



The Planning Inspectorate **APPENDIX A**

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# **Report to Shropshire Council**

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an Inspector appointed by the Secretary of State for Communities and Local Government

7th February 2011

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**PLANNING AND COMPULSORY PURCHASE ACT 2004**

**SECTION 20**

**REPORT ON THE EXAMINATION INTO THE  
SHROPSHIRE CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 30 July 2010  
Examination hearings held on 16-26 November 2010

File Ref: PINS/Y3235/429/7

## ABBREVIATIONS USED IN THIS REPORT

AA	Appropriate Assessment
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
BGS	British Geological Survey
CC	County Council
CIL	Community Infrastructure Levy
CS	Core Strategy
DCLG	Department for Communities & Local Government
DPD	Development Plan Document
DVI	Dynamic Viability Index
EA	Environment Agency
EH	English Heritage
EIP	Examination in Public
ELR	Employment Land Review
GOWM	Government Office for the West Midlands
GTAA	Gypsy & Traveller Accommodation Assessment
HA	Highways Agency
HCA	Homes & Communities Agency
ha	hectares
ICIS	Interim Community Involvement Statement
ICT	Information & Communication Technologies
IPS	Interim Policy Statement
LAA	Local Area Agreement
LDF	Local Development Framework
LDFIP	Local Development Framework Implementation Plan
LDS	Local Development Scheme
LEP	Local Economic Partnership
LTP	Local Transport Plan
MOD	Ministry of Defence
MPA	Mineral Planning Authority
MPS	Mineral Planning Policy Statement
MWMS	Municipal Waste Management Strategy
NE	Natural England
ONS	Office for National Statistics
¶/para	paragraph
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RPB	Regional Planning Body
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAMDev	Site Allocations & Management of Development DPD
SC	Shropshire Council
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SITS	Shrewsbury Integrated Transport Strategy
SNWRR	Shrewsbury North-West Relief Road
SPD	Supplementary Planning Document
SUE	Sustainable Urban Extension
WMRA	West Midlands Regional Assembly
WMRAWP	West Midlands Regional Aggregates Working Party
WMRSS	West Midlands Regional Spatial Strategy
WMRTAB	West Midlands Regional Technical Advisory Body

## Non-Technical Summary

This report concludes that the Shropshire Core Strategy Development Plan Document provides an appropriate basis for the planning of Shropshire over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet the legal and statutory requirements and ensure that the Core Strategy is sound. These can be summarised as follows:

- Clarify the overall level of housing and employment development, including the proportions of development allotted to Shrewsbury, the market towns and other key centres, and the rural areas, and the basis for the figures and any review of the plan;
- Clarify the development strategy for Shrewsbury, including details of the Sustainable Urban Extensions and the release of other sustainable sites;
- Add further details of water, waste water and hydraulic capacity constraints at the market towns and other key centres;
- Clarify the approach to development in the Green Belt and countryside, including rural conversions;
- Clarify the approach to sustainable development, including the *Sustainability Checklist*;
- Clarify the approach to managing the release of housing land;
- Clarify the approach to affordable housing and infrastructure contributions;
- Update and amend the figures on employment land supply and requirement;
- Confirm that retail development will be addressed using the sequential approach to site selection;
- Confirm that new development should meet current water efficiency requirements;
- Confirm the waste management "capacity gap" which needs to be met, and current waste management targets;
- Outline current mineral production and confirm that Shropshire will maintain the current level of production and current percentage regional contribution of production of aggregates;
- Various other changes to ensure the strategy, policies and explanatory text are consistent and soundly-based.

All the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the examination. These changes do not alter the thrust or basis of the Council's overall strategy.

## Introduction

- i. This report contains my assessment of the *Shropshire Core Strategy* (CS) Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the Core Strategy is compliant in legal terms and whether it is sound. Planning Policy Statement PPS12 (¶ 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
- ii. The starting point for the examination is the assumption that Shropshire Council (SC) has submitted what it considers to be a sound plan. The basis for the examination is the submitted Shropshire Core Strategy Final Plan Publication (February 2010) [CD1], together with the Schedule of Proposed Changes [CD6]. Since these changes have been formally accepted, they are embedded in the submission version of the CS and do not require any further recommendation or endorsement. However, some of these changes have been superseded by later changes put forward during the course of the examination.
- iii. A further Schedule of Proposed and Further Proposed Changes was published at the end of the hearing sessions of the examination [FS1.42], drawing together all the post-publication proposed changes and those put forward and discussed during the hearing sessions of the examination. All of the changes that the Council has put forward have been publicised on the Council's web-site and notified to all representors. I have taken account of the responses to these proposed changes made in writing and at the hearing sessions.
- iv. My report focuses on those changes that are needed to make the CS sound, identified in bold in the report **[PC]**. **All these changes have been put forward and agreed by the Council** and are presented in Appendix A, and subject to one minor amendment, are endorsed. None of these changes materially alters the substance of the plan and its policies, or undermines the sustainability appraisal and participatory processes undertaken.
- v. Many of the other changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments made in the interests of clarity and in response to points raised by representors. As these changes do not directly relate to soundness, they are not generally referred to in this report, but they do improve the clarity and coherence of the CS. These changes are shown in Appendix B. I am also content for the Council to make any additional minor changes to page, figure, paragraph numbering etc and to correct any spelling errors prior to adoption.
- vi. My approach to this examination has been to work with the Council and other participants in a positive, pragmatic and proactive manner with the aim of resolving differences and overcoming any elements of potential unsoundness in the plan.
- vii. References in my report to documentary sources are provided thus [ ], quoting the reference number in the examination library.

## Assessment of Soundness

### Overview

1. The Shropshire Core Strategy (CS) is a high-level strategic plan, which will form part of the Council's LDF, along with subsequent DPDs & SPDs. It encompasses a distinctive approach to development in Shropshire, with the aim of delivering more sustainable places at both urban and rural level. The essence of the strategy is to focus growth on Shrewsbury, the main market towns and other key centres, whilst also rebalancing the rural area by helping smaller settlements to become sustainable places. The CS sets out four main themes with a range of key policies: to create sustainable places, meet housing needs, ensure a prosperous economy, and protect the environment. The plan is supported by an extensive evidence base, including a LDF Implementation Plan [EV9], outlining the infrastructure requirements to support the CS, with place-based schedules detailing the infrastructure and investment necessary to deliver the CS.

2. At the heart of the Council's approach is pro-active community engagement, as an important tool to identify community needs, working in partnership with key delivery agencies. With its framework for creating sustainable places, the CS presents a balance between informed strategic planning and a "bottom-up" community-led approach to deliver the plan. Although the overall levels of new housing and employment development are clearly established, along with the distribution of development to Shrewsbury and each of the spatial zones, more detailed decisions about the precise scale, nature and location of development at the market towns, other key centres and smaller rural settlements are left to the Site Allocations and Management of Development DPD (SAMDev).

3. In taking this approach, the Council has set itself a challenging task, engaging with individual communities and working with key delivery partners. This reflects the approach taken to address Shropshire's specific issues and challenges, embracing the emerging concept of "localism" which is at the heart of the new coalition Government's agenda. However, it does mean that some aspects of the CS are not as detailed as they could be, but this approach is not, in itself, unsound. In essence, the CS provides the minimum strategic spatial framework required to guide future DPDs and development management decisions, but the Council will have to ensure that the necessary detailed decisions are made in the SAMDev in order to provide the complete framework to guide future development in the county.

### *Regional Spatial Strategy*

4. On 6 July 2010, shortly before the examination commenced, the Secretary of State announced the revocation of Regional Strategies, including the *Regional Spatial Strategy for the West Midlands* (January 2008) (WMRSS) [EV4a]. However, this decision was challenged in the High Court and the outcome, on 10 November 2010, was to quash the earlier revocation. As a consequence, the WMRSS as it stood on 5 July 2010 forms part of the statutory development plan. Although the CS has regard to this version of the WMRSS, it was prepared largely in the context of the more recent *WMRSS – Phase 2 Revision – Draft Preferred Option* (Dec 2007) [EV4b] and its accompanying evidence base. This was subject to an EIP in April-June 2009, and the CS pays particular regard to the recommendations of the Report of the Panel [EV66], published in September 2009, including the overall housing and employment land requirements. In March 2010, WMRA confirmed that the CS was in general conformity with both the approved WMRSS and the emerging Phase 2 Revision. However, there has been no further progress on the Phase 2 Revision, due to the Secretary of State's stated intention to revoke Regional Strategies.

## Main Issues

5. Taking account of all the representations, written evidence and the discussions at the examination hearings, there are six main issues upon which the soundness of the plan depends.

### *Vision and strategic objectives*

#### **Issue 1 – Are the Vision and Strategic Objectives soundly based and appropriate for Shropshire, consistent with national policies, reflecting community views and locally distinctive, and do they provide a sound basis for the overall spatial strategy and strategic policies in the Core Strategy?**

6. The basis for the CS Vision is set out in supporting statements [FS1.34]. It has been directly informed by community engagement from the earliest stages of the plan-making process [CD20] and revised as a result of responses. The preparation of the CS has been co-ordinated with the work of the Shropshire Partnership, and it closely relates to the vision and priorities of the SCS [CD14] and that of the *Shrewsbury Vision* [EV14]. It is locally distinctive and reflects both the shared evidence base and the consultation processes. It focuses on the issues and challenges facing the urban and rural parts of this diverse county, by seeking to meet the needs of a growing ageing population, providing skilled employment, retaining young people, delivering affordable housing, increasing access to services, producing sustainable transport solutions and by balancing growth with meeting environmental objectives.

7. This Vision is consistent with national policies, outlining the spatial development of Shropshire and its strategic priorities, and provides a sound basis for the spatial strategy, pattern of development and strategic objectives of the CS. It acknowledges the key role of Shrewsbury, and makes the distinction between the five largest market towns and other towns and key centres. Minor criticisms about the precise role and status of some of these centres do not undermine the overall Vision for the county, particularly when seen in the context of specific policies later in the CS. SC proposes some minor changes to clarify the role of the main market towns, whilst issues about particular settlements (such as Minsterley, Pontesbury and Much Wenlock) are better considered under the specific policy for these centres. References to transport priorities such as the SNWRR and Parkway Station are appropriate to this vision, and reflect the current LTP [EV63]; minor changes address detailed concerns. Issues about development "in", "at" or "within" settlements are not central to the soundness of the vision.

8. The strategic objectives are derived directly from the spatial vision and provide the broad direction for the strategy and policies in the CS. They are clear, specific and locally distinctive, focus on the range of spatial and strategic elements of the vision, and provide the basis for monitoring. They have emerged through the plan preparation process and are closely related to the policies and spatial interventions needed to deliver the plan. There are some minor criticisms about the detailed wording, relationship with the hinterlands of the main towns and centres, the self-contained nature of the settlements, making provision for affordable housing, supporting tourism and acknowledging land stability issues. However, these have been addressed by minor changes, are reflected in later policies, or are not crucial to the soundness of the objectives or the plan as a whole. Other points raised by representors largely seek to improve aspects of the Vision and objectives, rather than affecting soundness. Consequently, the Vision and Strategic Objectives provide a sound, relevant and locally distinctive basis for the spatial strategy, and **no further changes** are needed to this part of the plan in the interests of soundness.

## ***Spatial Strategy – Creating Sustainable Places***

### **Issue 2 – Is the Spatial Strategy soundly based, effective and deliverable, appropriate for Shropshire, supported by a robust and credible evidence base, and consistent with national policy?**

9. This section of the CS sets out some of the key policies and strategic approach to future development in Shropshire. This includes the overall levels of housing and employment development, the balance between urban and rural settlements, the distribution to spatial zones, and the development strategy for Shrewsbury, the market towns and other key centres, smaller rural settlements and the countryside. They represent crucial elements of the strategy, on which most of the discussion at the hearing sessions of the examination took place.

#### ***Strategic approach***

10. Policy CS1 reflects the three-tiered approach established in the Spatial Vision, focusing on Shrewsbury, the market towns and other key centres, and the rural areas. It sets out the overall scale of housing and employment development, the broad distribution of development to Shrewsbury, the market towns/other key centres and rural areas, and sets indicative ranges of development in the five spatial zones. The spatial strategy is clearly expressed and soundly based on a robust, credible and up-to-date evidence base [FS1.13]. It is consistent with national policy and aligned with the strategies, priorities and projects of adjoining areas and other agencies. It also provides sufficient strategic guidance and spatial direction about the broad scale, location and distribution of development to inform the SAMDev and development management decisions, and is effective and deliverable.

#### *Overall level of housing development*

11. As published, Policy CS1 sets an overall housing target for Shropshire of "around 27,500 new homes". On submission, SC wished to amend this figure to "up to 27,500 homes, if required". However, during discussions at the hearings, it became apparent that this was a materially different policy, setting a ceiling rather than a target for development, and it was unclear how the "if required" element would be assessed. SC confirmed its intention to make provision for "at least" 27,500 new dwellings in the SAMDev, with a managed release of housing land on a phased basis, along with a 15% reserve pool of housing land for Shrewsbury. The overall "headline" figure of 27,500 homes is clearly a target rather than a ceiling, and a return to the originally published wording is more correct and appropriate, as SC now agrees **[PC1]**. Further clarification is also proposed to indicate the circumstances when this figure may need to be reviewed **[PC4]**.

12. The basis of the overall housing figure stems from the evidence base used for the WMRSS Phase 2 Revision, which was subject to consultation and examination by the EIP Panel. SC is content to reflect the conclusions of the EIP Panel, who recommended a slightly higher figure than the 25,700 dwellings included in the submitted WMRSS, and endorses the 27,500 figure now included in the CS. This level of provision is based on population and household projections used for the WMRSS Phase 2 Revision and EIP, along with evidence of past rates of delivery, reflecting Shropshire's needs and linked to the delivery of the spatial strategy. Supporting evidence [FS1.8(4)] outlines the key factors behind the decision to rely on the housing figure in the WMRSS Phase 2 Revision, as it emerged from the EIP. This housing figure is essentially Shropshire's own target, geared to meet Shropshire's future housing needs, and supported by a robust evidence base, including a SHMA & SHLAA.

13. The proposed level of housing provision is supported by most house-builders and developers. There is little pressure for a higher target, apart from giving some additional flexibility and providing more affordable housing, but this is not justified by the evidence base. Others argue for a lower target, but this would exacerbate housing shortages, increase house prices and reduce the level of affordable housing, and could affect economic development. The 2004-based provision level in the approved 2008 WMRSS (18,400) is outdated and too constrained in terms of housing demand and affordability. The proposed proportion of affordable housing is based on the 33% target set out in Policy CS11, which is considered later. SC also confirms that housing for military personnel is excluded from the Shropshire total.

14. At the end of the hearings, new 2008-based DCLG/ONS household forecasts were published [FS1.43], predicting a lower number of households by the end of the plan period. However, it would not be appropriate to base a 15-year plan on a single snapshot of data, without any strategic policy input or consideration of other factors, issues, assumptions and longer-term trends. The appropriate mechanism would be to review the CS in due course, whilst carefully managing the release of housing land over the plan period and regularly monitoring the plan, as confirmed in the Council's suggested change **[PC4]**. There are significant risks in setting a lower target at this stage, particularly since the population continues to grow and average household size continues to fall; therefore the number of households, and so the number of dwellings needed, will continue to grow. Consequently, an overall level of housing provision expressed as "around 27,500 homes" is soundly based and appropriate.

#### *Overall provision of employment land*

15. The "headline" figure of "around 290ha of employment land" (as amended **[PC1]**) is similarly derived from the evidence base in the WMRSS Phase 2 Revision and subsequent Report of the EIP Panel. Although the WMRSS does not specify an amount of employment land for Shropshire, it establishes a methodology for calculating the total indicative employment land provision, which was endorsed by the EIP Panel. The CS merely rounds up the indicative figure (of 288ha) resulting from identifying four 5-year reservoirs of employment land (each of 72ha) to 290ha, as explained in the supporting evidence [EV52a]. This sets out the factors taken into account, including past rates of development, existing stock of land, cross-boundary issues, the need for small sites and the scale of housing growth. It is unfortunate that an up-to-date Employment Land Review was not completed before the CS was submitted and examined, but ongoing work [EV52a] provides a sound evidence base for the proposed level of employment land provision. The proposed level of provision is therefore soundly based, and will help to support sustainable economic development and meet the employment needs of Shropshire.

#### *Scale of development at Shrewsbury, the market towns and other key centres, and in the rural areas*

16. The distribution of residential development between the three levels of the settlement hierarchy is initially based on the past rate of delivery of development (1998-2008), varied as a result of consultation at the Issues & Options stage, the strategic objectives and the evidence base. Policy CS1 takes a different approach to residential and employment development, expressing the former as a proportional split and the latter as a desired outcome. Balancing homes and jobs does not simply equate to repeating the residential proportional split, but takes account of the type, quality and demand for employment land, as well as the strategic role and function of Shrewsbury. I deal with the proportions of development allotted to Shrewsbury, the market towns and other key centres, and the rural area under Policies CS2, CS3 & CS4 respectively.



### *Settlement hierarchy and Spatial Zones*

17. The settlement hierarchy is based on the scale and distribution of existing settlements, related to the SCS, Shrewsbury Vision and the objectives of providing strong market towns and rebalanced rural settlements, following the principles of community engagement and improving rural sustainability [FS1.15a]. The CS identifies five Spatial Zones, reflecting the diverse character of the county and their different functions, characteristics, needs, pressures and constraints, including Green Belt and AONB, as summarised in the spatial portrait. Policy CS1 provides a range of dwelling numbers and employment land for each spatial zone, based on factors such as estimated household growth, a broad fit between housing and employment land, analysis of past trends and future needs, local aspirations and land constraints [EV3]. The broad ranges provide a balance between certainty and flexibility, whilst reflecting the scope for new development and taking account of existing commitments. Taking the mid-point of each range would provide the 27,500 dwellings and 290ha of employment land required, within an upper and lower range.

18. There is some concern about the role and status of some settlements in the hierarchy and the deletion of the "local centres" category. Having considered all the evidence and the discussion at the hearing sessions, I am satisfied that the proposed hierarchy reflects the status, role and function of the various settlements. The removal of "local centres", as proposed in an earlier consultation document, is due to the lack of evidence based on their roles and absence of community aspirations; the future status and role of these smaller settlements will be addressed as part of Policy CS4 dealing with Community Hubs & Clusters and in the SAMDev.

19. Criticisms are also raised about the definition and purpose of the Spatial Zones, particularly the overlapping nature of boundaries and centres. The extent of the Spatial Zones reflects their particular characteristics and functions, including relationship with key centres, travel patterns, development pressures, needs and constraints, as detailed in the evidence base. The boundaries of the zones overlap because factors such as topography, local economy and the relationship with key centres do not have definite limits, giving flexibility and reflecting characteristics outlined in the spatial portrait. For monitoring purposes, each settlement will be allocated to a particular zone and SC confirms that the Spatial Zones will not be used to set 5-year housing or employment land supply targets.

20. There was much discussion about the scale of housing and employment development allotted to each Spatial Zone, but no conclusive evidence was offered to justify any major changes to the broad ranges proposed. There is a wide range of factors to consider, including development needs, the balance between housing and employment, land availability and constraints such as Green Belt and AONB; and altering the amount of development for one zone has repercussions for others. Having considered all the evidence and discussions on the various zones, I am satisfied that the broad ranges established in Policy CS1 recognise the particular characteristics and potential of each zone, whilst giving sufficient "headroom" to enable further development, after taking account of current commitments [FS3.12; EV142]. The SAMDev will address the detailed scale and location of future development across each zone, including the split between the main market towns and other key centres (such as Market Drayton, Oswestry and Bridgnorth), and the rural areas [PC3/PC15]. The various minor changes and corrections proposed to the spatial vision and Spatial Zones would ensure that the CS is internally consistent and factually correct.

## **Development Strategy for Shrewsbury**

21. Policy CS1 confirms Shrewsbury as the focus for significant residential, employment, retail and office development, accommodating *approximately* 25% (6,500 dwellings) **[PC2]** of Shropshire's residential development over the plan period. Policy CS2 also confirms a target of 90ha of employment land and sets out the priorities for development, including two Sustainable Urban Extensions (SUE). This reflects the town's strategic role as a main sub-regional centre, its Growth Point status and Shrewsbury Vision [EV14], in line with the WMRSS Phase 2 Revision [EV20; FS1.8]. It also recognises housing and employment needs and demand, the balance between new housing and employment development [EV3], past rates of development and the capacity for future development. It takes account of the need to make use of previously developed land, whilst recognising that some greenfield development will be needed [FS1.14]. At least 60% of new housing is expected to be on previously developed land, about 25% in the SUEs, and 15% on other sustainable land releases, plus a further 15% as reserve sites. Employment is to be focused on regenerating the Northern Corridor and in the SUEs. Retail and commercial development, along with key elements of infrastructure, are also priorities. Taking all factors into account, the overall strategy for Shrewsbury, including the scale of development, is justified by a comprehensive, robust and up-to-date evidence base, and is effective, deliverable, soundly based and appropriate for this county town.

22. In response to the concerns raised, Policy CS2 will ensure that adequate provision is made for housing at Shrewsbury, particularly with the latest change which amends the proportion of residential development at Shrewsbury from "up to" to "*approximately 25%/6,500 dwellings*" **[PC6]**. The SAMDev will also identify a reservoir of additional housing land (1,000 dwellings) at Shrewsbury, giving further flexibility and responding to the concerns of some house-builders about releasing other sustainable sites in or around Shrewsbury **[PC10]**. Some argue that more priority should be given to releasing greenfield sites, particularly smaller-scale sites, but this would be addressed by the amendments to include *other sustainable housing land releases on the edge of Shrewsbury* [FS1.12a] **[PC9]**. The balance between previously developed land, strategic locations and smaller/larger sustainable urban extensions is appropriate for the town, and is supported by extensive evidence [EV17/17a;EV24/a;EV44/51;EV52a;EV61;EV134/135].

23. The amount of new employment land is slightly higher than the proportion of new housing, reflecting the population of the town, the opportunities available, and its current and potential role to serve a wide catchment area. The brownfield land target (at 60%) is challenging, but accords with the WMRSS and is likely to be achievable, based on the evidence of past development and sites identified in the SHLAA [EV17a; FS1.8; FS3.14b]. Regeneration in the Northern Corridor is a key element of the strategy, in which Ditherington Flaxmill is an important component [EV12]. The development strategy for Shrewsbury is soundly based and fully justified in terms of highways/transport requirements [EV9], flood risk, water cycle and infrastructure. Agreements with HA & EA have resulted in minor changes to overcome concerns about transport and water cycle issues **[PC7]**, and other minor changes have resolved other relevant concerns. Issues about the Shrewsbury North-West Relief Road and Parkway Station are dealt with under Policy CS7.

### *Sustainable Urban Extensions*

24. Policy CS2 confirms that a key element in the provision of housing and employment development at Shrewsbury is the release of two Sustainable Urban Extensions (SUE) at Shrewsbury South and Shrewsbury West, providing about 900 dwellings/26ha of employment land and 700 dwellings/9-12ha of employment land

respectively, as confirmed in proposed changes **[PC8]**. The SUEs are supported by a comprehensive evidence base, including studies assessing potential sites and wider areas [EV24/24a], transportation assessments [EV61;EV134a] and master-plans [EV134-135], some of which are to be added to the evidence base **[PC12-13]**. They are integral to the delivery of Policy CS2, and provide strategic benefits for the long-term development of the town **[PC11]**. The proposed SUEs are not *allocated* sites in the CS, but are indications of their broad location. Further details, including detailed allocations and boundaries, will be established in the SAMDev, whilst details of the required infrastructure are set out in the LDFIP [EV9]. SC also confirms that areas/sites that were not selected as SUEs/urban extensions could be put forward for consideration as “non-strategic” allocations in the SAMDev.

25. The first main concern relates to the process by which the two preferred SUEs came to be identified in the CS, and whether alternatives (such as land at Weir Hill/London Road) were properly considered. Having considered all the evidence and discussion at the hearings, it is clear that all reasonable options were thoroughly considered during the plan-preparation process. SC has responded to the specific legal and procedural challenges in a robust manner, explaining the evolution of the policy and confirming the lack of any procedural irregularities [FS1.12a;FS1.33;FS1.41]. Even though the term “*Sustainable Urban Extension*” was not used until the later stages, when the importance of mixed-use development areas was recognised, consultation documents specifically referred to alternative areas (including Weir Hill/London Road (Option A), which at that stage was being promoted primarily as a housing site) in the various options. All options were subject to basic sustainability appraisal [CD31-32], and although this could have been more detailed and assessed each particular SUE, the level of detail was appropriate to this stage of plan-making. Consequently, I conclude that the process of selecting the SUEs was thorough and transparent, subject to full consultation and objective assessment, and is a sound approach with no fundamental shortcomings. There is certainly no justification to delete the SUEs from the CS on the basis of some serious procedural irregularity.

26. Shrewsbury South SUE is a mixed-use project, which would have a major benefit in terms of a new strategic employment allocation (22ha). It is subject to extensive evidence, including an indicative master-plan and delivery statement [EV135]. The main developer is fully committed to the project, and is drawing up a mixed-use scheme with employment, housing and open space elements. Concerns about the impact on Rea Brook in terms of greenspace and flood risk could be addressed as the detailed scheme emerges. Traffic and transport concerns have been resolved, including contributions to the improvement of junctions along the A5. Having considered all the evidence and discussion at the hearings, the site seems suitable and appropriate for this project, which is justified, deliverable and viable, with no major obstacles in terms of implementation or infrastructure.

27. Shrewsbury West SUE is another mixed-use project, with 700 houses, 9-12ha of employment land and a new Park & Ride site, which is also the subject of extensive evidence, including an indicative master-plan and delivery statement [EV134] and transport assessment [EV134a]. It would bring the benefits of a new link road to the Oxon Business Park and a new Park & Ride facility. The main concern relates to the provision of the Oxon Link Road (as part of the SNWRR) and the need for improvements at Churncote roundabout on the A5. However, the main developer sees these infrastructure works as integral to the project, and in response to concerns about viability, is confident that these costs have been taken into account. The development of the site is not dependent on the completion of the SNWRR, and discussions with HA are ongoing about detailed junction improvements, following general agreement [FS2.23].

28. Some questions are raised about the number of landowners involved, but the main developer (along with SC) controls most of the key elements of the site [FS3.15] and has no doubts about the viability or deliverability of the project. Detailed issues about access to schools, road links and cross-town traffic routes can be considered as the project advances. There is some suggestion that land at Mytton Oak Road (Option C) might be better as a SUE, particularly on landscape, public transport access and employment grounds [FS3.18], but no detailed mixed-use scheme has been put forward with the necessary level of supporting evidence or consultation. In any event, this area could be put forward as a potential development site at the SAMDev stage. Having considered all the evidence and the discussions at the hearings, this is a soundly-based proposal which is justified, deliverable and viable, and none of the detailed concerns demonstrate conclusively that it is unsound or that an alternative SUE needs to be identified.

29. Consequently, with the agreed amendments, Policies CS1 & CS2 provide a sound basis and framework for the future development strategy for Shrewsbury.

### ***Market Towns and other key centres***

30. Policy CS1 expects the market towns and other key centres to accommodate about 40% overall (11,000 dwellings) of the total residential development during the plan period, reflecting the spatial vision of creating a network of vibrant and prosperous market towns. This level of development was broadly supported at the Issues & Options stage and is seen as reasonable and deliverable in early consultations on the SAMDev. It reflects the role, status and sphere of influence of these centres, and recognises that they could be stronger focal points for local transport networks, employment opportunities and services. Policy CS3 carries this approach forward, seeking to ensure a network of vibrant and prosperous market towns and other key centres, identifying their existing and future role, function and sphere of influence, and supporting the Market Towns Regeneration Programme [EV41]. It has been subject to extensive consultation and is supported by a wide-ranging evidence base.

31. The detailed scale, location and phasing of development at each of the towns will be determined in the SAMDev. Although there are concerns about the scale of development likely at some centres (such as Bridgnorth, Ludlow, Oswestry, Much Wenlock and Shifnal), the figures show that there is sufficient "headroom" for such centres to accommodate new development [EV142]. To establish an upper limit on development at the market towns would be unduly prescriptive and pre-empt such decisions being made in the SAMDev with the benefit of information on site suitability/availability. Some representors seek to increase or reduce the overall proportion of development allotted to the market towns and other key centres, but there is no firm evidence to support any alternative figures. In the absence of conclusive evidence to the contrary, the overall allocation of about 40% of residential development to the market towns and other key centres is appropriate, justified and deliverable.

32. As for the role and status of the centres, some suggest that the larger market towns should be distinguished, but Policies CS3, CS15 & Table 2 confirm that they are treated differently. Although influenced by Shrewsbury, Minsterley & Pontesbury are complementary, and are the only settlements of any size in the locality; they are rightly included as much for their current, as well as their future social and economic role. There are concerns about the scale of future growth at Much Wenlock, but there is no dispute that it is rightly listed as one of the smaller market towns; the detailed scale and location of development and its relationship with Telford can be addressed in the SAMDev.

33. The policy of maintaining the Green Belt in Eastern Shropshire accords with national policy and the WMRSS. SC is not proposing changes to the existing Green Belt boundaries at this time, but the SAMDev will deal with detailed infill boundaries for “washed over” settlements and any allocations within the safeguarded areas at Albrighton and Shifnal. SC confirms that CS Table 2 is indicative, but proposes to amend the last column to specify <500 homes **[PC14]**. This reflects the results of early consultation on the SAMDev, which also confirms the general hierarchy and role of the settlements, supported by work on the SHLAA [EV17/a]. Smaller centres will be covered under Policy CS4, now that the “local centres” category has been deleted.

34. There is some concern about the infrastructure requirements, particularly given the current constraints in some towns and areas. However, the LDFIP [EV9] sets out all the detailed requirements, and SC has reached agreement with EA about clarifying current water, waste-water and hydraulic capacity constraints in the main towns [FS2.11]. These additions are important to ensure the soundness of the CS and ensure that these constraints are properly acknowledged **[PC16]**. With the agreed amendments, Policy CS3 is clearly expressed, fully justified, effective and deliverable, establishing a sound settlement hierarchy which provides the framework to guide the future development of the market towns and other key centres in Shropshire.

#### *Oswestry Sustainable Urban Extension*

35. Land on the south-eastern side of Oswestry is identified as a SUE, with a mixed-use development of 750 dwellings, 4-6ha of employment land, a local centre, new link road and open space. This is a long-standing project, with full consultation on options [CD21]. It is supported by a master-plan/delivery statement [EV136], transport assessment [EV62] **[PC17]** and other evidence [FS1.15], which confirms the need, suitability, location, infrastructure requirements and deliverability. It would provide up to 35% of Oswestry’s supply of new housing and is integral to the sustainable growth of the town. There are no serious issues relating to infrastructure or viability, following discussions with EA, HA and other service providers. The promoter of the scheme is fully committed to its implementation, which has support from the local community. This SUE provides the opportunity to create a distinctive new neighbourhood for Oswestry, which is sound, justified and deliverable.

36. There is a suggestion that a SUE should be identified at Bridgnorth. However, current plans do not envisage a new development of the scale, level of detail, mixed-use type and strategic nature as those proposed at Shrewsbury and Oswestry, and nor is it crucial to the implementation of the CS or the strategy for Bridgnorth. SC confirms that potential development sites on the edge of the town could be considered in the SAMDev, and similar considerations apply to other potential SUEs/allocations and sites at other towns put forward in the representations.

#### ***Community Hubs and Community Clusters***

37. Policy CS1 expects the rural areas to accommodate *around 35%* (9,625 dwellings) of the overall amount of residential development in Shropshire **[PC5]**. This amount of development will be delivered by Policies CS4 & CS5, in the *Community Hubs and Clusters* (around 24-29%), and from affordable housing on exception sites in the countryside (which previously have contributed about 10% of total supply), along with the conversion and re-use of rural buildings. It would also play a major part in the key objective of rebalancing the rural communities. The proposed 35% level is much less than has occurred in Shropshire’s villages in the past (42%), and early consultations on the SAMDev [EV141] show that this level of development meets community aspirations, is achievable and deliverable, particularly given the existing level of completions and commitments [FS3.5].

38. However, the suggested addition of "*if required*" to the 35% figure would introduce vagueness about how this figure would be established or delivered, which I cannot endorse. The term "*around 35%, to meet local needs and reflect community aspirations*" would give sufficient flexibility and clear guidance to communities to enable the precise amount and distribution of development within the rural area to be established as part of the SAMDev process **[PC5]**.

39. Policy CS4 establishes a positive framework for rural communities, enabling them to accept development where they consider it would benefit the sustainability of their settlement [FS1.16]. Rather than listing appropriate settlements, the policy outlines what a community hub or cluster is, as a focus for investment, and indicates what development might be acceptable in terms of catering for local needs; this will vary depending on the size and nature of the settlement and its needs. Community Hubs will be single settlements, whilst Community Clusters could be a group of closely related settlements which, together, have a range of facilities serving a local area. They will be identified in the SAMDev, after extensive consultation with communities, and the policy will be delivered through the LDF, other SPDs and the LDFIP. The policy will play an important part in rebalancing rural communities, closely reflects the emerging localism agenda, and is supported by evidence [EV10-11].

40. There is some concern that the policy should identify the specific local centres or include more criteria for their definition. However, the CS is based on a hierarchy which recognises the role and function of settlements, rather than their size, range of services, capacity or set criteria. The key is to engage with the communities and focus on the sustainability of settlements, and provide development which benefits the community and reflects their social and economic function. Policy CS4 will facilitate this community-based "bottom-up" process of "self-determination", enabling a more sustainable pattern of development in rural areas, with viable, realistic community benefits being delivered, in line with the concept of localism. Evidence on the initial consultation stage of the SAMDev [EV141] shows that enough settlements (over 40) will probably come forward to ensure that the overall scale of development envisaged in community hubs and clusters will be delivered. Continued dialogue with communities, landowners and other stakeholders may lead to more nominations as the plan-making process proceeds.

41. The community hubs and clusters would be unlikely to provide all of the 35% of development envisaged in the rural area outside market towns and other key centres. But with the contribution of "exception" sites, re-use and conversion of rural buildings and other rural developments, along with current commitments, it is likely that this proportion would be achieved [FS3.5]. Debate about which settlements should be identified as community hubs and clusters will be addressed in the SAMDev within the framework set by Policy CS4, providing certainty for both landowners and communities alike. Issues about sites being "*within*", "*in*" or "*at*" settlements are largely academic, given that this matter will be addressed in the SAMDev. The requirement for developers to provide community facilities and benefits is realistic and proportionate, and will depend on viability. A proposed change to the Glossary includes more specific definitions of housing for local needs **[PC18]**. Rural "exception" sites will form an appropriate part of the strategy for the rural area, and the policy will also facilitate special needs housing, including for the elderly.

42. Consequently, with the proposed changes, Policy CS4 provides a positive, clearly expressed and sound basis for identifying community hubs and clusters, which is justified, effective and deliverable. It also recognises the particular needs and characteristics of Shropshire's rural settlements, directly reflects the localism agenda, and will help in rebalancing the rural settlements.

## **Countryside and Green Belt**

43. Policy CS5 sets out the strategic approach to the sustainable management of the countryside, including the Green Belt [FS1.17]. It aims to ensure that development maintains and enhances the character and vitality of the countryside, positively encouraging schemes that improve the economic and social sustainability of rural communities, by focusing on the contribution that development would make to community benefit and sustainability. This enables a more positive and responsive approach to rural development, reflecting the particular needs of Shropshire's rural communities, helping to meet the objectives of rural rebalancing and maintaining a healthy rural economy. It also recognises the importance of the Green Belt, by maintaining its permanence and identifying areas of safeguarded land, in line with PPG2. It is based on an extensive, robust evidence base, including landscape assessments, and is consistent with national policies, including PPS1, PPS3, PPS4, PPS5 & PPS7. Further detailed policies, including those for the AONB, safeguarded land and Major Developed Sites in the Green Belt, will be addressed in the SAMDev.

44. The outstanding concerns include the principle of establishing development boundaries around settlements, the economic importance of agriculture to the rural economy, and the approaches to converting rural buildings and affordable housing in the countryside. SC confirms that rural settlements *may* have defined boundaries where appropriate, based on community preferences, which will be addressed in the SAMDev. This helps to focus on the potential community benefits of proposed development rather than its precise location, reflecting the principles of localism. Policy CS5 makes no changes to the designated Green Belt, with existing boundaries being retained, and sets out criteria to identify appropriate development and locations in other places. Issues about infill boundaries for other settlements which may be identified as Community Hubs & Clusters "washed over" by the Green Belt are a matter for the SAMDev. With the added definition of the *Countryside* in the glossary [PC23], the policy provides a flexible and positive approach to development in the countryside and at smaller settlements, consistent with national policy.

45. Policy CS5 recognises the economic importance of agriculture and the role of the countryside as a living working environment, by focusing on development which supports sustainable rural communities and benefits the rural economy. It lists a range of activities and uses appropriate to the rural area, in line with national policy in PPS4 (EC6/EC7) & PPS7, and linked to Policy CS13. Proposed changes confirm that appropriate uses include *leisure and recreation proposals which require a countryside location* and clarify the approach to development proposals in the countryside and Green Belt [PC19-20]. The allocation of specific sites (such as at Oswestry) will be for the SAMDev to address. The scale of development will largely be dependent on its nature, purpose and location, and possible anomalies in the classification of agricultural land (eg. Harley) are not for this CS to address. Caravan sites and canals are dealt with under Policy CS16.

46. Policy CS5 also sets out a clear and appropriate basis for the conversion and re-use of rural buildings, which balances historic and landscape considerations with community benefits and economic needs, ensuring an approach that is viable, deliverable and appropriate to Shropshire. The proposed deletion of the requirement for additional affordable housing contributions from barn conversions (as agreed with EH [FS2.18]) [PC21-22] recognises the economic viability issues and will ensure the sustainable management of rural buildings. The approach to affordable housing in the countryside is clearly set out, with a further definition proposed in the glossary [PC18], reflecting the particular nature of Shropshire's rural area; further details will be given in the Type & Affordability of Housing SPD [EV139].

47. Consequently, as amended, Policy CS5 provides a soundly based approach to development in the countryside, reflecting significant rural issues within Shropshire, which is effective, deliverable, justified, and consistent with national policy.

### ***Sustainable Design and Development Principles***

48. Policy CS6 aims to deliver a positive approach to creating sustainable places by drawing together key national standards for high quality, sustainable design to provide a consistent, but flexible sustainability checklist for developers and decision makers [FS1.18]. In this fast-moving area of national policy, Policy CS6 avoids including specific standards or criteria, which may duplicate national standards or quickly become out-of-date. The key is the *Sustainability Checklist*, with further details of this “living” tool in the draft Sustainable Design SPD [EV143]. Policy CS6 is clearly expressed, and sets out all the main elements and broad criteria, providing sufficient basic information about the form and design of new development. It is supported by local evidence and is generally consistent with national policy on sustainable design (PPS1), biodiversity (PPS9) and renewable energy (PPS22). The impacts on development viability are covered by Policies CS9 & CS11 **[PC25]**.

49. The main concern is about delegating various detailed requirements to the Sustainable Design SPD, but this approach provides more flexibility and avoids the policy becoming outdated. Being a “living” document, the Sustainability Checklist will be constantly updated, with the assistance of user panels, to include the latest national sustainability requirements. The approach set out in the policy is clear, and some minor changes clarify its application. SC has agreed with EH & EA that the Sustainability Checklist will address the character and quality of design, as well as water efficiency measures and foul drainage requirements **[PC24-25]**. No local targets for renewable energy have been set, due to lack of local evidence and viability work, and so SC will rely on the latest national targets as a minimum, but this does not preclude higher standards. Alternative policy approaches (such as adopted by Leicester City Council) do not necessarily offer greater certainty or flexibility. References to the *Code for Sustainable Homes* and *Lifetime Homes* are consistent with national policy and current good practice. Consequently, as amended, Policy CS6 is sound, effective and deliverable.

### ***Communications and Transport***

50. Policy CS7 sets out a broad strategy for maintaining and improving transport and communications infrastructure and services, as well as promoting smarter travel choices [FS1.19]. It establishes the key link between planning and transport, in line with PPS1 & PPG13, and addresses the transport needs of the main settlements by maintaining key road and rail links and proposing improvements, particularly along the A5 at Shrewsbury and Oswestry **[PC26]**. It also seeks to improve the accessibility of the main settlements, whilst aiming to reduce the need to travel and promote lower carbon choices for travel and transport. It is closely linked to the LTP [EV63] and the LDF Implementation Plan (LDFIP) [EV9], which sets out details of all the required transportation infrastructure; minor changes confirm this position. A detailed agreement has been drawn up with HA [FS2.23], who now confirm that the CS is supported by robust transport evidence and is sound, subject to some amendments to Policies CS2, CS3, CS7 & CS9 and the explanatory text.

51. The main concerns relate to the Shrewsbury North-West Relief Road (SNWRR) and the new Parkway Station. The SNWRR is a long-standing scheme, included in the adopted Local Plan, approved WMRSS and saved Structure Plan. It has been subject to considerable consultation and detailed work, but further progress on this project was halted in August 2010 until the implications of the Comprehensive



Spending Review were clearer. It is a key element of the Shrewsbury Integrated Transport Strategy (SITS), identified as a major scheme in the LTP and part of the Shrewsbury Growth Point Delivery Plan. At present, there is no certainty of funding or delivery, but it may attract funding in the future and is a priority scheme in the LDFIP, which will be put forward for inclusion in the LEP Business Plan and new LTP3. The Shrewsbury West SUE would deliver the first phase of the route (Oxon Link Road), and although there are some objections to the principle of the SNWRR, mainly on environmental and landscape grounds, there is strong support for the project. The CS does not depend on the completion of the SNWRR, but it is an important longer-term project which could come forward before 2026 and should therefore be retained in the CS. The detailed alignment of the route will be shown in the SAMDev. Earlier HA concerns about the A5 junction improvements around Shrewsbury and Oswestry have been resolved.

52. Shrewsbury Parkway station is included in the LDFIP, Shrewsbury Growth Point Delivery Plan, WMRSS and WM Regional Rail Development Plan, and will also be put forward for inclusion in the LTP and LEP Business Plan as part of the SITS. It is a longer-term project, and further minor changes confirm that it is a *possibility* rather than a certainty. However, apart from further details and funding, it could be delivered within the timescale of the CS, and is appropriately included in the policy and explanatory text. Concerns about developer contributions to infrastructure projects are addressed in Policy CS9 and the Developer Contributions SPD. This confirms that new infrastructure provision will be proportionate to the scale of development, set at a level which is economically viable, and closely related to the details, timing and funding arrangements set out in the LDFIP and new LTP3.

53. Consequently, as amended, Policy CS7 will help to deliver a sustainable pattern of development in Shropshire, including key road improvements in Shrewsbury and Oswestry, and is soundly based, effective and justified.

### ***Facilities, services and infrastructure provision and contributions***

54. Policies CS8 & CS9 set out the strategic framework for providing and enabling access to facilities, services and infrastructure, helping to deliver sustainable places and maintain the viability, vitality and resilience of Shropshire's communities [FS1.20-21]. In line with the localism agenda, they recognise that requirements and priorities will vary from place to place. The policies are supported by an extensive evidence base, and are closely related to the LDFIP, which sets out the details and priorities for the infrastructure required, with place-based appendices outlining timescales, costs and delivery partners. Not all infrastructure will be provided as a result of new development, but Policy CS9 sets the framework for an ongoing conversation with developers and local communities about providing infrastructure, in line with national guidance on planning obligations and emerging policy on CIL. Further details will be set out in the SAMDev and in the Developer Contributions SPD and CIL Charging Schedule [EV140]. Proposed changes to the policies, agreed with HA, clarify and extend the range of facilities, including transport **[PC27-29]**.

55. There is some concern about the extent of infrastructure required and the cumulative impact of the contributions and requirements on developers. However, infrastructure provision and contributions will be proportionate to the proposed development, given that much new development in Shropshire will be relatively small-scale. Proposed changes confirm that economic viability will be an important consideration, including dynamic viability analysis **[PC30-31]**. Consequently, with the agreed changes, these policies are clearly expressed, justified, effective and consistent with national policy, and will provide a sound basis for the provision of infrastructure needed in Shropshire over the plan period.

## ***Meeting Housing Needs***

### **Issue 3 – Does the Core Strategy make appropriate provision for the effective delivery of new housing in Shropshire, including managing the release of housing land and providing the right type and affordability of housing, including accommodation for gypsies and travellers, having regard to national policy, and is it fully justified, deliverable and supported by an up-to-date, credible and robust evidence base?**

56. In common with the strategic nature of Shropshire's high-level CS, the housing policies provide a positive approach towards planning for housing in general and for addressing the very challenging levels of need for affordable housing in particular. The housing policies are set in the context of the strategy to focus growth on Shrewsbury, the market towns and other key centres, and rural rebalancing by which smaller settlements become hubs or clusters for new development.

#### *Managed release of housing land*

57. Policy CS10 sets out the priorities for releasing housing land, to maintain a responsive supply of land, prioritising locations and setting out the approach by which sites will be advanced into the 5-year supply of deliverable sites. This will provide the strategic framework for allocating and phasing sites in the SAMDev, and for providing infrastructure, as well as for making development management decisions. Further evidence explains the approach, and shows that the policy is clearly expressed, deliverable, justified and consistent with national policy [FS1.22].

58. As submitted, the policy includes details of the phasing of housing supply over 5-year periods, based on current completions, commitments, remaining allocations, sites identified in the SHLAA, and the release of the SUEs and other sites in the SAMDev. The proposed phasing takes a slightly more optimistic view than the WMRSS Phase 2 Revision, supported by more recent work on the SHLAA [EV17/a]. There are some challenges to this phasing, from both house-builders and the CPRE, some arguing for different phasing and others arguing for its deletion. In response, SC proposes to transfer this element of the policy to the explanatory text **[PC34/36]**. This makes the policy itself less prescriptive, yet retains the broad phasing of housing in the text of the CS to guide the SAMDev and the housing trajectory in the LDFIP, and assist in monitoring. This is a reasonable compromise, particularly since SC does not wish to unduly constrain the delivery of housing. Detailed phasing of housing sites at Shrewsbury will be addressed in the SAMDev.

59. SC accepts that the 60% overall target for housing on brownfield land is challenging, but it reflects national policy in PPS3 and the adopted/draft WMRSS. Evidence shows that, over the whole county, an average of 56.7% of housing has been built on brownfield sites (2006-2010), whilst outstanding permissions/allocations and SHLAA sites show a figure of over 60% [FS1.22]. In Shrewsbury, over 90% of housing development has been built on brownfield sites [FS3.14]. Although this is a demanding target, SC confirms that it is achievable.

60. In terms of housing delivery, the balance between greenfield and brownfield development is justified and appropriate, and the CS enables the release of greenfield sites, including SUEs and other sites adjoining Shrewsbury, the market towns and key centres, and some Community Hubs & Clusters, through the SAMDev. Proposed changes confirm that the availability of housing sites will be kept under review, remove the order of priority for releasing housing sites, and specifically include the SUEs **[PC32/33]**. SC confirms there is currently a deliverable supply of over 9,300 dwellings, equating to 6.6 years supply [FS1.22; EV15]. The latest SHLAA

[EV17a] provides details of future housing land provision, including sites within settlements, allowances for windfalls in the later period, and a pool of potential sites from which the remaining 9,000+ dwellings will be identified in the SAMDev. SC confirms that the 5-year supply will be assessed against the overall target of 27,500, rather than the 5-year phasing targets or the ranges in each spatial zone **[PC35]**.

61. Despite some detailed criticisms of the SHLAA, mainly about specific sites, it has been undertaken in line with national guidance, including consultation with stakeholders and developers, and will be updated regularly. It may possibly have over-estimated the supply of sites in Shrewsbury, but this can be addressed when detailed allocations are made in the SAMDev, and may be offset by the additional reserve of housing sites. The SHMA [EV18] has similarly been prepared in line with national and regional guidance, augmented by the Local Housing Market Assessment [EV19]. SC also confirms that recent amendments to PPS3, deleting the minimum density target and excluding residential gardens from the definition of previously developed land, are unlikely to affect housing delivery significantly [FS1.22].

62. Consequently, with the agreed changes, Policy CS10 will provide a soundly based framework for releasing housing sites over the plan period, which is effective, justified and deliverable, and consistent with national policy.

#### *Type and Affordability of Housing*

63. Policy CS11 sets out a positive strategic approach to the delivery of mixed, balanced and inclusive communities, consistent with national, regional and county-wide policies, which will be achieved by seeking an appropriate mix and type of housing, including tenure and affordability [FS1.23]. It sets a clear *overall target* of 33% local needs affordable housing, from *all* sources, including not only from open-market housing schemes, but also from directly funded schemes, including those funded by RSLs, HCA, the Council's own housing programme, self-builders and other public/charitable bodies, along with "exception" sites [FS3.36].

64. There are undoubtedly high levels of need for affordable housing in Shropshire. Evidence shows that newly arising households generate a need for affordable housing provision at the level of 36% of housing in the county [EV18-20]. If the needs of current as opposed to future emerging households are included (as recommended in PPS3 (¶ 29)), the need for affordable housing in Shropshire rises to between 67-100% of total planned provision based on local and strategic housing market assessments. The viability of this overall target is justified by the levels of affordable housing available from sources other than open market sites. Figures indicate that over 400 affordable homes were completed in Shropshire in 2008/2009, with a significant number (25%) of these having been funded other than through open market developments [FS3.36]. In recent years, exception sites have delivered between 66-135 affordable homes/year (6-11% of total completions). The new definition of local needs affordable housing will assist in justifying future schemes on rural exception sites **[PC18]**.

65. Evidence has been fundamental to the establishment of the overall target of 33%, as shown in the SHMA [EV18], Local Housing Market Assessment [EV19] and policies and evidence in the WMRSS Phase 2 Revision [EV20]. More detailed work on viability [EV21/a/EV22] suggests that a 20-25% figure might be justified, but this is based on the contribution from open-market housing sites with no grant aid, and is likely to change over the plan period. Even though future grant aided schemes might be subject to cut-backs, the contribution to affordable housing from non-open market housing sites is likely to be considerable, and so the overall figure of 33% is sound, viable and justifiable in Shropshire's circumstances.

66. Policy CS11 also confirms that the target for the proportion of affordable homes to be delivered through open market developments (in contrast to the above 'all sources' overall target) will be established annually by SC using the *Shropshire Dynamic Viability Index* (DVI). This ensures the target remains viable with a view directly to the likely economic viability of development in the area, as required by PPS3 (¶ 29). In considering the soundness of this approach, it is notable that the 2010/2011 DVI [EV22] envisages a target of 25% of affordable housing for open market sites based on national house prices in 2009. The viability of this target will be reviewed annually (from December 2010 onwards), with the involvement of a developer panel, and adjusted if necessary, reflecting changes in established national data sources for land values, construction costs and house prices (i.e. development viability considerations). Minor changes clarify and confirm the approach [**PC37-39**], with further details being set out in the draft Type & Affordability of Housing SPD [EV139].

67. SC may be one of the first authorities to establish this in what is its own plan for the county. However, its evidential basis in terms of relating to the changing viability of development over time seems to offer a sounder approach than that of a fixed and immutable target in a CS policy for a period of the plan. The DVI approach is fully supported not only by SC and legal opinion [FS3.20], but also by all the house-builders who appeared at the hearing sessions, and was not seriously challenged in any of the other representations. All the evidence and debate at the hearing sessions confirms that this approach is deliverable and justified, particularly through its close reflection of the dynamics of development viability, and is consistent with the requirements of PPS3. If the effectiveness of the policy in delivering sufficient affordable homes proves wanting, SC could consider a partial review of the CS. However, over time, the DVI can be expected to deliver increasing proportions of affordable housing as they become more viable. It is therefore a soundly-based, transparent and consistent approach, clearly set out in the CS, supported by evidence and reflecting the particular circumstances of Shropshire.

68. Policy CS11 requires *all* open market housing schemes to make a contribution to affordable housing, usually on site, with any fractional provision of a unit to be contributed to SC by payment in lieu. Given the relatively high levels of need for affordable housing and the nature of provision expected in Shropshire (often on single sites or smaller-scale developments), this approach has been found to be viable [EV22] and is soundly based. A proposed change modifies the original policy of seeking additional contributions of affordable housing from residential conversions in the countryside [**PC40**]. Policy CS11 specifies the split between social-rented and intermediate housing, in line with PPS3. It also confirms that the "open-book" approach will be applied, ensuring that the policy reflects site-specific circumstances and is flexible to changing economic conditions. This should only apply in a minority of cases, but ensures that economic viability issues are properly considered, ensuring a sound policy.

69. Policy CS11 covers a wide range of housing types. It recognises the need to meet the housing needs of an ageing population and the young, including affordable housing, and provides the basis for securing the delivery of these types of housing; further details will be provided in the Type & Affordability of Housing SPD. It provides a locally appropriate approach to the provision of much-needed affordable housing, justified by local evidence, yet consistent with national and regional policy. It is clearly expressed, and the process of establishing the proportion of affordable housing from open-market sites is transparent, certain and flexible, with established methodology and the involvement of stakeholders. Consequently, as amended, the policy is sound, effective, justified and deliverable.

*Gypsy and Traveller Provision*

70. Policy CS12 confirms the Council's commitment to make site allocations for gypsies and travellers in the SAMDev; to provide a positive approach to sites close to Shrewsbury and other settlements; extends the exception site policy to include small sites for gypsies and travellers where there is a strong local connection; and requires good design standards and infrastructure contributions at gypsy and traveller sites [FS1.24]. Further policy guidance will be given in the Type & Affordability of Housing SPD, and minor changes are proposed to clarify the policy and its implementation.

71. Although the policy confirms that sites will be allocated to meet identified needs, it does not specify the scale of provision or numbers of pitches. However, the explanatory text refers to the current GTAA [EV23] and confirms that the CS will facilitate the provision of the additional 79 residential pitches required, along with a transit site and 4 plots for travelling showpeople. Since the current GTAA only covers the period to 2017, the inclusion of these figures in the policy would soon make it out-of-date. The current wording confirms the commitment to meet current needs, and gives flexibility to consider how future needs will be identified over the plan period. Since the Government has announced its intention to revoke Circulars 01/2006 & 04/2007 and decisions on the number of pitches are to be made by local authorities, Policy CS12 and the explanatory text provides the minimum guidance needed for deciding planning applications and making allocations in the SAMDev.

72. Some representors are concerned about the definition of a "strong local connection" for small exception sites. This will largely depend on individual circumstances, and the Council will need to establish an early dialogue with applicants about their local connections to particular communities. Further guidance will be given in the Type & Affordability of Housing SPD. However, it would not be appropriate to limit rural exception sites to a single pitch, since one family may need several pitches.

73. Consequently, Policy CS12 and the explanatory text provide the minimum strategic guidance and spatial direction needed to address the needs of gypsies and travellers over the plan period.

***A Prosperous Economy***

**Issue 4 – Are the strategy and policies for the economy and provision of employment land, town centres, market towns and other key centres, and for tourism, culture and leisure, soundly based, effective, deliverable and appropriate for Shropshire, supported by a robust and credible evidence base, and consistent with national policy?**

*Economic Development, Enterprise and Employment*

74. Policy CS13 sets out a strategic policy on economic development which seeks to address the key issues and challenges facing the Shropshire economy, including raising the profile of Shrewsbury, revitalising the market towns and rebalancing the rural area [FS1.25]. It encourages the key business sectors of Shropshire's economy, including environmental technologies, creative and cultural industries, tourism and the land-based sector (particularly food and drink and farming). The policy also plans positively for the development of infrastructure to support the economy, including higher/further education facilities, sustainable transport and ICT/broadband technology, with the aim of developing and diversifying the Shropshire economy. It has been prepared against a backdrop of economic recession, which makes it all the more important to plan positively for a prosperous Shropshire economy.

75. The policy is founded on a wide evidence base, including the Economy Topic Paper [CD24], area-based economic assessments carried out for the former district/ borough council areas [EV44-48], *Spotlight on the Shropshire Economy* [EV138] and the Shropshire SCS, with its priorities of enterprise and growth, with strong market towns and rebalanced rural settlements. It also reflects other initiatives, such as the Shrewsbury Growth Point, Market Towns Revitalisation Programme and other business and corporate plans. The general approach is consistent with national policy in PPS4 and with the approved/draft WMRSS and former Regional Economic Strategy. It also reflects the characteristics and trends in the Shropshire economy, and will set the context for the strategic priorities and strategy to be developed by the recently established Marches LEP.

76. There are some concerns about whether the policy properly recognises the need for economic development in rural areas and provides the appropriate balance between employment land, local need and housing provision. The nature of business enterprise in Shropshire has to reflect its rural character, with agriculture, farm diversification and tourism playing an important part. Policy CS13 covers these types of businesses, emphasising the need to meet local needs and cater for the growth of indigenous businesses, reflecting PPS4 (EC6-EC7), consistent with WMRSS Policy PA14 and linked to CS Policies CS3-5. In terms of the balance of employment land and new housing, the key question is whether the CS has identified the appropriate amount and distribution of employment land and housing, which has been addressed under Policy CS1. The SAMDev will consider the detailed provision and location of employment and housing land, including in individual settlements, such as Market Drayton, Oswestry and Much Wenlock, in the context of the new ELR. The issue of protecting existing employment sites is dealt with under Policy CS14.

77. Consequently, Policy CS13 provides a sound basis for promoting economic development, enterprise and employment in Shropshire, reflecting the particular needs, issues and strengths of the county's economy, and will help to deliver sustainable economic growth and prosperous communities. No changes are therefore needed in the interests of soundness.

#### *Managed Release of Employment Land*

78. Policy CS14 sets out the approach to managing the supply and release of employment land, in line with the key objective of Policy CS13 [FS1.26]. Planning for sustainable economic growth in Shropshire will be achieved by delivering employment development opportunities within the settlement strategy, supporting the growth of the rural economy and rebalancing rural communities, in line with PPS4 (EC2/EC6). The policy is soundly based on the evidence supporting the WMRSS Phase 2 Revision, confirming the overall employment land requirement for Shropshire of around 290ha, using the methodology endorsed by the EIP Panel. It also adopts the mechanism of providing a managed reservoir of employment land, with a target of maintaining a supply of 72ha of land at any one time. The policy was guided by the 5 district-based ELRs [EV44-48], and is supported by the AMR and more recent work on the emerging county-wide ELR [EV52a].

79. The policy clearly sets out the approach to providing a portfolio of employment sites and premises, in line with national policy and the WMRSS Phase 2 Revision, which will be addressed in the SAMDev. It establishes the scale of provision to support the role, function and requirements of the different tiers of settlements, including Shrewsbury and the market towns/key centres. A further minor change clarifies the role and delivery of employment development as part of the SUEs.

80. There is some concern about the balance between protecting existing employment land and ensuring flexibility to enable development to come forward. Some suggest the policy should permit alternative uses on employment sites that no longer meet the needs of the market. National policy in PPS4 (EC1.3.d) requires the evidence base to assess the future supply of land available for economic development, including reassessing existing site allocations for economic development. Work on the new ELR and evidence of the initial consultation on the SAMDev and that supporting the employment land targets clearly indicate that SC is carrying out this reassessment of existing employment sites. In terms of development management, SC has to balance flexibility with its policies to safeguard sites for future, sometimes lower value economic development and employment uses (PPS4; 2.1.h). It is for SC to determine where this balance lies, provided that the policies themselves are soundly based on a robust evidence base, as in this case.

81. The identification of protected employment sites and the selection of new sites will be addressed in the SAMDev, in line with PPS4 (EC2) and taking account of the results of the new ELR, when finalised. A minor change confirms that the viability of new allocations and existing employment sites will be assessed in the SAMDev, in line with PPS4 (EC1). The approach of a managed reservoir of employment land is an established mechanism in Shropshire of ensuring that there is a rolling supply of readily available employment land to meet the needs of indigenous and incoming businesses. It has been used in previous plans and was endorsed by the WMRSS Phase 2 Revision EIP Panel. The 0.1ha threshold for the strategic land supply is rather low, but this reflects the significance of small employment sites in Shropshire, particularly in the rural settlements. Regular monitoring through the AMR will keep the situation up-to-date, helping to ensure that employment land is released at the right time and in the right place.

82. There was some discussion about the scale and availability of employment land in individual settlements, particularly at the market towns (such as Market Drayton, Bridgnorth and Oswestry) and at smaller towns (such as Much Wenlock). The overall range of employment land provision and proportional split in each of the spatial zones is established in Policy CS1, with further details accompanying Policy CS3. SC has reviewed and updated the current employment land supply and requirement [FS3.21a/b], including discounting a site at Market Drayton which is not readily available because it is reserved for a major employer (Müllers). This would increase the amount of new employment land needed in the North-East spatial zone, whilst also increasing the overall amount of new provision to at least 113ha. Revised Table 4 confirms the situation **[PC41]**, giving more flexibility in this spatial zone. There is also sufficient flexibility in the broad range of employment land requirements in the other spatial zones to ensure that future employment needs are met, having regard to existing provision and commitments [EV142]; detailed provision in particular towns and other settlements will be considered in the SAMDev.

83. Consequently, Policy CS14, as amended, establishes a sound basis for managing the release of employment land, which is justified by an up-to-date evidence base, and is deliverable, effective and consistent with national policy.

#### *Town and Rural Centres*

84. Policy CS15 establishes a high-level policy which provides a positive and flexible framework for the sustainable development of Shropshire's town and rural centres [FS1.27]. It reflects the existing hierarchy of centres and policies in the WMRSS, seeking to reinforce Shrewsbury's position as a regional shopping centre in the context of a modest decline in its position in some of the league tables of national retail centres. It also establishes a network of strategic, principal and district centres

in line with PPS4 (EC3.1), which is not seriously challenged. In addition to the WMRSS evidence base, 5 retail studies/health checks were commissioned by the former district/borough councils [EV54-59], along with a new Retail Study for Shrewsbury [EV55]. The targets for comparison goods floorspace and large-scale offices are derived from the WMRSS Phase 2 Revision. Retail targets are set for 2006-21/2021-26, whilst the office floorspace target is for the whole plan period.

85. The policy confirms that the proposed Sustainable Urban Extensions (SUEs) will provide for neighbourhood centre retail provision, as opposed to more significant retail development, as clarified in a proposed change **[PC44]**. The policy also rightly identifies the Riverside and the West End regeneration areas for new retail development. The explanatory text makes clear that PPS4 procedures for impact testing of retail proposals will be followed (¶ 6.23). Policies on large-format retail developments and floorspace targets and allocations for convenience and other shopping will be set out in the SAMDev. Further changes to the policy confirm that the sequential approach to site selection will be applied, having regard to impact assessments, in line with PPS4 **[PC42-43]**.

86. PPS4 (EC1-EC5) requires local authorities to assess and identify various elements of retail and town centre provision. Most of these aspects will be addressed in the SAMDev and on the Proposals Map, but the CS needs to take the strategic decisions. As amended, Policy CS15 sets out locations for retail provision in the strategic centre (Shrewsbury), identifies principal centres within the county to meet local needs, and confirms the role to be taken by the proposed SUEs. The explanatory text confirms that matters such as site allocations for retail floorspace (convenience/comparison goods), the extent of town centres, definition of principal shopping areas and retail frontages, will be set out in the SAMDev. The absence of any defined floorspace thresholds for testing retail proposals (as required by PPS4 (EC3.1(d))) is a significant omission, but SC's proposed change confirms that local criteria to assess retail impact will be addressed in the SAMDev **[PC45]**.

87. The recently updated Shrewsbury Retail Study [EV55] raises a number of issues, particularly in its approach and assumptions, and it has not been subject to public consultation. It confirms the urgent need to identify more convenience retail floorspace in Shrewsbury town centre if out-of-town retail development is to be resisted (as per the Council's policies). This challenge is confirmed by SC and will be addressed in the SAMDev. There is some concern about the proportion of floorspace to be accommodated in Shrewsbury and other town centres and what strategic policies would guide the balance of retail development to be accommodated elsewhere, but these are matters to be addressed in the SAMDev. Although some argue that the Bridgnorth retail study is out-of-date, it assessed the quantitative need/expenditure capacity for comparison/convenience floorspace for the town, taking into account forecast population and expenditure growth in the short, medium and longer-term. Like all the other retail studies, it provides a sufficiently robust evidence base for the retail strategy, and will be updated through the SAMDev.

88. Some evidence points to a recent decline in the growth of comparison goods retailing, as might be expected given the recession, with a pick-up expected later in the plan period. The policy's weighting of floorspace towards the first part of the plan period is at odds with this, whilst other evidence suggesting weighting to the latter part of the plan period would be unreliable due to the greater uncertainty of more distant timeframes. However, any over-allocation of floorspace not initially taken up would be unlikely to lead to unsound outcomes, such as unsustainable locations coming forward, since the Council's suite of CS policies would militate against this. Hence, this aspect of the policy can be considered sound.



89. Consequently, with the agreed changes, Policy CS15 provides a soundly-based framework for dealing with development within Shrewsbury and the principal/district centres, helping to deliver strong market towns and rebalanced rural settlements, as well as supporting regeneration and revitalisation initiatives.

#### *Tourism, Culture and Leisure*

90. Policy CS16 provides the strategic framework for tourism, culture and leisure development in Shropshire [FS1.28]. It reflects local tourism and cultural strategies, and provides a positive approach to development that contributes to the well-being of Shropshire's communities and visitors. It also reflects the role and importance of tourism to the local economy, and enhances the county's environmental and heritage assets. It is consistent with national policy in PPS4 (EC7) and WMRSS Policy PA10. It is supported by a range of evidence, and a minor change includes some additional canal/waterways documents in the Key Evidence for this policy.

91. There is some concern about the references to the Shrewsbury & Newport Canal. Although the Canal Trust has firm aims and aspirations to restore this 36km long canal, there are feasibility and cost issues, including reconstruction of locks, bridges and aqueducts, which mean there is little realistic prospect of it being fully restored within the current plan period. Policy CS16 does not preclude its restoration or any associated regeneration schemes, but provides positive support to appropriate development that makes the best use of canal assets; further details on protecting the line of the canal will be covered in the SAMDev. Consequently, the reference in the explanatory text (¶ 6.36) to this canal restoration project goes as far as it can.

92. As regards the policy for touring and static caravans, Policy CS16 already broadly covers this type of visitor accommodation, in line with PPS4 (EC7). The question of criteria for such developments, along with site-specific proposals (such as at the Queens Head, Oswestry), are detailed matters, which SC intends to address in the SAMDev in the strategic context of Policy CS16. In the meantime, saved Local Plan policies will guide the siting, scale and nature of caravans and chalets, so there is no need for any additional reference to this type of development within the policy or explanatory text at this stage. Policy CS16 is therefore soundly based, justified, deliverable and consistent with national policy, without any further changes in terms of soundness.

### ***Environment***

**Issue 5 – Does the Core Strategy provide an appropriate, effective and soundly based framework for protecting and enhancing the environment of Shropshire and making provision for waste management facilities and minerals, fully justified with robust, up-to-date and credible evidence, consistent with national policy?**

#### *Environmental Networks*

93. Policy CS17 provides a positive and locally distinctive approach to protecting and enhancing environmental assets, including improved linkages between areas, as well as those not covered by national/international designations [FS1.29]. SC has agreed several minor changes to the policy and explanatory text, to address concerns raised by EH, NE & EA. The amended version is consistent with national policy (including PPS1, PPS5, PPS9 & PPG17) and other Council strategies, including the Open Space, Sport & Recreation Study, the Countryside Access Strategy and Green Infrastructure Strategy for Shrewsbury. The policy is effective and deliverable, outlining the mechanisms expected to contribute to its delivery. The approach to seeking financial contributions from developers towards new and enhanced

environment sites and corridors is soundly based and fully justified, in line with Policies CS8 & CS9. Further details are set out in the emerging Developer Contributions SPD [EV140], and details of specific projects are contained in the LDFIP. Consequently, it is a sound, deliverable and effective policy.

### *Sustainable Water Management*

94. Policy CS18 is based on the principle of integrated water management, ensuring that new development incorporates measures to address flood risk, water quality and water resources [FS1.30]. With its risk-based approach, it uses local evidence on Shropshire's water environment and infrastructure capacity constraints, including the SFRA and Water Cycle Study, which confirms that water management and flood risk concerns are not insurmountable. It ensures that the requirements placed on new developments are proportionate, whilst recognising the role of all new development in reducing flood risk, improving water quality and protecting water resources. It is consistent with national policy in PPS25 and is supported by Policy CS6. The policy will be delivered through the LDFIP and Surface Water Management and Sustainable Design SPDs. Detailed targets, including water efficiency targets and more detailed criteria for flood risk and foul drainage, will be addressed in the Sustainable Design SPD and SAMDev. More localised concerns, such as flooding and sewer capacity at Much Wenlock, are more appropriately considered at the detailed stage, through the SAMDev & LDFIP, when specific proposals are put forward. SC has put forward changes to address EA's concerns about water efficiency [**PC46-47**], which would ensure that the policy is justified, effective, deliverable and sound.

### *Waste Management Infrastructure*

95. Policy CS19 sets out a high-level strategic policy to facilitate the delivery of further waste management facilities in Shropshire. It is supported by an extensive evidence base and statements [FS1.31], including the Waste Technical Paper [EV110]. This sets out the best available information on the types, quantities, management and movement of waste generated in Shropshire and the location and capacity of existing waste management facilities. Much of this data derives from evidence which informed the WMRSS Phase 2 Revision, which was examined at the subsequent EIP and endorsed by the EIP Panel.

96. The explanatory text describes the scale and type of existing and required waste management facilities. At present, existing waste management capacity in Shropshire exceeds current requirements and, in the future, most of the additional capacity is likely to be delivered by smaller-scale facilities. The broad locations for new waste management facilities are shown on the Key Diagram, largely based on the density of waste arising in particular areas. The SAMDev will make specific site allocations on this basis, having regard to the outcome of the ELR and noting that 9 sites in the saved Waste Local Plan have yet to be taken up. The WMRSS includes no requirement to identify strategic waste management facilities in Shropshire, but the CS envisages that between 6-10 additional waste management facilities will be needed up to 2026. It confirms that all waste streams will be addressed, with additional facilities needed for both municipal and commercial/industrial wastes. However, the latest MWMS (2002) is somewhat dated and has been superseded by targets in the national Waste Strategy 2007 and performance targets in the Council's current waste management contract.

97. The CS confirms that additional waste recycling and recovery facilities may be required in some areas, which the SAMDev will address in terms of detailed criteria and specific sites. Although current landfill capacity is limited, it is not intended to identify any additional capacity, in line with WMRSS Policy W11, the national waste

hierarchy and policy objectives, and the landfill diversion strategy. Policy CS19 also refers to cross-boundary waste flows and the principle of equivalent self-sufficiency, recognising that waste does not always respect administrative boundaries. This is particularly relevant in Shropshire, where some waste generated within the county is managed or disposed of in adjoining areas, such as Telford & Wrekin, Cheshire, Staffordshire and Powys. For new developments, minimisation and management of waste is part of the "sustainability checklist" required by Policy CS6.

98. When read with the Waste Technical Paper and other evidence documents, most of the basic information is available to support the waste strategy. There are no serious challenges to the waste strategy or the evidence base, and SC is not aware of any more recent information on waste that might suggest that the plan is unsound. SC expects the WMRTAB to continue to monitor the regional situation, to assist the LEP. As a strategic high-level policy, Policy CS19 and the explanatory text provide the basic framework to undertake further work at the SAMDev stage.

99. However, as submitted, Policy CS19 is very general and does not specify any quantities of waste to be managed or the broad location of future facilities. The explanatory text includes some key figures about waste generation and capacity, and the Key Diagram identifies broad locations for additional waste facilities. Following discussion, SC has agreed to specify in the policy the waste capacity "gap" that needs to be addressed (150,000 tonnes/yr) and confirm that sites will be allocated in the SAMDev **[PC48]**. SC also agrees to refer in the explanatory text to waste strategy targets for municipal and commercial/industrial waste set out in the WMRSS Phase 2 Revision and Shropshire's current municipal waste management contract **[PC49]**. These amendments will ensure that the minimum amount of information is included in the policy and explanatory text to meet the requirements of national policy in PPS10 and ensure the plan is sound. More detailed development management policies and site-specific allocations will be addressed in the SAMDev.

#### *Strategic planning for minerals*

100. Policy CS20 provides a high-level strategic policy for the provision of minerals in Shropshire, supported by an extensive evidence base and statements [FS1.32], including the Minerals Technical Background Report [EV115]. This report sets out the best available information about the location, scale, extent, type, production, markets and movement of minerals in Shropshire, along with the location of existing mineral workings. Being derived from national, regional and local information, in discussion with key mineral operators, it is robust, credible and up-to-date, and provides a sound basis for the minerals strategy of the CS. The CS includes details of the mineral geology of Shropshire (Fig 10), including broad mineral safeguarding areas based on the BGS data, and detailed boundaries will be defined in the SAMDev. Further information about the location of existing mineral sites and construction waste recycling sites is shown in the Minerals Technical Paper. SC has also agreed several changes to Policy CS20 and the explanatory text in response to the concerns of mineral operators and adjoining local authorities.

101. The main shortcoming of the policy is the provision of aggregates to meet the sub-regional apportionment. As submitted, neither the policy nor the explanatory text gives any indication of the scale of production, either currently or proposed during the plan period. This is because, at present, there is no agreed revised sub-regional apportionment for aggregates. A revised apportionment has been put forward by the RPB [FS3.32], which GOWM advised should be given similar weight to a submitted draft RSS<sup>1</sup>. However, most members of the WMRAWP, including SC,

<sup>1</sup> Letter from Government Office for the West Midlands to WMRA (8 October 2009]

have questioned the status of the Interim Policy Statement (IPS) and do not support its assumptions and methodology for the revised apportionment. Having taken legal advice, and given the anticipated abolition of the WMRSS, SC argues that the IPS has little weight. Unless and until more robust evidence is assembled to justify higher levels of aggregates production, SC proposes to maintain the current level of production and current percentage contribution to the regional apportionment. This approach would be consistent with technical advice from the WMRAWP and is supported by the local minerals industry and by the evidence base. However, if this is the policy, then it should be included within the wording of Policy CS20.

102. Following discussion, SC has agreed to make the necessary amendments to the policy wording and explanatory text to indicate the current and expected scale of aggregates production **[PC50-51]**. The inclusion of these figures is crucial to determining the landbank and future production levels of aggregates. Issues about the overall and sub-regional apportionments for aggregates are matters to be determined by the WMRAWP, and it would be for other authorities (such as Staffordshire CC) to justify departing from this approach in their own LDFs.

103. In recent years, aggregates production has been consistently below the sub-regional apportionment figure for Shropshire. Although the current landbank for sand and gravel (at 2008) is equivalent to about 15 years production, almost 70% of resources exist at 3 sites which have remained unworked for over 5 years. The CS therefore recognises that further sand and gravel resources may need to be identified within the plan period to ensure continuity of production, and to allow local competition and flexibility. The Key Diagram identifies a range of broad locations for future sand and gravel working, and specific sites will be addressed in the SAMDev. However, in order to address concerns about possible mineral working in the AONB and avoid pre-empting decisions in adjoining local authorities, SC has agreed to delete the broad locations for sand and gravel working originally shown on the Key Diagram in the AONB and within Telford & Wrekin **[PC52]**.

104. For crushed rock, the current landbank is equivalent to almost 40 years production, with sufficient resources available from existing sites for the current plan period. Policy CS20 would facilitate the production of other minerals, such as building stone, brick and fireclay, along with environmentally acceptable proposals for the exploration and working of hydrocarbon resources. There is a difference of opinion between SC and the Coal Authority about the extent of surface coal resources (Salop Formation), but there is no evidence that this area includes economically workable coal reserves, or that it has ever been worked for this purpose.

105. Consequently, with the agreed changes, Policy CS20 and the explanatory text would provide the basic framework for minerals provision over the plan period, meeting the minimum requirements of national policy in MPS1 and providing sufficient strategic guidance and spatial direction for the SAMDev.

### ***Monitoring and Implementation***

#### **Issue 6 – Are the arrangements for monitoring the policies of the Core Strategy adequate, effective and soundly based, including details of the indicators, baseline information and targets/milestones to be used?**

106. The supporting evidence sets out the arrangements for monitoring and implementing the CS [FS1.35]. Each policy in the CS is accompanied by a Delivery and Monitoring section, showing the range of delivery mechanisms for implementing the policy and the indicators for measuring its effectiveness. The AMR is the principal mechanism for regular monitoring of the CS, which will report on the indicators set

out in the CS and provide a sound and robust basis to monitor the plan. There are references and linkages to other plans and programmes, including the LAA, SCS, LTP, SAMDev, Market Towns Revitalisation and Shrewsbury Growth Point/Vision Regeneration Framework, and more particularly, the LDF Implementation Plan [EV9]. This latter document outlines the key infrastructure required to deliver the CS, including the delivery partners, costs, priority, timescales and funding sources. This is an impressive “living” document, with place-based appendices, setting out the delivery mechanisms and timescales for the infrastructure required to implement the plan. It has been subject to consultation with stakeholders and delivery agencies, and will form a comprehensive and effective mechanism for delivering the CS.

107. The CS contains a set of over-arching strategic policies which have elements of flexibility and are capable of addressing reasonable changes in circumstances and external influences. Since this is a high-level strategic plan, it is unlikely to become out-of-date quickly, and in any event, the Council envisages reviewing all or part of the CS after 2020. Subsequent DPDs/SPDs, including the SAMDev, will deal with most of the detail of elements such as affordable housing and infrastructure contributions within the framework set out in the CS. The AMR will monitor not only the plan as a whole, but also specific elements, such as updating the housing trajectory. The overall implementation of the CS does not rely on a specific infrastructure programme or requirements that cannot be delivered without proposed developments.

108. Consequently, the arrangements for monitoring and implementing the CS are effective, clearly set out and soundly based. SC proposes to amend some of the individual indicators and targets in some of the policies, but no further changes are needed in the interests of soundness.

### **Other matters**

109. A wide range of matters were raised in the representations and at the hearing sessions which do not go to the heart of the soundness of the CS. In many cases, they suggest “improvements” to the plan, particularly in terms of the clarity and coherence of the strategy and policies. In response, SC proposes several minor changes to the text of the policies and explanatory text, which are set out in Appendix B. These require no comment from me, other than to generally endorse them in the interests of coherence, clarity and accuracy. Having considered all the other points raised in the representations and made during the hearing sessions, there are no further changes needed to ensure that this CS is sound in terms of the requirements in PPS12 and associated guidance.

## **Legal requirements**

110. My examination of the compliance of the CS with the legal requirements is summarised in the table below. The CS meets all the legal requirements.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Core Strategy is identified in the current LDS (2009) [CD12], and has been prepared in accordance with the milestones and content set out.
Statement of Community Involvement (SCI) and relevant regulations	The CS has been prepared in line with the Interim Community Involvement Statement (ICIS) [EV137], an interim document produced for the new unitary authority pending the adoption of a formal SCI,

	currently out to consultation. Consultation on the CS has complied with the requirements in the ICIS, including consultation and engagement during the process of preparing the CS [FS1.33;CD3/CD9]. Criticisms about the lack of detailed involvement of some communities (eg. Much Wenlock) do not represent a fundamental flaw in the consultation process or a breach in the regulations.
Sustainability Appraisal (SA)	SA has been carried out at all stages during the preparation of the CS [CD2; CD30-32;EV126], including details of how the SA influenced the final plan and how mitigation measures are to be dealt with [FS1.33]. Detailed criticisms about the sustainability appraisal of the Sustainable Urban Extensions (including at <i>Issues and Options</i> and <i>Directions of Growth</i> stages) are dealt with in the relevant part of this report.
Appropriate Assessment (AA)	Reports on Appropriate Assessment under the Habitat Regulations have been undertaken satisfactorily.
National Policy	The CS generally complies with national policy, except where indicated and changes are recommended.
Regional Spatial Strategy	WMRA has confirmed that the CS is in general conformity with the approved WMRSS and with the latest draft WMRSS Phase 2 Revision.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS [CD14]. The CS has aligned its key spatial planning objectives, vision and objectives with those of the SCS, with the close involvement of the Shropshire Partnership throughout [FS1.33].
2004 Act and Regulations (as amended)	The CS complies with the Act and the Regulations, including the arrangements for publication and making available the necessary documents [FS1.33;CD3/CD9].

## Overall Conclusion and Recommendation

**111. I conclude that with the changes proposed by the Council, set out in Appendix A, the Shropshire Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. I therefore recommend that the plan be changed accordingly, and for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.**

*Stephen J Pratt*

Inspector

This report is accompanied by:

Annex A – Schedule of Council's Proposed Changes required to make the plan sound  
Annex B – Schedule of Council's Proposed Minor Changes