APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS1 Strategic Approach

Summary of key issues:

1. **27,500 housing requirement**
2. **Proportionate split between Shrewsbury, the market towns and rural areas**
3. **Settlement hierarchy**
4. **Spatial Zones**
5. **Key diagram**
6. **Affordable Housing**
7. **Reference to table 1**
8. **Reference to Telford**

Proposed course of action:

1.   27,500 housing requirement

Some objectors consider that the housing figure should be higher, reflecting household projections of an increase of 29,500 households over 2006-2026. The Core Strategy figure of 27,500 (equivalent to 1,375 per annum) reflects the RSS requirement, which in turn reflects the agreed regional policy of discouraging migration to the shires in order to encourage regeneration of the metropolitan areas. It also reflects the views of the pre-existing District and Borough Councils in Shropshire, who agreed with the figure, having argued successfully that the previous figure of 900 new homes each year would not meet our needs and would harm the economic and social balance of the area. The figure of 27,500 has been thoroughly tested already through an extensive public examination into the RSS Phase 2 Revision (April-June 2009) and provides a robust strategic position on which to develop more detailed place sensitive plans for Shropshire. However, given the Government's stated intention of removing regional housing targets, it is proposed to make clear that the figure in Policy CS1 is a guiding target for Shropshire to respond to flexibly given the changing circumstances we will face over the life of the plan. Consequently it is proposed to amend "around 27,500 new homes" to "UP TO 27,500 new homes IF REQUIRED".

The possible 1,000 dwellings for military personnel, if required, is not included in the figure of 27,500. It is proposed to make this clearer by inserting at the end of paragraph 4.13, "They are not included in the Shropshire total in the first sentence of Policy CS1."

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2.   Proportionate split between Shrewsbury, the market towns and rural areas

Concerns are raised that 35% is too high a percentage for the rural area and will cause difficulties in meeting the total housing requirement. Allied to this is a view that Shrewsbury's target of "up to 25%" should be "approximately" or "at least" or higher than 25%. In response, it should be remembered that the results of consultation on Issues and Options in January 2009 were largely negative towards concentrating more development in Shrewsbury. There was a clear preference for the rural rebalance and market town regeneration options, which are consequently reflected in the Core Strategy Final Plan's spatial objectives and in the proportions given in Policy CS1. This justifies the retention of "around 35%" for the rural area.

It should be noted that 55% of residential development over the period 1998-2008 took place in the rural area outside Shrewsbury and the 8 market towns of Oswestry, Ellesmere, Wem, Whitchurch, Market Drayton, Bridgnorth, Shifnal and Craven Arms (see the "Analysis of development, demographic and economic trends over 1998-2008 Background Paper). This suggests that "around 35%" in the rural area is both realistic and directs more development than previously to the market towns.

Although the proportions are considered both appropriate and deliverable, nevertheless some flexibility is desirable, particularly given Shrewsbury's growth point status. Consequently it is proposed to change "up to 25%" for Shrewsbury to "approximately 25%".

3. Settlement hierarchy

Some objectors consider that the Local Centres proposed in the "Policy Directions" document in August 2009 have been unjustifiably removed. Concern is expressed that the approach to the rural areas will result in unstructured approach to sustainability that could produce a dispersed distribution of services and reduced overall sustainability. They would favour a sustainability matrix to assess every settlement coming forward and/or the identification of all Local Centres, Community Hubs and Community Clusters.

The local centres proposed in the Policy Directions were removed from the Final Plan publication as there was insufficient evidence of community aspirations, as are being sought for Community Hubs and Community Clusters. Furthermore, although there were various surveys of services and facilities undertaken by the former district and borough councils, these are not on a consistent basis across Shropshire. Consequently there is insufficient evidence for identifying local centres based on settlements' service centre roles, unlike the market towns and other key centres where evidence of their role is stronger. In any event, a policy decision was taken that local centres should reflect local aspirations and therefore were in the same category as Community Hubs.

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Although not naming smaller settlements in the Core Strategy might be considered risky with regard to certainty of delivery, this is unavoidable given a community-led approach, which necessitates a detailed programme of engagement with local communities. This is more appropriately carried out through the SAMDev rather than the Core Strategy. Past development rates indicate that delivery of at least 35% of development is highly likely. Furthermore, the Strategic Housing Land Availability Assessment shows that there is no shortage of land being put forward for development in the main settlements in the rural areas. With regard to sustainability, see response 3 to Policy CS4 objections. No change is proposed.

Other objectors suggest that the larger market towns should be treated separately and not absorbed into a single "market towns and other key centres" category. In fact, larger market towns are treated differently in the Core Strategy Final Plan, as is evident in the detailed wording of Policy CS3, Policy CS15 and table 2. No change is proposed.

4. Spatial Zones

A number of objectors would like to see specific boundaries for the spatial zones, to provide certainty and aid monitoring. However, overlapping spatial zones provide the Core Strategy with an essential element of flexibility, in accordance with PPS12. The SAMDev consultation uses local joint committee (LJC) boundaries to approximate the spatial zones for the purposes of consulting on broad options for development to meet policies CS1 and CS3. This approach (and any subsequent variation of it) ensures that each settlement is not counted in more than one spatial zone. However, the LJC boundaries may change over time, particularly as LJCs are subject to review as part of the Unitary Council's "transformation agenda", and therefore no change is proposed to the current flexible zones. Minor change proposed to the "Delivery and Monitoring of Policy" box – add to the first two indicators, "and also disaggregated by spatial zone".

Some objectors query the targets for residential and employment development in each zone, as inconsistent with the RSS requirement for the former local authority areas and lacking justification. In fact the "Development, Demographic and Economic Trends 1998-2008 technical paper" addresses this point. It is proposed to split item 11 under "Key Evidence" to make it clearer that this is a separate document.

It is also argued that the spatial zone targets are incompatible with the proportionate split given in first half of policy. Upon examination, this argument does not stand up. There can be no incompatibility between the first and second halves of policy CS1, as the first half of the policy applies to the whole of Shropshire. It is not necessary for the proportions of 25%, 40% and 35% from the first half of the policy to be applied evenly in each spatial zone. No change is proposed.

Others argue that the balance of development between larger and smaller settlements in each zone is a strategic matter that should be in Core Strategy. In response, it can be argued that the detailed balance between large and small settlements in each spatial zone is dependent upon

consultation on site allocations in market towns and on community-led suggestions for Community Hubs and Clusters, both of which can only occur through the detailed SAMDev process. No change is proposed.

One objector suggested that the latter half of Policy CS1 should give proportions rather than a quantity of development for each spatial zone. The reason that numbers rather than proportions are used is for clarity in expression, and because the proportions differ between residential and employment land requirements in each zone. No change is proposed.

Finally, some objectors consider that the policy is too specific and inflexible, and does not allow for changing needs and requirements, for example if one zone meets its target in advance of 2026. In fact the policy seeks a balance between flexibility on the one hand and providing a measure of certainty on the other. If development in one zone is significantly different from the policy, it will trigger a review of the Core Strategy. Similarly a review would be expected to occur if there were a significant change in circumstances, or when development approaches the figures in CS1. No change is proposed.

5. Key Diagram

One respondent suggested that the principal Market Towns referred to in Policy CS15 should be identified on the Core Strategy Key Diagram. This seems eminently sensible, and it is proposed that the five towns affected are identified by a different symbol or colour with the accompanying legend distinguishing between, "Market Towns that are Principal Centres" and "Market Towns & Other Key Centres that are District Centres."

Another respondent would like the Green Belt boundary to be shown more precisely, so that it is evident that there is non Green Belt land (ie. safeguarded land) around some of east Shropshire's towns, for example around Shifnal. It is proposed to amend the key diagram to identify more clearly safeguarded land as distinct from Green Belt.

6. Affordable Housing

Objectors claim there is a lack of evidence to justify the target for Affordable Housing in Policy CS11, so Policy CS1 should not specify 9,000 affordable homes. On the contrary, there is ample evidence of affordable housing need in both the Strategic Housing Market Assessment (Outside Consultants 2008) and the Local Housing Market Assessment (Shropshire Council July 2010). Although viability is a problem in the current market, it is reasonable to anticipate an improvement in the housing market over the course of the plan period. The target of 33% homes in Policy CS11 is considered both reasonable and deliverable over the plan period. However, given the proposed change to the

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housing figure, it is proposed to replace "9,000" with "33%" in the first sentence of Policy CS1, to read, "of which 33% will be affordable housing".

7. Reference to table 1

A comment was made that table 1 should be referenced in text of Core Strategy. This inadvertent omission will be amended by adding at the end of the penultimate sentence in paragraph 4.6, "as summarised in table 1."

8. Reference to Telford
One objector considered that Telford's overwhelming influence on parts of county has not been recognised in Policy CS1. She proposes additional wording to CS1 "The character and tranquillity of settlements in close proximity to Telford will be protected against potential pressures for over-development". This is not considered necessary, as the Green Belt and countryside policies (Policy CS5) and the Market Towns and Other Key Centres Policy (Policy CS3) provide protection from pressure from Telford. Cross boundary issues are also covered in the spatial portrait and under policy CS3. No change is proposed.

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CS2 Shrewsbury Development Strategy

Summary of Key Issues
1. **Ensuring adequate housing provision in Shrewsbury**
2. **Priority for release of housing land in Shrewsbury**
3. **Sustainable Urban Extensions – definition, need, suitability, level of housing provision, linked infrastructure provision.**
4. **Brownfield target**
5. **Priorities within Shrewsbury Northern Corridor**
6. **Transport evidence base**
7. **Waste water treatment evidence base**
8. **Other issues – infrastructure provision (emergency services), the importance of natural and historic environment and conformity with Regional Spatial Strategy in terms of Shrewsbury's role and transport objectives.**

Proposed course of action:

1. Ensuring adequate housing provision in Shrewsbury
Minor change
A number of representations relate to the expression of the housing target for Shrewsbury as 'up to' 25% of the County total, arguing that the figure should be a minimum. One respondent seeks a target of 40%. However, Shrewsbury's housing figure can not be unlimited in terms of the balance of development across the County and balance between housing, employment and infrastructure provision, and relationships between centres/sub-regionally (including conformity with the Regional Spatial Strategy whilst this remains part of the Development Plan), while some degree of certainty is needed in order to inform allocations in the Site Allocations and Management of Development (SAMDev) DPD. It is proposed to amend the wording to 'approximately 25% (up to 6,500 dwellings – 325 dwellings per annum)' to indicate an element of flexibility in the proportion of the County's development consistent with Policy CS1, but certainty on the upper limit of development. It should be noted that the actual target number could potentially change if the total County requirement changes as new forecasts of needs and demands become available.

2. Priority for release of housing land in Shrewsbury
No changes to Final Plan
Promoters of greenfield sites other than land forming part of the sustainable urban extensions consider that there should be priority and greater emphasis on the proposed smaller-scale   reenfield land releases in order to ensure delivery. One respondent seeks greater prioritisation for brownfield sites. It is considered that the Core Strategy approach is appropriate and robust, providing both the certainty for

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the planning and delivery of the sustainable urban extensions and the scope to ensure land supply required throughout the Plan period by using the smaller-scale sites, which are inherently a more flexible source of supply, as the balancing element for both brownfield development and the sustainable urban extensions. Therefore no changes are proposed to the stated priorities and approach.

3. Sustainable Urban Extensions – definition, need, suitability, level of housing provision, linked infrastructure provision.
Minor changes
Whilst 'sustainable urban extension' is considered to be an accepted term, a minor change is proposed to the first sentence of Paragraph 4.20 of the Explanation to add '….and, importantly, provide scope for high quality, comprehensively planned, integrated development embracing principles of sustainable development and communities.'

In response to representations received, to provide greater clarity on the amount of development planned, it is proposed to set out indicative housing and employment land provision figures for the two sustainable urban extensions drawn from their indicative masterplans/Delivery Statements and to refer to the indicative masterplans/Delivery Statements in the Key Evidence section of Policy CS2. These figures will be included in the relevant sections on the Policy (6th bullet point) and Explanation (paragraph 4.210, as follows:
Shrewsbury South:
- approximately 900 dwellings to the north and south of Oteley Road;
- expansion of Shrewsbury Business Park: approximately 4 hectares of employment land;
- new strategic employment site on land adjoining Shrewsbury Town Football Club: approximately 22 hectares.
Shrewsbury West:
- approximately 700 dwellings to the north of Welshpool Road;
- approximately 12 hectares of additional employment land.

For the Shrewsbury West sustainable urban extension, the linkage to the Shrewsbury North West Relief Road is the primary concern raised. A number of respondents assume that the urban extension is dependent on the delivery of the whole SNWRR, which is uncertain. However, the Council's position is that the urban extension is not dependent on the completion of the SNWRR, but that the it delivers a leg of the route which is desirable in its own right. There is, therefore, no uncertainty and the Delivery Statement will set out timescales.

For the Shrewsbury South sustainable urban extension, the issues are more to do with the suitability of parts of the area and the potential constraints on housing yield. Again the Delivery Statement and indicative masterplans will provide the evidence to counter these concerns. However, it is proposed to make a minor wording change to amend the reference to A5 junction improvements to 'A5 junction improvements, if needed, and sustainable transport measures,…' to reflect that the need for A5 junction improvements specifically linked to

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the Shrewsbury South sustainable urban extension is not yet clear, with assessment work being taken forward jointly with the Highways Agency, formalised through a Memorandum of Understanding.

Alternative sustainable urban extensions are promoted in the south east and south west Shrewsbury. The Council considers that the choice of Shrewsbury West and Shrewsbury South as the sustainable urban extensions is supported by robust evidence and alternatives are not required.

4. Brownfield target
No changes to Final Plan
One representation argues that the brownfield target for Shrewsbury is too high (a figure of 60% is set out in the Explanatory text, equating to 3,900 dwellings). This figure is considered appropriate, has regard to national/regional planning policy objectives (including conformity with the Regional Spatial Strategy whilst this remains part of the Development Plan), and is achievable having regard to the evidence base of identified sites and past rates. No changes are proposed to this element of the policy.

5. Priorities within Shrewsbury Northern Corridor
No changes to Final Plan
One representation raises issues regarding the approach to sites and spatial planning in the Northern Corridor, including suggesting that the Ditherington Flaxmill site should not alone be identified. It is considered that the importance of the Flaxmill site is such that it should be identified in the Core Strategy. No changes are proposed to Policy CS2.

6. Transport evidence base
Minor changes
Evidence base issues raised by the Highways Agency are being addressed by ongoing work, with a Memorandum of Understanding in place. No changes are proposed to Policy CS2, other than the minor wording change to amend the reference to A5 junction improvements with regard to the Shrewsbury South sustainable urban extension (see 3. above), and the inclusion of additional consultants' reports on transport issues and the indicative masterplans and Delivery Statements for the two urban extensions in the Key Evidence section of Policy CS2.

7. Water cycle evidence base
Minor change

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Evidence base issues raised by the Environment Agency are being addressed by ongoing work and liaison with Severn Trent Water and the Agency. No changes are proposed to Policy CS2 apart from a minor wording change to the explanatory text to include reference to environmental infrastructure in paragraph 4.27 of the explanatory text.

8. Other issues
Minor change
Infrastructure provision (emergency services) – minor change proposed to include reference to the emergency services in Paragraph 4.27 of the Explanation following representation from West Mercia Police, but it is not considered appropriate to make specific reference in the Policy.
No changes to Final Plan
A concern raised by CPRE regarding the importance of natural and historic environment is not considered to require a change to the Final Plan in view of references already made in the Policy and the Explanation. A positive comment regarding conformity with Regional Spatial Strategy in terms of Shrewsbury's role and transport objectives from the West Midlands Regional Assembly (before its demise) is noted.

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CS3 The market towns and other key centres

Summary of key issues:

1. **Role of centres**
2. **Scale of development**
3. **Infrastructure**
4. **Much Wenlock**
5. **Other text amendments**

Proposed course of action:

1. – **Role of centres**
There are objections to the inclusion of Minsterley & Pontesbury and the dropping of the "local centres" category. Objectors query the basis for inclusion of some small settlements in Policy CS3, and not others (also see Policy CS4 objections to not naming certain villages as "local centres", as occurred in the "Policy Directions" Core Strategy).

Paragraph 4.28 provides the justification for each settlement's inclusion in policy CS3, and by implication the non-inclusion of others, in the following text: "The market towns and other key centres are identified by their role and sphere of influence, both existing and potential, not simply by their size and their scope for future development. They are, and could be stronger, focal points for local transport networks, employment opportunities and services…." It is accepted that greater reference is needed to the evidence base behind this statement. Consequently, proposed changes are to add under "Key Evidence" *"Local Economic Assessment Market Towns Profiles"* and *"Shropshire Local Transport Plan"*.

Community hubs and clusters will provide opportunities for other settlements to fulfil a local role – see Policy CS4 Proposed course of action 1.

2   Scale of development
Some objectors argue that much greater clarity is needed on how much development is required in each town, and indeed what sites will deliver this. Shropshire's approach is that this is a matter for the SAMDev. No changes are proposed.

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Objectors have queried whether there are sufficient sites to deliver the proposed level of development in CS1. In addition to the SHLAA sites within existing development boundaries, there are plenty of greenfield site options around every town. We therefore have confidence that the CS1 totals can be achieved across the market towns in each spatial zone. No changes are proposed.

To clarify deliverability in East Shropshire, it is proposed to add asterisks to Shifnal and Albrighton in table 2, and insert underneath the table: *"*not including military needs".*

To address the concern that the minimum level of growth of 200 homes is too high, change the last column of table 2 from 200-500 homes to "< 500 homes".

To address confusion over whether table 2 is part of the policy or part of the Explanation, table 2 will be relocated to after paragraph 4.31.

To ensure that housing numbers do not eclipse the vital role of economic regeneration, insert "housing" before "development" in the last sentence of paragraph 4.31 and add at the end of the sentence, "An indication of economic development is provided in Policies CS13, CS14, CS15 and CS16."

3.   Infrastructure

Objectors wished to see greater recognition of infrastructure capacity constraints. Policy CS3 already qualifies development in market towns to be "of an appropriate scale and design that respects each town's distinctive character and is supported by improvements in infrastructure…." The inevitable consequence is that development that exceeds the town's infrastructure capacity would only be allowed if it is accompanied by improvements that help to resolve the problem. As this addresses the point raised with regard to infrastructure capacity, no change is necessary in this regard. However, it would be helpful to provide more explanation as to how infrastructure improvements will be delivered. Consequently, a proposed change is to add, at the end of paragraph 4.30, *"Detailed investment and infrastructure programmes are contained in the LDF Implementation Plan, which is updated regularly."* Other changes are proposed under Policy CS9.

4.   Much Wenlock

Concerns have been raised about the influence of Telford, with objectors wishing to protect Much Wenlock from pressure to become a dormitory suburb. Objectors consider that the indicative scale of development in table 2 is too high and does not reflect the Town Plan, representations made in October 2009 and previous work, such as the Bridgnorth District Local Plan's Inquiry (2004-5) when the Inspector considered that a 120 dwelling site was too much for the town, given its current congestion and parking problems. It is noteworthy that the Inspector also considered that Much Wenlock should remain a "Key Settlement" and as such there would be opportunities for housing

development under Local Plan policies H3 and H11. He also noted that "the matter could be reconsidered in preparing the Local Development Framework" in the light of updated housing requirements and progress on addressing parking and traffic management problems.

Some of the concerns about the scale of housing development and the balance with employment development are addressed under course of action 2. Scale of Development, particularly the change to table 2 (effectively making the range zero to 500). This would allow the interpretation of "limited development" for Much Wenlock to be very small indeed. There is already a focus in Policy CS3 on Much Wenlock's role as an employment centre, to counterbalance the pressure to become a dormitory suburb. Concerns about infrastructure capacity will be reflected in the detailed proposals for the town in the SAMDev and in the LDF Implementation Plan. The latter is already included under "Delivery and Monitoring of Policy". See also the proposed course of action 3 on infrastructure, above.

Concerns about Much Wenlock's infrastructure capacity and landscape setting would equally relate to all towns. The following change is therefore proposed to paragraph 4.34, which elaborates the second sentence in Policy CS3:

> "4.34 Shropshire's market towns and key centres all have distinctive identities, which new development is expected to reinforce. ~~Local distinctiveness is reflected in~~ *Respecting each town's distinctive character includes being sensitive to its landscape setting,* historic features and the towns' functions (past and present). Policy CS6 elaborates the requirements for new development to meet high standards and reflect local character."

5. Other text amendments

Add to spatial portrait on p27, under Cross border links: "*Part of East Shropshire lies within the 12 mile zone of influence of the Cannock Chase Special Area of Conservation (SAC) in Staffordshire.*"

Add to paragraph 4.45, after "…Green Belt. *To its north lies the Cannock Chase Special Area of Conservation (SAC).*"

Add to end of paragraph 4.38, "*Phasing of development will be linked to infrastructure delivery, particularly waste water treatment capacity and road junction capacity.*"

In paragraph 4.43, deleting the sentence "Shifnal lies in the Wolverhampton to Telford high technology corridor as defined by the West Midlands Spatial Strategy"

Replace the first sentence of paragraph 4.45 with:
"*Albrighton (population 5,100 excluding the military population) is 7 miles from both Telford to the west and Wolverhampton to the East.*"

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Add after RAF Cosford in the 4th sentence in paragraph 4.45: "*where the numbers of trainees in the Defence College of Aeronautical Engineering (DCAE) vary widely, from a few hundred to over 4,000 at any one time. The town thus caters for a significant but very variable number of these personnel, as well as for residents.*"

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CS4 – Community Hubs and Community Clusters

Summary of key issues:

1. **Deliverability - Criteria for Community Hubs and Clusters**
2. **Identifying Local Centres**
3. **Sustainable settlements**
4. **Capacity**
5. **Viability**
6. **Village and Town Design Statements**
7. **Housing for local need**
8. **Definition of "Local"**

Proposed course of action:

1. Deliverability - Criteria for Community Hubs and Clusters

Objectors challenge that Policy CS4 does not meet the requirements of paragraph 4.1 of PPS12 to set out how much development is intended to happen where, when, and by what means it will be delivered. They contend that it is by no means clear that sufficient settlements will emerge to deliver the 35% of residential development in rural areas to meet Policy CS1, and that the Council should specify the criteria that will be used to identify Community Hubs and Clusters.

As set out in paragraph 4.65, a key consideration in identifying Community Hubs and Community Clusters will be the aspirations of the local community. Policy CS4's approach is fundamentally the same as that of "localism", namely to reflect the local community's wishes, rather than seeking to impose a plan from above. Shropshire's approach to making "bottom up" plans is set out in paragraphs 4.64 and 1.5.

Working with communities to understand their settlement and work through how Policy CS4 could operate for them takes a great deal of time, as it involves very detailed work with a large number of villages on their future potential. It is not possible to do this in the timescales set for the Core Strategy except through a "top down" approach. In order to genuinely pursue a "bottom up" approach, it is necessary to identify Community Hubs and Clusters through the SAMDev process rather than through the Core Strategy. This means that policy CS4 will not take effect until the SAMDev identifies which settlements are Community Hubs or Clusters.

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Imposing criteria of any kind would dilute the "bottom up" approach. Consequently no criteria will be given in the Core Strategy, and no change to the Final Plan is proposed in this regard. Nevertheless, it is accepted that a little more explanation of the approach would be beneficial. It is therefore proposed to insert in paragraph 4.63 after "greater local self sufficiency and self reliance. *Rather than abandoning settlements that have lost services as perpetually "unsustainable", this approach seeks to improve the sustainability of rural settlements and their hinterlands, even those that start from a low base."* The approach to community-led plan-making (localism) is already detailed in paragraphs 4.64 and 4.65.

Paragraph 4.10 under Policy CS1 anticipates that the amount of development that is delivered in Community Hubs and Community Clusters may start low and increase over time as rural communities become more familiar with the new approach. The approach depends on no small part on the willingness of the representatives of the community themselves to take part. Initial pilots have worked well, and it is expected that more communities will engage with the process as they see how it is working elsewhere in Shropshire.

2. Identifying Local Centres

A number of objectors contend that the Core Strategy should follow the approach in the Core Strategy Policy Directions and identify "Local Centres", criteria for which should include the core services of an accessible school, shop / post office and church / community meeting place. A number of settlements are suggested as local centres.

As outlined under course of action 1 above, in relation to smaller settlements the Core Strategy deliberately avoids a directive approach where communities are told they are sustainable or unsustainable, based on the Council's assessment of existing services. Instead the Council will work closely with communities to assess whether they consider status as a Community Hubs or Cluster appropriate to their situation. No change is proposed.

3. Sustainable settlements

Concerns have been raised that we have not identified how sustainability will be achieved by this policy, nor indeed what we mean by "sustainable settlements". Objectors query how a relatively limited quantity of development spread, potentially, over a large number of settlements, will produce a settlement pattern that is sustainable when 'sustainability' is assessed on a county-wide basis.

The basis of Policy CS4 is that all improvements to sustainability, no matter how small their impact on a county-wide basis, matter to the community in which they occur. The policy seeks to allow communities who wish to improve their sustainability to do so, even in small ways, as part of delivering the "new models of living based on greater local self-sufficiency and self-reliance" described in paragraph 4.63.

The policy does not pursue the traditional, narrow definition of 'sustainability' based on accessible services, but instead follows the broader view of sustainability found in the rural toolkit developed by the Commission for Rural Communities (the "interactive toolkit" mentioned in paragraph

4.64). This includes social and economic sustainability, not only reducing the need to travel. For example, small scale rural development can enable family and social support networks to continue to function, and enable people to adapt to changing economic circumstances. No changes to the Core Strategy Final Plan are proposed other more detailed reference in the Key Evidence box to the evidence base for Phase Three of the Review of the West Midlands Regional Spatial Strategy. Specifically, adding reference to the State of the Region thematic report, "What Makes a Community Sustainable?" produced by the West Midlands Regional Observatory October 2009.

Some objectors point out that "Contributions to community benefits" will not deliver the kind of infrastructure desired by villagers, namely shops, post offices, the village pub, etc. Others request more information on the evidence base for developer contributions, and how capital and revenue funding is to be secured from the public sector to complement it. These concerns will be addressed through the LDF Implementation Plan, or "Shropshire Regeneration Prospectus", which provides a mechanism for identifying infrastructure requirements and discussing priorities with local communities. The Shropshire Regeneration Prospectus also provides a mechanism for linking public expenditure to place in a manner that helps deliver the Strategic Objectives.

The Shropshire Regeneration Prospectus contains place-based appendices that identify infrastructure requirements, investment programmes, and community aspirations. Place-based appendices for Community Hubs and Community Clusters will accompany the SAMDev in due course, and will reflect community input on infrastructure priorities obtained through the SAMDev process. No changes to the Core Strategy Final Plan are proposed, as paragraphs 4.58 and 4.59 already detail this approach.

4. Capacity

Objectors are of the view that there are few remaining development opportunities "within" any villages and that sites (including greenfield sites) will need to be identified by allocations or by making room in settlement boundaries to provide capacity. Paragraph 4.68 makes it clear that allocations of land for development will be made in the Site Allocations and Management of Development DPD, and this will ensure that there is sufficient supply of land. Depending on the outcome of the current SAMDev consultation, it is expected that further capacity will be provided by having no defined settlement boundaries in many cases.

Nevertheless, it is agreed that the term "within" could be very narrowly interpreted, creating more restriction on the capacity of Community Hubs and Community Clusters than is intended. Consequently it is proposed to replace "within" by "in" in the 2nd and 4th bullet points of the policy. To clarify what is meant by "in", paragraph 4.67 will be amended to read: "Development in Community Hubs and Community Clusters will be within the village*, or on land that has been specifically allocated for development.* To prevent *fragmented* development, *windfall* development adjoining the village is not acceptable, unless *it is* an exception site for affordable housing or other development allowed under Policy CS5 Countryside and Green Belt." This wording is intended to allow windfall development that relates well to the existing village, whilst preventing

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development that is less well related. The terms "adjoining" and "in" provide flexibility for development management decisions to reflect local circumstances.

5. Viability

Concerns have been voiced that community benefit requirements will make development unviable. To address this, further viability modelling has been undertaken to extend the existing April 2010 viability study, with more examples of small, rural schemes included. Proposed change is to add under Key Evidence: "*Shropshire Viability Study (Fordham Research 2010)*"

Some objectors consider that the basis for calculating contributions is such an important matter that it should be included in the Core Strategy. However, the practicalities of requiring contributions are contained in the Planning Act 2008 and implemented through the Community Infrastructure Levy Regulations that were published in March 2010. These require a Community Infrastructure Levy Charging Schedule to be prepared, which clearly was difficult pre-March 2010 when the Regulations had not been published Work is currently underway to produce a preliminary draft Charging Schedule in autumn 2010, moving to a draft charging schedule that could be examined in 2011. Although there may be a short delay between adoption of the Core Strategy and the adoption of a Charging Schedule, it is hoped that this will only be a matter of months.

Should the May 2010 change of Government result in a change to the Community Infrastructure Levy, the mechanism for requiring contributions for community benefit could be placed in the Site Allocations and Management of Development DPD. Given this uncertainty, it is not considered appropriate to change the Core Strategy references. No change to Policy CS3 is proposed, although some changes are proposed under Policy CS9, to paragraph 4.113.

6. Village and Town Design Statements

A number of respondents requested that Village and Town Design Statements (VDS) are referred to, as well as Parish Plans. Consequently it is proposed to add in paragraph 4.64 after Parish Plan, "or Village or Town Design Statement".

7. Housing for local needs

There was some confusion expressed regarding the 2nd bullet point in the policy, as to whether "housing for local needs" includes market housing. Various comments were received that a mix of affordable and market housing is required to reflect the variety of local needs identified. There is no conflict here, as "housing for local need" does indeed cover both affordable and market housing, but there is clearly a need to clarify this fact. It is proposed to add to the Glossary a definition of "housing for local needs" to avoid confusion in future, as follows:

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"Housing for local needs" – if "affordable" is not specified, "local needs" includes both market housing and "affordable" (ie. non-market) housing. It can cover a full range of housing types, prices and tenures, including social rented, shared ownership, shared equity, low-cost home ownership, starter homes, bungalows, family homes, low end of the market, mid-market and high end of the market. Its definition in practice is tied to an assessment of local needs in the settlement concerned in relation to house types, prices and tenures.

8. Definition of "local"

CPRE point out that "Local needs" is not defined in the DPD, but a robust definition is essential for implementation in relation to CS1, CS3, CS4, CS5, CS7, CS11, CS13, CS19 & CS20. A geographical extent would clarify what "local needs" means in each context – eg. "Shropshire need", "regional need", "within 30 miles", "within parish", etc.

Changes proposed are to add to the Glossary:

"Local needs" – In relation to housing and employment, "local" refers to the need in the settlement and its hinterland. The extent of a settlement's hinterland is essentially its sphere of influence, and ends where another settlement's sphere of influence becomes more dominant. For practical purposes this can be approximated by a set distance, or a parish boundary. In relation to affordable housing, section 106 legal agreements will define the extent of "local area" in relation to a particular development. "Local area" can differ between settlements and over time. Consequently the extent of "local area" is defined in the Type and Affordability of Housing SPD, as a document that is both more detailed and more readily updated than the Core Strategy
.
"Local needs affordable housing" – affordable housing that is provided for people with a strong connection to the local area. It includes social rented and shared ownership homes that are managed by Housing Associations, which have a "local connection" requirement in the lettings policy. Local needs affordable housing also includes the low cost home ownership, such as the "build your own affordable home" scheme. Such homes have a permanent restriction on their value and occupancy, through a section 106 legal agreement and restriction on the title, to ensure they can never be sold at full market price and to ensure that subsequent purchasers have a strong connection to the local area. Detailed definitions of what constitutes a "strong connection" and the extent of the "local area" are contained in the Type and Affordability of Housing SPD.

In addition, insert in the existing Glossary definition of Affordable Housing, after "…The definition includes housing for key workers and shared ownership homes*, and the "build your own affordable home" scheme for low cost home ownership (also see "local needs affordable housing").*"

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CS5 – Countryside

Summary of key issues:

1. **Development boundaries& identification of settlements**
2. **Conversion Viability & Deliverability**
3. **Inconsistency with Government policy**
4. **Evidence Base**
5. **Landscape & Heritage Impact**
6. **Green Belt & Safeguarded Land**
7. **AONB**
8. **Inflexibility**
9. **Omissions**
10. **Rural economy & infrastructure**
11. **Conflicting objectives**
12. **Affordable Housing and other development providing for local need**

Proposed course of action:

1. **Development boundaries**
   Minor Change to the final Plan. Whilst a number of representations have suggested that there is a need for development boundaries to be identified in order for the policy to operate effectively, it needs to be recognised that Policy CS5 is not a stand-alone policy**.** Policies CS1, 2, 3 and 4 set out the settlement development strategy and identify those settlements where development will be appropriate. However, for clarification, the Core Strategy should include reference in the glossary which sets out the definition of countryside in policy terms. This will read ' Countryside is considered to be the area outside of Market Towns(including Shrewsbury) and Key Centres identified in Policies CS2& CS3, and Community Hubs and Community Clusters, the framework for which is set out in CS4, and which will be defined in the Site Allocations and Management of Development DPD. A traditional approach has been that settlement development boundaries have been used to define the limits of settlements, with land outside settlement development boundaries being regarded as countryside. However the Site Allocations & Management of Development DPD will consider further whether development boundaries will be drawn.'   It should be noted that the Site Allocations & Management of Development DPD consultation is exploring further whether development boundaries should be drawn around identified settlements and that a definitive decision has not been made

regarding development boundaries. However, a commitment has been made in the Core Strategy to retain development boundaries around the named settlements in the Green Belt because of the need to prevent encroachment into Green Belt.

2. **Conversion Viability & Deliverability**
Minor Change to the final Plan having considered representations from both English Heritage (and following a meeting with representatives from the Agency), land agents and other interested parties, propose a series of wording changes under Policies CS5 and CS11 with the effect of deleting the additional 15% affordable housing contribution originally put forward and stressing the importance of conversions of traditional buildings having regard to the heritage asset. However, for the sake of consistency and clarity, reference should also be made to the requirements of Policy CS9 regarding infrastructure contributions. For Policy CS5, this means an amendment so that the relevant section reads: 'Open market residential conversions will only be considered where respect for the heritage asset (as also required by Policy CS17) and high standards of sustainability are achieved, a contribution to infrastructure requirements is made in accordance with Policy CS9, and …..'. Linked amendments are proposed to paragraph 4.71 of the explanatory text, deleting the word 'significant' in the sentence and referring to contributions to infrastructure requirements in accordance with Policy CS9. Schemes would still be expected to contribute to affordable housing provision at the current prevailing rate as with all open market housing development. Note that the evidence base on economic viability includes conversions and is being broadened to include more information on viability of infrastructure contributions as well as affordable housing contributions.

3. **Inconsistency with Government policy**
a) **No Change to Final Plan**: it is not considered that the Policy is inconsistent with national policy in its approach to conversions in the countryside as it does give priority to economic re-use (PPS4) and emphasises the importance of taking account of the character of the buildings and the countryside (PPS5 and PPS7). However, as set out above, it is proposed that greater emphasis be placed on the importance of conserving the heritage value of traditional buildings in the policy (and this would be further reflected in subsequent Site Allocations & Management of Development DPD /SPD.
b) **Minor Change to the Final Plan:** clarification of policy wording (under bullet point 2) which it is suggested circumvents rural exception criteria by the addition of the words 'where this is appropriate' at the end of the 2nd sentence so that it reads 'Development will be expected to take place primarily in recognisable named settlements or be linked to other existing development and business activity where this is appropriate'. Further clarification of this, if required, would be provided in subsequent SAMDev policy/SPD
c)) **Minor Change to the Final Plan:** Superseded references to PPS7 to be replaced, as appropriate, to PPS4 .
d) **Minor Change to the Final Plan:** changes made to Policy CS5 (set out above in section 2 'Conversion Viability and Deliverability') address heritage asset considerations.

4. **Evidence Base**

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No Change to Final Plan. Evidence base expanded as set out in 2) above, to provide further evidence of deliverability of contributions from rural building conversions. Consider English Heritage Historic Farmsteads & Landscape Project implications. Taylor Report recommendations, together with other adopted policy and evidence, have been considered: in formulation of the rural re-balance strategic approach (set out in CS1) and in Policy CS5.

5. **Landscape & Heritage Impact**
    Minor Change to the Final Plan. Issues regarding sustainable management of buildings and their retention as landscape features and heritage assets are linked to viability issues considered in 2) above and it is proposed to make minor amendments to change the emphasis in the Policy to one of greater regard for the management and retention of rural buildings as heritage asset and therefore also as landscape features. A cross reference to Policy CS17 has also been added. Additionally, recent evidence base such as English Heritage West Midlands Historic Farmsteads & Landscape Project and its implications will be considered and there will be inclusion of appropriate guidance in Historic Environment SPD. Furthermore, it is proposed that the Sustainability Checklist which will need to be submitted with all planning applications and is being developed as a practical tool to aid implementation of Policy CS6 and the Sustainable Design SPD, would provide an additional means to ensure that the necessary considerations, including those of character and quality of design and materials, are addressed. The considerations will be identified in consultation with English Heritage.

6. **Green Belt & Safeguarded Land –**
    Minor Change to the Final Plan. Site Allocations & Management of Development DPD to provide additional detail and consideration of allocation of sites. Illustrating safeguarded land is not feasible at the scale of the key diagram, but propose to modify labelling and insert safeguarded land onto key for the East Zone map on page 26 where it is already illustrated to identify more clearly safeguarded land as distinct from Green Belt.

7. **AONB**
    No Change to Final Plan Not appropriate to address in the same way as Green Belt as suggested by the National Trust since it is considered that the approach in the Core Strategy recognises the need to highlight the importance of nationally designated areas and the need to conserve them set out in PPS7. In the case of Green Belt, there is a need to set out how national policy in PPG2 will specifically affect the local policy approach to development and the consideration of boundaries and safeguarded land. With respect to the AONB, Policy CS5 with Policies CS17 (which directly references AONB) and CS6 (which provides the landscape protection as part of sustainable development aims), together with the AONB management plan, provide an adequate basis for implementation of an approach which recognises the important designated status. There is also a commitment to a Natural Environment SPD which additionally provides scope to address AONB issues.

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8. **Inflexibility-**
   No Change to Final Plan. PPS 4 sets out a duty to protect countryside and requires strict control of economic development in open countryside. Policy is providing considerable flexibility, seeking to provide for development which improves the sustainability of rural communities yet remaining in line with PPS4. There is more limited flexibility in Green Belt due to the national policy context which requires more stringent control over new development than in other areas of non designated countryside.

9. **Omissions**
   No Change to Final Plan. The highlighted omissions are mainly addressed by other policies or will potentially be dealt with by the Site Allocations and Management of Development DPD (SAMDev) or other Supplementary Planning Documents(SPD)
   a) Live /Work- included in Policy CS13 and more detailed policy will be developed in SPD or SAM Dev DPD, as appropriate.
   b) Replacement dwellings- not role of Core Strategy to provide this level of detail. It will be considered whether it is appropriate to develop further guidance as part of the SAMDEv. Sustainability requirements for new dwellings will be addressed by Sustainable Design SPD.
   c) Caravan Sites & Canals- not role of Core Strategy to provide this level of detail. It will be considered whether it is appropriate to include in more detailed tourism and related policy in SPD or SAMDev DPD, as appropriate.

10. **Rural economy & infrastructure**
    No Change to Final Plan. There is recognition in Policy CS13 of economic role of agriculture. Role of countryside management will be further explored in Natural Environment SPD. Do not consider that there is a need to say explicitly in text that there is a need to maintain a healthy agricultural sector in connection with land management.

11. **Conflicting objectives**
    No Change to Final Plan. It is the role of Core Strategy & SAMDev to seek to identify and manage competing demands & needs.

12. **Affordable Housing and other development providing for local need**
    No Change to Final Plan. Policy clearly identifies when development will be acceptable and definition of local need housing will be provided in Policy CS11 and Type & Affordability of Housing SPD. Until the Type & Affordability of Housing SPD is adopted, the existing adopted Interim Planning Guidance on Affordable Housing will provide criteria. It should be noted however that a **Minor Change to the Final Plan** is proposed under PolicyCS4 which seeks to incorporate definitions of 'local needs' in the Glossary. Policy CS5 (together with CS11) seeks to facilitate housing to meet local need whether through market development or affordable mechanisms. Monitoring of housing provision and updates to viability evidence, in particular in respect of affordable housing requirements on market housing sites, will be used to facilitate and ensure delivery. For consistency and clarification, a bullet point referencing 'Type & Affordability of Housing SPD' should be added to the Delivery & Monitoring of Policy section.

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Other Typographical and clarification changes
- Since the final plan was published PPS4 has been adopted. Therefore a number of changes are necessary to reference current policy.
- The second bullet point refers to 'other affordable housing or accommodation to meet a local need……..'. The intention of Policy CS5 is that the term 'affordable' refers both to housing and other residential accommodation and there is need for the purposes of policy interpretation to incorporate a minor typographical amendment to make this clear.

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS6 Sustainable Design and Development Principles

Summary of key issues:

1. **Consistency with national policy – Concern has been raised that this policy is not in accordance with PPS1 Supplement regarding targets for renewable energy being included within an SPD rather than the Core Strategy.**
2. **Procedural - Lack of procedural soundness due to level of delegation of the effect of the policy to a SPD and lack of external scrutiny.**
3. **Clarity – Some minor word changes have been recommended to improve clarity of the policy.**

Proposed course of action:

1. **Consistency with national policy**
Some respondents (Taylor Wimpey UK, Commercial Estates Group) are concerned that the Policy is not consistent with National Policy (PPS1 Supplement) in that it does not include a target percentage for decentralised energy provision along with criteria setting out the type and size of development to which the policy should be applied. No changes are proposed in relation to this concern as it is considered that including a numerical figure within the Core Strategy would lead to an inflexible approach and one which is likely to be superceded by higher level national guidance. The inclusion of this information within an SPD allows the Council to take a much more flexible approach whilst at the same time, avoiding obsolescence.
No changes to Final Plan

2. **Procedural**
The Sustainability Checklist will be a comprehensive online tool to ensure that developers include minimum standards for sustainability within their developments. The nature of the toolkit means that it is not possible to be fully included within the CS. The Sustainability Checklist will be taken to a sample group of likely users who will be able to comment on the usefulness and useability of the checklist.
No changes to Final Plan

3. **Clarity**
English Heritage have suggested some minor word changes regarding the historic environment, to improve the clarity of Policy CS6 and also to ensure it is consistent with PPS5. It is proposed to make these changes to the Final Plan.

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CS7 Communications and Transport

Summary of Key Issues:

1. **Policy support for the Shrewsbury North West Relief Road conflicts with the delivery of a sustainable strategy for Shropshire.**
2. **Policy objectives for the transport strategy and the Implementation Plan do not provide sufficient evidence for the delivery of A5 junction improvements around Shrewsbury and Oswestry, and sustainable transport measures for Shropshire.**
3. **Policy and Implementation Plan must ensure that developer contributions to transport infrastructure provision or improvements are proportionate to the impacts of development.**
4. **Policy needs to recognise need for area specific transport improvements and the reliance on private vehicles in rural areas.**

Proposed course of action:

The majority of representations received in respect of Policy CS7 either support the policy or propose detailed changes to reflect area specific issues or aspirations in relation to transport and communications infrastructure. The main issues relate to the two key highways infrastructure improvements around Shrewsbury (i.e. NWRR and A5 junctions improvements) and Oswestry (A5 junction improvements) and the extent to which developer contributions will be required to fund transport infrastructure improvements.

1. **Shrewsbury North West Relief Road**

Policy CS7 states a continuing commitment to delivering the Shrewsbury North West Relief Road (NWRR) in the spatial strategy for Shropshire. This commitment is based on improving the strategic highway network and enhancing the sub-regional role of Shrewsbury. Policy CS7 clearly indicates that this commitment is dependent on the preparation of the next generation of Local Transport Plan 2011- 2016 which will be subject to ongoing comprehensive spending reviews by the Department of Transport. The delivery of the NWRR will initially be addressed through the place based approach to the LDF Implementation Plan and through the Local Transport Plan 2011-2016 which is reflected in the minor change to the Explanation to the Policy (para 4.87) – see 4 below.

2. **A5 Junctions Improvements around Shrewsbury and Oswestry**

Shropshire Council is addressing this issue in partnership with the Highways Agency through a Memorandum of Understanding to evaluate the junction capacity issues and to identify improvements to manage future, increased traffic demands on the A5 by-passes around Shrewsbury and Oswestry. The partnership between Shropshire Council and the Highways Agency to address A5 junction improvements around Shrewsbury and Oswestry is reflected in a minor change to the Explanation to the Policy. It is proposed to amend para 4.99 of the Explanation

to read: "…and for the A5 especially on the Shrewsbury and Oswestry by-passes requiring highway improvements along the route and junction improvements on accesses to the towns *in partnership with the Highways Agency*"

3.   Developer contributions to infrastructure, facilities and services
The processes by which developer contributions will be required towards transport infrastructure provision or improvements will be determined through Core Strategy Policies CS8 and CS9 and through proposed SAMDev policies.

4.   Area specific communication and transport infrastructure requirements
Detailed infrastructure requirements will be addressed in place based appendices to the LDF Implementation Plan and localised traffic and transport improvements will be identified, justified and programmed through the emerging Local Transport Plan 2011 – 2016. Policy CS7 should more clearly explain the implementation of traffic and transport improvements in the explanation to the policy (para 4.87) through a minor change to read: "The Core Strategy will deliver these **policy** requirements principally through the **LDF Implementation plan and** the next generation of Local Transport Plans **which will continue to develop and implement the communication and transport strategy for Shropshire** for the period from 2011 to 2016".

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS8 Facilities, Services and Infrastructure Provision

Summary of key issues:
1. **Consistency with national policy- policy is not in accordance with PPS22 on Renewable Energy**
2. **Evidence Base- Without completion of the relevant studies, the Final Plan will not be considered to be founded on a robust and credible evidence base**
3. **Breadth of policy- the policy does not make reference to environmental infrastructure, cultural facilities or youth facilities**
4. **Links to LDF Implementation Plan- the delivery of the policy will be via the LDF Implementation Plan but this has not been consulted upon and is not based on evidence to determine whether the schemes are viable or deliverable**

Proposed course of action:
1. **Consistency with national policy**
   Ensure a more detailed criteria based policy for Renewable Energy is developed as part of the SAMDev DPD
   No changes to the Final Plan

2. **Evidence Base**
   Ensure the Indoor Sports Facilities Strategy and the Playing Pitch Strategy are complete by the time of submission and include them in the list of key pieces of evidence for Policy CS9.
   Minor change to the Final Plan

3. **Breadth of policy**
   Amend para 4.105 to reflect full range of facilities, services and infrastructure that are covered by the policy, including environmental infrastructure such as sewerage and cultural and youth facilities. Ensure the LDF Implementation Plan and place based appendices reflect the full range of infrastructure requirements
   Minor changes to the Final Plan

4. **Links to LDF Implementation Plan.**
   It is a requirement of PPS12 for Local Authorities to produce an Implementation Plan outlining all the physical, social and green infrastructure needed to enable the amount of development proposed for the area, taking account of its type and distribution. The LDF Implementation Plan has been put together following ongoing consultation with a wide range of infrastructure and service providers and incorporates infrastructure requirements which have been identified from the LDF evidence base work. It will provide an ongoing process for discussion with utility providers to ensure the identified infrastructure proposals are deliverable and accords with the planned phasing

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of development. The partnership working which has led to the development of the Implementation Plan is outlined in the Consultation Statement on the Regeneration Prospectus: 'Place making through Partnership Working'.

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CS9 Infrastructure Contributions

Summary of key issues:

1. **Viability – greater reference to viability required**
2. **Evidence base- Without completion of the relevant studies, the Final Plan will not be considered to be founded on a robust and credible evidence base**
3. **Community Infrastructure Levy- The policy needs to take account of CIL and the fact that affordable housing is exempt from contributing to this levy**
4. **Conformity with Circular 05/05 on planning obligations- Planning obligations should only be used to make acceptable development which would otherwise be unacceptable in planning terms**

Proposed course of action:

1. Viability

Requires further evidence base work to demonstrate that the low thresholds proposed (ie. small scale development) are viable.

Minor editing to text in explanation, reflecting changes since the Plan was published, as follows:

Insert in paragraph 4.108, "There will be geographical variation in the level of contributions sought, in reflection of *both economic viability and* the fact that some places have a higher level of requirement than others is they are to be sustainable places."

Replace paragraph 4.113 with, "The appropriate level of contributions for infrastructure other than affordable housing will be set in the Site Allocations and Management of Development DPD, or in a Community Infrastructure Charging Schedule, *at a level that is economically viable for the majority of development. Dynamic viability analysis will be used to ensure that viability is reassessed regularly, and reflects changes to market prices, costs of construction and alternative land use values over time."*

Under Key Evidence, change date of the Affordable Housing Viability Study to *"April and July 2010"* to reflect latest versions.
Minor changes to Final Plan

2. Evidence Base

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Ensure the Indoor Sports Facilities Strategy and the Playing Pitch Strategy are complete by the time of submission and include them in the list of key pieces of evidence for Policy CS9.
Minor changes to Final Plan

3. **Community Infrastructure Levy**
It is inappropriate to make changes in the Core Strategy, because the detail of which developments will be exempt (eg. affordable housing) will be contained in the SAMDev policy or community infrastructure charging schedule. In any case, no development can be exempt from providing critical infrastructure, without which development cannot take place.
No changes to the Final Plan

4. **Conformity with Circular 05/05**
The Circular is only relevant to S106 and does not take account of contributions via a community infrastructure charging schedule. The LDF Implementation Plan outlines the infrastructure needed to support the development strategy. It therefore relates specifically to the infrastructure requirements generated from future development. Additional investment opportunities and local needs are outlined in the place based appendices, which include more locally specific information and are aimed at creating and maintaining sustainable places, which is key to Shropshire's vision.
No changes to the Final Plan

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CS10 Managed Release of Housing Land

Summary of key issues:

1. Employment
 2. Housing Requirement
 3. Sustainable Settlements
 4. Phasing
 5. Brownfield Target

Proposed course of action:

1. Employment
   Minor change. Delete the words "…or employment premises" from the first sentence of the policy

2. Housing Requirement
   Minor change to Policy CS1. It is proposed to amend Policy CS1 which allows for development of "*around* 27,500 new homes" to "*up to* 27,500 new homes *if required*". Further explanation of the approach is set out under the "Implications for Policy CS1".

3. Sustainable Settlements
   No change to Final Plan. The Core Strategy follows the broader view of sustainability found in the rural toolkit developed by the Commission for Rural Communities. Further explanation of the approach is set out under the "Implications for CS4".

4. Phasing
   Minor change to explanatory text to clarify that amount of housing proposed in five year time bands is based on anticipated housing trajectories as set out in Implementation Plan. Phasing is to be subject to review linked to monitoring.
   Minor change proposed to the "Delivery and Monitoring of Policy" box of Policy CS1 – add to the first two indicators, "and also disaggregated by spatial zone".
   As above, **minor change** to "Delivery and Monitoring of Policy" box of Policy CS1 to clarify that development rates within the five spatial zones will be monitored through the AMR. The approach in the SAMDev consultation uses LJC boundaries to approximate the spatial zones for the purposes of consulting on broad options for development. It is considered appropriate to use the same approach for

monitoring purposes, as this would overcome the difficulty of the overlapping boundaries of Spatial Zones and ensure that each settlement is not counted in more than one spatial zone.

No change to Final Plan. Whilst delivery rate for 2016/21 is lower than Panel Report proposal, cumulative figure for delivery since 2006 is higher in Core Strategy by 2016/21 period

No change to Final Plan. Issue of phasing in Shrewsbury will be dealt with in SAMDev DPD

Minor change to identify figures for housing and employment on Sustainable Urban Extensions. More detailed housing trajectory to be included in AMR alongside preparation of SAMDev DPD when more certainty as to which sites will be allocated.

No change to Final Plan. Amount of housing proposed in five year time bands is based on anticipated housing trajectories as set out in Implementation Plan. For the early years of the plan period there are significant levels of housing already committed, either with planning permission, existing allocations or identified as deliverable in SHLAA. With regard to the phasing proposals put forward in the RSS Panel Report, Local Planning Authorities are advised to have regard to local factors "including any opportunities for early delivery".

No change to Final Plan. Policy includes priority to brownfield sites in sustainable locations. Housing trajectory and phasing bands take into account sites with planning permission coming forward in early years of plan period. Some greenfield sites will need to be released in later years of plan period if housing requirement is to be met. Phasing of individual sites will be addressed in SAMDev DPD

Minor change to refer in the explanatory text to Implementation Plan and to timing constraints due to need for infrastructure to be put in place. The Water Cycle Study will be completed and signed off by the Steering Group by the time of submission.

5. Brownfield Target

No change to Final Plan. It is acknowledged that 60% target is a challenging target (and will be more challenging with the amendment to PPS3 to exclude garden land from the definition of brownfield land). However Shropshire achieved 61% in 2007/08 and 55% in 2008/09 of housing development on previously developed sites and minimising future take up of greenfield land where possible is a desirable objective.

No change to Final Plan. Housing allocations and timescale for delivery of individual sites will be addressed in SAMDev DPD. The means of delivery of each policy including CS10 are set out in the Core Strategy Implementation Plan.

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CS11 Type and Affordability of Housing

Summary of key issues:
1. **Overall Target represents a shortfall in relation to need**
2. **Threshold should be raised to avoid being counter productive**
3. **Viability of schemes significantly affected due to overall target of 33%**
4. **Objection to open book approach**
5. **Additional contribution from barn conversions**
6. **Need for a clear statement of factors that influence desired Housing Mix**
7. **Identification of directly funded affordable housing schemes**
8. **Definition and allocation of local needs provision**
9. **Mix of social rented/intermediate housing**
10. **Greater need for affordable housing in East Spatial Zone**
11. **Delivery of schemes for the elderly**
12. **Affordable Housing for the elderly and young people**
13. **The impact of Lifetime Homes Standards on viability**

Proposed course of action:
1. **Overall Target represents a shortfall in relation to need**
   No change to Final Plan. The target is based on evidence of housing demand and need in the West Midlands and the West Housing Market Area in particular. Although extremely demanding, the target reflects need whilst being balanced against deliverability.

2. **Threshold should be raised to avoid being counter productive**
   No change to Final Plan. The viability assessment has shown that site size is not critical to viability, with relevant explanation with regard to small sites set out in paragraphs 5.19 and 5.20 of the explanation. There is also clear evidence of high levels of need for affordable housing throughout Shropshire. The Policy therefore requires that all market housing makes a contribution to affordable housing. An open book approach allows negotiation with regard to individual sites.

3. **Viability of schemes significantly affected due to overall target of 33%**

No change to Final Plan. The overall target for the plan period from all sources is 33% and the target is not linked to site viability. The Shropshire Viability Index will be used to set an appropriate target (currently 20%) for open market sites to apply at the time of adoption. In addition an open book approach allows negotiation with regard to individual sites.

4. **Objection to open book approach**
No change to Final Plan. Objection is made to an 'open book' approach as it would mean providing specific information in respect to individual proposals. Paragraph 5.19 explains the application of an open book approach. The developer has the option of either the current prevailing rate or an 'open book' negotiation approach which is intended to be used as a mechanism which provides flexibility and enables schemes to remain viable.

5. **Additional contribution from barn conversions**
Minor change
Delete the additional 15% contribution but note that conversion schemes that provide additional dwellings will be expected to make the appropriate infrastructure contributions in accordance with the requirements of Policy CS9 (subject to economic viability).
Existing evidence base has been updated to reflect the latest economic circumstances (Fordham Research's Dynamic Viability Assessment) and additional information obtained in relation to costs/viability of barn conversions.
Policy CS5 – Countryside and Green Belt; gives priority to appropriate uses for countryside conversions including affordable housing as well as small scale economic use, live-work and tourism uses, providing scope for the beneficial re-use of buildings and conservation of countryside and heritage assets.

6. **Need for a clear statement of factors that influence desired housing mix**
No change to Final Plan. Further detail regarding the factors that influence the desired mix will be included in SPD.
The Shropshire Housing Market Assessment will be updated annually to provide information on housing need and the balance of housing stock in 13 Local Housing Market Areas. This will inform negotiations for individual sites.

7. **Identification of directly funded affordable housing schemes**
No change to Final Plan. Site identification will be carried out via the SAMDev where appropriate and possible.

8. **Definition and allocation of local needs provision**
No change to Final Plan. It is considered important that affordable housing units will be allocated using a cascade approach to safeguard units for local people. The detail of this approach will be defined by SPD. It is proposed that a definition of 'local need' be added to the glossary (see summary for CS4).

9. **Mix of social rented/intermediate housing**
    No change to Final Plan. The annually updated Shropshire Housing Market Assessment will provide the information required to make appropriate adjustments to the tenure mix requirements. Detail will be provided by SPD.

10. **Greater need for affordable housing in East Spatial Zone**
    No change to Final Plan. It is recognised that there are significant affordability issues in the East Zone but these issues are repeated across the whole County. The proposed policy therefore seeks to provide a consistent County-wide approach, and sets an overall, plan wide target in accordance with PPS3.

11. **Delivery of schemes for the elderly**
    No change to Final Plan. Any allocations for specialist schemes for the elderly will be made by SAMDev DPD.

12. **Affordable housing for the elderly and young people**
    No change to Final Plan. Affordable housing need and provision incorporates the needs of the elderly and young people.

13. **The impact of Lifetime Homes Standards on viability**
    No change to Final Plan. The policy approach to 'seeks to achieve' Lifetime Homes Standards is justified in Shropshire due to the high proportion of elderly and the ageing population.

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS12 Gypsy and Traveller Provision

Summary of key issues:

1. **Small sites**
2. **Exceptions sites**
3. **Design requirements**
4. **National policy**

Proposed course of action:

1. Small sites

Objectors have pointed out that supporting larger sites (5 pitches and over) in the 2nd bullet point of the policy needlessly excludes suitable sites which are smaller. It could be interpreted that small sites will only be supported where a strong local connection can be demonstrated, contrary to national planning policy as expressed in Circular 1/2006. This was not the intention (see Policy Directions version). Consequently, it is proposed to delete reference to larger sites from the 2nd bullet point in Policy CS12, as follows: "Supporting suitable development proposals for ~~larger~~ sites ~~(5 pitches and over)~~ close to Shrewsbury, the market towns and key centres, and community hubs and community clusters."

2. Exceptions sites

Objection has been made to the treatment of small gypsy and traveller sites as "exceptions sites". The rationale for including them with other local needs affordable housing exceptions sites is set out in paragraph 5.39 of the Core Strategy Policy Directions document, namely that gypsy and traveller sites should be treated as far as possible in the same way as other housing sites. It follows that a gypsy or traveller with an unmet housing need and who has a strong local connection should be treated in the same way as other local persons. In their case, suitable affordable housing might be a caravan pitch rather than a bricks and mortar house.

Exception sites are allowed to meet local need that is not being met by other means. While there is a shortage of suitable gypsy and traveller sites in relation to the identified need, there is as much demonstrated need for gypsy and traveller exception sites as there is for other types of local needs housing.

The detail of the exceptions site policy, including the definition of "strong local connection", will be contained in a "Type and Affordability of Housing Supplementary Planning Document" (SPD). It is proposed to add reference to this SPD in the box relating to Delivery and Monitoring of Policy.

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

3. Design requirements

It is contrary to national planning policy as expressed in Circular 1/2006 to require that *all* sites make "provision for essential business uses and recreational facilities" as these are not necessarily required in every case, for example on a small family site. It is proposed that the policy be amended by inserting the following after recreational facilities: "*as appropriate. All sites must* comply with the requirement<u>s</u> of policy CS6 and …"

4. National policy

Given the Government's stated intention of removing Regional Spatial Strategies, it is proposed to make clear that Policy CS12 is meeting the needs identified in the sub-regional Gypsy and Traveller Accommodation Assessment (GTAA).

Therefore amend 1st sentence of policy by replacing 'met' with 'addressed' and replacing 'addressing' with 'meeting' to read:

'The accommodation needs of Gypsies, Travellers, and Travelling Show people will be *addressed* as part of *meeting* the housing needs of all sectors of the community, by:'

Amend 1st bullet point of policy by deleting the words 'national and regional site selection criteria'

Amend 1st sentence of paragraph 5.26 to delete 'sub-regionally' and replace with 'by Shropshire Council'

Amend 2nd sentence of paragraph 5.26 to delete …'have informed emerging Regional Spatial Strategy targets for Shropshire and an approach of meeting these needs where they arise.' and replace with '…commissioned by Shropshire Council have informed our approach to meeting identified needs where they arise.'

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS13 – Economic Development, Enterprise and Employment

Summary of Key Issues

1. **Policy approach to protecting employment land and dealing with proposals for alternative uses.**
2. **Policy approach to economic development in rural areas, including agricultural and farm diversification.**
3. **Relationship between provision of employment land, local need and housing provision.**

Proposed Course of Action:

The majority of representations received in respect of Policy CS13 do not raise soundness issues. Many are comments or supporting representations. Where this is the case, the comments and/or support for the policy are noted.

1. **Protecting employment land**

One representation maintains that specific advice should be included in the policy to deal with situations where employment land no longer meets the needs of the market and where alternative uses should be considered. The level of guidance sought by the respondent, by way of additional wording, is not considered necessary within the Policy. No change to Policy CS13 is proposed

2. **Economic development in rural areas**

A small number of representations make comments about the nature of economic development which should be encouraged in rural areas. Policy CS13 sets out the Council's intention to positively support rural enterprise and diversification of the rural economy, subject to further guidance provided in Policy CS5. Both policies are consistent with national planning policy in PPS4 Planning for Sustainable Growth. No change to Policy CS13 is proposed.

3. **Employment land, local need and housing provision**

One representation questions the relationship in the Core Strategy between provision of employment land, local need and provision of housing, highlighting the danger of both under and over-provision leading to excessive commuting. The overall scale of employment land provision being proposed in the Core Strategy reflects the need to balance new housing and population change with new employment. Based on local evidence and having been tested at the RSS examination, the broad balance in provision for Shropshire is considered appropriate. No change to Policy CS13 is proposed.

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS14 Managed Release of Employment Land

Summary of Key Issues:

1. **Shropshire employment targets need to be explained and justified.**
2. **Technical issues affecting the implementation of Policy CS14 need to be addressed.**

Proposed course of action:

1. **Justification of the Shropshire employment target and specific targets for the spatial zones**
   The actual quantum of employment land for Shropshire is identified in RSS* Preferred Option (2007) and Examination Panel Report (2009). Secretary of State's letter 27 May 2010, will require Shropshire Council to justify the Shropshire employment targets when the Core Strategy is examined.

2a. **Implementation of Policy CS14 to safeguard existing land and premises and allocate new employment sites.**
   The Explanation to Policy CS14 should refer to the need to re-assess the suitability of existing strategic employment land. This assessment will be performed through the SAMDev DPD* to protect sites required for employment purposes and to consider whether sites no longer viable/required for employment uses should be released for alternative forms of development. SAMDev DPD* will also address the overall scale and location of employment provision which will be informed by the Shropshire Employment Land Review, currently being prepared. A minor change to para 6.20 of the Explanation to the Policy is proposed: "In accordance with PPS4, Policy EC1, the need to ensure an adequate supply of ***land and*** premises will ~~also~~ be addressed through specific allocations and ~~also~~ by protecting the existing supply of strategic employment sites ***whose continuing viability is shown in the SAMDev DPD***"

2b. **Implementation of Policy CS14 to maintain a Reservoir of readily available land and allocate sufficient land to meet the needs of specific settlements.**
   Implementation of Policy CS14 will be achieved through the allocation of employment sites and the provision of detailed development management policies in the SAMDev DPD*.

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS15- Town and Rural Centres

Summary of Key Issues:

1. **Policy approach to the scale of retail and office targets for Shrewsbury**
2. **The appropriateness of the evidence base and the need to consider further expenditure patterns**
3. **Policy approach to the identification of broad potential town centre development areas in Shrewsbury**
4. **Coordination between Core Strategy policies regarding enabling development for local centre provision**

Proposed Course of Action:

Representations raise issues regarding the 'soundness' of the policy on grounds of being: effective; justified; and, consistent with national policy. However, it is considered that these representations do not raise any significant issues regarding the overall soundness of either Policy CS15 or the overall plan. It is proposed that three minor changes are made to the explanatory text to clarify some aspects of policy, responding to the representations.

1. Targets for Shrewsbury
Concern expressed that the retail and office targets for Shrewsbury are too high, which will lead to more out of centre development. The targets conform to the Phase 2 Regional Spatial Strategy (RSS) retail and office targets for Shrewsbury. Further local evidence is being provided through a review of the Shrewsbury Retail Study, to be completed in summer 2010. A change is proposed to the explanatory text for Policy CS15, Paragraph 6.24, to read: "The delivery of the policy's preference for town centre development will rely upon the realistic availability of sites, along with the delivery of the 'Shrewsbury Vision' regeneration programme, *and will reflect the outcomes of reviews to the Shrewsbury Retail Study*" and further proposed new text toParagraph 6.24 to read: "The policy identifies Shrewsbury's role as a strategic and sub-regional centre and *in providing* important support to the overall development strategy for the town, detailed in Policy CS2, *reflects the long term retail and office targets emerging from the phased review of the West Midlands Regional Spatial Strategy and its supporting evidence base."*

2. Evidence base
One representation questioned the robustness of the current evidence base to support future retail provision, and that the policy did not take into account the growth identified for market towns, specifically Bridgnorth. The policy's evidence base is founded on the Retail Studies

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

completed by each former Shropshire district council, which is considered robust. In due course, when circumstances dictate, a Shropshire wide retail study will be commissioned. No change to Policy CS15 is proposed.

3. Shrewsbury town centre development opportunities
Concern expressed that the policy wording regarding the identification of the Riverside and West End areas as "main opportunities" for retail and office development is insufficiently flexible to implement. In promoting a town centre first approach, it is considered the Core Strategy should seek to offer a degree of direction by identifying key areas where redevelopment opportunities are seen to exist. The Shrewsbury Retail Study and Shrewsbury Vision Regeneration Framework will consider the suitability, availability and viability of the Riverside and West End areas in more detail. No change to Policy CS15 is proposed.

4. Enabling development for new local centres
Objection made to the lack of explicit enabling element in the policy to support retail and other 'centre' uses in strategic growth allocations and sustainable urban extensions. A Minor change to policy CS15 and to the explanatory text is proposed.

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS16- Tourism, culture and leisure

Summary of key issues:

1.   **Protection of the Shrewsbury and Newport Canal line, particularly within the built up area of Shrewsbury.**
2.   **Policy approach to the touring and static caravan development**
3.   **Policy approach and evidence relating to Montgomery Canal.**

Proposed Course of Action:

1.   **Shrewsbury and Newport Canal**

A small number of representations make reference to Policy CS16's approach to the Shrewsbury and Newport Canal with two specifically regarding protection of the Shrewsbury and Newport Canal line, particularly within the built up area of Shrewsbury. The aspiration of the Shrewsbury and Newport Canal Trust to restore the canal is recognised, but at the current time, there is no evidence to suggest that there is a viable restoration scheme that will be brought forward within the plan period. The Policy sets out a positive and supportive approach to appropriate regeneration for canals and heritage railways within Shropshire and follows the aims of national guidance. No change to Policy CS16 is proposed. The Site Allocations and Management of Development DPD and Proposals Map will deal specifically with canal and heritage railway corridor protection.

2.   **Approach to touring and static caravan development**

One representation focussed on the policy approach to caravan development and questions whether Policy CS16 should provide clearer guidance on this matter to reflect guidance in PPS 4. The benefit to the local economy generated by touring and static caravan sites and their role in supporting Shropshire tourism is recognised. It is accepted that a policy should address the issue within the LDF. However, a specific detailed policy is best expressed through the Site Allocations and Management of Development DPD. No changes to Policy CS16 are proposed. Further guidance on touring and static caravan development will be developed as part of the Site Allocations and Management of Development DPD.

3.   **Evidence used to back up Montgomery canal approach**

One representation suggested that the Policy was not justified due to a lack of reference to evidence supporting the Montgomery Canal as a restoration scheme. A proposed change is to include in the evidence base list: DEFRA's 'Waterways for Tomorrow' 2000 and British Waterways'; 'Waterways 2025'; and 'Montgomery Canal – Canal Conservation Management Strategy' 2005. In para 6.36 between 'Llangollen

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

Branch.' and '13km', it is proposed to add "the restoration of the canal from Frankton Junction to near Newtown is recognised as a British Waterways Priority One project. In total..." This change and the inclusion in the evidence list recognises the 'evidence' that supports the policy.

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CS17 Environmental Networks

Summary of key issues:

1. **Effectiveness – a concern was raised that the Core Strategy lacked an ability to monitor the impact of the policy on the historic environment.**
2. **Clarity – minor word changes have been suggested in order to improve the clarity of the document.**
3. **Financial Contributions – Believe it is unreasonable to seek financial contributions to improve linkages from all developments, including developments that have no direct relationship with an environmental network. Seeking the reference to "ensuring" financial contributions from "all development" to be deleted.**

Proposed course of action:

1. Effectiveness
To address concerns an indicator will be included, against which Policy CS17 will be monitored.
Minor change to Final Plan

2. Clarity
Minor word changes have been suggested by English Heritage, Environment Agency and Natural England in order to improve clarity and quality of the Policy. It is proposed to include these minor word changes within the Core Strategy.
Minor word changes to Final Plan

3. Financial Contributions
A number of respondents have expressed their objection to the policy seeking financial contributions from developments which may make improvements to areas not directly related to their development. No changes are proposed in relation to this concern as the contributions required will be dedicated for a number of issues, not purely open space and corridors. But mechanisms need to be in place to ensure improvments are made where necessary.
No changes to Final Plan

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CS18- Sustainable Water Management

Summary of Key Issues:

1. **Evidence base- Water Cycle Study is not complete and the policy is not therefore founded on robust evidence**
2. **Inclusion of more detailed targets-include water efficiency targets in line with the Code for Sustainable Homes**
3. **Clarification- unclear what is meant by local surface water drainage areas, major development or what the scale and nature of development will be to determine whether a Surface Water Management Plan or Statement is appropriate**
4. **Detailed SAMDev policies- include detailed criteria based policies for foul drainage and flood risk in SAMDev**

Proposed course of action:

1. **Completion of evidence base**
   Complete the Water Cycle Study and ensure it is signed off by the Steering Group by the time of submission.
   No changes to the Final Plan

2. **Inclusion of more detailed targets**
   The Code for Sustainable Homes and Water Cycle Study recommendation for 105 l/p/d needs to be reflected in the Sustainability Checklist and supporting SPD. Whilst the EA have concerns about the weight given to SPDs, there is a need to maintain a flexible approach to deal effectively with changing circumstances. The water efficiency targets will therefore form part of a wider sustainability checklist, which is a living tool and can be reviewed and updated as and when required.
   No changes to the Final Plan

3. **Clarification**
   In terms of local surface water drainage areas bullet point 3 of the policy makes reference to these areas being identified in the Water Cycle Study.
   No changes to the Final Plan

   In terms of major development, the definition is set out in the Town and Country Planning General Development Procedure Order (2006)
   No changes to the Final Plan

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In terms of Surface Water Management Plans and Statements, a minor change will be made to clarify that 'proposals <u>will be</u> supported' by such evidence to make clear that this is a policy requirement. The scale and nature of development that will need to provide a full Surface Water Plan as opposed to a Surface Water Statement will be set out in the Water Management SPD. Paragraph 7.14 of the explanatory text should be amended to make clear that the SPD will clarify what is required for different types and scales of development.
Minor word changes to the Final Plan

4. **Detailed SAMDev policies**
   In terms of a detailed criteria based policy for foul drainage it is considered that the combined effect of the Implementation Plan and proposed Water Management SPD will adequately cover this issue and will ensure all development proposals demonstrate that there is sustainable wastewater infrastructure.
   No changes to the Final Plan

   In terms of a flood risk policy, Policy CS18 states that further guidance will be set out in a Water Management SPD. This will build on the information provided in the SFRAs and the Water Cycle Study. The requirement for any additional DM policies will be explored through the preparation of the Site Allocations and Management of Development DPD.
   No changes to the Final Plan

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

CS19 Waste Management Infrastructure

Summary of key issues:

1. **National Waste Policy Principles / Waste Hierarchy**
2. **Self Sufficiency and Local Need**
3. **Energy from Waste and Carbon Emissions**

Proposed course of action:

1. **National Waste Policy Principles / Waste Hierarchy**
    It is suggested that Policy CS19 should include greater emphasis on consistency with the waste hierarchy (FoE). For consistency with Strategic Objective 9 and to prevent any confusion about priorities in waste management, for example the promotion of energy generation at the expense of recycling, the policy should clearly state "any proposal for waste treatment facility must not prevent waste disposal options further up the waste hierarchy from being fully exploited" (CPRE).

    No changes are proposed in response to these concerns
    The Core Strategy is part of a continuum of policy guidance which includes PPS10 and there is therefore no need to duplicate existing guidance including that about the role, significance and interpretation of the waste hierarchy.

2. **Self Sufficiency and Local Need**
    Policy CS19 should promote proximate waste management and greater self sufficiency (Environment Agency) and reference to "local need" should be clarified to make clear the spatial dimensions of the anticipated need served by the policy (CPRE). The spatial pattern of waste management facilities in Shropshire is already addressed in paragraph 7.26.

    No changes are proposed in response to these concerns
    Local need refers to need within a cost effective transport distance which will vary depending on the market value and nature of the materials involved. This will be defined by the market and could include areas outside Shropshire.

3. **Energy from Waste and Carbon Emissions**
    A statement should also be included on the need for any facility to show efficient use of resources and a lower rate of CO_2 emissions compared to other available technologies (FoE). There should be a greater focus on waste minimisation and the integration of energy and

heat recovery in new development greater, together with greater emphasis on energy from waste and the potential for Combined Heat and Power [CHP] (Environment Agency).

No changes are proposed in response to these concerns
The role of waste in contributing to a low carbon economy is already addressed in para. 7.24. The Core Strategy deliberately adopts a flexible approach which allows for the market viability of different technologies to change over time (para. 7.21) and detailed consideration of the relative merits of different waste technologies is inappropriate and more properly considered as part of waste management regulation at the planning application stage. Low carbon and renewable energy generation are specifically encouraged by Policy CS8.

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CS20 Strategic Planning for Minerals

Summary of key issues:

1. **Consistency with National Policy** – concerns about mineral working in the AONB and reference to sub-regional apportionments;
2. **Minerals Technical Background Paper** – concerns about inadequate justification of the Plan in the context of the fact that the paper was not available at the time that the Final Plan was published;
3. *Mineral Safeguarding* – **Concerns about how Mineral Safeguarding Areas (MSA's) are illustrated;**
4. **Hydrocarbon Resources** – **Minor changes proposed to clarify the resources**

Proposed course of action:

1. **Consistency with National Policy**
    Several respondents (FoE, CPRE, National Trust) are concerned that showing "broad locations for future working of sand and gravel" within the AONB in Figure 11 is tantamount to an invitation for them to be considered for extraction and consider that while these areas remain on the plan, the Core Strategy fails the test of soundness by being in conflict with national policy MPS 1. National guidance in MPS1 is clear that mineral working is not precluded in the AONB, but should only take place in exceptional circumstances.

    No changes are proposed in response to these concerns

    Consideration of the availability of potential resources in the AONB is considered to be appropriate at a strategic planning stage, recognising that site allocations or applications would need to demonstrate compliance with national guidance to be capable of support. The second bullet point of Policy CS17 requires all development to have regard to the quality of Shropshire's environment, including the AONB.

    Concerns have also been raised that CS20 fails to set out how much mineral aggregate working is required to meet apportionment requirements (Mineral Products Association, West Midlands Regional Assembly, Lafarge, Cemex). As the mineral industry and the Assembly are aware, there was no current agreed revised sub-regional apportionment at the time that the Plan was drafted and the interim position still remains unclear. It was not therefore possible to include the detail suggested. Shropshire Council, together with the majority of the MPA's in the West Midlands region, and the minerals industry, does not accept the revised sub-regional apportionments included in the Interim Policy Statement which was agreed by the WMRA in March 2010 since these were based on inadequate evidence and a flawed methodology. The status of regional guidance, including the Interim Policy Statement has been called into question by the new Government's stated intention to abolish it. Available numerical and other information relevant to the sub-regional apportionment of aggregates is reviewed in the Minerals Technical Background Paper which has been prepared to support the submission Core Strategy

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(see below). Wherever possible, the Core Strategy deliberately avoids the inclusion of time limited information in order to avoid creating unnecessary early obsolescence.

2. **Minerals Technical Background Paper**
Policy CS20 is considered to be unsound because it is not justified through lack of evidence (Mineral Products Association, Lafarge, Cemex, Staffordshire County Council). As all these organisations are aware, it was not possible to prepare the background paper in time for publication of the Final Plan Core Strategy because of ongoing work to develop revised sub-regional apportionments in the West Midlands. However, much of the available data was already available in other sources of published evidence such as the Shropshire Council AMR 2009-10 and regional aggregates monitoring reports.

No changes are proposed to the Core Strategy
However, the available numerical and other information relevant to the sub-regional apportionment of aggregates is now reviewed in the Minerals Technical Background Paper which has been prepared to support the submission Core Strategy.

3. **Mineral Safeguarding**
Several concerns have been raised about the way in which mineral safeguarding is addressed in the Core Strategy:

- The mineral safeguarding approach is too 'broad brush' to be on practical use as a policy and the map (Figure 10) is at too small a scale to allow identification of any specific piece of land and that it should therefore be re-drawn on an OS base at a more appropriate scale or shown as part of the Proposals Map (Mineral Products Association) or a commitment should be provided to the provision of more detailed guidance (Cemex);
- The MSA is not currently illustrated as a single area on the Key Diagram (and in due course the specific boundaries of the MSA defined on the Proposals Map), in a way consistent with the requirements of MPS1 and its accompanying Practice Guide. (Coal Authority);
- Figure 10: Mineral Safeguarding Areas in Shropshire does not appear to reflect information showing the extent of surface coal resources provided by the Coal Authority in September 2008 and thus excludes areas of surface coal resource from the MSA.
- It is suggested that CS20 is not justified or effective because it does not indicate how MSAs are defined and the policies through which they have effect. The policy should clarify whether further guidance will be provided about the operation of MSA's in a subsequent DPD (Mineral Products Association).

No changes are proposed in response to concerns about the illustration of the MSA

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Shropshire is a very large county with a complex geology. Inclusion of a full OS base would not aid the ease with which the MSA boundary is interpreted. The format of the Core Strategy precludes inclusion of MSA data at a larger scale. However more detailed illustration can be tailored to a specific area and scale on request using GIS. No strategic site allocations are made by the Core Strategy and it therefore includes a 'Key Diagram', rather than a Proposals Map and the guidance in paras 8.1 – 8.3 of the current PPS12 do not therefore apply.

Minor changes Proposed

With respect to the definition and implementation of the MSA, 'operational limits' and buffering have already been taken into account as part of the work completed by BGS for Shropshire and Telford & Wrekin in 2009 which identified the MSA areas illustrated in Figure 10. A reference to this study will be included in the list of key evidence on page 119. Paragraph 7.27 will be updated to include reference to the fact that further guidance regarding the operation of the MSA will be provided as part of the Site Allocations and Management of Development DPD.

4. **Hydrocarbon Resources**
   A range of concerns have been expressed about the way in which the Plan addresses the working and legacy of hydrocarbon resources:

   - For the sake of clarity, it is suggested that the annotation on Figure 10 should be amended to read "Petroleum Exploration and Development Licence Area" rather than CBM and that specific reference to the exploration and exploitation of a wider range onshore oil and gas reserves using other methods should be included within Policy CS20. (Composite Energy);
   - Amend Policy CS20 supporting text to note that the planning authority and licensed operators will work together to ensure that operation requirements and likely environmental impacts of development associated with that extraction are understood;
   - Development Plans for areas covered by PEDL licences should identify the area within which extraction may be acceptable and the factors that should be taken into account when deciding planning applications. (Composite);
   - Within the Shropshire area there are a range coal mining legacy related hazards. The impact of these hazards should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards. (Coal Auth)

Minor Changes Proposed to amend the annotation on Figure 10

More detailed mineral guidance, including guidance about hydrocarbon exploration and working will be included as part of the SAMDev DPD as indicated under 'Delivery and Monitoring of Policy on page 119. With respect to mining legacy issues, no changes are required since the need for the design of development to respond to safety issues is already addressed in Objective 10 and is expanded in Policy CS6 with specific reference to land stability issues. Relevant GIS data for specific areas affected will be requested from the Coal Authority, and reference to mining legacy issues will be included in the place based appendices of the implementation Plan.

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'The Challenges we face' (page 28)

Summary of Key Issues:

1.   To reflect Community Strategy reference should be made to addressing safety of residents

Proposed Course of Action:

1.   Reference to safe and secure communities
One representation identified the need to reflect more closely the priorities of the Community Strategy. Proposed change to final bullet on page 28 to include reference to 'active, healthy safe and secure lives' in the section 'in Shropshire, we need to plan for:'

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

Spatial Vision (pages 28-31)

Summary of Key Issues:

1.   **Clearer reference should be made to market towns and key centres to reflect CS1 and CS3**
2.   **The market towns and key centres (outside of the five pre-eminent market towns) should be recognised as a focus for sustainable growth.**
3.   **Reference to 'proposed' construction of Shrewsbury North West Relief Road (SNWRR) and Shrewsbury Parkway Station**
4.   **Role of the private sector in managing and maintaining the landscape should be reflected in the vision**

Proposed Course of Action:

The majority of representations received in respect of the Spatial Vision do not raise soundness issues. Many are comments or supporting representations. Where this is the case, the comments and/or support for the Spatial Vision are noted.

1.   **References to market towns and key centres**

One representation highlighted that the reference to 'main' market towns and smaller market towns and key centres needs to be revised to reflect reference in CS1 and CS3 which does not distinguish between main and smaller market towns. Issues over main/small market towns could be addressed through proposed change to Paragraph Four to read as below:

"An appropriate balance of new housing and employment development will have taken place in sustainable locations within each of these towns. The other market towns and key centres will have continued to play a vital role in meeting local need and providing services as the focus for sustainable growth for areas not easily served by Oswestry, Whitchurch, Market Drayton, Bridgnorth and Ludlow."

In Paragraph Two of the vision a proposed change is to remove 'main' from "Shrewsbury, Shropshire's main market towns and key centres"

2.   **Reference to sustainable growth of towns outside of the main market towns**

One representation highlighted that the role of the market towns and key centres outside of Oswestry, Whitchurch, Market Drayton, Bridgnorth and Ludlow should be more explicitly recognised. A proposed change to Paragraph Four of the vision is set out above.

3.   **Reference to SNWRR and Shrewsbury Parkway**

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A couple of representations highlighted the vision's reference to the proposed construction of the SNWRR and Parkway Station and suggest that there should be a firm commitment or they should not be mentioned. The lack of certainty is acknowledged but as key priorities of the LTP it is important to reference them but with ongoing uncertainty it is difficult to give more backing in the vision than currently made. Therefore no changes are proposed to the Final Plan.

4.   The role of private sector in maintaining and managing the landscape
One representation highlighted that the role of private agriculture should be recognised as key to maintaining and managing the landscape. There is a proposed change to penultimate paragraph on page 31 to reflect this: "The quality of the landscape, geodiversity and core areas of biodiversity such as the Shropshire Hills AONB, Meres and Mosses, and Severn Valley corridor will have been maintained and managed, recognising the role played by the public and private sectors. Both designated and…"

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

Objectives (pages 31-34)

Summary of key issues:

1.   Reference to 'self contained settlements' in Strategic Objective 2.
2.   Reference to 'hinterlands' in Strategic Objective 2 although strategy is set out by spatial zone.
3.   Delivery of the rebalancing of rural areas referenced in Strategic Objective 3.
4.   Making up of shortfall of housing numbers and the need identified in RSS and Strategic Housing Market Area Assessment.
5.   Reflecting the need to safeguard mineral reserves.

Proposed Course of Action:

1.   Reference to 'self contained settlements in SO2.
A number of representations highlighted that Strategic Objective 2 should not reference Shrewsbury and the market towns/key centres as 'self contained settlements' as this is not achievable. A minor change to Strategic Objective 2 is proposed to reflect the wording in Policy CS3. Strategic Objective 2 to now read: 'Develop the roles of Shrewsbury as a sub-regional centre, and Shropshire's market towns and key centres as ~~self contained~~ <u>more</u> <u>sustainable and self sufficient</u> settlements, providing the main focus for new housing, employment and infrastructure development and the preferred location for a range of services and facilities to serve the wider needs of their respective hinterlands.'

2.   Reference to hinterlands of Shrewsbury and market towns/key centres
A number of representations refer to Strategic Objective 2 in relation to the reference to rural hinterlands. This issue is related to the strategic approach outlined in Policy CS1 and its use of spatial zones rather than referring to this Strategic Objective in isolation. Although the spatial zones are used in Policy CS1, Policy CS3 clearly also references the role of market towns/key centres in meeting the needs of their rural hinterlands and recognises the sphere of influence of the market towns/ key centres. No changes to this Strategic Objective are proposed.

3.   Delivery of rebalanced rural areas in SO3
A small number or representations recognised the importance of planning for rural areas but questioned the dispersal of development. No changes are proposed to the Strategic objectives as it is more of an issue in terms how Policy CS1 sets out the strategic approach to development in Shropshire and its implementation rather than a comment on the Objective itself. The Site Allocations and Management of Development DPD will provide more guidance on the rural areas.

4.   Delivery of shortfall of housing numbers

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A number of representations questioned whether Strategic Objective 5 should explicitly deal with the shortfall of housing identified between housing numbers set in the RSS and need identified in the SHMAA, and shortfall between RSS and affordable housing needs. The figures set out in Policy CS1 are based on a robust evidence base. The type and affordability of housing is largely dealt with within Policy CS11 and a subsequent Supplementary Planning Document. Taken together Strategic Objective 4 and Strategic Objective 5 are considered a robust basis for the Core Strategy housing policy approaches and no changes are proposed.

5.   Respecting mineral reserves and land instability issues
One representation suggested the need to have a new objective to highlight the safeguarding of mineral resources in a new Strategic Objective. The need to safeguard mineral resources is clearly identified in Policy CS20 and it is considered that a detailed objective would not be appropriate to the Core Strategy and would replicate national policy guidance. No changes are proposed to the Final Plan.

APPENDIX A: SUMMARY OF KEY ISSUES AND PROPOSED RESPONSES

Spatial Zones and Key Diagram

1. **Consistency of mapping – concerns about the consistent illustration of some key centres between Figure 4, the Key Diagram and Spatial Zone maps;**
2. **Spatial Zone Text – concerns about accuracy and suggested updates;**

Proposed course of action:

1. **Consistency of mapping**
   Several respondents have raised issues about the consistency with which some key centres are shown on different maps. Minor changes are proposed to address these concerns;

2. **Spatial Zone Text**
   Several respondents have suggested updates to the text for specific spatial zones or for additional infrastructure which should be described for each zone. Minor changes are proposed to address many, but not all, of these suggestions.