

Shropshire Council Examination of Shropshire Local Plan 2016-2038

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Shropshire Council Response to the Planning Inspectors' Initial Questions

Dear Examining Inspectors,

Shropshire Council welcomes the opportunity to provide further clarification on the various initial questions you have identified, within your correspondence dated the 3rd November 2021 (ID1) and 24th November 2021 (ID2), in order to aid your understanding of the draft Shropshire Local Plan and the associated evidence base.

As such, please find below Shropshire Council's response to each of these initial questions. For convenience this document includes the relevant paragraph number from ID1 and ID2 (containing the initial questions), *in italics*, followed by the Shropshire Council response. Where appropriate, these responses cross-reference the main relevant evidence base documents submitted in support of the draft Shropshire Local Plan.

Where a topic paper has been requested, we will confirm our intention to prepare such a document in response to the relevant question(s).

As also requested, we have prepared a document identifying potential Main Modifications to the draft Shropshire Local Plan resulting from these initial questions. As the examination process is ongoing, this is considered a 'live document' which will be updated as necessary to record the outcome of any further correspondence and discussions that occur. However, the current draft is enclosed for your consideration.

We hope that these responses are of assistance, however if you do require further information in relation to any of them, please do let us know.

Legal Compliance

ID1 Paragraph 4: Has the Plan been prepared in accordance with the Local Development Scheme?

Shropshire Council Response:

1. Shropshire Council considers that the draft Shropshire Local Plan has been prepared in accordance with the adopted Local Development Scheme (March 2021). This document has been submitted in support of the draft Shropshire Local Plan (**EV008.01**).

ID1 Paragraph 5: Has the Plan been prepared in general accordance with the Statement of Community Involvement and public consultation requirements?

Shropshire Council Response:

2. Shropshire Council considers that the draft Shropshire Local Plan has been prepared in general accordance with both the adopted Statement of Community Involvement (2021) and the Statement of Community Involvement (2011) which the currently adopted version superseded. Both of these documents have been submitted in support of the draft Shropshire Local Plan (**EV008.02 and EV008.03**). It has also been prepared in general accordance with public consultation requirements as set out in national legislation.

ID1 Paragraph 6: Following Duty to Cooperate discussions, have signed Statements of Common Ground now been secured between the Council and all relevant parties? Furthermore, have any significant concerns been expressed by interested parties about the Duty to Cooperate which remain in dispute?

Shropshire Council Response:

3. As documented within the Duty to Cooperate: Statement of Compliance (**EV042**), where considered appropriate, Statements of Common Ground with relevant partners are to be submitted to summarise the positive engagement and 'duty to cooperate' process that has occurred and conclusions reached.
4. It should be noted that it is not the intention or purpose of the Statements of Common Ground to record every discussion and all the joint working that has occurred during the Local Plan Review process. Rather, they focus on the key strategic matters where strategic cooperation has been and remains crucial to facilitating sustainable development.

5. Shropshire Council has now completed Statements of Common Ground with all adjoining Local Planning Authorities as part of the Local Plan Review.
6. The majority of these Statements of Common Ground were submitted alongside the draft Shropshire Local Plan. The references for these documents are **EV028, EV029, EV030, EV032, EV033, EV034, EV036, EV037, and EV039**. Since submission occurred, two further Statements of Common Ground, which were in the process of being prepared at the time of submission, have been completed and signed-off by the relevant parties, these are:
 - a. The Duty to Cooperate - Statement of Common Ground with Newcastle Under Lyme Borough Council (**EV031**).
 - b. The Duty to Cooperate - Statement of Common Ground with Wyre Forest District Council (**EV040**).
7. These documents are submitted alongside this response.
8. At the time of submission of the draft Shropshire Local Plan, Statements of Common Ground were also in preparation with the adjoining County Councils (Staffordshire County Council and Worcestershire County Council). These documents are now in the process of being finalised and will be submitted as soon as this process is completed. No significant concerns have been expressed by these parties concerning the duty to cooperate process. We anticipate that these Statements will be finalised in February 2022 and will be submitted to the Examination at this stage.
9. Shropshire Council has also completed and submitted a Statement of Common Ground with the Black Country Authorities (**EV041**). Whilst none of the Black Country Authorities are adjoining Local Planning Authorities, they Black Country is considered to have a functional relationship with Shropshire.
10. Shropshire Council has also completed Statements of Common Ground with relevant key partners, these are: Dwr Cymru Welsh Water (**EV021**); the Environment Agency (**EV022**); Historic England (**EV024**); Natural England (**EV025**); Severn Trent Water (**EV026**); and Sport England (**EV027**).
11. Further to ongoing positive discussions, Shropshire Council and National Highways (formally Highways England) intend to complete a Statement of Common Ground to inform the Examination. In particular this follows on from the additional highway modelling work carried out by Shropshire Council to inform the strategic development proposals for Shrewsbury, and which are set out in Shrewsbury Highway Modelling (**EV100**) submitted alongside the draft Shropshire Local Plan. Further information on this matter is provided in response to **ID1 Paragraph 27**.

ID1 Paragraph 7: *Have any significant concerns been expressed by interested parties about the Sustainability Appraisal (SA) which remain in dispute?*

Shropshire Council Response:

12. A Sustainability Appraisal (SA) was undertaken at every stage of the plan preparation process and an SA Report was published alongside each consultation document.
13. The methodology for the SA is set out in the SA Scoping Report (**EVO02**). The way in which the Draft Shropshire Local Plan policies have been assessed follows this. However, the methodology of the SA of land promoted or proposed for allocation was carried out was adapted to reflect consultation responses as the plan, and its SA, progressed. Consultation responses did not identify issues with the SA of the strategic of development management policies. Details of these modifications are included in the SA Reports for the relevant plan stages.
14. Additionally, the SA of sites was incorporated into the wider site assessment process in response to views expressed during the Regulation 18 Preferred Sites consultation. The SA of sites for the Regulation 18 Pre-Submission Draft plan and the Regulation 19 Draft Shropshire Local Plan thus forms stage 2a of a four stage process – the others being: Stage 1 – Strategic Land Availability Assessment (SLAA); Stage 2b – screening of sites; and Stage 3 – detailed assessment of sites. The SA conclusions from Stage 2a are also considered as part of Stage 3 of the process. In this way, all the information on how sites were chosen for housing or employment uses in the draft Shropshire Local Plan is presented in one place specifically to avoid any concerns of a ‘paper trail’.
15. The final SA methodology for assessing sites uses a GIS based system to support the assessment of 15 separate sustainability criteria derived from the Environmental Assessment of Plans and Programmes Regulations 2004. It assesses all the SLAA sites associated with relevant settlements for both housing and where appropriate employment uses and gives each a rating of Good, Fair or Poor based on that site’s performance against all the other SLAA sites in that settlement.
16. Appendix 1 of this response presents all the responses to the Regulation 19 Draft Shropshire Local Plan consultation which officers ascribed to the SA. No comments were received about the SA of the draft policies: all the responses concern the SA of the proposed site allocations.

17. Many responses concern perceived inaccuracies in scoring sites. The Council has reviewed the SA scores for the sites affected and concluded that in all cases, the changes suggested would not alter the site's rating. As they would have no material effect, the Council does not consider them to be significant.
18. A small number of responses cover the issue of SA ratings. Either the site being promoted in the response scores more highly than the one proposed for allocation, or the proposed allocation site's rating is lower than the site favoured by the respondent. In these instances, 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.
19. Some responses requested that features or environmental issues (e.g. non designated wildlife sites, amenities and facilities yet to be provided as part of a planning consent or the need to link green infrastructure) not included in the SA criteria used by the Council should be included in the assessment for particular SLAA sites. However, as the SA Scoping Report (**EVO02**) shows, the Council's SA criteria are based on the format set out in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004. The Council thus considers that the correct criteria have been used and no others should be included.
20. Other responses were concerned with the way the Council undertook the SA, citing either perceived inconsistencies in the assessment process or a perceived lack of compliance with various Acts of Parliament, the Environmental Assessment of Plans and Programmes Regulations 2004, the Gunning Principles or national policy and guidance.
21. With respect to inconsistencies, each SA Report details any changes made to the methodology for site assessment. Where the point raised is not covered by this, the Council has provided explanations (shown in **SD014.02** and reproduced in Appendix 1) which demonstrate that whilst the SA is an iterative process, it has been carried out consistently at all stages of the Draft Local Plan preparation process.
22. The Council considers it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for the SA and site assessment process.
23. The Council thus considers that all concerns raised about the SA at the Regulation 19 stage on the SA of sites have been addressed.

ID1 Paragraph 8: *Have any significant concerns been expressed by interested parties about the Habitat Regulations Assessment which remain in dispute?*

Shropshire Council Response:

24. Appendix 2 presents all the responses to the Regulation 19 Draft Shropshire Local Plan consultation which officers ascribed to the Habitats Regulations Assessment (HRA). The majority of the responses are from the statutory agencies: Natural Resources Wales (NRW) (respondent reference number **A0131**); The Environment Agency (EA) (respondent reference number **A0347**); and Natural England (NE) (respondent reference number **A0349**).
25. NRW had previously expressed concerns about the HRA at the Regulation 18 Pre-Submission Draft consultation stage. Subsequent discussions and an exchange of information resolved these concerns. NRW's response to the Regulation 19 Draft Shropshire Local Plan reflects this outcome and they are generally supportive of the Regulation 19 Draft Shropshire Local Plan HRA.
26. EA and NE raised a number of concerns with the HRA. The Statements of Common Ground with both agencies (**EV022** and **EV025** respectively), show that all issues have been resolved, with the exception of the effect from development on the River Clun SAC. This issue is covered in detail in the Council's answer to question ID1 Paragraph 25.
27. The other responses from the EA and NE on this issue cover: the assessment of Hencott Pool Ramsar Site with respect to the construction of the Shrewsbury North West Relief Road (NWRR); the potential impact on the River Teme from development in Burford; and the lack of consideration within the HRA of the pollution caused by intensive livestock units (including poultry).
28. The Council's responses to these issues are shown in **SD014.02**. (and reproduced in Appendix 2). However, for clarity, greater detail is set out below.
29. The proposal for the NWRR is currently subject to a planning application and is not a specific allocation within the Local Plan Review, and as such is currently subject to a separate HRA process. The Council is thus satisfied that the HRA of Draft Local Plan HRA correctly assesses the impact on Hencott Pool Ramsar site.
30. The River Teme is not an internationally designed sites, but it feeds into the River Severn. The Severn estuary has a number of designations and the impact of development in Shropshire on the Severn Estuary SPA, Severn Estuary SAC and Severn Estuary Ramsar

Site has been assessed in the HRA. The Council thus considers that the effect of development in Burford has been accounted for.

31. The Draft Shropshire Local Plan does not allocate land for intensive livestock units. Planning proposals for these are dealt with through the development management process. As such, the HRA for the Draft Shropshire Local Plan does not appraise this form of development. Instead, internationally designated wildlife sites are safeguarded by draft policy DP12 which requires a project-level HRA for all planning applications which are likely to affect them.
32. In conclusion, the Council considers that, with the exception of the impact of development on the River Clun SAC (where further detail is provided in the response to question ID1 Paragraph 25), no significant concerns about the HRA remain in dispute.

ID1 Paragraph 9: Have any concerns been expressed about the Equality Assessment?

Shropshire Council Response:

33. No representations received in response to the Regulation 19 'Pre-Submission' consultation on the draft Shropshire Local Plan raised concerns about the Equality and Social Inclusion Impact Assessment undertaken to inform the draft Shropshire Local Plan.

National Planning Policy

ID1 Paragraph 10: *An updated version of the National Planning Policy Framework (NPPF) was published in July 2021. Are there any implications for the published Plan or the evidence base arising from the changes to the NPPF? If so, what are these and how does the Council intend to remedy them?*

Shropshire Council Response:

34. Shropshire Council undertook the Regulation 19 'Pre-Submission' Consultation on the Draft Shropshire Local Plan between 18th December 2020 and 26th February 2021. Following the completion of this consultation, an updated version of the National Planning Policy Framework (NPPF) was published (20th July 2021).
35. Shropshire Council has carefully reviewed the changes made to the NPPF as part of this 2021 update. It is apparent that whilst the document itself remains generally consistent with the previous version published in February 2019, the update does contain a number of important changes.
36. In summary, it is considered that the key changes in the context of 'Plan Making' include:
 - a. A stronger focus on well designed, beautiful and safe places.
 - b. Greater emphasis on the use of trees in new development.
 - c. Adjustments to the presumption in favour of sustainable development in the context of plan making.
 - d. Faster delivery of public service infrastructure.
 - e. Reference to the United Nations climate change goals.
 - f. The need to plan for 30 years when proposing larger scale developments.
 - g. Clarification of approach to flood risk.
 - h. Clarification on isolated homes in the countryside.
 - i. Clarification of affordable home ownership requirements on major housing schemes.
 - j. The need to provide genuine transport choice in very large residential proposals.
 - k. Strengthening policies on biodiversity.

37. The table below summarises these key changes and other main changes relevant to 'Plan Making' introduced to the NPPF in July 2021 and the position and implications (if any) for the draft Shropshire Local Plan.
38. Having carefully reviewed the changes made to the NPPF in July 2021, it is considered that the draft Shropshire Local Plan is consistent with and positively responds to all these changes. As such it is considered that the draft Shropshire Local Plan is consistent with and positively responds to the updated NPPF (2021).

Table 1: The Main Changes Relevant to 'Plan Making' Introduced to the NPPF in July 2021

Chapter and Key Change(s)	Implications for draft Shropshire Local Plan or Evidence Base (if any):
<p><u>Chapter 2: Achieving Sustainable Development</u></p> <p>Amendments have been made to phrasing, setting out clearly that the environmental objective is now to protect and enhance, and to improve biodiversity, where before the requirement was simply to contribute to these matters.</p> <p>Para 7 has added: "At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection."</p> <p>Para 8b adds "beautiful" when fostering "a well-designed and safe built environment."</p> <p>Para 8c has removed "contributing," and focusses on protection and enhancement, rather than just contributing to this. Likewise, it has changed from "helping to improve biodiversity" to "improving biodiversity."</p> <p>Changes to wording of paragraph 11a from "plans should positively seek opportunities to meet the development needs</p>	<p>The Spatial Vision under para 2.31 confirms that: "In 2038, communities will be safe and healthy as Shropshire moves positively towards a zero carbon economy; all residents will be able to access well-designed, decent and affordable homes in the right location; economic productivity will be maximised through greater investment; and the County's historic and natural environmental assets will be protected and enhanced".</p> <p>This is furthered under SP1: The Shropshire Test: "Development will contribute to meeting local needs and making its settlements more sustainable, providing the right mix of new housing, employment and other types of development which...Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;"</p> <p>The draft Shropshire Local Plan has, unlike the current adopted plan, specific policies relating to Climate Change (SP3), Minimising Carbon Emissions (DP11) and Pollution and Public Amenity (DP18). Additionally, there is a policy directly on Development in the Clun Catchment (DP13). SP11: Green Belt and Safeguarded Land specifically states that "Proposals, including changes of uses of land...by enhancing green infrastructure, biodiversity, visual amenity</p>

Chapter and Key Change(s)	Implications for draft Shropshire Local Plan or Evidence Base (if any):
<p>of their area, and be sufficiently flexible to adapt to rapid change,” to “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”.</p>	<p>and landscapes or improving derelict land and opportunities for access, outdoor sport and recreation, will be supported...”</p> <p>Policy DP12: The Natural Environment ensures that all development produces a net gain for biodiversity of at least 10%. Many site-specific guidelines also state that biodiversity enhancements should be provided. It is therefore considered that the draft Shropshire Local Plan satisfies this element of the revised NPPF.</p> <p>Para 7’s amendment references UN Global Goals for Sustainable Development in the period to 2030, broken down into social, economic and environmental factors. The draft Shropshire Local Plan has extensive policies in line with these, notably SP2, SP3 and SP4.</p> <p>Para 8’s amendments reinforce well designed places (as with Chapter 12, see comments below) and provides further clarity on what development <i>must</i> do, rather than what they <i>should</i> do.</p> <p>Para 11’s amendments focus on a development’s sustainability, both in isolation and when linking with the surrounding area, with an emphasis on the environment. This is mostly covered in SP4, which directly references assessment against the NPPF (para 3b). Additionally, SP5 specifically makes reference to making effective use of the land under para 3k.</p>
<p><u>Chapter 3 – Plan Making</u> The main edits to this chapter focus on the design quality of places, rather than just the individual development. Additionally, a new insertion to paragraph 22 sets out that “Where larger scale developments such as new settlements or</p>	<p>In terms of paragraph 22, within Annex 1: Implementation it states that:</p> <p>“221. For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have not reached</p>

Chapter and Key Change(s)	Implications for draft Shropshire Local Plan or Evidence Base (if any):
<p>significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”.</p>	<p>Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point this version is published (for Spatial Development Strategies this would refer to consultation under section 335(2) of the Greater London Authority Act 1999).”</p> <p>As the draft Shropshire Local Plan reached its Regulation 19 stage prior to the publication of the NPPF (2021), para 22 of the NPPF (2021) is not relevant for the draft Shropshire Local Plan. Please refer to the Housing Topic Paper for further details on this aspect.</p>
<p><u>Chapter 4 – Decision Making</u></p> <p>The conditions in which the use of Article 4 directions to remove national permitted development rights are now more clearly set out. For non-residential uses, this should be limited to where Article 4 is necessary to avoid wholly adverse impacts. In other cases, it should be limited to where Article 4 direction is necessary to protect local amenity or well-being of the area. In all cases, robust evidence is needed.</p>	<p>Not relevant to the draft Shropshire Local Plan – relates to the Development Management arm of planning, rather than Planning Policy.</p>
<p><u>Chapter 5: Delivering a Sufficient Supply of Homes</u></p> <p>In regard to identifying land for homes, an amendment to paragraph 70 (previously 69) now states that neighbourhood planning groups should give particular consideration to the opportunities for allocating small and medium-sized sites.</p> <p>An insertion into paragraph 73 (previously 72) also states that supply of large numbers of new homes should be supported by a genuine choice of transport modes. Reference to the quality of places to be created is also noted again in paragraph 73, as well as ensuring that appropriate tools such as masterplans and design guides or codes are used to secure a variety of</p>	<p>Shropshire Council is not a neighbourhood planning group, and therefore the first part of this chapter’s changes is not directly relevant. Please see the Housing Topic Paper for further information on this aspect.</p> <p>Policy DP25: Infrastructure Provision confirms that new development “should only take place where there is sufficient existing infrastructure capacity available.” Additionally, many of the site allocations proposed also require relevant improvements to access, for vehicles, pedestrians and/or cyclists.</p> <p>Policy SP5: High-Quality Design will ensure that “New development will deliver high quality design by ensuring the creation of better</p>

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<p>well-designed and beautiful homes to meet the needs of different groups in the community.</p> <p>Para 64 is now para 65 in the 2021 NPPF, and adds clarity by amending “Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership...” to “Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership...” (my emphasis).</p>	<p>places in which to live and work, improving sustainability, supporting active and healthy lifestyles and ensuring individual and community well-being.” This policy, alongside DP1: Residential Mix would ensure that development is well-designed and will meet the needs of different groups in the community.</p> <p>In terms of the amendment to para 64 (now 65), para 4.54 (the explanatory text to policy DP3 confirms that: “National policy promotes affordable home ownership and requires at least 10% of new homes built to be available for this. In our towns where most new homes are built, we ask for a minimum of 10%,” (my emphasis) and so this change to the NPPF is considered as being covered within the draft Shropshire Local Plan.</p>
<p><u>Chapter 8: Promoting healthy and safe communities</u></p> <p>Amendments have been made to ensure pedestrian and cycle routes are attractive and well-designed. Also, a new insertion as paragraph 96 requires that local authorities, in regard to public service infrastructure, should work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.</p>	<p>Policy SP6: Health and Wellbeing confirms that “New development should ensure the health and well-being of individuals, communities and places.” This policy also makes specific reference to pedestrian and cycle routes under para 7, as well as linking with SP5: High Quality Design under para 1. Policy DP25: Infrastructure Provision also confirms that where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means.</p> <p>Additionally, Shropshire Council, during the various stages of consultation as well as part of the Duty to Cooperate, engaged with promoters, delivery partners and statutory bodies to ensure that their views were heard at each stage.</p>
<p><u>Chapter 9: Promoting Sustainable Transport</u></p> <p>Similarly, to chapter 8, it is reiterated that walking and cycling networks should be attractive and well-designed.</p>	<p>Policy SP6: Health and Wellbeing confirms that “New development should ensure the health and well-being of individuals, communities and places.” This policy also makes specific reference to pedestrian</p>

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<p>Paragraph 110 (previously 108) which sets out what should be ensured when assessing sites that may be allocated for in development plans or specific applications for development, has an additional point inserted as point C which reads as follows “the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code”.</p>	<p>and cycle routes under para 7, as well as linking with SP5: High Quality Design under para 1. Additionally, SP5 fully covers this aspect, leading with para 1 stating: “New development will deliver high quality design by ensuring the creation of better places in which to live and work, improving sustainability, supporting active and healthy lifestyles and ensuring individual and community well-being.”</p>
<p><u>Chapter 11: Making Effective Use of Land</u> An insertion has been made to paragraph 125 (previously 123) which relates to achieving appropriate densities at a development. The new text states that “area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places”.</p>	<p>The draft Shropshire Local Plan allows for the efficient use of land within its draft policies. Policy SP1: The Shropshire Test ensures that development will contribute to “...meeting local needs and making its settlements more sustainable, providing the right mix of new housing, employment and other types of development which...makes efficient use of land.”</p> <p>In addition, Shropshire Council has incorporated policy SP5: High-Quality Design into the draft Shropshire Local Plan. This confirms under para 3(K) that:</p> <p>“Planning applications will set out how these principles have been considered in proportion to and taking into account the scale and type of development, with an emphasis on design quality and consideration of the context, place and local distinctiveness, to ensure the following...</p> <p>...K. Sensitive siting that responds to local identity, whether urban or rural, and the relationship between existing buildings in the streetscene or landscape, including views and vistas, whilst making efficient and effective use of land and topography.”</p>
<p><u>Chapter 12: Achieving Well-designed Places</u> This chapter has undergone a significant amount of editing. A much bigger focus is placed on making ‘beautiful’ and</p>	<p>SP5: High-Quality Design ensures that the aspects and aspirations surrounding beautiful and sustainable places as described in the NPPF (2021) are met. In relation to the importance of trees, policy DP12:</p>

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<p>'sustainable' places, and the use of plans, design policy, guidance and codes is hugely encouraged. For example, Paragraph 128 (previously 126) sets out that "all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences."</p> <p>Another important insertion is paragraph 131, which sets out that important contribution trees make to the character and quality of urban environments. It requires that planning policies and decisions should ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments. It also sets out a requirement that appropriate measures are in place to secure the long-term maintenance of newly planted trees and existing trees are retained wherever possible.</p> <p>The importance of policies and guidance is reiterated at paragraph 134, which states development that is not well designed should be refused "especially where it fails to reflect local design policies and government guidance on design".</p> <p>Para 135 also seeks to ensure that extant permissions are not altered to diminish the quality of their design.</p> <p>Para 129 is also an entirely new addition, stating:</p> <p>"Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning</p>	<p>The Natural Environment sets out under para 8 how the retention of trees and a significant increase in the extent and distribution of trees, woodlands and hedgerows in Shropshire will be achieved.</p> <p>Design codes (as stated in para 129 in the 2021 NPPF) are relevant under the larger site allocations at Bridgnorth and Shifnal, and are confirmed within their respective site guidelines.</p> <p>The removal of "innovative," within para 80 is welcomed by the draft Shropshire Local Plan as it further reduces the ability to create isolated homes in the countryside. This change is supported by SP5 (as above), as well as SP10 whereby the "management of development in the countryside will reflect the Plan's urban focused development strategy which seeks to direct the majority of new development to the Strategic, Principal and Key Centres and new Strategic Settlements," and "New market housing will be strictly controlled outside the development boundaries of the Strategic Centre of Shrewsbury, the Principle Centres, the Key Centres, the new Strategic Settlements and the Community Hubs."</p>

Chapter and Key Change(s)	Implications for draft Shropshire Local Plan or Evidence Base (if any):
<p>application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes."</p> <p>The new para 80 (replacing para 79) removes "innovative," in relation to the design being of exceptional quality.</p> <p>Para 133 has also been added, however it is more relevant to the Development Management arm of planning rather than Planning Policy, as it relates to as and when planning applications are made and the process it goes through before it is determined.</p>	
<p><u>Chapter 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change</u></p> <p>Edits in this chapter focus on making sure plans take into account all sources of flood risk. It is also encouraged to use opportunities provided by improvements in green infrastructure, and to make as much use as possible of natural flood management techniques. Development should be appropriately flood resistant and resilient "such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment (paragraph 166b)". Additionally, the Flood Risk Vulnerability Classification is referenced as newly provided at Annex 3 of the NPPF.</p>	<p>The draft Shropshire Local Plan has a policy specifically relating to flooding – DP21: Flood Risk. This policy outlines the requirements for development proposals in areas of flood risk now or in the future, which aligns with the requires as set out in the NPPF (2021).</p> <p>Any flood-related issues on allocated sites are also specifically referenced in their respective site guidelines.</p>
<p><u>Chapter 15: Conserving and Enhancing the Natural Environment</u></p>	<p>There are no National Parks in Shropshire, and so this element is not applicable however the Shropshire Hills AONB covers a significant proportion of land in the county. A specific policy in the draft</p>

Chapter and Key Change(s)	Implications for draft Shropshire Local Plan or Evidence Base (if any):
<p>Edits to this chapter make it clear that permission should be refused for major development applications within National Parks, the Broads and Areas of Outstanding Natural Beauty other than in exceptional circumstances.</p> <p>Additionally a new insertion has been made as paragraph 198, that sets out that local authorities should, when considering applications to remove or alter a historic statue, plaque, memorial or monument (listed or not), have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.</p> <p>Para 180d (previously 175d) has changed from “...opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity,” To “...opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”</p>	<p>Shropshire Local Plan - DP24: Shropshire Hills Area of Outstanding Natural Beauty – achieves the aims set out in the NPPF (2021) by confirming that great weight will be given to conserving and enhancing the landscape and scenic beauty of the AONB by limiting the scale and extent of development in the designated area. Any development proposed in the AONB will need a proportionate assessment, and the policy also confirms that “Permission will be refused for major development other than in exceptional circumstances...”.</p> <p>In terms of para 198 of the NPPF (2021), policy DP23 Conserving and Enhancing the Historic Environment confirms that Shropshire’s heritage assets will be “protected, conserved, sympathetically enhanced and restored, by...ensuring that wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings.” Likewise, para 3 of this draft policy confirms that: “proposals which are likely to result in any loss of, harm to, the significance of a designated heritage asset, including its setting, either directly or indirectly, are determined in line with the National Planning Policy Framework.”</p> <p>The changes made within 180d reinforce the need for biodiversity improvements, and not just to “encourage,” as previous. Policy DP12 under para 3 confirms that “...all development delivers at least a 10% net gain for biodiversity.”</p>
<p><u>Annex 1: Implementation</u> Edits set out changes to policy application, including The Housing Delivery Test.</p>	<p>Please see the relevant topic papers which go into further detail on these changes.</p>

ID1 Paragraph 11: *Have there been any changes to the Planning Practice Guidance that have implications for the published plan or the evidence base? If so, what are these and how does the Council intend to remedy them?*

Shropshire Council Response:

39. As with the NPPF, there has been changes and updates to National Planning Practice Guidance (NPPG) since Shropshire Council undertook the Regulation 19 'Pre-Submission' Consultation on the Draft Shropshire Local Plan between 18th December 2020 and 26th February 2021. The changes made in recent years are summarised in the table below.

40. In summary, the key changes in terms of 'Plan Making' (and therefore of greatest relevance to the draft Shropshire Local Plan) relate to housing need (calculation of housing need and meeting the need of different groups in the community) and impacts of the COVID-19 pandemic during the 'Plan Making' process. It is considered that the draft Shropshire Local Plan accords with these changes, as set out below.

Table 2: Main changes and updates to National Planning Practice Guidance (NPPG) over recent years

Planning Practice Guidance categories which have recently been amended or updated	Impacts, if any, with the draft Shropshire Local Plan or its Evidence Base
Fire safety and high-rise residential buildings	This is not common for developments in Shropshire, however it is considered that should any developments proposed will do so in accordance with national policy, and this aspect would be dealt with during the planning application process, rather than through the draft Shropshire Local Plan.
First Homes	<p>Whilst there are no direct policies in the draft Shropshire Local Plan which relate to the updated guidance, it is considered that it does accord with the guidance. Due to the transitional arrangements within the Written Ministerial Statement and reiterated within the NPPF (Local plans and neighbourhood plans submitted for examination before 28 June 2021, or that have reached publication stage by 28 June 2021 and subsequently submitted for examination by 28 December 2021, will not be required to reflect the First Homes policy requirement), 'First Homes' are not applicable to the draft Shropshire Local Plan.</p> <p>Please refer to the Housing Topic Paper for further information.</p>

Planning Practice Guidance categories which have recently been amended or updated	Impacts, if any, with the draft Shropshire Local Plan or its Evidence Base
Flood risk and coastal change	<p>The only recent amendments to this element relate to paragraph 49, specifically around permitted development. It is considered that the draft Shropshire Local Plan covers this aspect under DP21 – Flood Risk, as requirements through a Sequential Test are mandatory for developments proposed in areas “known to be at risk of any form of flooding now or in the future.”</p>
Housing and economic needs	<p>The added and new paragraphs relate to numbers 033 to 039 and 004, 010 and 013 respectively. Paragraphs 33 is not relevant as Shropshire Council’s authority area does not include one of the top 20 most populated cities or urban centres (no town exceeds 75,000 people). Paragraph 34 relates only to London and paragraph 35 relates to efficient use of land, which is covered by SP1: The Shropshire Test. Paragraphs 36-38 are not relevant as Shropshire Council’s authority area does not include a town which is one of the top 20 most populated in the country. Likewise the new sub-paragraph under paragraph 004 is also not relevant as Shropshire Council is not an urban local authority.</p> <p>Paragraph 39 advises how local housing need be calculated for re-organised authorities. However, as Shropshire Council is not a re-organised authority, this aspect is not relevant.</p> <p>In relation to paragraphs 010, Shropshire Council’s delivery, as outlined in Policy SP2: Strategic Approach (and its corresponding explanation text) is as follows:</p> <p>The housing requirement for Shropshire of around 30,800 dwellings over the plan period from 2016 to 2038 will meet housing need and support the long-term sustainability of the County. It also provides some flexibility to respond to changes to LHN over the plan period and an opportunity to:</p> <ul style="list-style-type: none"> a. Respond positively to specific sustainable development opportunities; b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire; c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;

Planning Practice Guidance categories which have recently been amended or updated	Impacts, if any, with the draft Shropshire Local Plan or its Evidence Base
	<p>d. Support the diversification of our labour force; and e. Support wider aspirations, including increased economic growth and productivity...</p> <p>...the expected rate of housing delivery over the Local Plan period is around 1,400 dwelling per annum, which is consistent with the annual housing requirement.</p> <p>It is considered that this is a reasonable and precautionary approach to preparing a housing trajectory. This trajectory of future housing delivery will be kept up to date and a revised version published each financial year within Shropshire Council's Authority Monitoring Report (AMR).</p> <p>Paragraph 013 largely relates to authorities producing a joint plan, which is not relevant here.</p>
Housing needs of different groups	<p>The changes to the PPG under this topic relate to paragraphs 011-015 on rural exception sites. It is Shropshire Council's position that the draft Shropshire Local Plan does not conflict with any of these recent additions to the Guidance. The changes relate defining where and what a rural site is, type of affordable housing on these sites, market housing on these sites, as well as land identification for these sites and their encouragement.</p> <p>It is considered that the draft Shropshire Local Plan covers these changes under policy SP10: Managing Development in the Countryside, DP4: Affordable Housing Exception Sites, DP7: Cross-Subsidy Exception Schemes. In addition, Shropshire Council encourages landowners to bring forward sites for potential development, and also works with Registered Providers and Parish Councils to help ensure the delivery of such sites.</p>
Neighbourhood Planning	<p>The recent changes to the guidance on Neighbourhood Planning relate to changes due to the COVID-19 pandemic, the addition to the Community Infrastructure Levy (CIL) to para 107 as well as updates to their consultations.</p>

Planning Practice Guidance categories which have recently been amended or updated	Impacts, if any, with the draft Shropshire Local Plan or its Evidence Base
	<p>It is considered that these changes do not materially affect the draft Shropshire Local Plan, as whilst it is acknowledged that there are some existing and emerging Neighbourhood Plans in Shropshire Council's authoritative area, the above changes do not have any significance to this stage of the draft Local Plan.</p>
Plan-making	<p>The recent changes to the guidance on Plan Making relate to changes due to the COVID-19 pandemic (paragraphs 076-082), particularly around the Statements of Community Involvements and consultation processes. The sections on Mayors is not relevant for the draft Shropshire Local Plan.</p> <p>It also added paragraphs 083 and 084, however as Shropshire Council had already reached its Regulation-19 stage of the plan process, these additions are not relevant.</p> <p>It is considered that Shropshire Council's Statement of Community Involvement (2021) fully complies with all of the requirements, available here: https://shropshire.gov.uk/media/20961/statement-of-community-involvement-2021.pdf</p>
Self-build and custom housebuilding	<p>This guidance added new paragraphs: 016a, 038, amended paragraphs: 006, 007, 008, 016, 021, 011, 012, 018, 019, 021, 029, 034, 022, 004, 025, 026, 014, 028, 031 and removed paragraphs: 002, 032, 037.</p> <p>It is not considered that the additions at paragraphs 016a and 038 have any bearing on the draft Shropshire Local Plan. In terms of this part of the guidance, the draft Shropshire Local Plan has a policy dedicated to this aspect – DP2: Self-Build and Custom-Build Housing.</p>
Strategic environmental assessment and sustainability appraisal	<p>This part of the Guidance refers to changes made in response to the COVID-19 pandemic, as well as reflecting The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020, which came into force on 31 December 2020 (paragraphs 046-047 of the Guidance).</p> <p>Most prominently, the changes are focussed around the availability of documents during the COVID-19 pandemic. Shropshire Council's Statement of Community</p>

Planning Practice Guidance categories which have recently been amended or updated	Impacts, if any, with the draft Shropshire Local Plan or its Evidence Base
	<p>Involvement (available here: https://shropshire.gov.uk/media/20961/statement-of-community-involvement-2021.pdf) confirms the Consultation Methods under section 4 - "How Shropshire Council Will Consult The Community For Plan Making And Decision Taking On Planning Applications."</p> <p>Due to the availability and timescales allowed to view and respond to each of this consultation stages, it is considered that Shropshire Council has satisfied this aspect of the PPG</p>
Town centres and retail	<p>Updates to the Guidance for Town and Retail were made in September 2020, and these related to the updates reflecting the changes to the Use Class Order (paras 007 and 008).</p> <p>Much of the changes relate more to the Development Management arm of the planning process, however the changes to the names of the use classes have been updated in the draft Shropshire Local Plan.</p>

41. Other changes since the submission of the draft Shropshire Local Plan relate to such matters as: consultation and pre-decision matters, determining a planning application, fees for planning applications, and making an application and when permission is required. None of which are directly relevant to the preparation or content of the draft Shropshire Local Plan, given that they primarily relate to the Development Management arm of planning.

Housing

ID1 Paragraph 12(a): *The Plan seeks to accommodate some of the unmet housing need from the Black Country. Has the unmet housing need been tested through a local plan examination? Also, can the Council please explain how the figure of 1500 dwellings over the Plan period was arrived at. A housing topic paper would be helpful in setting out this information along with the details of the Council's spatial strategy and distribution and how it was arrived at.*

ID1 Paragraph 12(c): *In addition, the topic paper should cover the Council's approach to providing affordable housing, small and medium sized sites, what reliance is being place on windfall sites and any other information the Council think may be helpful in providing an overview of this topic.*

Shropshire Council Response to ID1 Paragraph 12(a) and 12(c):

42. As requested, Shropshire Council has prepared a Housing Topic Paper to address these questions. This has been submitted alongside this response.

ID1 Paragraph 12(b): *A housing trajectory to demonstrate how the housing requirement will be delivered over the plan period should also be provided. We have appended a proforma for you to complete with this information (Annex 2).*

Question 13: *In terms of whether the Council will have a 5-year housing land supply (HLS) on adoption of the plan, we cannot find any detailed evidence in this regard. We have appended a form (Annex 1) to this letter to be completed for every site that the Council intend to rely on to demonstrate their 5-year HLS.*

Shropshire Council Response to ID1 Paragraph 12(b) and 13:

43. The evidence base originally submitted in support of the draft Shropshire Local Plan included the document **Five Year Housing Land Supply Statement 2020 – Proposed Local Plan - EV048.3**. This document consisted of a Five Year Housing Land Supply Statement for the draft Shropshire Local Plan (at 31st March 2020), including appendices providing schedules of the sites included within the identified supply.

44. An updated Five Year Housing Land Supply Statement with a base date of the 31st March 2021 has now been prepared by Shropshire Council. This document is enclosed for your consideration (**EV048.07**). For convenience, an executive summary of the five year

housing land supply assessment has also been prepared and is similarly enclosed (**EV048.08**).

45. **EV048.07** summarises the assessment undertaken to determine whether, as at 31st March 2021, there are sufficient deliverable sites to achieve the proposed housing requirement within the draft Shropshire Local Plan, over the five year period (2021/22 – 2025/26).
46. In summary, this assessment concludes that there is a sufficient supply of deliverable sites for a **6.59 years' supply of deliverable housing land against the proposed housing requirement**. The following tables, extracted from document **EV048.7** summarise this calculation of the five year housing land supply in Shropshire:

Table 3: Summary of Proposed Five Year Housing Requirement

Category		Proposed Requirement – draft Shropshire Local Plan
(A) 5 Year Requirement:	2020/21	1,400
	2021/22	1,400
	2022/23	1,400
	2023/24	1,400
	2024/25	1,400
	Total	7,000
(B) Under-Delivery: (from earlier in the proposed plan period)		0
(C) Buffer: (10% buffer consisting of supply brought forward from later in the proposed plan period to ensure choice and competition. Applied to both the requirement and past under-delivery)		700
(D) Total Requirement (A) + (B) + (C):		7,700

Table 4: Summary of Deliverable Housing Land Supply (as at 1st April 2021)

Category	Net Dwellings
(A) Dwellings on sites with Planning Permission*	6,782
(B) Dwellings on sites with Prior Approval*	87
(C) Selected sites with a 'resolution to grant'* Planning Permission	149
(D) Dwellings on Allocated Sites estimated to be completed within 5 years*	838
(E) Dwellings proposed for Allocation within the Draft Shropshire Local Plan estimated to be completed within 5 years*	1,282
(F) SLAA Sites deliverable within 5 years*	141
(G) Emerging Affordable Housing Sites*	278
(H) Windfall Sites**	598
Total: (A) + (B) + (C) + (D) + (E) + (F) + (G) + (H)	10,155

*A very cautious assumption that 10% of deliverable dwellings on sites with Planning Permission; Prior Approval; 'resolution to grant' Planning Permission; allocation within the adopted Local Plan; proposed allocation within the draft Local Plan; identified within the SLAA; and identified as an Emerging Affordable Housing Site will not be delivered in the five year period has been applied to figures in this table.

**Based on historic delivery rates and expected future trends.

Table 5: Comparison: Proposed Five Year Housing Requirement and Supply

Category	Proposed Requirement – draft Shropshire Local Plan
Total Requirement:	7,700
Total Supply:	10,155
Over / Under Provision:	+2,455
Number of Years Supply:	6.59

47. Furthermore, Annex 1 of document **EV048.7** summarises the assessment of the supply of deliverable and developable sites, as at 31st March 2021, identified to achieve the proposed housing requirement over the entirety of the proposed Plan period (2016 - 2038).
48. In summary, the assessment concludes that there is sufficient deliverable or developable housing land identified in Shropshire to meet the total proposed housing requirement within strategic policies within the draft Shropshire Local Plan (30,800 dwellings). It also allows for around 10% flexibility in the overall supply.
49. The following table, extracted from **EV048.7** summarises this calculation:

Table 6: Housing Land Supply across the Proposed Plan Period

Category	Net Dwellings
Completions 2016/17 – 2019/20:	8,769
Years 1 - 5 Supply:	10,155
Year 6-10 Supply:	8,919
Years 11-15 Supply:	4,826
Years 16+ Supply:	1,920
Total:	34,589

50. The appendices of document **EV048.7** consist of schedules of all the sites that are considered will either contribute to the Shropshire Five Year Housing Land Supply (as at 31st March 2021) and/or will contribute towards achieving the proposed housing requirement over the entirety of the proposed plan period (to 2038).
51. These appendices are as follows:
- Appendix A. Sites with Planning Permission as at 31st March 2021.
 - Appendix B. Deliverability of Sites for Major Development with Outline Planning Permission as at 31st March 2021.

- c. Appendix C. Sites with a Prior Approval decision as at 31st March 2021.
 - d. Appendix D. Sites with a 'resolution to grant' as at 31st March 2021.
 - e. Appendix E. Sites allocated for development within the adopted Local Plan.
 - f. Appendix F. Sites proposed for allocation within the draft Shropshire Local Plan.
 - g. Appendix G. Sites from the Strategic Land Availability Assessment (SLAA).
 - h. Appendix H. Affordable housing sites, including those seeking Homes England (HE) funding.
 - i. Appendix I. Windfall sites.
 - j. Appendix J. Lapsed permissions.
52. These schedules include the assumptions on delivery timescales for each site. For sites of more than 50 dwellings these assumptions are provided for each year of the proposed plan period and then aggregated into five year time periods. For sites of less than 50 dwellings, given the number of such sites and given that they are generally considered more than capable of being built out within a five year period, data is provided at five year time periods only. This is considered a proportionate and robust approach.
53. Furthermore, for selected sites considered deliverable within the five year period (2021/22 – 2025/26), further information to provide evidence of the sites deliverability is also provided within these schedules. These selected sites are those that:
- a. Benefited from Outline Planning Permission and represent major development as at 31st March 2021;
 - b. Had a 'resolution to grant' Outline Planning Permission and represent major development as at 31st March 2021;
 - c. Were allocated within the adopted Local Plan and did not have Planning Permission as at 31st March 2021;
 - d. Are proposed for allocation within the draft Shropshire Local Plan and did not have Planning Permission as at 31st March 2021;
 - e. Are included within the Strategic Land Availability Assessment (SLAA) and did not have Planning Permission as at 31st March 2021; or
 - f. Represent an emerging affordable housing scheme as at 31st March 2021.

54. It is considered that the information provided within these schedules generally aligns with that documented within Annexe 1 and 2 of ID1. This is because for the relevant components on the housing land supply:
- a. Our understanding of the developer's delivery intentions including anticipated start and build out rates is primarily summarised within either the deliverability or summary columns as relevant. Furthermore, this information is, where appropriate, reflected within the delivery assumptions for the site.
 - b. The current planning status is identified through the sub-division of the housing land supply into the various Appendices – which are grouped by status as at the 31st March 2021.
 - c. The progress towards the submission of an application/further applications (as appropriate) is primarily summarised within either the deliverability or summary columns as relevant.
 - d. Progress with site assessment work is primarily summarised within either the deliverability or summary columns.
 - e. Site viability information is summarised within a viability column, for those sites it is considered necessary.
 - f. Availability: ownership, any existing uses, etc is summarised within an availability column, for those sites it is considered necessary.
 - g. Key infrastructure provision is summarised within the viability, deliverability, or summary column, for those sites it is considered necessary.

ID1 Paragraph 14: The Draft Housing Strategy is undated. Please advise when this was prepared and what its status is?

Shropshire Council Response:

55. The Housing Strategy was adopted by Shropshire Council in January 2021 following approval by Shropshire Council's Cabinet on the 18th January 2021. For clarity, enclosed is the Adopted version of Housing Strategy (**EV063.01**).
56. The Council is currently preparing an Action Plan to support the implementation of this Housing Strategy.

ID1 Paragraph 15: *In terms of Gypsy and Traveller accommodation it appears that the 2017 Gypsy and Traveller Accommodation Assessment (GTAA) was refreshed in 2019. Did the refresh include re-surveying the gypsy and traveller community and if not, why is this? Is the evidence base in terms of Gypsies and Travellers considered to be sufficiently up to date and robust?*

Shropshire Council Response:

57. Shropshire Council can confirm that as part of the Gypsy and Traveller Accommodation Assessment (GTAA) 2019 Update (**EV053.02**), no re-surveying of the gypsy and traveller community was undertaken. The GTAA 2019 Update was undertaken with the intention of providing a focused review of the evidence to ensure the study remained robust and up to date; reflecting relevant revisions to national policy and guidance and best practice and any other significant changes. Additionally, the update took into account the extended Plan period of 2016 to 2038.
58. As part of this process the opportunity was taken to re-examine the approach and outcomes of the earlier GTAA (2017) (EV053.01) in the light of information which had been collected by the local authority since 2017 and to incorporate appropriate refinements to the methodology. The methodology used however remained largely consistent with previous assessments. This allowed comparisons to be made with previous assessments whilst additional detail (particularly in relation to the nature of movements on and off local authority sites) reflected the additional information that had become available.
59. Significantly the update was achieved through a joint working approach between the planning policy team; the consultants who prepared the GTAA report; and Councils Gypsy Liaison team who manage Council sites, liaise with other agencies and neighbouring authorities and have on the ground links with the Gypsy and Traveller community. This collaborative approach, which began with the preparation of the first GTAA (2015), has provided access to an increased level of information on which to base an understanding of accommodation needs for planning purposes. Thus, the report was able to use existing base data gathered by the Council over several years to support and supplement the previous survey work carried out in 2016/17.
60. The evidence used to inform the GTAA 2019 Update included the Council's pitch waiting list, and other detailed site management records which, together with the contextual knowledge of the gypsy liaison team, provided an improved understanding of site occupancy, pitch demand and turnover on local authority pitches (as set out in paragraphs 7.30 – 7.36 and associated tables 7.4, 7.5, 7.6 & 7.7 of the GTAA 2019 Update (EV053.02). In addition, the monitoring of

planning approvals for pitches was used to update the picture of pitch demand and supply; and a review of records of unauthorised encampments helped inform a transit site recommendation update.

61. This approach to the update of the GTAA and the body of information that has informed it has allowed the Council to re-examine and challenge findings within the GTAA and confirm that the evidence that underpins it, in particular turnover and migration assumptions, remained robust. It is considered therefore that the GTAA 2019 Update work provided a suitable mechanism for updating the GTAA 2017 in order to ensure that the evidence base remained fit for purpose for the plan period to 2038. As such it is considered a proportionate and robust evidence base document.

ID1 Paragraph 16: *Has the Council sought to meet any of the identified need for additional gypsy and traveller pitches through a call for sites or other method, such as allocating council owned land or allocating land on the edge of strategic housing allocations? If not, why is this?*

Shropshire Council Response:

62. Shropshire Council issued a 'Call for sites' to identify potential locations that could be available to meet the potential accommodation needs of Gypsies and Travellers alongside the 'Regulation 18' Plan-Making Consultation on 'Preferred Sites' (29 November 2018 - 08 February 2019).
63. However, as both the 2017 Gypsy and Traveller Accommodation Assessment (GTAA) (**EV053.01**) and the subsequent GTAA 2019 Update (**EV053.02**) arrived at similar conclusions and taking into account the SAMDev Plan Inspector's position regarding the role of turnover, it was concluded that there was no strategic need for additional general sites to be allocated. Thus, sites promoted through the 'call for sites' process and other avenues for bringing forward general sites for allocation were not progressed as part of the Local Plan Review process.
64. The Draft Shropshire Local Plan does, in line with the GTAA 2017 and 2019 update, recognise that small scale non-strategic needs will nonetheless arise in draft Policy DP8. Gypsy and Traveller Accommodation. This draft policy provides for a clear and positive approach to the consideration of windfall development to meet any demonstrated accommodation needs of Gypsy and Travellers.
65. The draft policy sets out a criteria-based approach for the consideration of proposals to allow for the delivery of sites of an appropriate scale in suitable locations to meet that need through the development management process. There is also a commitment in the

draft Shropshire Local Plan Policy to ongoing monitoring and review to identify and address any changes in strategic requirements.

66. The specific need for a permanent site for Travelling Showpeople identified within both the GTAA 2017 and the GTAA 2019 Update has been progressed. In order to address this requirement, Shropshire Council reviewed its land holdings and the possible availability of other potentially suitable land in order to bring forward a permanent site to meet the identified need for a family plot, which made provision for both business use and residential requirements. A site was subsequently found, was granted planning permission (May 2020), and is now occupied by the family. As this need has been met, such a plot has not been proposed for allocation in the draft Shropshire Local Plan.
67. As has been noted in paragraph 2.65 of the GTAA 2019 Update, Shropshire Council has been proactive in seeking to meet the needs of its Gypsy and Traveller community, particularly through its established policy approach and the work of its Estates Department and the Gypsy liaison team.
68. Significant work has been carried out by the Council in expanding and improving its existing sites and facilities in order to deliver a better offer of accommodation for the Gypsy and Traveller community. This has included redevelopment of sites to make additional pitch provision at the Council's sites in both Park Hall and Craven Arms (Long Lane); improvements at the sites in Craven Arms (Long Lane) and Higher Heath (Manor House Lane); as well as the aforementioned provision for Travelling Showpeople, subsequent to the following planning approvals:
- a. Change of use and extension to Park Hall, traveller site to provide 10 additional pitches. Reserved matters approval 20/08/12.
 - b. Provision of 6 additional pitches, including 3 double amenity blocks at Long Lane Caravan Site. Full approval 27/08/13.
 - c. Redevelopment of existing Long Lane Caravan Site to provide 10 replacement pitches and new amenity blocks. Full approval 09/07/14.
 - d. Redevelopment at Park Hall Site to provide 15 replacement pitches and 14 new Amenity Blocks (with a 2 pitch gain). Full approval 13/10/14.
 - e. Redevelopment of part of Manor House Lane site including replacement of 12 pitches; and provision of 6 amenity blocks. Full approval 10.10.2014.
 - f. 19/04688/FUL Shropshire Change of use of land at Glovers Meadow, Oswestry to provide business base/residential accommodation for a local family of travelling show people. Full approval 28.05.2020.

69. The Council as a landowner is continuing to consider requirements for additional and enhanced pitch provision and as evidenced by previous schemes, has a good track record of implementation.
70. Recently, Shropshire Council as a landowner, has explored options to provide a Council transit site. Such provision could complement existing private provision, support and enhance transit capacity, assist in the management of unauthorised encampments, and provide a facility to assist in meeting other short term accommodation requirements.
71. As part of this process, the Council's Estates Department has undertaken a public consultation on a proposal for a temporary transit site on the north west edge of Shrewsbury. This was undertaken from October to November 2020, with the aim of progressing this site as a potential option.
72. Thus, it is evident that the Council's programme, outside the local planning process, has provided increased site capacity with the current focus shifting from general sites to making permanent provision for Travelling Showpeople and the potential for a transit site. This complements the proposed approach to appropriate windfall sites where there is an evidenced need set out within draft Policy DP8 of the draft Shropshire Local Plan.
73. In preparing the draft Shropshire Local Plan, expertise within the Estates Department and Gypsy liaison team has been harnessed through effective and ongoing collaboration to ensure an understanding of need and a coordinated approach to meeting these needs. As such it is considered that the proposed approach within the draft Shropshire Local Plan, complemented by the wider activities of Shropshire Council, is an effective approach to meeting the needs of our Gypsy and Traveller Community.

Employment land

ID1 Paragraph 17: *The Plan seeks to accommodate some of the unmet employment land need from the Black Country. Has the unmet need been tested through a local plan examination? Also, please can the Council explain how the figure of 30 hectares of employment land over the Plan period was arrived at and where it would be accommodated? A topic paper would be helpful in setting out this information along with the details of the Council's spatial strategy and distribution and how it was arrived at.*

Shropshire Council Response:

74. As requested, Shropshire Council is preparing an Employment Topic Paper to address these questions. This Topic Paper is currently being finalised and will be submitted in the week commencing 7th February.

ID1 Paragraph 18: *In relation to Policy S16.6 Shrewsbury, site SHR 166, paragraphs 4.1.6 and 4.1.7 of the Statement of Common Ground between Historic England and Shropshire Council, dated August 2021 state, "Historic England is undertaking further work in liaison with landowner in the Summer of 2021 in order to understand the significance of the site and will keep Shropshire Council fully informed. Once further information is known about the buried archaeology of the site and its significance, then the principle of development may, or may not be established. If the principle of development is established, then Historic England would agree to development being carried out in an appropriate way, together with mitigation, in association with the Council's Natural and Historic Environment Manager. However, it is Historic England's view that there is insufficient evidence available at the present time to make such a judgement on the principle of development at this site." Can the Council please advise what the latest position is on this matter. Also, are there any other unresolved matters in relation to the historic heritage of this site?*

Background

75. Shropshire Council has proactively engaged with Historic England (HE) throughout the Local Plan Review process. Comments were received from HE at all consultation stages and in the majority of instances, this has led to positive outcomes. However, HE was proposing to undertake archaeological investigations of the Roman marching camp, present on site SHR166 at the time the Statement of Common Ground (SoCG) (EV024) with the Council was signed.

Current situation

76. HE has confirmed to the Council that geophysical, archaeological and aerial photography analysis work has been undertaken for site SHR166. HE has also confirmed their objection to the allocation of the site for an employment use.
77. The Council is seeking clarity from HE on this and discussions are continuing. To aid in understanding their position, HE has agreed to provide the Council with an advice note by 17th February 2022. Further information, including the geophysical, archaeological and aerial photography analysis reports will be provided to the Inspectors once discussions conclude.

78. As far as the Council is aware, the above issue is the only unresolved matter for site SHR166 in relation to the historic environment.

Green Belt

ID1 Paragraph 19: *We note that the Plan identifies some sites to be taken out of the Green Belt and allocated for development purposes. Proposals to re-draw Green Belt boundaries should generally follow a two-stage approach. The first stage is the evidence gathering and assessment that leads to an in-principle decision by the Council that review of the Green Belt boundary is necessary to help meet development needs in a sustainable way, as set out in the NPPF¹.*

ID1 Paragraph 20: *The second stage determines which site or sites would best meet the identified need having regard to Green Belt harm and other relevant considerations. It is only after satisfactory completion of the two stages that exceptional circumstances are capable of being fully demonstrated.*

ID1 Paragraph 21: *Typically, the first stage involves several steps, starting with a thorough investigation of the capacity of the existing urban areas and whether this has been maximised. Subtracting this from the local housing need (LHN) leaves the amount of development to be provided outside the urban areas. The next step is to consider whether there is any non-Green Belt rural land which could meet all or part of the unmet need in a sustainable manner and having regard to any other significant constraints. These two steps address the requirements of NPPF paragraph 142 and 143 and give a scale of unmet need which can only be met by Green Belt release.*

ID1 Paragraph 22: *In some situations, it may then be necessary to consider whether, in principle, this residual need is one which should be met by Green Belt release. This might involve examining not only the justification for meeting the LHN (or the consequences of not meeting it) but also addressing sustainability considerations and consistency with the overall strategy of the Plan reflecting NPPF paragraphs 142 and 143.*

ID1 Paragraph 23: *Can the Council please provide a Green Belt topic paper which explains the steps taken by the Council prior to making the decision to allocate land in the Green Belt for development. This should include reference to relevant parts of the evidence base. Can the Council also set out in the topic paper how it has addressed NPPF paragraph 141 and where necessary, provide evidence to substantiate this. Also, please*

¹NPPF paragraphs 142 & 143

explain whether taking unmet need from the Black Country has led to the need to release land from the Green Belt.

Shropshire Council Response:

79. As requested, Shropshire Council has prepared an Green Belt Topic Paper to address these questions. This Topic Paper has been submitted alongside this response.

Environmental Matters

Water neutrality

ID1 Paragraph 24: *In table 4.1 of the statement of common ground between the Council and Severn Trent Water Ltd (STW), dated June 2021, item No 4 says "STW and SC agree to explore potential for water neutrality (as advised by STW and EA) for relevant development proposals – in particular for RAF Cosford, Albrighton and Shifnal. SC agrees to explore water neutrality concept through their climate change agenda." Can the Council please advise what progress has been made with this.*

Shropshire Council Response:

Background

80. The need to manage water resources more sustainably is being driven by the climate change agenda. Section 4.6 of the Shropshire Water Cycle Study (WCS) (**EV117.01**) states that:

"It is widely recognised that the climate is changing and in response Shropshire Council declared a climate emergency in May 2019. Climate change is predicted to increase pressure on water resources, increasing the potential for a supply-demand deficit in the future, and making environmental damage from over abstraction of water resources more likely. Furthermore, the delivery of water and wastewater services and the heating of water in the home require high energy inputs, and therefore contribute directly to emissions of greenhouse gases. Water efficiency therefore reduces energy use and carbon emissions."

81. The WCS goes on to discuss the concept of water neutrality in the climate change context and section 4.6.6 states that:

'Water neutrality is a relatively new concept for managing water resources, but one that is receiving increased interest as deficits in future water supply/demand are identified.

The definition (of water neutrality) adopted by the Government and the Environment Agency is:

"For every development, total water use in the wider area after the development must be equal to or less than total water use in the wider area before development".

It is useful to also refer to the refined definition developed by Ashton:

"For every new significant development, the predicted increase in total water demand in the region due to the development should be offset by reducing demand in the existing community, where practical to do so, and these water savings must be sustained over time" (V Ashton, 2014)

This definition states the need to sustain water saving measures over time, and the wording "predicted increase in total water demand" reflects the need for water neutrality to be designed in at the planning stage. '

82. Later in the same section, the WCS states:

"In essence water neutrality is about accommodating growth in a region without increasing overall water demand"

83. Section 4.6 of the WCS states that:

'It is importantthat new development does not result in an unsustainable increase in water abstraction. This can be done in a number of ways from reducing the water demand from new houses through to achieving "water neutrality" in a region by offsetting a new development's water demand by improving efficiency in existing buildings'

84. Table 4.12 WCS then goes on to recommend that:

The concept of water neutrality has the potential to provide a significant benefit in terms of resilience to climate change and enabling all waterbodies to be brought up to Good status.

This approach could have particular application in the strategic site of RAF Cosford, and the settlements of Albrighton and Shifnal and should be explored further if required by STW to accommodate growth in these locations.

85. This recommendation is carried forward to the Statement of Common Ground (SoCG) between Severn Trent Water and Shropshire Council and forms the basis for this question.

Response

86. The WCS identifies a number of ways in which water neutrality can be achieved. Section 4.6.6 sets these out as follows:

- a) Reducing leakage from the water supply networks*
- b) Making new developments more water-efficient*
- c) "Offsetting" new demand by retrofitting existing homes with water-efficient devices*
- d) Encouraging existing commercial premises to use less water*
- e) Implementing metering and tariffs to encourage the wise use of water*
- f) Education and awareness-raising amongst individuals*

87. Shropshire Council can influence the second of these actions through the planning system. Accordingly, draft policy DP20 of the Draft Shropshire Local Plan requires new residential development to meet the Building Regulations' 110 litres per person per day standard for water. Non-domestic buildings will be expected to reach 'Good' BREEAM status or equivalent.
88. More widely, the Council's climate change agenda has a role to play. This is being taken forward through the Corporate Climate Change Strategy and Action Plan (**EV019.01**). The corporate climate management strategy is set out in section 4 of this document and under the 'Power down' heading, the Resource consumption and waste action sets out that the Council will '*Reduce water consumption through a comprehensive retrofit programme of Council buildings;*'
89. However, the other activities set out in the WCS as means of achieving water neutrality are outside the remit of the planning process, resting mostly instead with the water company. The Council asked Severn Trent Water (STW) for information on their plans for these and received the following response:

Severn Trent's Water Resources Management Plan (WRMP) 2019 sets out the Company's strategy to meet future water demand needs in our area. We account for population and property growth amongst other factors in our forecasting assumptions, and update the WRMP every 5 years. The WRMP19 sets out the Demand Management strategies, such as household water efficiency, metering and leakage reduction (see below) which alongside supply side solutions, help achieve a positive forecast supply demand balance.

With regard to water neutrality ambitions, if we were to make this part of our plan over & above addressing supply-demand balance deficits, our first steps would be to assess opportunities to scale up the current demand management options across the wider Water Resource Zone to offset 'new' water demand alongside requiring all future developments to be very water efficient.

Our current Demand Management strategies that address supply demand deficits identified in the WRMP19, but are also relevant to moving towards water neutrality if there are opportunities to upscale, comprise the following:

1. Reducing leakage from the water supply networks.

Leakage currently makes up around 23% of the total water we put into supply. Our reduction activities reduced this by 15% between 2010 and 2020 and we propose a further ambitious 15% reduction in AMP7 (2020 -2025). Our longer term (25 years) leakage reduction target is 50%, with 30% of this to be achieved before the end of the Shropshire Local Plan period (2038).

We prioritise our leakage reduction activities in water resource zones with the greatest supply/demand challenges and our future leakage reductions are targeted in the zones with the greatest supply/demand needs.

2. Influencing customers' use of water through water efficiency activities.

We intend to scale up and roll out our water efficiency home check programme. Under this free service, customers sign up for a home check where we visit their home and fit free water saving devices. We also offer them advice on how they can save water and we check for simple leaks. The programme provides a greater certainty than offering products on request and it is popular with our customers. Our roll out will focus on areas facing supply/demand deficits and we will also extend the programme to engage directly with social housing providers to help their tenants save water. We will also continue our customer and community programmes to inspire our customers to change their water habits. We expect our proposals to reduce customer demand by 19 million litres per day over AMP7.

3. Increasing the coverage of water meters to support water efficiency and improving our understanding of water demand patterns.

We propose to change our metering policy, moving from a reactive approach to a more proactive and targeted approach to increase household meter coverage. Based on the benefits reported by other companies, we believe that achieving full meter coverage could reduce demand by 80 million litres per day. We aim to reach this by the end of AMP9 (2030 – 2035) and will target the water resource zones with the greatest supply/demand deficit first.

As part of this change, we are exploring with the Environment Agency and DEFRA whether an application for the power to implement a compulsory metering programme would be appropriate, either for the whole region or for specific water resource zones, and the timescale over which it would be applied. Until we have clarity on this, we are installing meters proactively and offering customers the opportunity to switch, based on information on what their measured bill would be.

An added benefit from increasing the number of metered properties on our network is the greater certainty of demand. Currently, when we monitor leakage performance on our network, we have to estimate consumption for the 60% of our customers who are not metered. That makes it very difficult to distinguish changing consumption patterns from leakage breakouts. Increasing the number of metered properties will therefore enable us to deploy leakage repair more effectively and efficiently. This will be crucial to achieving our 15% leakage reduction target in AMP7.

90. The Council is also one of the key founders and supporters of the Shropshire Climate Action Partnership (SCAP). The Partnership is being supported by volunteers drawn from a wide range of business sectors and communities across Shropshire and has established a number of Technical Working Groups to develop a vision and actions for topic areas such as consumption and resources - which includes water. They have published a practical information document on domestic water https://zerocarbonshropshire.org/wp-content/uploads/008_Consumption_Resources_Wv2.pdf which gives an estimate of the baseline carbon footprint for the supply of clean drinking water, sets out the actions being taken by STW to reduce this

and recommends further actions for STW. Many of the latter mirror those given in the company's response above.

91. Thus, progress towards water neutrality is being achieved through a combination of Draft Shropshire Local Plan policy, actions that the Council is taking itself or in partnership with others through SCAP, and demand management strategies being implemented by STW.

River Clun catchment issue

ID1 Paragraph 25: *We note that in a letter to the Council dated 22 June 2021 from Natural England and the Environment Agency (appended to the statement of common ground between the Council and the Environment Agency) they say, "Natural England (NE) and the Environment Agency (EA) have significant concerns regarding the sites proposed in the Shropshire Local Plan for the Clun catchment and deliverability of policy DP13 Development in the river Clun catchment. We advise that Shropshire Council removes the housing allocations located in the catchment of the River Clun SAC until there is greater certainty around available nutrient neutrality options. This is because in our view there is not currently the required degree of certainty that nutrient neutrality could progress without undermining the ability of the River Clun SAC to reach favourable conservation status."*

ID1 Paragraph 26: *It appears that the Council has been advised to produce, as part of the local plan evidence base, details of possible mitigation measures, in sufficient detail including feasibility/likely cost, etc. It seems that this work might then contribute to the restoration plan. Can the Council please advise what the latest position is with regards to this matter.*

Shropshire Council Response:

Introduction

92. Throughout the Local Plan Review process, Shropshire Council has sought to proactively engage and where appropriate undertake joint working with both Natural England (NE) and the Environment Agency (EA). In particular, EA's advice and support as part of relevant steering groups was integral to the preparation of the Water Cycle Study and both the Level 1 and Level 2 Strategic Flood Risk Assessments. The emphasis throughout has been on collaboratively identifying opportunities for environmental protection and improvement through the draft Shropshire Local Plan.
93. In the majority this engagement has had positive outcomes. A good example of this is the water efficiency requirement within draft policy DP20, which was informed by the recommendations arising from the

Water Cycle Study. Another example is the effective way that the Level 1 and Level 2 Strategic Flood Risk Assessments have informed the site assessment process undertaken to inform proposed allocations

94. Unfortunately, this process has not resulted in agreement with regard to the River Clun Special Area of Conservation (SAC). NE and EA have both objected to the Council's proposed approach to safeguarding this internationally designated site in the Draft Shropshire Local Plan.
95. The sole special interest of the River Clun SAC is the presence of the extremely rare freshwater pearl mussel. When the SAC was assessed in 2014 it was identified as being in unfavourable and declining condition due to nutrient enrichment (phosphates and nitrogen) and sediment deposition. A more recent analysis (November 2021) carried out by NE (water quality data collected by EA) shows that levels of orthophosphate and total oxidised nitrogen are still greatly above those needed to maintain the freshwater pearl mussel population and there has been little or no improvement since 2007. Therefore, restoration measures are needed to bring the SAC back to a favourable conservation status.
96. Phosphates from development in the catchment of the River Clun have the potential to adversely affect the SAC's special interest. To comply with the Habitats Regulations, development must not lead to any increase in phosphate levels in the River Clun. Also, measures taken to mitigate any increase in phosphates reaching the SAC as a result of development must not compromise the ability of the designated site to reach a favourable condition.
97. A Nutrient Management Plan (NMP) (**EVO92**) for the River Clun was prepared by NE and EA in 2014. The NMP summarises the condition of the river pre-2014 and sets out potential measures to support the restoration of the SAC. It also shows that between 92% and 99% of the nitrogen load, 98% to 99% of the sediment and 65% of the phosphate load in the river comes from agricultural activities. Phosphates from wastewater treatment works accounted for 35% of the load.
98. Following the publication of the NMP, Severn Trent Water (STW) installed phosphate stripping at their wastewater treatment works in the catchment. This has reduced their contribution to phosphate loads by more than 75% and has enabled some of the housing from the Site Allocations and Management of Development (SAMDev) Plan to be delivered (although the Council has not permitted any development resulting in discharges to wastewater treatment works in the catchment in the last 3 years based on informal advice from NE concerning the Dutch Nitrogen Judgement – see below for more information on this legal case). It is likely that the proportion of

phosphates arising from development is less than 35% of the total now.

99. The NMP has not been updated to take account of the Dutch Nitrogen Judgement, more recent modelling of the Clun catchment carried out by NE using the 'Farmscoper' tool, and more up to date water quality data held by EA.
100. The Habitats Regulation Assessment (HRA) of the Regulation 19 draft Shropshire Local Plan (**SD008.01**) carried out an Appropriate Assessment for the River Clun SAC. Paragraph 3.36 of the HRA concludes that:
- "through the Development Policy and Settlement Policy wording and the statutory requirement for a project level HRA for development, there will be no adverse effects on the integrity of the River Clun SAC as a result of the Draft Local Plan."*
101. NE and EA's principal areas of concern (see below for more detail) are draft policy DP13: Development in the River Clun Catchment and the proposed allocation of sites BKL008a and CLU005 for residential use in Bucknell and Clun respectively. Comments from both agencies on the Draft Shropshire Local Plan HRA for the Clun SAC at the Regulation 19 consultation stage reflect this and are covered here in response to Paragraph 26 of ID1 rather than in the Council's response to Paragraph 8 of ID1.

Regulation 18: Preferred Sites stage

102. The proposed allocations in Bucknell and Clun (BKL008a and CLU005 respectively) were first consulted on as part of the Shropshire Local Plan Review within the Preferred Sites Consultation (November 2018 - January 2019) (**EV005.01**). An HRA Report of the preferred sites proposals accompanied the consultation documents (**EV005.05.01**).

NE's response

103. NE's response was in the form of general advice on conserving and enhancing the natural environment through the plan making process - no specific comments were given on the proposed allocations or the HRA Report. The following comments were the most relevant to the River Clun SAC:

"Designated sites should be protected and, where possible, enhanced. Of particular concern to your authority will be the River Clun Special Area of Conservation which is currently not meeting its conservation targets(this is) sensitive to large scale development and pollution from diffuse sources"

and

"A number of recent judgements in the High Court and the Court of Justice of the European Union (CJEU) have occurred since your authority's last conversation including The Joined Cases C-293/17 and C-294/17 also known as Coöperatie Mobilisation or the Dutch Nitrogen Case which relates to the treatment of plans and projects where internationally designated sites are failing their conservation targets and the certainty of using mitigation to achieve favourable status. This may particularly affect your authority's allocations in the catchment of the River Clun Special Area of Conservation. Natural England is currently advising those competent authorities making or considering plans or projects under the Habitat Regulations to seek their own legal advice on the implications of these judgement"

EA's response

104. EA provided a response for some of the proposed site allocations, but did not specifically comment on the sites in Bucknell and Clun, nor the HRA Report. However, they provided 5 paragraphs of advice for Clun catchment under the heading '*Development Growth in the Clun catchment and the Clun Nutrient Management Plan (NMP)*'. The first paragraph describes the special interest of the SAC and its level of protection. The other paragraphs are reproduced as follows:

"With regard to water quality and waste-water infrastructure, we would welcome discussion with you and Severn Trent Water Limited, and ultimately Natural England, as part of the information you are completing as part of the WCS update. This will inform proposals in the Clun catchment in relation to development growth scenarios, any barriers/phasing options/improvements or other requirements etc, linked to your Habitat Regulations Assessment (HRA).

As part of our discussions on the WCS, we have raised concerns with you on the potential issues which might prevent any additional growth in this catchment being brought forward as part of this local plan review.

As you are aware, the Adopted SAMDEV plan (current committed growth) references the need for mitigation measures to remove the adverse effects of development on the integrity of the River Clun Special area of Conservation (SAC), including developer contributions for those relevant options.

The above discussions will help inform your Habitats Regulations Assessment."

105. In response to these comments the Council's senior planning policy officer, ecologist and the drainage and flood risk manager met with NE and EA. Following the meeting, the Council asked JBA to extend their work to cover the issue of growth in the Clun catchment. As a result, JBA added a new section (12.3 River Clun Catchment) to the Water Cycle Study (**EV117.01**). This discusses 7 options for mitigating nutrients arising from growth in the Clun catchment, including constructed wetlands, natural flood management techniques and changes to agricultural practices. Table 12.2 on page 151 of **EV117.01** then sets out the pros and cons of each option.
106. At this stage of the plan preparation process, NE did not raise any specific concerns about the proposed allocation of land in Bucknell and Clun. The Council also considers that the advice received from EA was followed, through the additional work carried out in the Water Cycle Study to assess mitigation measures for development.

Regulation 18: Pre-Submission Draft stage

107. The draft policy for development in the Clun catchment (within this consultation the draft policy was DP14, in subsequent consultations and the draft Shropshire Local Plan it is DP13) and the previously referenced proposed site allocations in Bucknell and Clun (BKL008a and CLU005 respectively) were consulted on at the Regulation 18: Pre-Submission Draft stage (August - September 2020). A HRA Report for the draft Local Plan documents was made available at the same time.
108. Draft policy DP14 follows good practice from other Local Authorities in England where poor water quality caused by nutrient enrichment is affecting the special interest of internationally designated sites. For instance, NE have advised the Local Authorities in Somerset that a *"nutrient neutrality" approach, whereby applicants demonstrate that a proposed development will not lead to an increase in levels of nutrients such as nitrates and phosphates, was likely to be a "lawfully robust solution"*. The Solent Local Authorities are also being supported by NE to implement a nutrient neutrality approach to development. Accordingly, the Council's draft policy DP14 aims to restrict development in the River Clun catchment to that which can be demonstrated to be nutrient neutral.

NE and EA consultation responses to Draft Policy DP14

109. **EV007.3** provides a summary of responses to the consultation on the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan and shows that in response number **A2407 B05** (on page 78) for Draft Policy DP14, whilst NE supported the principle of a specific policy for the Clun catchment, they urged caution around this. They asked the Council to

'consider how it might permit development without compromising the ability to restore the SAC to favourable condition. It may be necessary first to understand what is required to restore the site and then to use that as a baseline for nutrient neutrality.'

110. They stated they were seeking legal advice on this matter and suggested the Council might want to do the same.
111. EA (respondent reference number **A2389**) did not comment on Draft Policy DP14.

NE and EA consultation responses to proposed site allocations

112. **EV007.3** shows that NE did not comment on the site allocations in Bucknell and Clun (BKL008a and CLU005, under Draft Policy Area S2 Bishop's Castle Place Plan Area).
113. EA's comments for the Bishop's Castle Place Plan Area (**A2389B1** on page number 115) refer to opportunities linked to the Strategic Flood Risk Assessment (SFRA). They mention that the Tasley, Bridgnorth area has potential for flood storage.

NE and EA consultation responses to the HRA Report

114. NE commented (**A2407 B06** on page 388) that

'A revised nutrient management plan or action plan, providing the required certainty that mitigation measures will be implemented, would help to unlock future development. The building industry is also being encouraged to seek innovative solutions for larger developments.' Natural England agrees that additional work on the Nutrient Management Plan and actions arising from it are necessary, in order to provide appropriate certainty to enable development and restore the site.'

115. EA advised (**A2389B2** also on page 388) that

'There are also further discussions probably to be had around the Clun catchment which we have spoken about previously i.e. around possible measures/solutions and potential concerns including Natural England.'

116. At this stage of the Local Plan preparation process, neither agency indicated that a nutrient neutral policy approach to development in the River Clun catchment may not be acceptable and neither of them expressed concerns about the proposed site allocations. In fact, it seems that NE were positive about mitigation measures to unlock future development and recognised that work to update/revise the River Clun Nutrient Management Plan was necessary to support this.

Regulation 19: Draft Shropshire Local Plan:

117. Shropshire Council again consulted on proposed allocations in Bucknell and Clun (BKL008a and CLU005 respectively) and the draft policy for development in the Clun catchment (now policy reference DP13) at the Regulation 19: Pre-Submission Draft stage (December 2020 – February 2021).

NE and EA consultation responses to policy DP13 (previously DP14)

118. NE's response to the Regulation 19 consultation for policy DP13 is set out in **SD014.02**, (reference number **A0349 B005**, page 437). NE state in their point 1 that:

'this policy does not give enough detail to be certain of what is required to meet the requirement of nutrient neutrality or nutrient betterment and in their point 2 that 'additional work may be needed to inform the evidence base underpinning the SAC restoration scheme'. NE also 'do not believe the policy is compatible with the Dutch Nitrogen Judgement'.

119. Concerns over other unintended consequences of the policy were also raised.

120. EA's response to policy DP13 (**SD014.02**, reference **A0347 B040**, page 437) states that they

'Do not agree that development policywill prevent adverse effects on the integrity of the River Clun SAC. Measures to ensure that developments achieve nutrient neutrality cannot yet be calculated and therefore there is no guarantee that nutrient neutrality can be achieved for the scale of development in the Local Plan.'

NE and EA consultation responses to site allocations

121. NE's response to the allocations in Bucknell (BKL008a) and Clun (CLU005) is shown in SD014.2 (reference numbers **A0349 B003** and **A0349 B005** on pages 505 and 507 respectively).

122. The comments are the same for both allocations as follows:

'welcome the Council's commitment.... to working with stakeholders to develop a restoration plan for the SAC with enough certainty of mitigation measures to unlock development. However, as NE does not yet know where any SAC restoration measures would be best locatedthis site may be needed for these and thus it may be premature to include it as an allocation in the Local Plan. Also, this allocation may not be deliverable without additional work to inform the evidence underpinning the SAC restoration scheme.'

123. They note that *'no acceptable nutrient neutrality or betterment schemes have been designed to date to allow development to proceed'* and they do not believe the allocation is compatible with the Dutch Nitrogen Judgement.

124. EA's response to the site allocations is included in the comment on policy DP13 and states that they

'Do not agree that settlement policy wordingwill prevent adverse effects on the integrity of the River Clun SAC. Measures to ensure that developments achieve nutrient neutrality cannot yet be calculated and therefore there is no guarantee that nutrient neutrality can be achieved for the scale of development in the Local Plan'.

125. They suggested that development is not allocated in the Clun catchment - considering that windfall proposals could be assessed on an individual basis - but there needs to be

'some discussion on that to ensure that mitigation has a reasonable prospect of delivery'.

NE and EA consultation responses to the Plan HRA.

126. NE's relevant comment on the Clun catchment (**A0349 B002** on page 1107) was:

'Paragraphs 3.27 and 3.39: we agree that the allocation of 319 houses and an employment site will have an adverse effect on the integrity of the SAC without mitigation and that there are particular difficulties in applying nutrient neutrality principles in the river Clun catchment'

127. EA's comments (**A0347 B039** page 1105) covered the inter-dependency of pearl mussels on trout and salmon and thus the need for good water quality as well as the potential for increased drought and flooding as a result of development. They did not directly address the issue of defining mitigation measures for development to safeguard the SAC.

Duty to co-operate discussions

128. Following the responses from NE and EA to the Regulation 19 consultation, the Council held meetings with both agencies. The aim was to resolve objections as far as possible and to clarify matters where disagreement remained. The outcomes of these discussions are set out in the respective Statements of Common Ground (**EV025** for NE and **EV022** for EA).

129. The Council met NE on 5th May and 14th June 2021 and EA on 24th June 2021 to continue discussions on this issue. The minutes of the

meeting held with NE on 5th May 2021 are included as Appendix A in **EV025**.

130. Following these meetings, and in the light of the need to continue to plan positively for the Clun catchment to maintain community social and economic sustainability, the Council proposed a series of modifications to draft policy DP13 and its' explanation. These are set out in **SD003: Schedule of Proposed Minor Modifications** and reproduced for clarity in **EV022** and **EV025**.
131. The proposed modifications to draft policy DP13 clarify the Habitats Regulation requirement that mitigation measures should not compromise the ability of the SAC to reach favourable condition. They are designed to provide certainty regarding the concerns NE raised about the legality of the policy (see **EV025**).
132. The proposed modifications to the explanation for draft policy DP13 set out a mechanism for defining mitigation measures once a SAC Restoration Plan is in place. They aim to address the current uncertainties around restoration measures and provide comfort that mitigation measures will be defined once these uncertainties have been resolved. The Council considers that this is a pragmatic approach, given that the draft Local Plan period runs to 2038. There is thus time for restoration measures to be identified and after this, for complementary mitigation measures to be set out to allow nutrient neutral development to take place. Delivery assumptions on sites BKL008a and CLU005 (Bucknell and Clun respectively), and other relevant sites within the catchment, recognise the implications of such an approach - specifically that development is likely to occur later in the draft Local Plan period – and as such these sites are not included within the 5 year housing land supply. However, it is considered appropriate and important to include them in the housing supply for plan period as they provide an important contribution to meeting the housing need of communities within the Clun catchment.
133. Additionally, the Council notes that any development on the proposed site allocations (or indeed any other site) in the Clun catchment would be subject to (modified) draft policy DP13 and the requirement for a project level HRA in draft policy DP12. Taken together, these provisions are considered sufficient to prevent any harm to the SAC resulting from development.

NE-EA Statement of Common Ground and Joint Advisory Position

134. Following the duty to co-operate meetings, the Council prepared Statements of Common Ground with NE (**EV025**) and EA (**EV022**). The proposed modifications to draft policy DP13 and explanation were presented as part of these documents, but although other areas of

disagreement were resolved, neither NE nor EA agreed with the Council's proposed modifications with NE suggesting their own series of modifications instead. This issue remains outstanding.

135. Before the Statements of Common Ground were finalised, NE and EA provided the Council with their Joint Advisory Position on the issue of the Clun Catchment (now attached as an appendix to both Statements of Common Ground).

136. The Joint Advisory Position reiterates that NE and EA have significant concerns about the proposed site allocations in the Clun catchment and the deliverability of draft policy DP13. It confirms in the 2nd paragraph on page 2, under the '*Restoring the Clun*' heading that

'The responsibility for producing a river restoration plan sits with NE in partnership with the EA, however input from other parties such as Severn Trent Water and Shropshire Council is essential both for plan writing and delivery.'

137. The Council has always welcomed this approach, offering administrative support for such a plan to both agencies during the duty to co-operate meetings and latterly bringing all parties together at a strategic level through the establishment of the River Clun Strategic Liaison Group (see below).

138. The section on the Dutch Nitrogen Case on page 3 in the Joint Advisory Position advises (in the 4th paragraph) that the 2014 River Clun Nutrient Management Plan cannot be relied on for strategic mitigation.

139. The 5th paragraph in the Dutch Nitrogen case section confirms that

'a 'nutrient neutrality' approach to development is likely to be a lawfully robust solution to enable the grant of permissions that give rise to an appreciable effect'

140. Several examples of local authorities where this approach has been implemented are then quoted.

141. Still under the Dutch Nitrogen cases heading, the 1st paragraph on page 4 advises that

'further work on mitigation measures which do not compromise the ability to restore the designated site is needed before a nutrient neutral approach can be utilised'

142. Whilst the 2nd paragraph on page 4 suggests that the Council produce

'something as part of the local plan preparation to show whether additional growth would compromise the ability to restore the site'.

143. It is the Council's view that information on what is needed for restoration would provide the starting point for fulfilling this request. In this respect, the 2nd paragraph on page 2 (quoted above) is relevant in that it confirms that the responsibility for preparing a river restoration plan lies with NE and EA.

144. However, the last line of paragraph 1 page 4, states that

'in the absence of any detail currently, we (NE and EA) do not have options or know which measures will need to be utilised to restore the site.'

145. Further, under the Restoration Plan heading on page 4, NE and EA advise that

'timescales and likelihood of delivery (for a restoration plan) are currently unknown'

146. It would therefore appear to be unlikely that information on restoration measures will be available in the near future.

147. The 2nd paragraph under the heading *'Will it address plan development growth'* on page 4 (it being the restoration plan) states that

'the restoration plan will identify measures to resolve the existing problem and would not include (those) for additional growth'. That is why we have been advising you to produce, as part of your local plan and growth aspirations, an evidence base of possible mitigation measures, in sufficient detail including feasibility/likely cost, etc'

(this section of the Joint Advisory Position forms the basis for this question).

148. In conclusion, the Council considers it is being advised to produce an evidence base of possible mitigation measures which would not form part of restoration plan.

Subsequent Shropshire Council actions

a) Mitigation measures study

149. In response to the NE-EA Joint Advisory position and as a means of planning positively for the Clun catchment, the Council is now pursuing the identification of suitable, deliverable and costed mitigation measures for residential development in the Clun catchment. This work is being delivered for the Council by specialist consultants Royal HaskoningDHV and will;

- a. set out a phosphate calculator
- b. develop a phosphate budget for housing

- c. recommend the most appropriate mitigation measures based on costings and effectiveness
- d. assess opportunities for broad locations for the recommended measures and
- e. advise on implementation mechanisms.

150. The brief for the commission is attached as Appendix 3. The final report is expected by the end of March 2022.

151. The River Clun SAC Mitigation Measures Study has been informed by work carried out by Ricardo for Herefordshire Council. This advised on mitigation measures to achieve nutrient neutral development for the River Lugg sections of the River Wye SAC. Development in Herefordshire has the potential to adversely affect the River Lugg through phosphate pollution – the same issue as for the River Clun SAC – so there are many parallels. Herefordshire Council are now implementing a nutrient neutral approach to development through the use of the recommended mitigation measures to offset the phosphates such development will produce. Their updated position statement for development in the River Lugg catchment area April 2021, states that NE have advised that this nutrient neutral development has the potential to pass Appropriate Assessment under the Habitats Regulations
<https://www.herefordshire.gov.uk/downloads/file/22149/position-statement-update-april-2021>

b) The River Clun Strategic Liaison Group

152. In October 2021 Shropshire Council set up a River Clun Strategic Liaison Group. This comprises senior representatives from NE, EA, STW and Shropshire Council. The group meets monthly and aims to provide a multi-agency response and co-ordinated leadership to resolve the complex issues surrounding the restoration of the SAC whilst balancing the social and economic needs of the community. Their Position Statement is included as Appendix 4.

153. The Council anticipates that the Group will play a major role in the preparation of a River Clun Restoration Plan as well as providing a strategic governance structure for the delivery of mitigation measures for development.

Summary

154. The Council has sought to follow NE and EA advice regarding the identification of mitigation measures to protect the River Clun SAC throughout the draft Shropshire Local Plan preparation process.

155. At the Regulation 19 stage, a review of potentially acceptable mitigation measures showed that they would overlap with potential restoration measures for the SAC, based on indicative information on the latter supplied by NE in confidence. Given that NE's advice at this stage was that restoration measures could not be the same as mitigation measures, the Council concluded that without further information from either NE or EA on restoration measures, EA's request that mitigation measures be identified was unlikely to deliver a solution that NE would accept. Notwithstanding this, the Council considers that once specific restoration measures are identified through a Restoration Plan, there will be capacity for appropriate mitigation measures, including those which involve land-take.
156. Furthermore, Shropshire Council has a duty to plan positively for the Clun catchment. In seeking to fulfil this, the Council proposed that a series of modifications be made to draft policy DP13 (Development in the River Clun Catchment). These make it clear that for development to be deemed appropriate within the River Clun Catchment it must achieve nutrient neutrality and that the mitigation measures necessary to achieve nutrient neutrality must not compromise the ability of the SAC to reach a favourable condition. They also set out a mechanism for defining mitigation measures once a SAC Restoration Plan is in place. The Council considers that if amended as suggested, policy DP13 safeguards the River Clun SAC whilst allowing for the delivery of the small levels of development necessary to maintain the social and economic sustainability of the communities in the River Clun catchment.
157. These modifications were not accepted by NE and EA. Instead, in their Joint Position Statement, they advised the Council to '*produce details of possible mitigation measures including feasibility, likely cost etc*'. This work is now being implemented through a commission to Royal HaskoningDHV for a River Clun Mitigation Measures Study: the results should be available by the end of March 2022. Additionally, the Council has set up a River Clun Strategic Liaison Group. This comprises senior representatives from Shropshire Council, NE, EA and STW and aims to work in partnership to progress the restoration of the SAC and could also provide a strategic governance structure for the delivery of mitigation measures for development.

Infrastructure

ID1 Paragraph 27: *We note that Highways England in their Regulation 19 consultation response, dated 22 February 2021, state that further transport evidence, in the form of highway modelling is being prepared which will be followed by the production of a Statement of Common Ground between the Council and Highways England. When will the*

further evidence and statement of common ground be completed and available to the examination?

Shropshire Council Response:

158. The Shrewsbury Highway Modelling was completed and a summary report (**EV100**) submitted alongside the draft Shropshire Local Plan. This provides a forecast for where there is likely to be capacity issues on the Strategic Road Network (SRN) by the end of the Plan period as a result of the current baseline situation (including committed development) and proposed planned growth within the draft Local Plan for Shrewsbury and its surrounding hinterland.
159. Shropshire Council is currently engaged in proactive discussions with National Highways (previously known as Highways England) informed by the highway modelling undertaken for Shrewsbury.
160. These discussions are focused on:
- a. The importance and role of demand management in addressing constraints within the highway network, including as part of the delivery of projects associated with the emerging Shropshire Local Transport Plan; the emerging Shropshire Local Cycle and Walking Infrastructure Plans; and the Shrewsbury Big Town Plan and its associated studies;
 - b. The scope, extent and timing of any subsequent strategic and local highway improvement works following consideration of demand management measures;
 - c. The diverse delivery mechanisms and funding sources available to undertake forecast required improvements to the highway network. This is likely to include works undertaken as part of development, S106 funding for highways works, the application of CIL and potentially National Highways funding associated with future rounds of Road Investment Strategies (RIS). As part of this process, Shropshire Council, supported by National Highways, has submitted various projects for inclusion in the Highways England Route Strategies.
161. Both Shropshire Council and National Highways remain committed to preparing a Statement of Common Ground (which will have the reference **EV023**). It is considered that the likely timescales for completion of this Statement of Common Ground is March 2022.

ID1 Paragraph 28: *In addition, the Council's Infrastructure Implementation Plan (ev067) dated December 2020 has a significant amount of unknown costs and many projects with no known funding source. Are the Council able to update this document and if not, when will this information be available?*

Shropshire Council Response:

162. Ensuring that the delivery of necessary infrastructure improvements to support development occurs has been carefully considered throughout the Local Plan Review process.
163. To inform this process, Shropshire Council has proactively engaged with key stakeholders in the delivery of infrastructure (including both relevant services/functions within Shropshire Council and relevant external infrastructure providers) throughout the Local Plan Review process.
164. Ultimately, certain infrastructure requirements will be addressed through investment by partners, such as utility companies. Other infrastructure requirements may be delivered through projects undertaken by Shropshire Council as part of its capital programme of works.
165. Other infrastructure requirements may be directly delivered as part of development proposals, or through the use of developer contributions (such as CIL and S106 contributions) arising from these development proposals.
166. To provide certainty on this matter, as part of the draft Shropshire Local Plan, draft Policy (DP25) specifically outlines the proposed approach to infrastructure provision. It states:
- "1. New development should only take place where there is sufficient existing infrastructure capacity available. Where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means.*
- 2. For new development where the Community Infrastructure Levy (CIL) applies, priority will be given to using CIL funds to support any critical or statutory infrastructure requirements resulting from the development.*
- 3. CIL funds derived from specific development which are not required to make the development acceptable in planning terms, will be prioritised according to the infrastructure needs of communities identified in the Shropshire Place Plans and the Local Infrastructure Plan.*
- 4. On proposals where it is considered CIL funds will not be sufficient to meet the specific infrastructure needs of development, consideration will be given to applying additional Section 106 contributions for specific*

infrastructure items where this meets national requirements for planning obligations.

5. For development where the CIL does not apply, necessary infrastructure improvements will be secured through planning obligations where this meets national requirements."

167. Paragraph 4.224 of the proposed explanation to draft Policy DP25 identifies examples of the types of infrastructure that are likely to be included within the Place Plan stating, "They include a focus on local needs such as highways, flood defences, educational facilities, medical facilities, sporting and recreational facilities and open spaces." A proposed minor (additional) modification to this paragraph also proposes the inclusion of 'emergency service facilities' in this list of examples.
168. The Local Plan Delivery and Viability Study – July 2020 (**EV115.01**) includes consideration of site-specific costs on all proposed site allocations, taking account of likely CIL contributions and an initial assumption of £5,000/unit of S106 contributions on sites of 50 or more dwellings towards infrastructure costs. As such it reflects and supports the approach to infrastructure provision embedded within draft Policy DP25.
169. It is therefore considered that there is a clear process to secure the funding necessary to deliver any necessary infrastructure improvements to support appropriate development proposals.
170. The Strategic Infrastructure Implementation Plan (**EV067**) and the associated Place Plans (**EV067.01 – EV067.18**) are intended to act as 'live' documents that take account of and reflect changing needs and priorities. They seek to capture the infrastructure needs and aspirations of development proposals and our communities.
171. It is perhaps inevitable that the specific costs and delivery mechanism(s) for many infrastructure projects are currently unspecified, as these will become clearer as the associated development or individual projects progress (which can then be reflected within the 'live' Strategic Infrastructure Implementation Plan and associated Place Plans) and it is also considered important to maintain flexibility regarding the specific delivery mechanism(s).
172. Notwithstanding this, Shropshire Council is currently in the process of updating the Strategic Infrastructure Implementation Plan to provide greater clarity on a number of identified infrastructure items, including costings, informed by further discussions with infrastructure providers, as well as the outcome of the recent capital investment programme prepared by Shropshire Council. It is therefore anticipated that an updated position on the Strategic Infrastructure Implementation Plan will be available in March 2022.

General Matters

ID1 Paragraph 29: *We are unaware as to whether the Council has a running list of draft Main Modifications (MMs), although we note that a list of minor modifications (sd003) has been submitted. However, we deem some of these to be MMs that may form part of discussions at hearings and therefore will eventually need to be consulted upon, whilst others are Additional Modifications (AMs) which are not necessary for soundness and tend to be of a minor nature e.g., typographical matters. It would be helpful if you could draw up a list of MMs. If the Council is unsure which modifications in the list are MMs, then we can assist with this.*

Shropshire Council Response:

173. Shropshire Council has carefully reflected on this matter and the advice provided by the Inspectors within their correspondence ID2 regarding Additional (Minor) Modifications and Main Modifications within ID2. Specifically, that *"In terms of distinguishing between a main modification (MM) and an additional modification (AM), MMs tend to be about soundness points and are consulted upon. AMs are normally limited to changes such as typographical corrections and changes that do not go to the heart of soundness and are not likely to need consulting upon."*
174. Therefore, in seeking to positively respond to this question we have reviewed all of the proposed modifications in the Schedule of Proposed Minor Modifications (**SD003**) against the criteria above and sought to divide them into those which are considered to clearly represent Minor (Additional) Modifications and those which could potentially be viewed as Main Modifications.
175. These Schedules (Updated Schedule of Proposed Minor Modifications (**SD003.01**) and Schedule of Proposed Main Modifications (**SD003.02**)) have been submitted alongside this document.
176. Within the Updated Schedule of Proposed Minor Modifications (**SD003.01**) for the sake of continuity, the same references as provided within the initial Schedule of Proposed Minor Modifications (**SD003**) are retained for each proposed modification, although there are now some 'gaps' in the numbering where proposed modifications have been relocated to the Schedule of Proposed Main Modifications (**SD003.02**), as they could potentially be viewed as such.
177. Within the Schedule of Proposed Main Modifications (**SD003.02**) the proposed modifications have been assigned new references (MaM) to clearly distinguish them from those proposed modifications in the Updated Schedule of Proposed Minor Modifications (**SD003.01**).

Legal Compliance

ID2 Paragraph 4: *We have some concerns about the summary of representations (Schedule 1) which has been submitted. Firstly, we are unconvinced that the summaries cover the scope of all relevant points made by representors. This is particularly apparent in respect to proposed policies S1- S18, where it tends to be stated that 'reasoning for objections varied, but included such factors as...'. We are concerned that some key points may have been missed from the summary of representations.*

ID2 Paragraph 5: *Secondly, the document formatting has produced extensive tracts of unbroken text. Furthermore, whilst the key issues summarised tend to be numbered, the same cannot be said for the points raised in the Council's response in most instances. This all makes for difficult reading.*

ID2 Paragraph 6: *Consequently, to ensure the timely and inclusive progression of this examination, it will be necessary for the Council to review its consultation summary (schedule 1) and in particular pages 24-44 in respect to all of these concerns.*

Shropshire Council Response to ID2 Paragraphs 4-6:

178. The summary of representations received (under Regulation 20) in response to the Regulation 19: Pre-Submission Consultation prepared by Shropshire Council is provided within documents **SD014.01** and **SD014.02**. This summary includes three schedules:
- a. Schedule 1 provides a high-level summary of the key issues raised, within the duly-made representations received, including those of soundness, legal compliance and compliance with the duty to cooperate. It also includes a high-level response on these matters from Shropshire Council.
 - b. Schedule 2 provides a more comprehensive high-level summary of each of the duly-made representations received and a high-level response to each of these duly-made representations from Shropshire Council.
 - c. Schedule 3 provides a list of the names/agents names and unique reference (A reference) assigned to respondents.
179. As such, Schedule 1 was not intended to represent an exhaustive list of all the issues raised within the representations received. Rather it was intended to provide a high-level summary of the key issues raised within the duly-made representations. A more detail list of issues raised is provided within Schedule 2.
180. However, it is recognised that there is an opportunity to expand Schedule 1 so that it more extensively captures the main issues raised

within the duly-made representations received, particularly with regard to specific settlements (pages 24-44 of **SD014.01**).

181. Shropshire Council also recognises that the provision of cross-referencing between the main issues raised and the relevant elements of the Shropshire Council response for each draft Policy in Schedule 1, would assist with legibility.
182. As such, Shropshire Council has prepared an updated version of Schedule 1 of document SD014.01, named **SD014.03 – Regulation 19 consultation response summary Schedule 1a**. This document is currently being finalised and will be made available to the Examination in the week commencing 7th February. This document, when available, more extensively captures the main issues raised within the duly-made representations received, particularly with regard to specific settlements (pages 24-44 of **SD014.01**), and also includes the aforementioned cross-referencing.

Proposal's Map

***ID2 Paragraph 7:** Can the Council please provide us with the 'Shropshire Council Local Plan 2016-2038 Policies Map' at a larger scale than the A3 version previously submitted. Ideally the plan should be printed at A1 size so that we can see the annotations on the map.*

Shropshire Council Response:

183. The Policies Map for Shropshire consists of the Overarching Policies Map (**SD005**) and the various Inset Maps (**SD005.01 – SD005.21**). An interactive version of the Policies Map has also been provided (**SD005.22**).
184. Shropshire Council can of course provide the Programme Officer with two copies of each of the following:
- a. A1 size printed version of the Overarching Policies Map (**SD005**).
 - b. A1 size printed versions of the Inset Maps for each of the Strategic, Principal and Key Centres.
185. The Programme Officer can then provide these printed documents to the Planning Inspectors. We would suggest that an A1 size printed map is unnecessary for the other Inset Maps, particularly given the availability of the interactive version of the Policies Map (**SD005.22**).

Housing Land Supply

ID2 Paragraph 8: *We would be obliged if you would confirm whether or not the Council wishes to confirm the 5-year housing land supply position through the plan-making process.*

Shropshire Council Response:

186. Shropshire Council confirms that it wishes to confirm the 5-year housing land supply position in Shropshire through the plan-making process.
187. The accompanying document, Five Year Supply Statement 2021 – Draft Shropshire Local Plan (**EV048.07**) summarises the five year housing land supply for Shropshire identified by Shropshire Council as at 31st March 2021. Further information on this document is provided in response to *ID1 Paragraphs 12(b) and 13*.

'Saved' site allocations

ID2 Paragraph 9: *It appears that the sites set out in appendix 2 of the submitted Plan (the Plan), with the status identified as 'saved', are ones that you intend to carry forward from your SAMDev plan. Carrying sites forward from an adopted plan to an emerging one is, in theory, acceptable and a common approach taken by Councils.*

ID2 Paragraph 10: *However, we do have concerns that these sites are included as a list in an appendix, rather than as specific allocations in the plan, in the same manner as the new allocations. The sites to be carried forward from the previous plan need to be set out as allocations in the plan, with development guidelines and details of the level of provision expected, in the same way as the new sites. This will enable them to be properly examined and their contribution to meeting the identified needs alongside the proposed new sites fully considered. It will also enable developers to understand any specific development requirements pertaining to these sites. This issue will need to be remedied through MMs to the Plan.*

Shropshire Council Response to ID2 Paragraphs 9-10:

188. The adopted Local Plan for Shropshire consists of the Core Strategy (2011) (**EV009**); Site Allocations and Management of Development (SAMDev) Plan (2015) (**EV010 and SD015**); and any adopted (made) formal Neighbourhood Plans².

² **EV087** provides overarching details on Neighbourhood Planning in Shropshire. **EV083-EV086** are the four adopted Neighbourhood Plans in Shropshire.

189. The Shropshire Core Strategy identifies the vision, overarching spatial strategy and framework for the development of Shropshire to 2026. The SAMDev Plan identifies detailed development management policies and site allocations.
190. Following the adoption of the SAMDev Plan in late 2015, Shropshire Council has proactively sought to implement the adopted Local Plan. This included facilitating appropriate development on the identified site allocations, consistent with the wider policies in the adopted Local Plan and with national policy.
191. As part of the examination of the SAMDev Plan, Inspector Sherratt included a main modification providing a commitment to an early review of the Local Plan.
192. The conclusions reached by Inspector Sherratt in her Main Modifications are perhaps most succinctly captured in the Non-Technical Summary of her Inspectors Report (**EV010.01**). The first Main Modification summarised is a *"commitment to an early review of the Local Plan..."*.
193. Inspector Sherratt addresses the Local Plan Review in several areas of her report (**EV010.01**). In Paragraph 23 she addresses the scope of the review, stating *"In line with the framework (paragraph 153), a Local Plan can be reviewed 'in whole or in part to respond flexibly to changing circumstances.'"* It is acknowledged that there have subsequently been changes to the National Planning Policy Framework (NPPF, referenced as the framework within **EV010.01**), however it is considered this principle of reviewing Plans in whole or part remains in place.
194. Paragraph 1.13 of the SAMDev Plan includes this necessary main modification. It states *"The LDS includes the timetable for the early review of the Local Plan (Core Strategy and SAMDev Plan). An early review will ensure that Shropshire Council can respond flexibly to changing circumstances in line with the National Planning Policy Framework."*
195. As such, alongside the implementation of the adopted Local Plan, Shropshire Council has also been progressing a Local Plan Review (which commenced in 2017).
196. The scope of the Local Plan Review needed to be carefully considered to ensure that it addressed all relevant matters but also that it complemented rather than undermined the implementation of the adopted Local Plan.
197. Ultimately, it was concluded that the scope of the Local Plan Review needed to be extensive, which was perhaps inevitable given a number of factors, including: the extended proposed Plan period to 2038; the

changes occurring to national policy over recent years; the understanding of the current policy mechanisms gained from the implementation of the adopted Local Plan; the refinement and identification of new local strategies and priorities for Shropshire; and the opportunities identified through the Local Plan Review process.

198. However, with regards to the site allocations in the SAMDev Plan, as a key component of the adopted Local Plan, it was recognised that these sites had only recently been allocated within an adopted Plan. Whilst the Council was undertaking an early review, the SAMDev Plan was only adopted in late 2015 and the Local Plan Review was formally commenced in late 2016 / early 2017.
199. It was also recognised that these allocations had been informed by a proportionate and robust site assessment process, technical assessments (including Sustainability Appraisal (incorporating the requirements of Strategic Environmental Assessment Regulations) and Habitats Regulations Assessment) and had been through examination and been found sound and legally compliant. It was also considered that these site allocations could contribute to the vision and spatial strategy within the Local Plan Review.
200. As such, it was concluded that these site allocations (including the sites location, extent, development guidelines and approximate provision figures) should remain outside the scope of the Local Plan Review, and would instead complement this process by forming an integral part of the Spatial Strategy for Shropshire to 2038. To clearly document this position for the decision makers, developers and local communities, Shropshire Council proposed to identify these sites as 'saved' allocations within the draft Shropshire Local Plan – this planning terminology and its meaning is generally well understood and has been used on that basis.
201. It is for this reason that the SAMDev Plan has been submitted as part of the evidence base for the draft Shropshire Local Plan (**EV009**) and as a core document of the draft Shropshire Local Plan (**SD015**).
202. It is considered that this approach has provided much needed certainty regarding the status of these site allocations for communities, the development industry and the decision maker, and as such has resulted in considerable progress being made on the delivery of many of these sites. It has also provided certainty regarding their status in the context of demonstrating a housing and employment land supply in Shropshire, with many of the proposed 'saved' housing site allocations contributing to our five year housing land supply and the proposed 'saved' employment site allocations forming the immediate 'pipeline' for the Shropshire employment land supply.

203. Whilst the list of 'saved' allocations within Appendix 2 of the draft Shropshire Local Plan is extensive, it does include all site allocations in the adopted Local Plan that were not fully 'built out' at 31st March 2019.
204. Since this base date a considerable number of these site allocations have been 'built out' (17 residential allocations). Furthermore, a significant number are either under construction or progressing towards commencement, have Planning Permission on all or part of the site, or are the subject of a current Planning Application. For information, the current planning position on these 'saved' allocations is documented within the table below:

Table 7: Current Planning Position of 'Saved' Allocations

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
MD5: Sites for Sand and Gravel Working	Wood Lane North Extension	Rural	Ellesmere	Mineral	Saved	No Planning Application to date.
MD5: Sites for Sand and Gravel Working	Gonsal Extension	Rural	Shrewsbury	Mineral	Saved	Consists of two extensions to the existing site. Northern extension: No Planning Application to date. Southern extension: Planning Permission (21/03846/EIA) granted.
MD5: Sites for Sand and Gravel Working	Morville Extension	Rural	Bridgnorth	Mineral	Saved	No Planning Application to date.
S1: Albrighton	Land at White Acres (ALB003)	Albrighton	Albrighton	Residential	Saved	Site being brought forward in phases. Phase 1: Outline and Reserved Matters Planning Permissions (14/03657/OUT & 19/02785/REM) granted for 3 dwellings. Phase 2: Currently the subject of a Full Planning Application (21/05665/FUL) for 24 dwellings. The applicant is a developer (Shropshire Homes).
S1: Albrighton	Land east of Shaw Lane (ALB002)	Albrighton	Albrighton	Residential	Saved	Site being brought forward in phases. Phase 1: Outline and Reserved Matters Planning Permissions (BR/APP/OUT/08/0907 and 14/05456/REM) granted for 56 dwellings. Development had commenced. Phase 2: Full Planning Permission (15/02448/FUL) granted for 65 dwellings. Development had commenced. Phase 3: Known developer interest and the Council is confident of the deliverability of this component of the site in the short to medium term.
S2: Bishop's Castle	Schoolhouse Lane East (BISH013)	Bishop's Castle	Bishop's Castle	Residential	Saved	Full Planning Application (19/04444/FUL) pending consideration for 55 dwellings on the site. Bishop's Castle is located within the River Clun catchment. To protect the integrity of the river Clun Special Area of Conservation and to comply with the Habitats Regulations, development within the catchment of the river Clun will only be permitted if it can demonstrate either nutrient neutrality or nutrient betterment.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S2: Bishop's Castle	Land at Bishops Castle Business Park, Phase 2	Bishop's Castle	Bishop's Castle	Employment	Saved	Site area reduced by extension of adjacent community allotments. Full Planning Permission (19/02268/FUL) granted on the remaining site (1.8ha) for four new build industrial units and associated infrastructure. Development has commenced.
S2: Bishop's Castle	Timber Yard / Station Yard (BUCK001)	Bucknell	Bishop's Castle	Residential	Saved	Site to be brought forward in phases. Phase 1a: Full Planning Application (13/03241/FUL) pending consideration for 50 dwellings. Phases 1b: It is expected that Phase 2 will follow-on from Phase 1a. Phase 2: Employment Site on Station Yard received Full Planning Permission (21/01059/FUL) to develop whole site for single user, Class B2 use. Development has commenced. Bucknell is located within the River Clun catchment. To protect the integrity of the river Clun Special Area of Conservation and to comply with the Habitats Regulations, development within the catchment of the river Clun will only be permitted if it can demonstrate either nutrient neutrality or nutrient betterment.
S2: Bishop's Castle	Land to the rear of Horseshoe Road (CHIR001)	Chirbury	Bishop's Castle	Residential	Saved	Full Planning Application (21/01136/FUL) pending consideration for 40 dwellings on the site. Development proposed to consist of two phases, the first is for 13 affordable dwellings to support the wider delivery of the allocation, the second is an open market development of 27 dwellings (5 of which are affordable dwellings).
S2: Bishop's Castle	Land at Turnpike Meadow (CLUN002)	Clun	Bishop's Castle	Residential	Saved	Site to be brought forward in phases. Phase 1: Outline Planning Application (13/03440/OUT) pending decision for 38 dwellings. Phase 2: It is expected that Phase 2 will follow-on from Phase 1. Clun is located within the River Clun catchment. To protect the integrity of the river Clun Special Area of Conservation and to comply with the Habitats Regulations, development within the catchment of the river Clun will only be permitted if it can demonstrate either nutrient neutrality or nutrient betterment.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S2: Bishop's Castle	South of Telephone Exchange (LYD007)	Lydbury North	Bishop's Castle	Residential	Saved	Outline Planning Application (17/03400/OUT) pending decision for 8 dwellings on the site. Lydbury North is located within the River Clun catchment. To protect the integrity of the river Clun Special Area of Conservation and to comply with the Habitats Regulations, development within the catchment of the river Clun will only be permitted if it can demonstrate either nutrient neutrality or nutrient betterment.
S2: Bishop's Castle	North of Telephone Exchange (LYD008)	Lydbury North	Bishop's Castle	Residential	Saved	Outline Planning Permission (19/00839/OUT) granted for 5 dwellings on the site.
S2: Bishop's Castle	Former Garage (LYD009)	Lydbury North	Bishop's Castle	Residential	Saved	No Planning Application to date. This site is expected to follow-on from other site allocations in the village. Lydbury North is located within the River Clun catchment. To protect the integrity of the river Clun Special Area of Conservation and to comply with the Habitats Regulations, development within the catchment of the river Clun will only be permitted if it can demonstrate either nutrient neutrality or nutrient betterment.
S2: Bishop's Castle	Land adjacent to Church Close (LYD011)	Lydbury North	Bishop's Castle	Residential	Saved	Outline Planning Permission (19/00837/OUT) granted for 4 dwellings on the site.
S3: Bridgnorth	Land north of Wenlock Road, Tasley (BRID001/BRID020b)	Bridgnorth	Bridgnorth	Mixed-Use	Saved	Hybrid Planning Application (21/05023/OUT) pending consideration for development of the entirety of BRID001/BRID020b, BRID020a, ELR011/a and ELR011/b.
S3: Bridgnorth	Land north of Church Lane, Tasley (BRID020a)	Bridgnorth	Bridgnorth	Residential	Saved	Hybrid Planning Application (21/05023/OUT) pending consideration for development of the entirety of BRID001/BRID020b, BRID020a, ELR011/a and ELR011/b.
S3: Bridgnorth	Land at Tasley south of the A458 bypass (ELR011/a)	Bridgnorth	Bridgnorth	Employment	Saved	Hybrid Planning Application (21/05023/OUT) pending consideration for development of the entirety of BRID001/BRID020b, BRID020a, ELR011/a and ELR011/b.
S3: Bridgnorth	Land at Tasley south of A458 at Tasley (ELR011/b)	Bridgnorth	Bridgnorth	Employment	Saved	Hybrid Planning Application (21/05023/OUT) pending consideration for development of the entirety of BRID001/BRID020b, BRID020a, ELR011/a and ELR011/b.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S3: Bridgnorth	Land at Old Worcester Road (W039)	Bridgnorth	Bridgnorth	Employment	Saved	No Planning Application to date.
S3: Bridgnorth	Land opposite 6 Station Road (DITT005)	Ditton Priors	Bridgnorth	Residential	Saved	Full Planning Permission (19/04692/FUL) granted for 16 dwellings on the site.
S3: Bridgnorth	Pheasant Inn (NEE001)	Neenton	Bridgnorth	Residential	Deleted	Development completed (as at 31st March 2019).
S3: Bridgnorth	Morville Quarry Extension	Rural	Bridgnorth	Mineral	Saved	See under reference to Policy MD5.
S4: Broseley	Land south of Avenue Road ELR017	Broseley	Broseley	Employment	Saved	Outline Planning Permission (14/04019/OUT) granted for mixed residential and employment development. Reserved Matters Planning Application (19/03639/REM) pending decision for 16 dwellings and employment development.
S5: Church Stretton	School Playing Fields (CSTR018)	Church Stretton	Church Stretton	Residential	Deleted	Landowner has confirmed that the site is no longer available for development.
S5: Church Stretton	Battlefield to rear of Oaks Road/Alison Road (CSTR019)	Church Stretton	Church Stretton	Residential	Saved	Outline and Reserved Matters Planning Permissions (14/01173/OUT and 16/02491/REM) granted for 43 dwellings on this site. Development has commenced on the site.
S5: Church Stretton	Springbank Farm (ELR078)	Church Stretton	Church Stretton	Employment	Saved	No Planning Application to date.
S6: Cleobury Mortimer	Land off Tenbury Road (CMO002)	Cleobury Mortimer	Cleobury Mortimer	Residential	Saved	Development completed (since 31st March 2019).
S6: Cleobury Mortimer	Land at New House Farm (CMO005)	Cleobury Mortimer	Cleobury Mortimer	Residential	Saved	Outline Planning Permission (19/05260/OUT) granted for 5 dwellings on the site.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S6: Cleobury Mortimer	Land adjacent to Cleobury Mortimer Industrial Estate, New House Farm (ELR068CM)	Cleobury Mortimer	Cleobury Mortimer	Employment	Saved	Allocated site to form extension to existing Cleobury Mortimer Industrial Estate at New House Farm approved in outline (12/00782/OUT) for the erection of four industrial units to be developed in phases: Phase 1: Unit 2 for Class B1/B8 uses approved on 0.11ha (14/00631/FUL) and now completed Phase 2: Units 3 and 4 for Class B1/B8 uses approved on 0.15ha (16/05654/FUL) and now completed Phase 3: Unit 1 comprising 0.4ha (including landscaping buffer to extended Industrial Estate) awaiting application for development.
S6: Cleobury Mortimer	Land off Little Stocks Close (KLT001)	Kinlet	Cleobury Mortimer	Residential	Saved	Development to be implemented in phases. Phase 1: Full Planning Permission (14/00897/FUL) for 8 dwellings granted. Development completed (since 31st March 2019). Phase 2: Outline Planning Permission (19/05151/OUT) for 15 dwellings granted.
S6: Cleobury Mortimer	Land adjacent to adjacent to Old Station Business Park (ELR071)	Rural	Cleobury Mortimer	Employment	Saved	No Planning Application to date.
S7: Craven Arms	Land off Watling Street, Craven Arms (CRAV002)	Craven Arms	Craven Arms	Residential	Deleted	Development completed (as at 31st March 2019).
S7: Craven Arms	Land between Watling Street and Brook Road (CRAV003 & CRAV009)	Craven Arms	Craven Arms	Residential	Saved	No Planning Application to date.
S7: Craven Arms	Land off Watling Street (east) (CRAV004 & CRAV010)	Craven Arms	Craven Arms	Residential	Saved	Site to be implemented in Phases. Phase 1: Full Planning Permission (18/04931/FUL) for 10 dwellings granted. Development completed (since 31st March 2019). Phase 2: Expected to follow on from Phase 1.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S7: Craven Arms	Land adjoining Clun Road / Sycamore Close (CRAV024)	Craven Arms	Craven Arms	Residential	Saved	No Planning Application to date.
S7: Craven Arms	Land at Newington Farmstead (CRAV030)	Craven Arms	Craven Arms	Residential	Saved	No Planning Application to date.
S7: Craven Arms	Land at Newington Farm (ELR053)	Craven Arms	Craven Arms	Employment	Saved	No Planning Application to date.
S7: Craven Arms	Land west of A49 (ELR055)	Craven Arms	Craven Arms	Employment	Saved	No Planning Application to date.
S7: Craven Arms	Land North of Long Lane	Craven Arms	Craven Arms	Employment	Saved	No Planning Application to date.
S8: Ellesmere	Land South of Ellesmere (ELL003a)	Ellesmere	Ellesmere	Residential	Saved	Outline Planning Permission (14/04047/OUT) granted for up to 250 dwellings on the site. Reserved Matters Application (19/05445/REM) pending consideration for 99 dwellings, representing phase 1 of the overarching consent.
S8: Ellesmere	Land off Grange Road (ELR075)	Ellesmere	Ellesmere	Employment	Saved	Previous Outline Planning Applications have been submitted to develop the expansion land at Grange Road (Fullwood Works) but there are no current Planning Permissions for this development.
S8: Ellesmere	Ellesmere Business Park, Phase 2 (ELR074)	Ellesmere	Ellesmere	Employment	Saved	Previous Outline Planning Applications have been submitted to develop the Ellesmere Business Park Phase 2 extension but there are no current Planning Permissions for this development.
S8: Ellesmere	Land South of Ellesmere (ELL003b)	Ellesmere	Ellesmere	Leisure / Tourism	Saved	Outline Planning Permission (14/04047/OUT) granted for various leisure/tourism uses on the site.
S8: Ellesmere	Land to the West of Cockshutt (CO002a and CO002b)	Cockshutt	Ellesmere	Residential	Saved	Site to be implemented in Phases. Phase 1: Full Planning Permission (17/05018/FUL) for 4 dwellings granted. Development completed (since 31st March 2019). Phase 2: Expected to follow on from Phase 1.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S8: Ellesmere	Land at Cockshutt House Farm (CO005) and Land South of Kenwick Road (CO023)	Cockshutt	Ellesmere	Residential	Saved	Development completed (since 31st March 2019).
S8: Ellesmere	Land South of Chapel House Farm (CO018)	Cockshutt	Ellesmere	Residential	Saved	Development completed (since 31st March 2019).
S8: Ellesmere	Ravenscroft Haulage Site (DUDH006)	Dudleston Heath	Ellesmere	Residential	Saved	Outline Planning Application (20/02270/OUT) for 20 dwellings pending decision on the site.
S8: Ellesmere	Land South of Cairndale (TET001)	Tetchill	Ellesmere	Residential	Saved	Development completed (since 31st March 2019).
S8: Ellesmere	Land adjacent to St Andrew's Church (WFTN002)	Welsh Frankton	Ellesmere	Residential	Saved	Development completed (since 31st March 2019).
S8: Ellesmere	Wood Lane Quarry Extension	Rural	Ellesmere	Mineral	Saved	See under reference to Policy MD5.
S9: Highley	Land off Rhea Hall/Coronation Street (HIGH003)	Highley	Highley	Residential	Deleted	Development completed (as at 31st March 2019).
S10: Ludlow	Land south of Rocks Green (LUD017)	Ludlow	Ludlow	Residential	Saved	Hybrid Planning Permission (17/05189/FUL) granted for up to 200 dwellings. 72 dwelling have Full Planning Permission and 132 dwellings have Outline Planning Permission. Development has commenced on the site.
S10: Ludlow	Land east of Eco Park (LUD034)	Ludlow	Ludlow	Residential	Saved	Outline and Reserved Matters Planning Permissions (14/01012/OUT and 19/02741/REM) granted for 68 dwellings and employment land covering LUD034 and ELR059. Development has commenced on the site.
S10: Ludlow	Land east of Eco Park (ELR059)	Ludlow	Ludlow	Employment	Saved	Outline and Reserved Matters Planning Permissions (14/01012/OUT and 19/02741/REM) granted for 68 dwellings and employment land covering LUD034 and ELR059. Development has commenced on the site.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S10: Ludlow	Land south of Sheet Road (ELR058)	Ludlow	Ludlow	Employment	Saved	No Planning Application to date.
S10: Ludlow	Onibury Farm (ONBY003)	Onibury	Ludlow	Residential	Saved	No Planning Application to date.
S11: Market Drayton	Land off Rush Lane (West) MD030 (part)	Market Drayton	Market Drayton	Residential	Saved	Development to be implemented in phases. Phase 1: Outline and Reserved Matters Planning Permissions (14/04701/OUT and 16/03082/REM) granted for 162 dwellings covering part of MD030 east and part of MD030 west. Development has commenced on the site. Phase 2: Expected to follow on from phase 1.
S11: Market Drayton	Land off Rush Lane (East) MD030 (part)	Market Drayton	Market Drayton	Residential	Saved	Development to be implemented in phases. Phase 1: Outline and Reserved Matters Planning Permissions (14/04701/OUT and 16/03082/REM) granted for 162 dwellings covering part of MD030 east and part of MD030 west. Development has commenced on the site. Phase 2: Outline and Reserved Matters Planning Permission (14/03782/OUT and 21/01142/REM) granted for 250 dwellings and 209 dwellings respectively, covering part of MD030 east and the entirety of MD010 and MD028. The Reserved Matters Application does not address the entirety of the area subject to the Outline Planning Permission, however the area not subject to this Reserved Matters Application extends beyond the extent of this allocation.
S11: Market Drayton	Land between Croft Way and Greenfields Lane (MD010 and MD028)	Market Drayton	Market Drayton	Residential	Saved	Outline and Reserved Matters Planning Permission (14/03782/OUT and 21/01142/REM) granted for 250 dwellings and 209 dwellings respectively, covering part of MD030 east and the entirety of MD010 and MD028. The Reserved Matters Application does not address the entirety of the area subject to the Outline Planning Permission, however the area not subject to this Reserved Matters Application extends beyond the extent of this allocation.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S11: Market Drayton	Sych Farm (Phase 2) ELR023/ELR024	Market Drayton	Market Drayton	Employment	Saved	Development to be implemented in phases and in response to market demand: Phase 1: Full Planning Permission (12/01321/FUL) granted on land adjoining the allocated site and partially extends into the allocation by 2ha to support the development of the Hales Sawmill complex, development now completed. Phase 2: No Planning Applications have yet been submitted but the remainder of the site will follow in response to demand.
S11: Market Drayton	Land West of Manor Farm Drive (HIN002)	Hinstock	Market Drayton	Residential	Saved	Outline Planning Permission (14/00985/OUT) granted for 6 dwellings on the site. Subsequent series of Full Planning Permissions granted, one for each of the 6 plots. Development has commenced on the site.
S11: Market Drayton	Land at Bearcroft (HIN009)	Hinstock	Market Drayton	Residential	Saved	Development completed (since 31st March 2019).
S11: Market Drayton	Land to rear of Shrewsbury Street (HOD009)	Hodnet	Market Drayton	Residential	Saved	Full Planning Permission (13/03452/FUL) granted for 44 dwellings covering HOD009, HOD010 and HOD011. Development has commenced on the site. A Variation Planning Application (20/03882/VAR) is pending consideration to increase the site capacity to 51 dwellings.
S11: Market Drayton	Land off Station Road (HOD010)	Hodnet	Market Drayton	Residential	Saved	Full Planning Permission (13/03452/FUL) granted for 44 dwellings covering HOD009, HOD010 and HOD011. Development has commenced on the site. A Variation Planning Application (20/03882/VAR) is pending consideration to increase the site capacity to 51 dwellings.
S11: Market Drayton	Shrewsbury Street Farm (HOD011)	Hodnet	Market Drayton	Residential	Saved	Full Planning Permission (13/03452/FUL) granted for 44 dwellings covering HOD009, HOD010 and HOD011. Development has commenced on the site. A Variation Planning Application (20/03882/VAR) is pending consideration to increase the site capacity to 51 dwellings.
S11: Market Drayton	Part of land off Dutton Close (STH002)	Stoke Heath	Market Drayton	Residential	Saved	Outline and Reserved Matters Planning Permissions (15/00415/OUT and 19/00471/REM) granted for 25 dwellings. Development has commenced on the site.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S12: Minsterley – Pontesbury	MIN002/MIN015 Hall Farm, Minsterley	Minsterley	Minsterley and Pontesbury	Mixed-use	Saved	Development to be implemented in phases. Phase 1: Enabling development with Outline Planning Permission (17/02610/OUT) for 14 dwellings. Phase 2: Consisting of residential and employment development expected to follow-on from Phase 1.
S12: Minsterley – Pontesbury	MIN007 Callow Lane Minsterley	Minsterley	Minsterley and Pontesbury	Residential	Saved	Development completed (since 31st March 2019).
S12: Minsterley – Pontesbury	Hall Bank- Pontesbury PBY018/29	Pontesbury	Minsterley and Pontesbury	Mixed-use	Saved	Full Planning Permission (17/05554/FUL) granted for 86 dwellings on the site. Development has commenced on the site.
S12: Minsterley – Pontesbury	Land off Minsterley Road- Pontesbury PBY019	Pontesbury	Minsterley and Pontesbury	Residential	Saved	Outline and Reserved Matters Planning Permissions (14/01233/OUT and 17/05709/REM) granted for 18 dwellings. Development has commenced on the site.
S14: Oswestry	Land off Whittington Road (OSW004)	Oswestry	Oswestry	Residential	Saved	An Environmental Impact Assessment (EIA) screening is pending consideration on the site for 91 dwellings.
S14: Oswestry	Eastern Gateway Sustainable Urban Extension (OSW024)	Oswestry	Oswestry	Residential	Saved	Outline Planning Permission (16/02594/OUT) granted for a series of phases totalling up to 600 dwellings. Reserved Matters Planning Application (21/04449/REM) received for the first of these phases (284 dwellings). Outline Planning Application (17/06025/OUT) granted and Reserved Matters Planning Application (21/03584/REM) pending consideration for a further phase of up to 120 dwellings.
S14: Oswestry	Former Oswestry Leisure Centre (OSW029)	Oswestry	Oswestry	Residential	Deleted	Development completed (as at 31st March 2019).
S14: Oswestry	The Cottams, Morda Road (OSW030)	Oswestry	Oswestry	Residential	Deleted	Development completed (as at 31st March 2019).
S14: Oswestry	Land South of the Cemetery (OSW034, 035 & 045)	Oswestry	Oswestry	Residential	Saved	No Planning Application to date.
S14: Oswestry	Alexandra Road Depot (OSW033)	Oswestry	Oswestry	Residential	Deleted	Development completed (as at 31st March 2019).

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S14: Oswestry	Richard Burbidge (OSW042)	Oswestry	Oswestry	Residential	Saved	Development to be implemented in phases. Phase 1: Full Planning Permission (15/03727/FUL) granted for 53 dwellings. Development completed (since 31st March 2019). Phase 2: Expected to come forward in the medium term.
S14: Oswestry	Land north of Whittington Road (ELR042)	Oswestry	Oswestry	Employment	Saved	Outline Planning Application (18/05391/OUT) awaiting determination for the erection of industrial units for Class b1, B2, B8 uses to include access.
S14: Oswestry	Land south of Whittington Road (ELR043)	Oswestry	Oswestry	Employment	Saved	No Planning Application to date.
S14: Oswestry	Land at Mile End East (ELR072)	Oswestry	Oswestry	Employment	Saved	Development to be implemented in phases to comprise: Phase 1: Full Planning Permission (20/00283/FUL) granted for improvements to the strategic road network, junction and link road, drainage and ecology and landscaping to support the development of the employment allocation at Mile End East now nearing completion. Phase 2a: Hybrid Planning Application (21/01334/EIA) awaiting determination for Full Planning Permission for supporting highway, utilities, drainage and landscaping infrastructure for the layout of the proposed Oswestry Innovation Park. Phase 2b: Hybrid Planning Application (21/01334/EIA) awaiting determination for Outline Planning Permission (subject to reserved matters) for mixed use commercial developments to comprise office, light industrial, general industrial, storage and distribution employment uses, an hotel and other hospitality and service uses.
S14: Oswestry	Land at Southlands Avenue (GOB008)	Gobowen	Oswestry	Residential	Saved	Planning Application being worked-up for affordable housing.
S14: Oswestry	Land between A5 and Shrewsbury railway line (GOB012)	Gobowen	Oswestry	Residential	Saved	No Planning Application to date.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S14: Oswestry	Land north of Lower House (KK001)	Knockin	Oswestry	Residential	Saved	Development completed (since 31st March 2019).
S14: Oswestry	Land north of playing fields (LLAN009)	Llanymynech	Oswestry	Residential	Saved	Outline and Reserved Matters Permissions (14/05001/OUT and 16/05302/REM) granted for 35 dwellings on the site. Development has commenced on the site.
S14: Oswestry	Former Railway Land, Station Road (LLAN001)	Llanymynech	Oswestry	Residential	Saved	No Planning Application to date.
S14: Oswestry	Land at Rhos y Llan Farm (STM029)	St Martins	Oswestry	Residential	Saved	Full Planning Permission (19/03995/FUL) granted for 80 dwellings on the site. Development has commenced on the site.
S14: Oswestry	Land adjacent to Oaklands Drive (WGN001); Land to rear of Hershell House (WGN004); Land to south east of School (WGN005); Land adjacent to Big House (part of WGN021)	Whittington	Oswestry	Residential	Saved	Development to be implemented in phases. Phase 1: Full Planning Permission (18/01990/FUL) granted for 34 dwellings. Development has commenced on the site. Phase 2: Full Planning Permission (20/03858/FUL) granted for 39 dwellings, post 31st March 2021.
S14: Oswestry	Land adjacent Kinnerley Primary School (KYN001)	Kinnerley	Oswestry	Residential	Deleted	Development completed (as at 31st March 2019).
S14: Oswestry	Land west of School Road (KYN002)	Kinnerley	Oswestry	Residential	Saved	Full Planning Permission (16/04719/FUL) granted for 18 dwellings on the site. Pre-commencement conditions were being discharged as at 31st March 2021 and development has subsequently commenced.
S14: Oswestry	Land at Greenfields Farm (MBK001)	Maesbrook	Oswestry	Residential	Saved	No Planning Application to date.
S14: Oswestry	Land adj. to The Smithy (MBK009)	Maesbrook	Oswestry	Residential	Saved	No Planning Application to date.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S14: Oswestry	Land at Artillery/Larkhill/Park Crescent (PARK001)	Park Hall	Oswestry	Residential	Saved	Outline Planning Permission and a series of Reserved Matters Planning Permissions (13/01643/OUT, 17/03677/REM, 17/03678/REM, 17/03679/REM, 17/03680/REM and 17/03690/REM) granted for 27 dwellings. Subsequent Full Planning Permission (20/00168/FUL) granted for 6 dwellings (supersedes 2 of the dwellings previously approved). Development has commenced on the site.
S14: Oswestry	Land South of Brookfield's and Aspen Grange, Weston Rhyn (WRN010)	Weston Rhyn	Oswestry	Residential	Saved	Full Planning Application (21/01230/FUL) pending decision for 40 affordable dwellings on the site.
S14: Oswestry	Land at the Sawmills, Rhoswel (WRN016)	Rhoswel	Oswestry	Residential	Saved	Outline Planning Permission (14/05708/OUT) granted. Reserved Matters Planning Application (21/02243/REM) now pending consideration for 59 dwellings.
S15: Shifnal	Land south of Aston Road (SHI004/a)	Shifnal	Shifnal	Residential	Saved	Development completed (since 31st March 2019).
S15: Shifnal	Land between Lawton Road and Stanton Road (SHI004/b)	Shifnal	Shifnal	Residential	Saved	Outline and Reserved Matters Planning Permissions (13/05136/OUT, 16/05492/REM, 19/00494/REM and 18/00726/REM) granted for 99 dwellings and a 70 bed extra care facility. Development has commenced on the site.
S15: Shifnal	Land north of Wolverhampton Road (SHI006-a)	Shifnal	Shifnal	Residential	Saved	Development to be implemented in phases. Phase 1 and 3: Outline and Reserved Matters Planning Permissions (14/00062/OUT, 16/00646/REM and 17/05982/REM) granted for 75 dwellings on phase 1 and 70 dwellings on phase 3. Phases 2: Outline and Reserved Matters Planning Permissions (17/06087/OUT and 19/01527/REM) granted for 105 dwellings. Phase 4: Full Planning Permission (19/01526/FUL) granted for 15 dwellings. Development has commenced on the site.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S15: Shifnal	Land between Lawton Road and Lamledge Lane (SHI004/c)	Shifnal	Shifnal	Employment	Deleted	Outline and Reserved Matters Planning Permissions (13/05136/OUT, 16/05492/REM, 19/00494/REM and 18/00726/REM) granted for 99 dwellings and a 70 bed extra care facility. Development has commenced on the site.
S15: Shifnal	Land at J.N. Bentley Ltd off Lamledge Lane (ELR021)	Shifnal	Shifnal	Employment	Saved	No Planning Application to date.
S16: Shrewsbury	Land off Ellesmere Road (SHREW073)	Shrewsbury	Shrewsbury	Residential	Deleted	Development completed (as at 31st March 2019).
S16: Shrewsbury	Land at Ditherington Flaxmill (SHREW198)	Shrewsbury	Shrewsbury	Residential	Saved	Development to be implemented in phases. Phase 1: A new build element. Phase 2: Restoration of the Main Mill and redevelopment of the remaining historic buildings. Hybrid Planning Application (20/05065/OUT) granted for both phases (residential aspect is Outline), post 31st March 2021. Works under phase 2 have significantly progressed under a series of earlier consents.
S16: Shrewsbury	Shrewsbury South Sustainable Urban Extension (SHREW028, 029, 075, 107, 114, and 127/ELR02 and 66)	Shrewsbury	Shrewsbury	Residential	Saved	Development to be implemented in phases informed by a Masterplan. Residential phases 1a and 2a (north of Oteley Road): Full Planning Permission (13/00893/FUL) granted for 291 dwellings. Development has commenced on the site. Residential phases 1b, 2b (south of Oteley Road) and part of 3a (western end of the phase), employment phases 1b and 2b (western end of the site), and local centre phase 2: Outline Planning Permission (14/04428/OUT) granted for up to 550 dwellings, up to 23ha (gross) of mixed commercial development and a variety of other uses including a local centre and community facilities. A series of Reserved Matters Planning Permissions (17/06149/REM, 19/00048/REM, 19/04460/REM and 19/05470/REM) have been granted for the majority of the residential components. Development had commenced on these sub-phases.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
						<p>The remaining residential component is currently the subject of a new Outline Planning Application (21/02982/OUT) which is pending decision with a resolution to grant for 35 dwellings.</p> <p>Known developer interest in the employment phases.</p> <p>Part of residential phase 3b (eastern end of the phase): Full Planning Permission (16/02618/FUL) granted for 159 dwellings. Development has commenced on the site.</p> <p>Local centre phase 1: Full Planning Permission (12/01946/FUL) granted for a garden centre and other retail units. Development of the southern element (garden centre and 3 retail units) has completed. The northern element was superseded by a Hybrid Planning Permission (18/04194/FUL) granted for a supermarket and care facility (supermarket has been completed). Subsequent Reserved Matters Planning Permission (19/04101/REM) granted for part of the care facility. Development has commenced. Remainder of the care facility expected to follow-on.</p> <p>Employment phases 1a and 2a (eastern end of the site - Shrewsbury Business Park): Full Planning Permission (17/05812/FUL) for a car dealership including service workshops, valeting facilities and car repair and preparation buildings (0.53ha) development of which is completed.</p> <p>Hybrid Planning Permission (17/06157/FUL) consisting of Full Planning Permission for a roadside services development and Outline Planning Permission for a new Class B1a (Class E(g)(i)) office park use (2.96ha).</p>

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S16: Shrewsbury	Shrewsbury West Sustainable Urban Extension (SHREW002, 035, 083, and 128/ELR64, 67, and 68)	Shrewsbury	Shrewsbury	Residential	Saved	<p>Development to be implemented in phases informed by a Masterplan.</p> <p>Residential phase 1 and employment phase 1: Outline Planning Permission (14/00246/OUT) granted for 296 dwellings and 3.3ha of employment and commercial development. Subsequent Reserved Matters Planning Permission (20/00307/REM) granted for 296 dwellings, a separate Reserved Matters Application is expected for the employment development. Alternative Full Planning Application (20/01957/FUL) pending decision for 340 dwellings on the residential element.</p> <p>Residential phase 2: Known developer interest in bringing forward the second phase of residential development.</p> <p>Employment phase 2: Full Planning Permission (21/04495/FUL) pending decision for roadside services.</p> <p>Residential phases 3 and 4, employment phase 3, local centre phases 1 and 2, part of health care phase 1 and health care phase 2: In Shropshire Council ownership. The Council is committed to bringing these components of the site forward. Given the remainder of the site is coming forward there is clear investment interest in this SUE and it is expected that this site will come forward alongside the wider development proposals.</p> <p>Health care phase 1: Full Planning Permission (14/05707/FUL) granted for 85 extra care apartments. Development completed (since 31st March 2019). Full Planning Permission (20/04541/FUL) granted for a further 54 apartments/bungalows. Outline Planning Permission (20/04544/OUT) granted for health/medical office accommodation.</p>
S16: Shrewsbury	Bowbrook/Radbrook – land between Mytton Oak Road and Hanwood Road (SHREW210/09, 030/R, 094 and 019)	Shrewsbury	Shrewsbury	Residential	Saved	<p>Development to be implemented in phases.</p> <p>Phase 1: Outline and Reserved Matters Planning Permissions (13/03534/OUT and 14/03844/REM) granted for 425 dwellings.</p> <p>Phase 2: Full Planning Permission (13/03285/FUL) granted for the erection of 118 dwellings.</p> <p>Development has commenced on both phases.</p>

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S16: Shrewsbury	Land at Weir Hill Farm/Robertsford House, Preston Street and adjoining Land off London Road (SHREW027 – parts)	Shrewsbury	Shrewsbury	Residential	Saved	Development to be implemented in phases. Hybrid Planning Application (17/01612/OUT) granted permission for a total of 600 dwellings. Phase 1: 353 dwellings has full consent on 17/01612/OUT. Development has commenced on the site. Phase 2: 247 dwellings has outline consent on 17/01612/OUT. Reserved Matters Planning Permission (19/05564/REM) subsequently granted for phase 2.
S16: Shrewsbury	Land off Hillside Drive, Belvidere (SHREW016)	Shrewsbury	Shrewsbury	Residential	Deleted	Development completed (as at 31st March 2019).
S16: Shrewsbury	Land East of Woodcote Way (SHREW120/R)	Shrewsbury	Shrewsbury	Residential	Deleted	Development completed (as at 31st March 2019).
S16: Shrewsbury	Land off Shillingstone Drive (SHREW105)	Shrewsbury	Shrewsbury	Residential	Saved	Development completed (since 31st March 2019).
S16: Shrewsbury	Land west of Battlefield Road (SHREW095 and 115/ELR006)	Shrewsbury	Shrewsbury	Residential	Saved	Outline Planning Permission (19/03905/OUT) for 100 dwellings granted on the site.
S16: Shrewsbury	Land west of Longden Road (SHREW212/09)	Shrewsbury	Shrewsbury	Residential	Saved	Development completed (since 31st March 2019).
S16: Shrewsbury	Land at Corner Farm Drive (SHREW023)	Shrewsbury	Shrewsbury	Residential	Deleted	Development completed (as at 31st March 2019).
S16: Shrewsbury	Land north of London Road (SHREW001 – part)	Shrewsbury	Shrewsbury	Residential	Saved	Full Planning Permission (16/02049/FUL) granted for a single dwelling on the site. Development completed (since 31st March 2019). No Planning Application to date on the remainder of the site.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S16: Shrewsbury	Shrewsbury South Sustainable Urban Extension (SHREW028, 029, 075, 107, 114, and 127 – parts)	Shrewsbury	Shrewsbury	Employment	Saved	<p>Development to be implemented in phases informed by a Masterplan.</p> <p>Residential phases 1a and 2a (north of Oteley Road): Full Planning Permission (13/00893/FUL) granted for 291 dwellings. Development has commenced on the site.</p> <p>Residential phases 1b, 2b (south of Oteley Road) and part of 3a (western end of the phase), employment phases 1b and 2b (western end of the site), and local centre phase 2: Outline Planning Permission (14/04428/OUT) granted for up to 550 dwellings, up to 23ha (gross) of mixed commercial development and a variety of other uses including a local centre and community facilities.</p> <p>A series of Reserved Matters Planning Permissions (17/06149/REM, 19/00048/REM, 19/04460/REM and 19/05470/REM) have been granted for the majority of the residential components. Development had commenced on these sub-phases.</p> <p>The remaining residential component is currently the subject of a new Outline Planning Application (21/02982/OUT) which is pending decision with a resolution to grant for 35 dwellings.</p> <p>Known developer interest in the employment phases.</p> <p>Part of residential phase 3b (eastern end of the phase): Full Planning Permission (16/02618/FUL) granted for 159 dwellings. Development has commenced on the site.</p> <p>Local centre phase 1: Full Planning Permission (12/01946/FUL) granted for a garden centre and other retail units. Development of the southern element (garden centre and 3 retail units) has completed. The northern element was superseded by a Hybrid Planning Permission (18/04194/FUL) granted for a supermarket and care facility (supermarket has been completed). Subsequent Reserved Matters Planning Permission (19/04101/REM) granted for part of the care facility. Development has commenced. Remainder of the care facility expected to follow-on.</p> <p>Employment phases 1a and 2a (eastern end of the site - Shrewsbury Business Park): Full Planning Permission (17/05812/FUL) for a car</p>

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
						dealership including service workshops, valeting facilities and car repair and preparation buildings (0.53ha) development of which is completed. Hybrid Planning Permission (17/06157/FUL) consisting of Full Planning Permission for a roadside services development and Outline Planning Permission for a new Class B1a (Class E(g)(i)) office park use (2.96ha).
S16: Shrewsbury	Shrewsbury West Sustainable Urban Extension (SHREW002, 035, 083, and 128 – parts)	Shrewsbury	Shrewsbury	Employment	Saved	<p>Development to be implemented in phases informed by a Masterplan.</p> <p>Residential phase 1 and employment phase 1: Outline Planning Permission (14/00246/OUT) granted for 296 dwellings and 3.3ha of employment and commercial development. Subsequent Reserved Matters Planning Permission (20/00307/REM) granted for 296 dwellings, a separate Reserved Matters Application is expected for the employment development. Alternative Full Planning Application (20/01957/FUL) pending decision for 340 dwellings on the residential element.</p> <p>Residential phase 2: Known developer interest in bringing forward the second phase of residential development.</p> <p>Employment phase 2: Full Planning Permission (21/04495/FUL) pending decision for roadside services.</p> <p>Residential phases 3 and 4, employment phase 3, local centre phases 1 and 2, part of health care phase 1 and health care phase 2: In Shropshire Council ownership. The Council is committed to bringing these components of the site forward. Given the remainder of the site is coming forward there is clear investment interest in this SUE and it is expected that this site will come forward alongside the wider development proposals.</p> <p>Health care phase 1: Full Planning Permission (14/05707/FUL) granted for 85 extra care apartments. Development completed (since 31st March 2019). Full Planning Permission (20/04541/FUL) granted for a further 54 apartments/bungalows. Outline Planning</p>

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
						Permission (20/04544/OUT) granted for health/medical office accommodation.
S16: Shrewsbury	Land west of Battlefield Road (SHREW095 part/ELR006)	Shrewsbury	Shrewsbury	Employment	Saved	Land with outline application (20/05405/OUT) for mixed use commercial development for part of area of saved allocation. A revised scheme anticipated for entire area of saved allocation.
S16: Shrewsbury	Land east of Battlefield Road (ELR007)	Shrewsbury	Shrewsbury	Employment	Saved	Land approved for retail foodstore (21/01374/FUL). Further current application (21/05804/FUL) awaiting determination for modified layout and access arrangements for Class E retail foodstore.
S16: Shrewsbury	Riverside Shopping Centre, Smithfield Road.	Shrewsbury	Shrewsbury	Retail	Deleted	Proposals in this location addressed through draft Policy S16.1 of the draft Shropshire Local Plan.
S16: Shrewsbury	Land at rear of Wheatlands Estate (BAS005)	Baschurch	Shrewsbury	Residential	Deleted	Development completed (as at 31st March 2019).
S16: Shrewsbury	Land at Station Road (BAS035)	Baschurch	Shrewsbury	Residential	Saved	Outline and Reserved Matters Planning Permissions (14/02454/OUT and 18/05447/REM) granted for 52 dwellings on the site.
S16: Shrewsbury	Land to rear of Medley Farm (BAS025)	Baschurch	Shrewsbury	Residential	Deleted	Development completed (as at 31st March 2019).
S16: Shrewsbury	Land to the west of Shrewsbury Road (BAS017)	Baschurch	Shrewsbury	Residential	Saved	Development completed (since 31st March 2019).
S16: Shrewsbury	Land off Shrewsbury Road, Bomere Heath (BOM004/R)	Bomere Heath	Shrewsbury	Residential	Saved	Development completed (since 31st March 2019).
S16: Shrewsbury	Land West of Holyhead Road (NESS004 and NESS012 – part)	Nesscliffe	Shrewsbury	Residential	Saved	Outline and Reserved Matters Planning Permissions (13/04757/OUT and 17/01576/REM) granted for up to 43 dwellings on the site. Development has commenced on the site.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S16: Shrewsbury	Land off Forge Way, Dorrington (DOR004)	Dorrington	Shrewsbury	Residential	Saved	Full Planning Application (17/04926/FUL) granted for 26 dwellings on the site. Development has commenced on the site.
S16: Shrewsbury	Land to the rear of the Old Vicarage, Dorrington (DOR017 – part)	Dorrington	Shrewsbury	Residential	Saved	No Planning Application to date. This site is expected to follow-on from other site allocations in the village.
S16: Shrewsbury	Land opposite School, Condover (CON006)	Condover	Shrewsbury	Residential	Saved	Outline and Reserved Matters Planning Permissions (17/00863/OUT and 18/04353/REM) granted for 4 dwellings on the site.
S16: Shrewsbury	Land east of the Shrewsbury Road, Condover (CON005)	Condover	Shrewsbury	Residential	Saved	Outline Planning Permission (17/00862/OUT) granted for 3 dwellings. Reserved Matters Planning Permissions (18/00555/REM, 18/03582/REM and 20/03325/REM) granted, each for one of the 3 plots. Development has commenced on the site.
S16: Shrewsbury	Land west of school (HAN011/R)	Hanwood	Shrewsbury	Residential	Saved	Development completed (since 31st March 2019).
S16: Shrewsbury	Land between Manor Farm and Top Cottages (UFF006/10 – part)	Uffington	Shrewsbury	Residential	Deleted	Development completed (as at 31st March 2019).
S16: Shrewsbury	Gonsal Quarry Extensions (M10/11)	Rural	Shrewsbury	Mineral	Saved	See under reference to Policy MD5.
S17: Wem	Land off Pyms Road (WEM003)	Wem	Wem	Residential	Saved	Two Planning Applications addressing the site and additional land refused. The site is still considered developable.
S17: Wem	Land at Tilley (WEM012)	Wem	Wem	Residential	Saved	Development completed (since 31st March 2019).
S17: Wem	Land adjacent to Shawbury Rd (ELR031)	Wem	Wem	Employment	Saved	No Planning Application to date.
S17: Wem	Land to the rear of Brickyard Farm, Poynton Road (SHAW004)	Shawbury	Wem	Residential	Saved	Development completed (since 31st March 2019).

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S18: Whitchurch	Land at Tilstock Road (WHIT009)	Whitchurch	Whitchurch	Residential	Saved	Development to be implemented in phases. Outline Planning Permission (13/05077/OUT) granted for up to 500 dwellings - covering all phases of development. Phase 1: Reserved Matters Planning Permission (16/02160/REM) granted for 156 dwellings. Development has commenced on the site. Phase 2: Reserved Matters Planning Permission (20/01895/REM) pending consideration for 134 dwellings. Phase 3: Reserved Matters Planning Permission (20/01897/REM) pending consideration for 151 dwellings. Phase 4: Reserved Matters Planning Permission (20/01899/REM) pending consideration for 39 dwellings.
S18: Whitchurch	Land at Mount Farm (WHIT046)	Whitchurch	Whitchurch	Residential	Deleted	Development completed (as at 31st March 2019).
S18: Whitchurch	Land at Alport Road (WHIT021)	Whitchurch	Whitchurch	Residential	Saved	Outline and Reserved Matters Planning Permissions (14/01263/OUT and 17/03076/REM) granted for 90 dwellings on the site. Development has commenced on the site.
S18: Whitchurch	Land West of Oaklands Farm (WHIT051)	Whitchurch	Whitchurch	Residential	Saved	Development to be implemented in phases. Phase 1: Outline Planning Application (21/02736/OUT) pending consideration for 7 dwellings. Phases 2+: No Planning Applications to date, but known developer interest.
S18: Whitchurch	Land North of Mill Park (WHIT033)	Whitchurch	Whitchurch	Residential	Deleted	Development completed (as at 31st March 2019).
S18: Whitchurch	Land at the Oaklands Farm (ELR033)	Whitchurch	Whitchurch	Employment	Saved	No Planning Application to date.
S18: Whitchurch	Land at Heath Road (ELR035)	Whitchurch	Whitchurch	Employment	Saved	No Planning Application to date.

Main Policy Reference	Site Allocation	Settlement	Place Plan	Type	Status*	Status of Site
S18: Whitchurch	PRE002/011/12 Land West of Shrewsbury Street	Prees	Whitchurch	Residential	Saved	Development to be implemented in phases. Phase 1: Full Planning Permission (16/05870/FUL) granted for 1 dwelling. Development completed (since 31st March 2019). Phase 2: Full Planning Permission (16/02309/FUL) granted for 2 dwellings. Development completed (since 31st March 2019). Phase 3: Outline and Reserved Matters Planning Permissions (17/03775/OUT and 21/00120/REM) granted for 5 dwellings. Phases 4+: To follow on from phase 3.
S18: Whitchurch	PRE008 Land at Moreton Street	Prees	Whitchurch	Residential	Saved	No Planning Application to date. This site is expected to follow-on from other site allocations in the village.
S18: Whitchurch	TIL001 Land at the Vicarage, Tilstock	Tilstock	Whitchurch	Residential	Saved	Outline and Reserved Matters Planning Permissions (16/04615/OUT and 20/02640/REM) granted for 24 dwellings on the site. Development has commenced on the site.
S18: Whitchurch	TIL002 Land at Tilstock Close, Tilstock	Tilstock	Whitchurch	Residential	Saved	Outline and Reserved Matters Planning Permissions (14/03013/OUT and 18/05370/REM) granted for 9 dwellings on the site. Development has commenced on the site.
S18: Whitchurch	TIL008 Land at Russell House, Tilstock	Tilstock	Whitchurch	Residential	Deleted	Development completed (as at 31st March 2019).
S18: Whitchurch	ASHP002 Land West of Ash Parva	Ash Parva	Whitchurch	Residential	Saved	Development completed (since 31st March 2019).
S18: Whitchurch	PH004 Former Cherry Tree Hotel and adjoining land, Prees Heath	Prees Heath	Whitchurch	Residential	Saved	No recent Planning Application on the site.

**Currently proposed in the draft Shropshire Local Plan.*

205. The status of these 'saved' site allocations is outlined within the draft Shropshire Local Plan which explains within the introduction (paragraph 2.17) that *"Upon adoption the policies of the Shropshire Local Plan 2016 to 2038 will replace the policies of the Core Strategy and SAMDev Plan, except for the SAMDev site allocations which have yet to be delivered, which will be 'saved' and therefore continue to form part of the Development Plan. The policies and proposals within adopted formal Neighbourhood Plans which conform with the Shropshire Local Plan 2016 to 2038 will also continue to apply."*
206. This is also outlined within Appendix 1 and Appendix 2 of the draft Shropshire Local Plan, which include *"Where a Core Strategy or SAMDev Plan policy is 'saved' the issues addressed within the policy are considered to continue to be relevant and have not been addressed within a Local Plan policy, as such it will continue to form part of the Local Plan for Shropshire."* and *"Where a SAMDev Plan allocation is 'saved' it will continue to form part of the Local Plan for Shropshire. The 'saved' status applies to the site location, extent, development guidelines and approximate provision figures identified within the SAMDev Plan."*
207. The draft settlement policies (S1-S21) of the draft Shropshire Local Plan also provide appropriate cross-references to these 'saved' SAMDev allocations.
208. The Local Development Scheme (LDS) for Shropshire (**EVO08.01**) and previous stages of consultation have also recognised this approach.
209. This approach is considered consistent with relevant legislation. Specifically, the Planning and Compulsory Purchase Act (2004) (as amended) and Town and Country Planning Act (2012) (as amended) establish that a Development Plan can consist of one or more Development Plan Documents. Any such document is considered part of a Local Plan (indeed that is the structure of the adopted Local Plan which consists of multiple documents)³.
210. Furthermore, the principle of undertaking a Local Plan Review which only addresses part of the adopted Local Plan is well established. Paragraph 33 of the National Planning Policy Framework states *"Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated **as necessary**. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. **Relevant strategic policies** will need updating at least once every five years if*

³ Including Section 19 of the Planning and Compulsory Purchase Act (2004) (as amended) and Regulations 5 and 6 of the Town and Country Planning Act (2012) (as amended).

their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." (my emphasis).

211. The National Planning Practice Guidance (NPPG) on Plan-Making is perhaps clearer on this matter, stating *"Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. **Most plans are likely to require updating in whole or in part at least every 5 years.** Reviews should be **proportionate** to the issues in hand. Plans may be found sound conditional upon a plan update **in whole or in part** within 5 years of the date of adoption. Where a review was undertaken prior to publication of the Framework (27 July 2018) but within the last 5 years, then that plan will continue to constitute the up-to-date plan policies unless there have been significant changes as outlined below."*⁴ (my emphasis).

212. Further to the recognition that such an approach is acceptable and commonly used by Councils, it is perhaps useful to point to a few examples where a similar process has taken place.

- a. Fylde Council's Local Plan Partial Review – the partial review was adopted on the 6th December 2021. This partial review superseded nine policies within the adopted Local Plan. Within the Inspectors Report on the Partial Review of this Local Plan the inspector concluded in paragraph 10 that *"As the Plan is a partial review, there is no requirement for me to examine all other aspects of the FLP32. The Plan, once adopted, and in combination with the remaining unchanged policies and supporting text of the FLP32, will constitute the development plan for Fylde."*⁵
- b. Cherwell District Council Partial Review – focusing on unmet housing need arising within Oxford adopted on the 7th September 2020. Within the Inspectors Report on the Partial Review of this Local Plan the inspector states in paragraph 22 that *"The Development Plan, that is this Partial Review viewed alongside the adopted Cherwell Local Plan 2015, includes policies to address the*

⁴ DLUHC was MHCLG, (2021), NPPG: Plan Making, Paragraph 062, Reference ID 61-062-20190315, www.gov.uk/guidance/plan-making

⁵ Planning Inspector Yvonne Wright, (21 October 2021), Report on the Examination of the Partial Review of the Fylde Local Plan to 2032, <https://new.fylde.gov.uk/wp-content/uploads/2021/10/Inspectors-Final-Report-and-Appendix.pdf>

strategic priorities for the development and use of land in the area.”⁶

213. It should also be noted that Shropshire Council is proposing a similar approach for adopted formal Neighbourhood Plans in Shropshire (which also form part of the adopted Development Plan for the area). Specifically, in the case of Much Wenlock and Shifnal, the Neighbourhood Plans cover the period to 2026 (in line with the adopted Local Plan). As such the draft Shropshire Local Plan includes a proposed development strategy for these settlements for the further 12 year period to 2038, which will supersede the existing development strategy for these settlements within the adopted Neighbourhood Plan. However, as recognised within the relevant draft settlement Policies (S13.1 and S15.1) of the draft Shropshire Local Plan, the policies and proposals within these Neighbourhood Plan’s which conform with the draft Shropshire Local Plan *“continue to form part of the Development Plan for the area”*.
214. This is consistent with the National Planning Practice Guidance (NPPG) on Neighbourhood Planning (which also recognises the potential for ‘partial reviews’), which specifies that *“There is no requirement to review or update a neighbourhood plan. However, policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence...”*
215. *Communities in areas where policies in a neighbourhood plan that is in force have become out of date **may decide to update their plan, or part of it.** The neighbourhood area will already be designated, but the community may wish to consider whether the designated area is still the most suitable area to plan for.”⁷ (my emphasis).*
216. Given that relevant legislation, national policy, and national guidance recognise that a Local Plan can consist of one or more documents and the ability to undertake ‘partial reviews’; the specific circumstances and approach that has been applied in Shropshire; and the comparable approaches taken by other Local Planning Authorities, it is not considered necessary or appropriate to include the components of the adopted Local Plan which will continue to form part of the Local Plan for Shropshire moving forward (specifically the proposed ‘saved’ allocations), within the draft Policies of the draft Shropshire Local Plan.

⁶ Planning Inspector Paul Griffiths, (6 August 2020), Report on the Examination of the Cherwell Local Plan 2011 - 2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need, [file:///C:/Users/cc140648/Downloads/Local_Plan_Inspector_s_Report_and_Schedule_of_Main_Modifications%20\(1\).pdf](file:///C:/Users/cc140648/Downloads/Local_Plan_Inspector_s_Report_and_Schedule_of_Main_Modifications%20(1).pdf)

⁷ DLUHC was MHCLG, (2020), NPPG: Neighbourhood Planning, Paragraph 084, Reference ID 41-084-20190509, <https://www.gov.uk/guidance/neighbourhood-planning--2>

217. It is also for this reason that these sites have not been re-assessed within the evidence base and technical assessments undertaken to inform the draft Shropshire Local Plan – this is addressed further in response to subsequent questions.
218. However, for clarity and the convenience of all parties (the decision maker, developers and local communities), further additional (minor) modifications have been proposed to update Appendix 2 of the draft Shropshire Local Plan to:
- a. Update the list of proposed ‘saved’ site allocations to reflect the fact that further sites have been built out since the 31st March 2019 and as such, no longer require ‘saving’; and
 - b. For the remaining proposed ‘saved’ site allocations, include the relevant aspects of the SAMDev Plan – specifically the development guidelines and approximate provision figures for each ‘saved’ allocation (the location and extent of these ‘saved’ allocations are already illustrated on the draft Policies Map).
219. These proposed additional (minor) modifications are documented within the Updated Schedule of Additional (Minor) Modifications (**SD003.01**).
220. This would mean that Appendix 2 of the draft Shropshire Local Plan would provide a more clearly consolidated version of the ‘saved’ elements of the SAMDev Plan. Appendix 2 is of course directly referenced within the relevant draft settlement policies (S1-S21) of the draft Shropshire Local Plan.

ID2 Paragraph 11: *Also, for the avoidance of doubt the housing sites being carried forward will need to be entered into the tables we sent you as annexes to our previous letter.*

Shropshire Council Response to ID2 Paragraph 11:

221. Shropshire Council can confirm that the deliverability of ‘saved’ allocations is specifically considered within the Five Year Housing Land Supply Statement undertaken for Shropshire (**EV048.3**).
222. They are also specifically considered within the update of this assessment (March 2021 base date) submitted alongside this response (reference: **EV048.07**).

ID2 Paragraph 12: *The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) requires that the environmental report (SA in this case) shall identify, describe and evaluate the likely significant effects on the environment of (a)*

implementing the plan or programme; and (b) reasonable alternatives, taking account of the objectives and the geographical scope of the plan or programme. Consequently, the environmental effects of implementing this Plan can only be properly assessed if all the sites are considered.

ID2 Paragraph 13: *However, we can find no evidence that the 'saved' site allocations being carried forward from your SAMDev Plan have been subject to sustainability appraisal on a like for like basis as the new sites in the submitted plan, and other reasonable alternatives for each of the Place Plan Areas. If this work has been undertaken, can the Council please direct us to it. If has not been carried out, can you please explain why not, with reference to the SEA Regulations.*

ID2 Paragraph 14: *In addition, please direct us to where in the submitted evidence we can ascertain the rationale for the selection of some lesser performing housing sites over better performing sites within a given settlement. Please clarify whether sites selected requiring mitigation to improve their sustainability credentials have been re-appraised.*

Shropshire Council Response to ID2 Paragraphs 12-14:

223. Shropshire Council can confirm that the site allocations within the SAMDev Plan were informed by a proportionate and robust site assessment process and technical assessments (Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment (SEA) Regulations, and Habitats Regulations Assessment) during the preparation of the SAMDev Plan. The site assessment process and technical assessments were undertaken using a methodology generally consistent with that undertaken to inform the draft Shropshire Local Plan.
224. When the SAMDev Plan was subject to examination the Planning Inspector at that time considered this information and ultimately found the Plan sound and legally compliant. Within her Inspectors Report (**EV010.01**) Inspector Sherratt concluded with regard to the Assessment of Legal Compliance that the Sustainability Appraisal *"has been carried out and is adequate"* (Page 67).
225. It is acknowledged the Council did not submit the site assessment process and technical assessments (Sustainability Appraisal, incorporating the requirements of the SEA Regulations, and Habitats Regulations Assessment) undertaken during the preparation of the SAMDev Plan as part of the evidence base for the draft Shropshire Local Plan. This is because it was not considered this evidence would be required, given that the 'saved' allocations represent components of the adopted Local Plan which will continue to form part of the Local Plan for Shropshire moving forward (see response to ID2 Paragraphs 9 and 10).

226. On balance, it is considered this approach aligns well with paragraph 31 of NPPF which states *"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals"*, as well as with paragraph 1.9 of the Planning Inspectorate Procedural Guide for Local Plan Examinations.
227. However, this material can of course be provided, if required, in order to give the additional confidence that the 'saved' allocations have been the subject of Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment (SEA) Regulations.

ID2 Paragraph 15: *It appears that the Council's Local Plan Delivery and Viability Study – July 2020 (CD EV115.01) has also not had regard to the 'saved' sites. Can the Council please confirm whether this is the case and if not, why?*

Shropshire Council Response:

228. As documented in response to ID2 Paragraphs 9 and 10, 'saved' allocations in Appendix 2 of the draft Shropshire Local Plan represent components of the adopted Local Plan which will continue to form part of the Local Plan for Shropshire moving forward. As such, the Council's Local Plan Delivery and Viability Study – July 2020 (**EV115.01**) has not had specific regard to them.
229. This list of 'saved' allocations is extensive, as it includes all site allocations within the adopted Local Plan that had not been fully 'built out' as at 31st March 2019.
230. Since this base date a considerable number of these site allocations have been 'built out' (17 residential allocations). Furthermore, a significant number are either under construction or progressing towards commencement, have Planning Permission on all or part of the site, or are the subject of a current Planning Application. The current status of 'saved' allocations is documented within Table 7, contained within the response to *ID2 Paragraphs 9 and 10*. Many of the remaining 'saved' allocations or components of 'saved allocations' are considered to generally align with the typologies of development considered within the Viability Assessment. Shropshire Council is confident of the deliverability of the proposed 'saved' allocations, and to this end continue to include them within the Council's latest Housing Land Supply statement submitted alongside this response (**EVO48.07**).

ID2 Paragraph 16: Furthermore, please confirm whether there are any other relevant evidence base documents that have not taken account of the 'saved' sites.

Shropshire Council Response:

231. As documented in response to ID2 Paragraphs 9 and 10, 'saved' allocations in Appendix 2 of the draft Shropshire Local Plan represent components of the adopted Local Plan which will continue to form part of the Local Plan for Shropshire moving forward. As such, it is not considered that they needed to be specifically assessed within relevant evidence base documents.
232. However, we can confirm that relevant evidence base documents included appropriate consideration of these 'saved' allocations, as part of the baseline for their assessment.

The Scale and Distribution of Development

ID2 Paragraph 17: We have noted that page 92 of the Sustainability Appraisal and Site Assessment Appraisal Report (SA) sets out the Council's intended approach, based on the outcomes of the SA. This is also set out in paragraph 3.52 of the Plan where it says that "The strategic approach to the distribution of development which underpins this Local Plan is one of 'urban focus', whereby the majority of development is focused into the urban areas identified within Schedule SP2.1 of Policy SP2 of this Local Plan".

ID2 Paragraph 18: According to the SA an 'Urban Focused' distribution of development would see Shrewsbury taking around 30% of the housing development, Principal Centres around 24.5%, Key Centres around 18% and Rural Areas around 27.5% along with development at strategic sites such as Ironbridge Power Station and Clive Barracks, and potential new Garden Village settlements in strategic locations. In our last letter we asked that as part of a housing topic paper you set out details of the Council's spatial strategy and distribution and how it was arrived at. Can you also please confirm that the above is indeed the approach the Council has adopted in the Plan and, if so, where the evidence can be found to demonstrate that the spatial distribution has been followed when selecting all housing and employment sites for allocation, including those 'saved' sites.

Shropshire Council Response to Paragraphs 17-18:

233. The Local Plan Review which has culminated in the submitted draft Shropshire Local Plan has involved an iterative process.

234. A series of Regulation 18 'Plan Making' Consultations (five stages of Regulation 18 consultation) have been undertaken to gradually develop the proposed spatial strategy and framework for the management of the future development of Shropshire to 2038.
235. The Sustainability Appraisal process directly mirrors the development of the draft Shropshire Local Plan, with stages of Sustainability Appraisal undertaken to directly inform and appraise proposals at each stage of Regulation 18 'Plan Making' Consultation and at the Regulation 19 'Pre-Submission' Consultation stage.
236. The Sustainability Appraisal and Site Assessment Environmental Report of the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan (**SD006.01**) provides a summary of the work undertaken to inform and appraise proposals within the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan, but also provides an overview of the wider Sustainability Appraisal process undertaken as part of the Local Plan Review.
237. The reference to an 'Urban Focused' strategy within **ID2 Paragraph's 17 and 18** appears to be taken from the summary of the Sustainability Appraisal undertaken to inform and appraise the proposals within the Regulation 18 'Plan Making' Preferred Scale and Distribution of Development Consultation within **SD006.01** (this was the second Regulation 18 'Plan Making' Consultation undertaken as part of the Local Plan Review).
238. Since this consultation, proposals have continued to evolve and be refined, informed by a number of factors including additional evidence base, consultation responses, and the Sustainability Appraisal process.
239. Within the draft Shropshire Local Plan, the principle underpinning the proposed distribution of residential development within the proposed spatial strategy remains one of 'Urban Focus'.
240. However, whilst 'Urban Focus' remains a key principle of the proposed spatial strategy, it was ultimately concluded that identifying specific percentages of the proposed housing requirement to be delivered within each general category of settlement was too rigid and would not provide sufficient flexibility to positively respond to circumstances where appropriate opportunities for sustainable development that is consistent with the draft Shropshire Local Plan arise. As such a more flexible approach has been advanced, set out in draft Policy SP2 – Strategic Approach, which does not specifically identify the proportion of development within each general category of settlement. This flexibility is also reflected within the wider draft Policies of the draft Shropshire Local Plan.
241. This proposed approach to the distribution of development within the draft spatial strategy is recognised within the Sustainability Appraisal

and Site Assessment Environmental Report of the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan (**SD006.01**). In particular this is summarised within Chapter 10 (starting on Page 195 of the document). It is also apparent within Appendix A of the Sustainability Appraisal (**SD006.02**) which provides the summary of the Sustainability Appraisal Assessment undertaken of the draft Policies within the draft Shropshire Local Plan.

242. However, it should be noted that the levels of development proposed within each category of settlement are generally comparable to those proposed within the earlier Preferred Scale and Distribution of Development Consultation (although with an allowance for the Strategic Settlements and Strategic Site, which are considered to represent future urban areas, which were identified through the subsequent Regulation 18 'Plan Making' Consultation on Strategic Sites).

243. This is apparent when the proposed residential development guidelines for settlements are considered in the context of the proposed housing requirement for Shropshire (30,800 dwellings between 2016 and 2038). This is summarised within the following table:

Table 8: Proposed Residential Development Guidelines for Settlements in the draft Shropshire Local Plan

Settlement	Settlement Category	Proposed Residential Development Guideline
Shrewsbury	Strategic Centre	8,625
Strategic Centre:		8,625 (around 28.0% of the proposed Housing Requirement)
Bridgnorth	Principal Centre	1,800
Ludlow	Principal Centre	1,000
Market Drayton	Principal Centre	1,200
Oswestry	Principal Centre	1,900
Whitchurch	Principal Centre	1,600
Principal Centres:		7,500 (around 24.5% of the proposed Housing Requirement)
Albrighton	Key Centre	500
Bishops Castle	Key Centre	150
Broseley	Key Centre	250
Church Stretton	Key Centre	200
Cleobury Mortimer	Key Centre	200
Craven Arms	Key Centre	500
Ellesmere	Key Centre	800
Highley	Key Centre	250
Much Wenlock	Key Centre	200
Shifnal	Key Centre	1,500

Settlement	Settlement Category	Proposed Residential Development Guideline
Wem	Key Centre	600
Key Centres:		5,150 (around 17.0% of the proposed Housing Requirement)
Former Ironbridge Power Station	Strategic Settlement	1,000
Clive Barracks, Tern Hill	Strategic Settlement	350*
Strategic Settlements:		1,350 (around 4.5% of the proposed Housing Requirement)
Bucknell (Bishop's Castle)	Community Hub	110
Chirbury (Bishop's Castle)	Community Hub	45
Clun (Bishop's Castle)	Community Hub	95
Worthen and Brockton (Bishop's Castle)	Community Hub	55
Alveley (Bridgnorth)	Community Hub	130
Ditton Priors (Bridgnorth)	Community Hub	65
Dudleston Heath (Ellesmere)	Community Hub	60
Burford (Ludlow)	Community Hub	190
Clee Hill (Ludlow)	Community Hub	75
Hinstock (Market Drayton)	Community Hub	155
Hodnet (Market Drayton)	Community Hub	105
Woore, Irelands Cross and Pipe Gate (Market Drayton)	Community Hub	88
Minsterley (Minsterley and Pontesbury)	Community Hub	155
Pontesbury (Minsterley and Pontesbury)	Community Hub	175
Cressage (Much Wenlock)	Community Hub	80
Gobowen (Oswestry)	Community Hub	360
Kinnerley (Oswestry)	Community Hub	60
Knockin (Oswestry)	Community Hub	55
Llanymynech (Oswestry)	Community Hub	125
Pant (Oswestry)	Community Hub	50
Ruyton XI Towns (Oswestry)	Community Hub	125
St Martins (Oswestry)	Community Hub	355
Trefonen (Oswestry)	Community Hub	35
West Felton (Oswestry)	Community Hub	130
Weston Rhyn (Oswestry)	Community Hub	155
Whittington (Oswestry)	Community Hub	200
Baschurch (Shrewsbury)	Community Hub	360
Bayston Hill (Shrewsbury)	Community Hub	200
Bicton (Shrewsbury)	Community Hub	30
Bomere Heath (Shrewsbury)	Community Hub	110
Cross Houses (Shrewsbury)	Community Hub	90

Settlement	Settlement Category	Proposed Residential Development Guideline
Dorrington (Shrewsbury)	Community Hub	150
Ford (Shrewsbury)	Community Hub	125
Hanwood (Shrewsbury)	Community Hub	50
Longden (Shrewsbury)	Community Hub	50
Nesscliffe (Shrewsbury)	Community Hub	115
Clive (Wem)	Community Hub	30
Hadnall (Wem)	Community Hub	125
Shawbury (Wem)	Community Hub	150
Prees (Whitchurch)	Community Hub	170
Community Hubs**		4,988 (around 16.0% of the proposed Housing Requirement)
Community Clusters and the Wider Rural Area		No specific guidelines (around 10.0% of the proposed Housing Requirement)

Please Note: Percentages are rounded to one decimal place.

*Shropshire Council understands that a recent announcement has been made (25th November 2021) confirming that as a result of the Future Soldiers Project, which represents the most radical transformation of the British Army in 20 years, the timescales for the release of Clive Barracks, Tern Hill have moved from 2025 to 2029. The implications of this change on the level of residential delivery expected on the site during the proposed Plan period (2016-2038) and the implications for the distribution of residential development between the various settlement categories is captured in the above table. This announcement has required further proposed minor (additional) modifications to the draft Shropshire Local Plan.

*For proposed Community Hubs, the relevant Place Plan Area is shown in brackets.

Neighbourhood Planning

ID2 Paragraph 19: Paragraph 66 of the Framework requires that the local plan's strategic policies set out a housing requirement for each designated neighbourhood planning area and also that the neighbourhood area requirement figures reflect the strategy for the pattern and scale of development and any relevant allocations.

ID2 Paragraph 20: It is not clear to us that this has been done in Policy SP2. Furthermore, it is unclear if the individual Place Plans contain a specific requirement for each designated neighbourhood area. If there is no apportionment for a given neighbourhood area then this should be explicitly stated for the sake of clarity. It is also unclear whether any Neighbourhood Plans are intended to contain site allocations. Again, this should be made clear in the submitted plan.

ID2 Paragraph 21: Consequently, can the Council please confirm whether the Place Plan areas and apportionments reflect the designated neighbourhood area boundaries; and what apportionments (if any) have been made to each specific neighbourhood area.

Shropshire Council Response to Paragraphs 19-21:

244. Draft Policy SP2 of the draft Shropshire Local Plan contains the proposed spatial strategy for the distribution of development (including residential development) across Shropshire between 2016 and 2038.
245. A core principle of this proposed spatial strategy is 'urban focus', by which the majority of residential development will be directed into identified 'urban' areas. The proposed urban areas are the Strategic Centre, Principal Centres, Key Centres, Strategic Settlements, and Strategic Site.
246. However, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of our rural communities, development in urban areas will be positively complemented by appropriate new development within the proposed Community Hubs and Community Clusters. Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification.
247. Draft Settlement Policies S1-S21 then provide specific residential development guidelines for settlements that are proposed to be identified as a Strategic Centre, Principal Centre, Key Centre, Community Hub or Strategic Settlement.
248. The proposed residential development guidelines for these settlements will contribute towards achieving the proposed spatial strategy for the distribution of development.
249. Where settlements are not proposed to be identified as a Strategic Centre, Principal Centre, Key Centre, Community Hub or Strategic Settlement, a residential development guideline is not proposed to be identified within the draft Shropshire Local Plan. Rather development beyond these locations will primarily be managed through either the proposed policy mechanism for managing development within Community Clusters (draft Policy SP9) or the draft policy for managing development within the wider rural area (draft Policy SP10) as appropriate. Draft Policy SP2 specifically recognises that Neighbourhood Plans can be used to identify additional Community Clusters.
250. This approach is considered consistent with the proposed spatial strategy for the distribution of development across Shropshire. It is also a pragmatic approach, given the geographic scale of Shropshire, the number of Parishes and communities within Shropshire, and the significant diversity in the size and nature of these Parishes and communities.

251. In Shropshire, there are currently four adopted (made) Neighbourhood Plans, these are for Much Wenlock; Shifnal; Stoke Upon Tern; and Woore, Ireland's Cross and Pipe Gate.

252. There are also nine further approved Neighbourhood Plan Areas⁸. Shropshire Council is working proactively with each of these Town/Parish Councils and/or Neighbourhood Plan Groups (as appropriate) in order to facilitate the preparation of these Neighbourhood Plans.

253. The following table provides a summary of each of these areas and the proposed apportionment of residential development to them within the draft Shropshire Local Plan. It is noted that in all of these cases the designated area is the parish, or parishes in the case of joint Neighbourhood Plans.

254. We would note that in some instances, whilst the draft Local Plan provides strategic policies to guide the overall scale of development, Neighbourhood Plans are intended to provide the strategy for achieving the proposed residential and where relevant employment development guidelines for settlements within them. Where this is the case it is clearly explained within the relevant draft Settlement Policy (S1-S21) of the draft Shropshire Local Plan. However, it is ultimately the role of the Town/Parish Council or Neighbourhood Plan Group (as appropriate) to determine an appropriate strategy for this settlement and whether there is a need for one or more site allocations.

Approved Neighbourhood Plan Areas	Relevant Proposed Residential Development Guideline in the draft Shropshire Local Plan
Parishes of Adderley, Moreton in Say and Norton in Hales	<p>The Parishes of Adderley, Moreton in Say and Norton in Hales are predominantly rural areas located to the north of Market Drayton.</p> <p>The settlements of Bletchley, Longford, Longslow, Adderley, Moreton in Say and Norton in Hales within these Parishes have been identified as a proposed Community Cluster within the draft Shropshire Local Plan (see draft Policy S11.3 of the draft Shropshire Local Plan).</p> <p>The draft Shropshire Local Plan does not propose to identify specific residential development guidelines for Community Clusters, rather it is proposed that development within them will be managed through a policy mechanism (draft Policy SP9).</p> <p>However, if as part of the process of preparing the Neighbourhood Plan for these Parishes, the Parish Councils/Neighbourhood Plan Group identified an aspiration for a residential development guideline for</p>

⁸ There is also an approved Neighbourhood Plan Area for Market Drayton Parish and surrounding areas. However, the examiner's report on the draft Neighbourhood Plan for this area concluded that it should not proceed to referendum.

Approved Neighbourhood Plan Areas	Relevant Proposed Residential Development Guideline in the draft Shropshire Local Plan
	<p>these settlements, Shropshire Council would work with them to provide an indicative figure for the area which could be taken forward within the Neighbourhood Plan itself.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within these Parishes, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of these areas.</p>
Parish of Bickton	<p>The draft Shropshire Local Plan proposes that around 30 dwellings will be delivered in Bickton village which is a proposed Community Hub (see draft Policy S16.2 of the draft Shropshire Local Plan).</p> <p>The Bickton Neighbourhood Plan will seek to support the achievement of the proposed strategy for achieving the proposed residential development guideline for Bickton village.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within Bickton Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p>
Parish of Bishop's Castle	<p>The draft Shropshire Local Plan proposes that around 150 dwellings will be delivered in Bishop's Castle town over the plan period which is a proposed Key Centre (see draft Policy S2.1 of the draft Shropshire Local Plan).</p> <p>The Bishop's Castle Neighbourhood Plan will identify the strategy for achieving the proposed residential development guideline for Bishop's Castle town.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within Bishop's Castle Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p>
Parish of Broseley	<p>The draft Shropshire Local Plan proposes that around 250 dwellings will be delivered in Broseley town over the plan period which is a proposed Key Centre (see draft Policy S4.1 of the draft Shropshire Local Plan).</p> <p>The Broseley Neighbourhood Plan will identify the strategy for achieving the proposed residential development guideline for Broseley town.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within Broseley Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p>

Approved Neighbourhood Plan Areas	Relevant Proposed Residential Development Guideline in the draft Shropshire Local Plan
Parish of Burford (alongside the Civil Parish of Tenbury Wells in Malvern Hills District Council's administrative area)	<p>The draft Shropshire Local Plan proposes that around 190 dwellings will be delivered in Burford village over the plan period which is a proposed Community Hub (see draft Policy S10.2 of the draft Shropshire Local Plan).</p> <p>The Tenbury Wells and Burford Neighbourhood Plan will seek to support the achievement of the proposed strategy for achieving the proposed residential development guideline for Burford village and that proposed for Tenbury Wells town within the South Worcestershire Development Plan.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within Burford Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p>
Parish of Cleobury Mortimer	<p>The draft Shropshire Local Plan proposes that around 200 dwellings will be delivered in Cleobury Mortimer town which is a proposed Key Centre (see draft Policy S6.1 of the draft Shropshire Local Plan).</p> <p>The Cleobury Mortimer Neighbourhood Plan will identify the strategy for achieving the proposed residential development guideline for Cleobury Mortimer town.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within Cleobury Mortimer Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p>
Parish of Condover	<p>The draft Shropshire Local Plan proposes that around 150 dwellings will be delivered in Dorrington village which is a proposed Community Hub (see draft Policy S16.2 of the draft Shropshire Local Plan).</p> <p>The Condover Neighbourhood Plan will identify the strategy for achieving the proposed residential development guideline for Dorrington village.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within Condover Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p>
Parish of Pontesbury	<p>The draft Shropshire Local Plan proposes that around 175 dwellings will be delivered in Pontesbury village which is a proposed Community Hub (see draft Policy S12.1 of the draft Shropshire Local Plan).</p> <p>The Pontesbury Neighbourhood Plan will support the achievement of the proposed strategy for achieving the</p>

Approved Neighbourhood Plan Areas	Relevant Proposed Residential Development Guideline in the draft Shropshire Local Plan
	<p>proposed residential development guideline for Pontesbury village.</p> <p>It is not considered necessary or appropriate to identify a specific residential development guideline for the wider rural area within Pontesbury Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p>
Parish of Sheriffhales	<p>The Parish of Sheriffhales is a predominantly rural area containing a number of small settlements including Sheriffhales village, Heath Hill and Weston Heath.</p> <p>As such, it is not considered necessary or appropriate to identify a specific residential development guideline for this rural Parish, given the proposed spatial strategy for the distribution of development across Shropshire and the characteristics of this wider rural area.</p> <p>However, if as part of the process of preparing the Neighbourhood Plan for the Parish, the Parish Council/Neighbourhood Plan Group identified an aspiration for residential development they can choose to opt-in one or more of their settlements as a Community Cluster. They can also request a residential development guideline for one or more of these settlements and Shropshire Council would proactively work with them to provide an indicative figure for the area which could be taken forward within the Neighbourhood Plan itself.</p>

255. It is apparent from this table that the majority of the emerging Neighbourhood Plans focus on a settlement with a proposed residential development guideline within the draft Shropshire Local Plan (these are settlements identified as proposed Strategic, Principal or Key Centres or proposed Community Hubs).

256. The two exceptions to this are:

- a. The Parishes of Adderley, Moreton in Say and Norton in Hales within which the settlements of Bletchley, Longford, Longslow, Adderley, Moreton in Say and Norton in Hales have been identified as a proposed Community Cluster within the draft Shropshire Local Plan. The draft Shropshire Local Plan does not propose to identify specific residential development guidelines for Community Clusters, rather it is proposed that development within them would be managed through a policy mechanism (draft Policy SP9).
- b. The Parish of Sheriffhales which is a predominantly rural area containing a number of small settlements including Sheriffhales village, Heath Hill and Weston Heath. It is proposed that

development within this parish would be managed in accordance with draft Policy SP10.

Infrastructure

ID2 Paragraph 22: *We note that through the consultation undertaken concerns have been raised about the future capacity of healthcare and Police infrastructure to support the planned housing growth, including representations from those providers. Please confirm whether the development requirements arising from the total growth planned across the plan period in respect to these matters have been quantified and included within the viability assessment of the proposed housing site allocations and, if not, please explain the reasons for this. Please confirm whether any cross-boundary concerns regarding hospital capacity remain in dispute? Furthermore, please confirm how the Council's Strategic Infrastructure Implementation Plan has taken these matters into account.*

Shropshire Council Response:

257. Draft Policy DP25 of the draft Shropshire Local Plan outlines the proposed approach to infrastructure provision. It states:

"1. New development should only take place where there is sufficient existing infrastructure capacity available. Where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means.

2. For new development where the Community Infrastructure Levy (CIL) applies, priority will be given to using CIL funds to support any critical or statutory infrastructure requirements resulting from the development.

3. CIL funds derived from specific development which are not required to make the development acceptable in planning terms, will be prioritised according to the infrastructure needs of communities identified in the Shropshire Place Plans and the Local Infrastructure Plan.

4. On proposals where it is considered CIL funds will not be sufficient to meet the specific infrastructure needs of development, consideration will be given to applying additional Section 106 contributions for specific infrastructure items where this meets national requirements for planning obligations.

5. For development where the CIL does not apply, necessary infrastructure improvements will be secured through planning obligations where this meets national requirements."

258. As such, it is considered that there is a clear process to secure the funding necessary to deliver any necessary infrastructure improvements to support appropriate development proposals.
259. The Local Plan Delivery and Viability Study (2020) (**EV115.01**), reflects this proposed approach to the provision of infrastructure. Specifically, the assessment summarised within EV115.01, incorporates the requirement for all residential development to make CIL contributions in accordance with the CIL Charging Schedule, and the potential for S106 contributions of £5,000 per dwelling on sites of 50 or more dwellings.
260. Paragraph 4.224 of the proposed explanation to draft Policy DP25 identifies examples of the types of infrastructure that are likely to be included within the Place Plan stating, "They include a focus on local needs such as highways, flood defences, educational facilities, medical facilities, sporting and recreational facilities and open spaces." As such, there is already reference to the importance of health care infrastructure, which can of course include the critical statutory healthcare infrastructure requirements of the NHS Trusts. Furthermore, a proposed minor (additional) modification to this paragraph also proposes the inclusion of 'emergency service facilities' in this list of examples, positively responding to the representation from the West Mercia Police.
261. Shropshire Council will of course continue to engage with key stakeholders in the delivery of infrastructure (including both relevant services/functions within Shropshire Council and relevant external infrastructure providers) as part of the process of updating the Strategic Infrastructure Implementation Plan (**EV067**) and the associated Place Plans (**EV067.01 – EV067.18**) which are considered live documents.
262. It is important to note that CIL funding must be used on infrastructure (capital projects, although associated revenue spending to maintain those capital items is also permissible) and cannot be used to resolve existing deficits unless needed to support new development. Whilst S106 funding must be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
263. With regard to cross boundary discussions on infrastructure, and in particular in relation to potential impacts on hospital capacity, this matter has subsequently been discussed further between Shropshire and Telford & Wrekin Councils, which have informed the agreed Statement of Common Ground (**EV036**) between the parties, where no matters of disagreement were concluded. It is therefore considered there are no cross boundary concerns on this matter which remain in dispute.

Viability

ID2 Paragraph 23: *In addition to concerns set out above relating to viability we have some additional questions. Firstly, did the Local Plan Delivery and Viability Study - July 2020 (CD EV115.01), assess the submitted Plan or an earlier version of it?*

Shropshire Council Response:

264. The Local Plan Delivery and Viability Study (2020) (**EV115.01**) was completed in July 2020. It directly informed and appraised the proposals within the last Regulation 18 'Plan Making' consultation document (Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (**EV007.01**)).

265. These proposals were the subject of an eight-week consultation commencing on the 3rd August 2020. Following the completion of this consultation the responses received were carefully considered and it was ultimately concluded that proposals with a viability implication for development were generally appropriate.

266. As such, these proposals generally remained the same within the draft Shropshire Local Plan. Therefore, it is considered that Local Plan Delivery and Viability Study (2020) (**EV115.01**) remains relevant and applicable to the proposals within the draft Shropshire Local Plan.

ID2 Paragraph 24: *Secondly, we note paragraphs 12.77 to 12.99 express some concerns about the viability of certain types of development and also make some recommendations. What action has the Council taken as a result of these findings and recommendations?*

Shropshire Council Response:

267. The findings and recommendations of the Local Plan Delivery and Viability Study (2020) (**EV115.01**) have been carefully considered and directly informed the policies and proposals within the draft Shropshire Local Plan.

268. The main findings and recommendations within Paragraphs 12.77 to 12.99 of the Local Plan Delivery and Viability Study (2020) (**EV115.01**) can be summarised as follows:

- a. Recommendations on a geographic split for Shropshire – based on viability zones (Paragraph 12.77(a) and Paragraph 12.91(a)).

- b. Findings regarding the viability of some residential typologies and recommendations on the approach to these residential typologies – consider placing less reliance on these typologies or seek confirmation from site promoters about the sites viability (Paragraph's 12.77(b and c), Paragraph's 12.91(b and c), Paragraphs 12.92-12.93, and Paragraph's 12.96-12.97).
- c. Findings regarding the viability of the 'South Higher' sub-area within the south of Shropshire (the 'South Higher' area is focused on Ludlow, Church Stretton and Bishop's Castle) and recommendations on the approach to this sub-area – consider placing more development within this area (Paragraph 12.77(d), Paragraph 12.91(d), and Paragraph's 12.94-12.95).
- d. Recommendation to consider a review of the CIL Charging Schedule (Paragraph 12.77(e), Paragraph 12.89, and Paragraph 12.91(e)).
- e. Recommendation that Shropshire Council continues to engage with the promoters of strategic sites (Paragraph's 12.77(f), Paragraph's 12.78-12.81, and Paragraph 12.91(f)).
- f. Findings regarding the viability of employment development and resultant recommendations (Paragraph's 12.82-12.86 and Paragraph 12.98).
- g. Findings regarding the viability of retail development (Paragraph's 12.82-12.83 and Paragraph 12.87).
- h. Findings regarding the viability of hotel development (Paragraph's 12.82-12.83 and Paragraph 12.88).
- i. Overarching findings regarding the vibrancy of the property market in Shropshire (Paragraph 12.90).
- j. Overarching recommendations regarding applying a watching brief in relation to Covid-19 and Brexit (Paragraph 12.99).

269. Dealing with each of these main findings/recommendations in turn:

- a. The proposed affordable housing contribution zones within the draft Shropshire Local Plan align with the suggested geographic split - with a lower affordable housing contribution rate proposed for the north compared with that proposed for Shrewsbury and the south.
- b. Shropshire Council has undertaken an extensive site assessment exercise in order to identify proposed allocations for inclusion within the draft Shropshire Local Plan.

These assessments are summarised within Appendices B-T of the Sustainability Appraisal and Site Assessment Environmental Report

of the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan (**SD006.01-SD006.22**) with an interactive map showing the location of sites within Stage 2 of the site assessment process provided as Appendix U of the Sustainability Appraisal and Site Assessment Environmental Report of the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan (**SD006.22**).

As part of the process of finalising conclusions of proposed site allocations, careful consideration was given to the recommendations relating to the approach to specific typologies of residential development (Typology 1 – Green 250; Typology 2 – Green 120, Typology 3 - Green 80 and Typology 4 – Green 60 in Paragraph's 12.77(b and c). Ultimately it was concluded that it was appropriate to retain sites within these typologies.

However, to provide confidence about the delivery of such sites further discussions were undertaken with the promoters of relevant sites to obtain confirmation of their viability. This process is summarised within the Viability Topic Paper (**EV113**).

- c. Whilst it is recognised that the 'South Higher' area has the highest levels of viability, it is considered that the proposed spatial strategy for the distribution of development across Shropshire within the draft Shropshire Local Plan remains appropriate.

The level of development proposed within settlements within the 'South Higher' area has been informed by careful consideration of their role within the proposed spatial strategy; their role within the settlement hierarchy; national policy; existing commitments (including sites with Planning Permission, Prior Approval or allocated within the adopted Local Plan without Planning Permission) and completions already achieved within the proposed Plan period; and each settlement's specific characteristics, constraints and opportunities.

It should be noted that the 'South Higher' area contains one Principal Centre (Ludlow) and two Key Centres (Bishop's Castle and Church Stretton).

As a Principal Centre, Ludlow is already identified as a particular focus for investment, employment, housing and development and will have the key role in providing facilities and services to the Place Plan area, with a residential development guideline of some 1,000 dwellings. However, significant commitments also already exist within the settlement which will be developed during the proposed Plan period.

Bishop's Castle is located within the Clun catchment. Within this catchment a precautionary approach has been taken to the level of development proposed, recognising the concerns regarding the condition of the Clun Special Area of Conservation – further

information on this matter is provided in response to ID1 Paragraph's 25 and 26.

Church Stretton is located within the Shropshire Hills Area of Outstanding Natural Beauty (AONB). As such development proposals must recognise the importance of conserving and where possible enhancing, the special qualities of the Shropshire Hills AONB.

- d. It is important to recognise that the conclusions of the Local Plan Delivery and Viability Study (2020) (**EV115.01**) are reached in the context of the existing Community Infrastructure Levy (CIL) charging schedule. As such, the conclusions within **EV115.01** are not predicated on undertaking a review of the CIL Charging Schedule. Indeed, this is specifically recognised within Paragraph 12.89 of the document.

It is also important to recognise that new development should only take place where there is sufficient existing infrastructure capacity available or where necessary improvements are made to any shortfall in infrastructure provision that exists. In Shropshire an important mechanism for securing the infrastructure necessary to support new development is CIL.

Indeed, draft Policy DP25 of the draft Shropshire Local Plan explains that where CIL applies to new development, priority will be given to using this CIL to support critical or statutory infrastructure requirements resulting from the development. It also proposes that other forms of developer contributions will only be considered where the CIL associated with the development is insufficient to meet the specific infrastructure needs of the development.

However, consistent with the recommendations of paragraph 12.77(e) **EV115.01**, Shropshire Council will continue to monitor the viability of development and reserves the right to undertake a CIL review in the future if one is considered necessary.

- e. Shropshire Council is committed to working proactively with the site promoters and developers of all proposed allocations, including those considered strategic sites, to ensure that they deliver sustainable development which meet the needs of our communities and is consistent with the proposed requirements of the draft Shropshire Local Plan.

We would note that the proposed approach to infrastructure contributions in draft Policy DP25 (documented above) equally applies to strategic sites. We would also note that as part of the process of considering the viability of proposed allocations, further discussions with the promoters of relevant strategic sites was undertaken to obtain confirmation of their viability. This process is summarised within the Viability Topic Paper (**EV113**).

- f. The findings and recommendations of the Local Plan Delivery and Viability Study (2020) (**EV115.01**) for employment development and investment in Shropshire are acknowledged.

The draft Shropshire Local Plan has been prepared in response to these circumstances and the draft strategic policies now encourage a broader spectrum of developments to support the Economic Growth Strategy to facilitate local economic growth.

The draft strategic policies set an ambitious employment development target supported by a land supply sufficient to offer choice and competition in the market. This employment development requirement and the land supply both favour principal urban centres with proven demand, strategic corridors through the County with good connectivity and accessibility and now offer a more equitable distribution including the more viable areas to the centre, south and east of the County. This proposed approach also recognises that more provision closer to the metropolitan areas can now support some unmet metropolitan need, which will build on the potential of the County to attract more investment demand and labour into Shropshire.

The proposed spatial strategy is supported by a comprehensive investment and business support service now led by an Economic Recovery Taskforce established to guide both the recovery and response to Covid-19 and to Brexit. This partnership has initiated the review of the Economic Growth Strategy and is assisting the 'Invest in Shropshire' brand to deliver a stronger business support programme. The Council takes a lead role in these initiatives to intensively promote the County, offer a broader range of business support services and undertake a more intensive delivery programme.

These direct services to business are now supported by an investment programme to deliver modern, managed employment floorspace to the market. The Council now delivers investment to undertake a much needed speculative development role in the market. This investment programme is bringing new sites to the market, delivering serviced development plots and offering managed floorspace to known end users.

The economic spatial strategy is therefore expressed through the Economic Growth Strategy and the Submission Local Plan to address the circumstances limiting the economic potential of the County.

Shropshire Council can also confirm that it has applied caution when setting policy requirements for employment development that would impact on viability. Such requirements are limited to circumstances where they are considered necessary in order to ensure that development meets the needs of our communities and end users now and in the future; and that they contribute towards

the wider vision, spatial objectives and spatial strategy proposed for Shropshire.

- g. No specific sites are proposed to be allocated for retail development within the draft Shropshire Local Plan.

Large format retail development is in any event shown to be viable.

On some of the larger proposed residential allocations, a local centre may be required in order to provide future residents with convenient access to services and facilities and maximise the overall sustainability of the site. Where this is the case this provision will include smaller format retail units. However, it is considered that the wider site will cross-subsidise any such provision. This approach is supported by the conclusions reached within the Viability Topic Paper (**EV113**).

- h. No sites are allocation for hotel development within the draft Shropshire Local Plan. Such development is in any event considered to be viable.
- i. It is important to recognise that there is a vibrant and active property market in Shropshire. The recommendations within EV115.01 have been carefully considered in formulating the proposals within the draft Shropshire Local Plan.
- j. Shropshire Council will monitor the implications of Covid 19 and Brexit. It is likely that these factors may inform decisions regarding the need for and scope of any future Local Plan Review.

Green Belt

ID2 Paragraph 25: *Having looked further at the evidence in relation to the release of Green Belt land, it would be helpful if your Green Belt topic paper could also include a comprehensive list of all alterations made to the GB in the plan. This should include:*

- *Land removed from GB to allocate for development proposed in the plan;*
- *Land removed from GB to safeguard for potential development beyond the plan period;*
- *Land added to GB to protect from development;*
- *Land added or removed from GB to reflect physical changes, correct cartographical errors etc; and*
- *Any other alterations to GB.*

Shropshire Council Response:

270. This information is provided within the Green Belt Topic Paper submitted alongside this response.

Minerals and Waste

ID2 Paragraph 26: *We have read the helpful technical background papers on minerals and waste. In terms of aggregate minerals, it would be helpful if you could complete the following table, using the formulas in the right-hand column.*

Reserves with planning permission	A
Annual demand forecast	B
Demand over plan period	$B \times \text{plan period} = C$
Landbank	$7 \times B = E$
Requirement over plan period (demand plus landbank)	$C + E = F$
Balance to be found in Plan	$F - A$

Shropshire Council Response:

271. As requested, the above table has been completed:

Table 9: Aggregate Minerals Information

Details	Calculation	Million Tonnes
Reserves with planning permission	A	13.5
Annual demand forecast	B	0.85
Demand over plan period	$B \times \text{plan period} = C$	17
Landbank	$7 \times B = E$	5.95
Requirement over plan period (demand plus landbank)	$C + E = F$	23
Balance to be found in Plan	$F - A$	9.5

272. Table DP30.1 of the draft Shropshire Local Plan references 4.0mt of capacity on proposed 'saved' allocations from the adopted SAMDev Plan and 10.5mt of capacity from windfall sites, which together significantly exceed the required 9.5mt balance documented within the above table.