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SHROPSHIRE CORE STRATEGY FINAL PLAN: REPORT OF REPRESENTATIONS AND PROGRESS TO SUBMISSION STAGE

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Summary

The Core Strategy is the key strategic plan that drives Shropshire's sustainable development, economic recovery and response to climate change. It sets out the framework for public and private investment. This report sets out the Council's responses to the issues arising from the recently completed 'Final Plan' representations stage on the Shropshire Core Strategy, alongside consideration of the potential impact of the recent Government announcement revoking the Regional Spatial Strategy as the 6th July. It is imperative that progress towards early adoption of our Core Strategy is maintained in order to replace increasingly outdated former local plans and to establish our locally-generated development plan and 'bottom-up' planned approach for Shropshire.

Recommendations

- A. That Council approves the Schedule of Proposed Changes for submission to the Secretary of State alongside the Final Plan in July for Public Examination later this year.
- B. That authority is delegated to the Director of Development Services in consultation with the Portfolio Holder for Strategic Planning and Transport to approve any further minor amendments to the Schedule prior to submission.
- C. That Council agrees that progress on the Shropshire Core Strategy is maintained as recommended by the government in revoking the Regional Spatial Strategy and that the Core Strategy is submitted for Examination in July.

Report

1. The Core Strategy is the principal document in the Local Development Framework LDF that will guide future development in Shropshire over the

next 15-20 years. The Core Strategy is a high level, strategic document that must be grounded in the Sustainable Community Strategy. It will set out a distinctive spatial vision and strategy for Shropshire to 2026.

2. The Core Strategy sets out the vision, objectives and approach to planning policy in Shropshire by closely aligning with the Sustainable Community Strategy as well as other strategies such as the Housing Strategy and the Local Transport Plan that influence the way land is used, managed and developed. We have worked so far to a very challenging timetable to comply with the statutory process and produce a "sound" Core Strategy for adoption in March 2011. It is imperative that the Core Strategy is in place as soon as possible, in order to replace the increasingly outdated former local plans.
3. The Final Plan was published for a 6 week period beginning on 15 February in line with the timetable set out in the approved Local Development Scheme. Due to the extensive engagement at earlier stages the aim of this statutory stage, rather than draw out finely detailed objections, was to elicit representations on the 'soundness' of the Core Strategy. These should consider whether it is 'justified' i.e. founded on a robust and credible evidence base; it is 'effective' i.e. that it can be delivered; it is legally compliant; and it is consistent with national policy.
4. A total of 525 representations were received from 107 organisations, reflecting the engagement throughout the process and the delivery of a Final Plan that responded to the views submitted during the earlier stages of consultation and engagement. There were also a number of 'comments' received, seeking in the main, to clarify elements of the Final Plan rather than questioning its 'soundness'.
5. The Town and Country Planning Regulations now stipulate that Local Planning Authorities must analyse the representations received and produce a list of key issues for the Planning Inspector and how the Council wishes to react to them (proposed changes). The Council must also consider whether the representations raise any issues of 'soundness' or whether they require any fundamental changes to the approach adopted by the Core Strategy. This process is intended to deal with issues of 'soundness' and proposed changes should relate to representations raised by stakeholders. In practice however some changes are proposed in response to changing guidance and as the Council's approach has crystallised particularly to delivery, and such changes would improve the 'soundness' of the Core Strategy.
6. In order to make consideration of the issues and proposed changes easier Appendices A and B are attached to this report. Appendix A sets out a summary of the key issues and proposed responses; whilst Appendix B is a schedule of precise wording changes. A complete list of the key issues raised – some 350+ pages - has been placed in the members' library as Appendix C.
7. The informal LDF Member Group have met twice to consider the representations and proposed responses on 26th May and 10th June. Members endorsed both the proposed changes and to continue to

submission in July of the Core Strategy in response to the abolition of Regional Spatial Strategies (RSS).

Main Issues Arising.

8. The vast majority of representations focus on whether the Core Strategy is 'justified' and 'effective'. It is recognised that the Core Strategy process has complied with the legal requirements of the 2004 Act so no representations have been received on this basis. Some minor editing and up-dating of references to recent Planning Policy Statements will mean increased consistency with national policy.
9. Many representations, particularly those to policy CS1 Strategic Approach, CS2 Shrewsbury, and CS3 Market Towns and Other Key Centres reflect a desire to see a different strategy in place or for different levels of house building. However this does not in itself constitute a representation on the 'soundness' of the Core Strategy so representations have focussed on the credibility of the evidence base and the ability of the Core Strategy to deliver the chosen approach on 'the ground' especially in relation to delivery of new infrastructure.
10. Representations concerning the credibility of the evidence base and delivery can be rebutted because we are confident in our evidence base and the delivery framework set out by the Core Strategy and the Regeneration Prospectus and the emerging importance of its 'Place Based' approach set out in the LDF Implementation Plan. In relation to these issues the proposed changes therefore focus on improving the evidence base in relation to development viability, seeking further clarification from the Environment Agency to improve the Water Cycle Study, continuing joint work with the Highways Agency on A5 junction improvements, and preparing a Minerals Technical report. In terms of delivery issues the proposed changes focus on clarifying and strengthening reference to the LDF Implementation Plan; to implementation through the approach we intend to adopt in our Site Allocations and Development Management (SAMDev) document; and additional Supplementary Planning Documents following the Core Strategy on certain specific issues such as Sustainable Design or Surface Water Management.
11. Appendix B shows that of the 20 policies in the Core Strategy a number of the policies require little or no change in response to representations. Policies CS2, CS6, CS7, CS8, CS9, CS10, CS13, CS14, CS15, CS16, CS17, CS18, CS19, and CS20 require only very minor changes to the policy wording, the supporting text to provide further clarification or emphasis or to correct typographical errors. In some cases additions have been made to the evidence base as previously 'draft' studies have been published or updated, whilst some additional monitoring indicators have also been added.
12. Very modest changes are also proposed to the remaining policies: CS1, CS3, CS4, CS5, CS11 and CS12 and their supporting text. However these changes whilst modest in themselves do have a greater impact. As these policies are largely concerned with the overall strategy, and development of

new housing, they naturally accounted for the majority of the representations.

- a. In CS1 the noteworthy proposed change is designed to deliver greater flexibility to the housing target in the light of the abolition of RSS. It is proposed to amend the policy text to read “*up to 27,500 new homes if required*”. (See below paragraphs 15 – 20.)
 - b. In CS3 a number of changes to supporting text are proposed to clarify implementation and delivery issues and to improve the descriptions of each town and key centre. Again the noteworthy change is to deliver an element of flexibility over potential new housing development, this time in response to representations around the smaller towns and key settlements where this is set out in Table 2, it is proposed to change the final column to read “*less than 500 homes*” rather than 200 -500 homes.
 - c. For CS4 the proposed changes to supporting text seek to clarify our approach to rural settlements and how and where development can take place in settlements that have come forward as Community Hubs or Community Clusters. An additional important proposed change is to recognise the importance of Village or Town Design Statements alongside Parish Plans. Representations to CS4 also highlighted the need for definitions of ‘Housing for Local Needs’ and ‘Local Needs’ and proposed changes to the Glossary will set these out.
 - d. CS5 and CS11 need to be considered together as they set out our policy to conversions of rural buildings in the countryside (‘barn conversions’). The proposed changes to CS5 are to recognise the importance of heritage issues and to link with policy CS11 to seek contributions to infrastructure alongside affordable housing. Policy CS11 was heavily criticised for seeking further additional contributions for affordable housing from rural conversions, the proposed change is to remove this requirement so that the level of contributions is the same as that sought from new housing generally.
 - e. The proposed changes to CS12 deliver greater consistency with current government policy and recognise the important contribution to Gypsy and Traveller accommodation needs that could be made by smaller sites by deleting reference to “larger sites (5 pitches and over)”.
13. Additional minor changes are also proposed to other sections of the Core Strategy; the Introduction, Spatial Portrait, Spatial Vision and Strategic Objectives; for emphasis and consistency particularly between the Key Diagram and the Spatial Zone maps. Similarly changes are proposed to rectify typographical errors.

Submission

14. The Core Strategy and all supporting documents including the evidence base and representations received on the Final Plan stage are to be submitted to the Secretary of State by 30 July for Public Examination by a

Planning Inspector. It is anticipated that the Examination will be in late October or November this year. The Council will then include any changes as required by the Inspector in his Report and adopt the Core Strategy by March 2011.

Abolition of Regional Spatial Strategies (RSS)

15. The Secretary of State for Communities and Local Government announced on 6th July that Regional Strategies have been revoked, with decisions on housing supply to rest with local planning authorities without the framework of regional numbers and plans. However, the RSS Phase 2 Revision evidence base and subsequent Examination Panel recommendations remain material considerations when preparing a Core Strategy.
16. The figures proposed in the Core Strategy; 27,500 (1375 pa) new homes for the period 2006-2026 are those recommended by the Panel which carried out the independent Examination of the Phase 2 Revision of the RSS in 2009. These represent a slight increase on figures published in the 'Preferred Options' document published by the West Midlands Regional Assembly in December 2007 which were 25,700 dwellings (1,285 p.a.) for 2006-2026. (Attached as Appendix D is the recent briefing note sent to all members, setting out the technical background to the housing numbers in the Core Strategy).
17. The figures for Shropshire are very much what the Shropshire local authorities, taking the views of the communities and stakeholders of Shropshire into account, wanted and worked hard to achieve – so, in Shropshire's case, the targets reflect local needs, demands and aspirations for growth and do not represent the imposition of unwelcome or undeliverable levels of development. The pre-unitary authorities worked together and argued for an increase and agreed to a figure of 1,285pa (25,700) to 2026. An additional 1,900 overall was added to this by the Panel specifically to help Shropshire deliver its ambitions towards rural affordable housing, taking the total to 1,375 p/a or 27,500 in total.
18. It is considered that the target proposed in the Core Strategy remains reasonable, realistic and appropriate to help to address the needs of Shropshire. These figures are comparable with the average of about 1,200 p/a that Shropshire has consistently delivered in past years, especially taking into consideration the recent slow down in house building in Shrewsbury.
19. The increase in the proposed target from 25,700 additional dwellings to 27,500 dwellings is not significant over a 20 year period across the whole of Shropshire, and policies in the Core Strategy relating to the release of land for housing provide the necessary safeguards and flexibility to manage future development appropriately. Policies (particularly Policy CS11) will also address the mix, type and affordability of housing, issues which are as important as quantity and location. To clarify that this is a target for the LDF to respond to flexibly given the changing circumstances and emerging evidence (in the shape of 2008 based population and household projections)

over the life of the plan, the wording of Policy CS1 of the Core Strategy is proposed to be changed so that it reads “*up to 27,500 new homes if required*”.

20. The number of sites to be sought for Gypsy and Traveller accommodation in Shropshire is also laid out in RSS. RSS proposed as part of the Phase 3 Revision that Shropshire should provide 93 residential pitches and 1 site for Travelling Show people. These figures are in direct correlation with the research and evidence base the Council has derived from the Sub regional Gypsy and Traveller Accommodation Assessment (GTAA) and should be achievable and deliverable within the timescale through the SAMDev document of the LDF. Again this should be seen as a target that requires a flexible approach through the LDF process in response to changing circumstances and evidence.
21. It is important, in order to drive our sustainable development, economic recovery and response to climate change, to have an up-to-date consistent planning policy framework in place across Shropshire as the existing ‘saved’ Local Plan policies become increasingly out-dated and obsolete. The Council is working hard to engage with local communities to agree the scale and location of future development, with an initial consultation period ending on 25th June.
22. The removal of the Regional Spatial Strategy does not affect this important work to guide development in Shropshire’s towns, villages and rural areas - Shropshire Council’s approach is very much about responding to the wishes of communities in working with them to identify the role they wish to play in the future development of Shropshire.
23. At submission stage, when stakeholders are notified, we will take the opportunity to communicate, in particular with Parish and Town Councils, the reasons for continuing to submit the Core Strategy whilst explaining the implications for SAMDev and drawing other issues together such as impending consultation on the draft Statement of Community Involvement.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Shropshire Core Strategy Final Plan

Human Rights Act Appraisal

The recommendations contained in this report are compatible with the provisions of the Human Rights act 1998

Environmental Appraisal

The Core Strategy has been subject to full Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitat Regulation Assessment under EU law at the earlier Final Plan stage.

Risk Management Appraisal

If the Core Strategy is not submitted there will be considerable delay in delivering a consistent Shropshire wide planning framework to replace out-of-date Local and Structure Plan policies. Delay to the Core Strategy would hold up preparation of the SAMDev document of the LDF and undermine delivery of the Councils objectives and priorities especially those in the Sustainable Community Strategy.

Community / Consultations Appraisal

The Final Plan stage was the fourth point at which views were sought from the community and stakeholders in the development of the Core Strategy. All stakeholders will be notified of the submission of the Core Strategy including proposed changes.

Cabinet Member

Martin Taylor-Smith

Local Member

All

Appendices

Appendix A: Summary of Key Issues raised and Proposed Responses

Appendix B: Schedule of Proposed Changes

Appendix C: Complete Schedule of Issues Raised (200 pages – copy in Members Library)

Appendix D: Member briefing note: Shropshire's Future Housing Supply