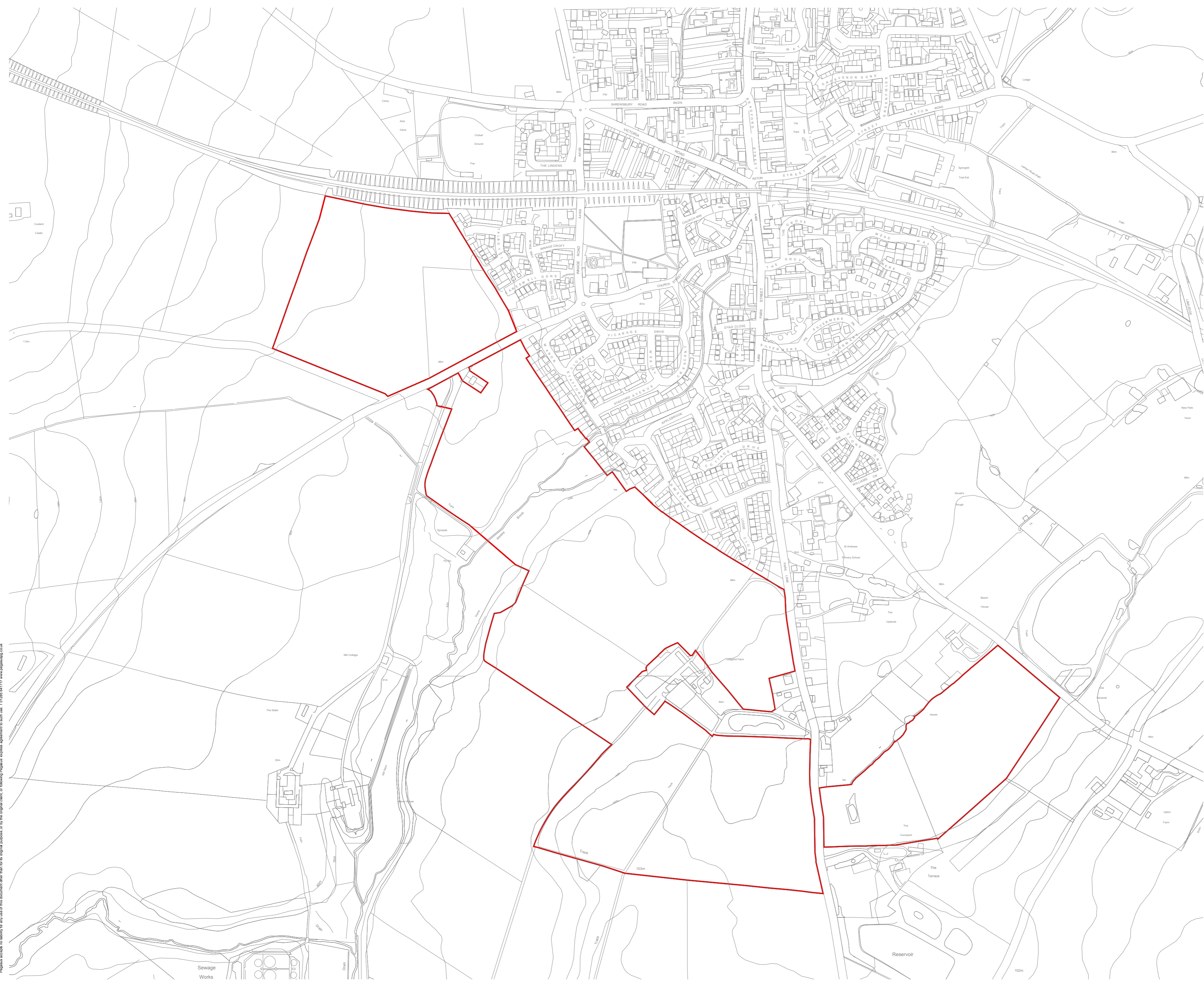
Plan period

17: Is the Local Plan period of 2016 to 2038 consistent with national policy? If not, is there justification for this?

- 1.18 Yes, provided the Draft Local Plan is adopted by 2023 then the plan period will comply with NPPF Paragraph 22.
- 1.19 If the Examination process results in adoption being delayed beyond 2023, the plan period will need to be extended to ensure that strategic policies look ahead over a minimum 15-year period from adoption (this position has recently occurred during the Examination of the Solihull Local Plan).
- 1.20 Any extended plan period would require a re-assessment of growth requirements over this extended period, and a review into whether additional allocations are required. This would also need to include a review of the contributions towards the Black Country's unmet needs; we highlight that the Black Country Plan Review is currently proposing a plan period to 2039, with adoption envisaged in 2024.

Appendix 1: Site Location Plan

KEY
Total Site Boundary
64.5 ha / 159.4 acres



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