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SHROPSHIRE LOCAL PLAN REVIEW: Pre Submission Draft (Regulation 19)

Responsible Officer Mark Barrow, Executive Director Place
 e-mail: mark.barrow@shropshire.gov.uk Tel: 01743 258919

1. Summary

- 1.1 The principle purpose of this report is to seek Cabinet approval for the Pre-Submission Draft of the Shropshire Local Plan and to trigger a period of public consultation in line with Government Regulations. This is referred to as Regulation 19 stage of Plan preparation, and signifies the point in the process where the Council has concluded its earlier consultations under Regulation 18, which in Shropshire's case has included five separate public consultation stages.
- 1.2 On a directly related issue, the report also seeks approval in principle to accept an element of unmet employment land need from the Association of Black Country Authorities (ABCA), and for this employment need to be incorporated into the overall employment requirement for Shropshire to 2038. This follows on from Cabinet's decision in July 2020 to accept the principal of Shropshire Council to accept up to 1,500 dwellings from ABCA's identified housing need and represents an important aspect of the ongoing Duty to Cooperate legal process.
- 1.3 The Cabinet paper also seeks approval of an amended timeframe for the production of the Local Plan, which must be set out in the Local Development Scheme (LDS). In order for a Local Plan to be 'legally compliant' it must be produced in accordance with the timeframe set out in the LDS – hence the need to amend it. This has been necessary in order for the Council to give meaningful consideration to the responses made to the public consultation on the Regulation 18 Pre-Submission Draft version of the Plan.
- 1.4 The purpose of the Shropshire Local Plan is to plan effectively for growth over the long term, in this case to 2038. The Plan should respond to local issues, including settlement and site specific evidence and from public consultation responses, but should also have full regard to national planning policy and guidance. As such the Plan establishes a long term housing requirement for the county to 2038, based in part on the nationally set methodology, but also taking into account localised factors, in particular the need to support economic growth and to deliver more affordable and lower cost housing.
- 1.5 The Local Plan seeks to set an appropriate and 'sound' strategy for the County. It is the role of the Regulation 19 stage of consultation to seek

representations on the 'soundness' of the Plan based on a number of specified criteria in the National Planning Policy Framework.

1.6 The 'Regulation 19' Pre-submission version of the Local Plan has been informed by the following five previous stages of public consultation as part of the 'Regulation 18' stage of preparation:

- Issues and Strategic Options (January 2017);
- Preferred Scale and Distribution of Growth (November 2017);
- Preferred Site Allocations (November 2018);
- Strategic Sites (June 2019);
- Draft Pre-Submission Local Plan (August 2020)

These stages have sought views on a range of issues including County wide growth proposals; the distribution of that growth; settlement specific strategies; proposed site allocations to guide future growth; the inclusion of a number of 'strategic sites' on land outside recognised settlements for large-scale mixed-use development; and a range of strategic and development management policies with which to effectively manage development. Alongside this the Council have developed a range of evidence base documents to inform proposals and policies.

1.7 In line with national regulations the Council will seek representations through a consultation process on the Regulation 19 Pre-Submission Draft Plan. The public and other stakeholders will be asked to make representations by considering whether the pre-submission version of the Local Plan is 'sound' based upon a set of nationally prescribed criteria. It is the intention to seek a period of seven weeks for this consultation period, which is in excess of national minimum requirements.

2. Recommendations

- A. That Cabinet approves the Pre-Submission Version (Regulation 19) of the Local Plan (Appendix 1) for public consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of seven weeks;
- B. That Cabinet agrees the principle for Shropshire Council to accept up to 30 hectares of employment need from the Association of Black Country Authorities (ABCA) as part of the legal Duty to Cooperate process, in order to supplement the acceptance of up to 1,500 dwellings from ABCA to 2038 (previously agreed in principle), and for this employment provision to be distributed in accordance with draft policy SP2 of the draft Local Plan.
- C. That Cabinet approves an updated version of the Local Development Scheme (Appendix 3)

- D. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitats Regulation Assessment and the Consultation Strategy.

REPORT

3. Risk Assessment and Opportunities Appraisal

- 3.1 A key purpose of the Local Plan is to provide an appropriate strategy to enable an area to grow in a sustainable manner to meet the need for development. The Local Plan is the starting point for taking planning decisions. In recent years the importance of having an up-to-date Local Plan has been amplified by the need for Local Authorities to show a sufficient (at least five years) supply of housing land. Indeed Shropshire has seen first-hand the impact of not having a sufficient housing land supply where some planning decisions are made in an ad hoc manner where Local Plan policies are afforded less weight in decision making.
- 3.2 The most effective way to ensure the Council maintains a sufficient level of housing supply is to keep its Local Plan up-to-date. Whilst the Council's current Core Strategy and SAMDev Plans (combined equating to the Local Plan for the area) are currently considered up-to-date, there is a risk that should the Local Plan not be reviewed in an appropriate timescale, the ongoing ability for the Council to manage growth in a plan-led manner will be compromised.
- 3.3 The pre-submission version of the Local Plan (Appendix 1) is a statutory stage of plan making and represents a very advanced and fully formed version of the Local Plan. It signals the end of the Council's detailed and robust 'Regulation 18' stage of plan making and the transition into the more formal 'Regulation 19' stage. Indeed, since 2017 the Plan has been subject to five separate stages of public consultation. Most recently, between August and September, the Council published and consulted on a full Draft Local Plan as part of the Regulation 18 stage, and Section 5 of this report will provide more detail on the outcomes of this important consultation.
- 3.4 It is considered the Council's approach to consultation has allowed the public and other stakeholders to have a significant opportunity to input into the process and, where appropriate, to shape the emerging Local Plan's proposals. Importantly however, consultation in this context does not mean that a consensus of opinion has been reached in all cases, and it is appropriate to recognise there remains opposing views to some elements of the Local Plan locally, either from residents, local parish and town councils, site promoters or all three. It is the role of the Local Plan's consultation process to allow for these views to be made, and for the Council to respond and reflect upon them, especially if they are advancing material considerations. It is considered the thorough process the Council has engaged in over the last few years, which has followed the requirements of

legislation and the Council's own Statement of Community Involvement (SCI), has allowed this to happen in an effective and meaningful manner.

- 3.5 The Regulation 19 Pre-Submission Draft is the second occasion where the emerging Local Plan has been published and consulted on in a full format. The five previous stages of consultation (listed in para 1.6) were part of the preliminary Regulation 18 stage of preparation; the first four consultations between 2017 and 2019 focussing on specific parts of the process, whilst the fifth stage bringing these elements together with the inclusion of a full set of draft strategic and development management policies.
- 3.6 If agreed, the proposal is to consult on the on the 'Pre-Submission Draft' version of the Local Plan at Regulation 19 for seven weeks between mid-December and the end of January 2021. The updated version of the Local Development Scheme (LDS), included to this report as Appendix 3, recommends a new timetable for the Local Plan. This takes into account the recommendation to consult for a period of seven weeks on the Pre-Submission Local Plan, and charts a realistic timetable to the Submission of the Local Plan to the Government for Examination in April 2021. It should be noted that the proposed seven week period of consultation at Regulation 19 exceeds the statutory minimum requirements and takes into account that the proposed consultation includes the Christmas period. Once submitted, the revised LDS anticipates an Examination process of around 12 months, and it is therefore hoped to move to adoption of the Local Plan in May 2022, subject to a successful Examination process.
- 3.7 The key purpose of the Regulation 19 consultation stage is to allow consultees the opportunity to make representations on the 'soundness' of the Local Plan. All representations made will be considered by a Planning Inspector appointed to independently examine the Local Plan, currently scheduled to take place in 2021. Ahead of the submission of the Local Plan for examination, the Council's ability to respond to representations made through the consultation is more limited than at the Regulation 18 consultation stages. Indeed, whilst the Council will be able to agree minor modifications to the Local Plan ahead of its Submission to the Secretary of State this does not extend to making more significant changes, such as the inclusion of an additional site allocation.
- 3.8 However, if, through the Regulation 19 consultation process, it is decided there is a need for the Council to make a significant change to the Plan, the Council does have the ability to propose these changes as long as these are subject to a period of consultation through a further Regulation 19 consultation exercise. Again, the risk to the Council in this scenario is one of timeframe, and a new Local Development Scheme (LDS) setting out the Local Plan preparation timetable would need to be agreed. The extensive consultation the Council has carried out at the Regulation 18 stages has mitigated this risk, but it should be recognised that there is always the possibility of new evidence being presented through the Regulation 19 process which could lead to a need to propose a more significant alteration to the Plan.

4. Financial Implications

- 4.1 Planned growth provides the best possible opportunity for Shropshire Council to harness growth potential by providing a stable platform for investors and developers (from both the public and private sectors). Growth also provides an opportunity to secure contributions to help maintain and improve local facilities, services and infrastructure. New growth simultaneously imposes an additional burden on local services and provides opportunities to secure investment to improve local facilities which are the responsibility of Shropshire Council and other public service providers.
- 4.2 The Local Plan process is subject to a number of costs, both during preparation principally due to the need to commission evidence base documents to inform both site allocations and development management policies, and through the Examination process, principally through the cost of the Planning Inspectorate. This expenditure is both necessary and unavoidable in the pursuit of a 'sound' Plan.
- 4.3 Equally there is a financial risk to the Council of not pursuing a review of the Local Plan in a timely manner, most notably through the likelihood of increased levels of planning appeals as a result of increased challenges to the integrity of the currently adopted Core Strategy and SAMDev plan.

5 Background

- 5.1 The National Planning Policy Framework (NPPF) confirms that the planning system should be genuinely plan-led, and that up-to-date Plans should provide a positive vision for the area; a framework for addressing housing need and other economic, social and environmental priorities. The NPPF also states that Plans should be a platform for local people to shape their surroundings. This important principle is also central to the recent proposed changes to the Planning system as part of the Government's Planning White Paper.
- 5.2 Whilst Shropshire currently has an up-to-date Local Plan through the adopted Core Strategy and SAMDev documents, there is clearly a significant onus on authorities to regularly update these plans in order to keep them up-to-date. The need for an early review of the Local Plan was also a requirement of the SAMDev Inspector's Report in 2015. However, it should equally be recognised that Plan making does take time; an inevitable consequence of necessary and constructive community engagement, and the need for policies and proposals to be supported by robust evidence. With this in mind, the Council began an early review of the Local Plan in 2017, with the Pre-Submission draft (Appendix 1) being the consolidated outcome of this process.
- 5.3 In July 2020 Cabinet agreed to consult on a full Draft version of the Local Plan. Broadly this plan contained the following sections:
- Strategic approach to growth and distribution of development;
 - Strategic Policies
 - Development Management policies
 - Localised Strategies for individual settlements;

- Policies for new Strategic Sites and Settlements;

Feedback from the Draft Local Plan consultation (August-September 2020)

- 5.4 The recent consultation on the Draft Local Plan at Regulation 18 allowed the Council to consult on a full version of the Local Plan for the first time, and to consider responses, before moving to the formal Regulation 19 stage. The consultation process, which spanned for eight weeks between August and September, led to responses from around 2,500 consultees, including from statutory organisations, local organisations, parish and town councils, local residents and site promoters. This is a significant response rate, and officers have reflected upon these responses in moving the Plan forward. Indeed, it should be noted that due to the high response rate, officers have required a further two weeks to consider responses than first assumed, leading to the change in date of Cabinet. A full summary of the consultation responses will be made available as part of the consultation into the Regulation 19 Pre-Submission Plan.

Changes incorporated into the Regulation 19 Pre-Submission Local Plan

- 5.5 Officers have reviewed and considered the comments made, alongside any other material issues not previously considered. Revisions are now suggested and have been incorporated into the Regulation 19 version included as Appendix 1 to this report. A detailed summary of all the consultation responses is included as Appendix 4 to this report.
- 5.6 None of the suggested changes alter the core strategic approach to the Plan. There are no changes proposed to the overall levels of local housing and employment growth over the plan period; the approach to the distribution of growth across the County through a settlement hierarchy; and the identification of Community Hubs in the rural area.
- 5.7 The vast majority of the changes which are now proposed relate to relatively minor amendments to policy wording, both with respect to the proposed developer guidelines to site allocations and to strategic and development management policies. Officers are recommending these changes in response to consultation responses, but also to the need to provide additional clarity to policies. The Plan has also needed to reflect very recent changes to the Use Class Order classification that came into effect on 1 September relating to consolidation of several previous uses into a new Class E Use Class Order comprising commercial, business and service uses.
- 5.8 The proposed Regulation 19 version of the Local Plan proposes a small number of more significant changes to site allocations, in instances where consultation responses have raised new material considerations, and the site assessment process has been revisited. Also it is now proposed to include an additional development management policy concerning Strategic, Renewable and Low Carbon Infrastructure (Draft Policy 26) which includes criteria by

which the Council will consider proposals for wind and non-wind renewable energy infrastructure proposals.

5.9 With regard to the changes to site allocations, in summary it is proposed to:
Remove the following sites from the previous draft version of the Local Plan:

- Church Stretton: Land at Snatchfields for 70 dwellings (CST021);
- Oswestry: Land at Trefonen Road for 30 dwellings (OSW017);
- Weston Rhyn: Land off High Street for 60 dwellings (WRP006)
- Shrewsbury: Land at Battlefield Roundabout for 9ha of employment land (SHR197/VAR)

Include the following site in the Local Plan:

- Weston Rhyn: Land off Trehowell Lane for 60 dwellings (WRP001/VAR)

5.10 In the case of land at Snatchfields, Church Stretton (CST021), following consideration of comments made to the draft Plan, officers have reassessed the ability for the town to deliver its localised housing guideline through a combination of windfall sites within the development boundary, including on Brownfield land, and through the likely delivery of exception and cross-subsidy affordable housing sites, in line with draft policies DP4 and DP7 of the Draft Local Plan. Having undertaken this reassessment it has been concluded that these sources of supply are likely to be sufficient to achieve the localised housing guideline and as such it is considered that there is insufficient justification to warrant the allocation of major housing development in Church Stretton, given its location within the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and the need, documented within the NPPF, to demonstrate that exceptional circumstances exist for such major development within the AONB.

5.11 In the case of land at Trefonen Road, Oswestry (OSW017), following consideration of comments made to the draft Plan, officers acknowledge there are localised highway issues, which although are not considered to be severe, have been re-considered as part of the overall balance of considerations. These considerations have included the site's potential contribution to the overall housing supply in the town, which has been judged to be minimal over the plan period.

5.12 In the case of the proposed change to the site allocation at Weston Rhyn, by way of background, in 2018 the Council preferred site WRP001 for the development of around 60 dwellings. However, at this time it became apparent that the site may not be available for development due to the dated nature of the site promotion material. Therefore, this site was replaced by the adjacent WRP006 as the Preferred Site for the 'Regulation 18 Pre-Submission Draft of the Shropshire Local Plan' in August 2020, also for 60 dwellings. In response to this latest consultation the council have become aware of new promotional material from the promoters of WRP001, which confirms the site's availability as well as proposing new access arrangements. This, alongside the consideration of local concerns relating to access arrangements for WRP006, has led officers to revert to the preference for site WRP001, albeit in a slightly modified format, which also takes in a small element of WRP006. Both sites have therefore been subject

to public consultation during the regulation 18 stage of plan preparation, and importantly they are now subject to a “joint promotion” agreement between the landowners. It is therefore considered preferred options provides a more sustainable solution for the settlement’s housing delivery.

- 5.14 In the case of land at Battlefield Roundabout, Shrewsbury, following consideration of comments made to the draft Plan, which have highlighted concern about development to the east of the A49, as well as consideration given to the implications of the new Class E Use Class Order (which came into operation on 1 September during the consultation period), it is now considered unnecessary to specifically allocate this land for employment purposes. It is therefore considered that Shrewsbury’s employment provision can be met through the delivery of the proposed strategic employment site north of Preston Boats roundabout (SHR166); through other mixed use development proposed, particularly on land to the west of the town; through existing SAMDev allocations, and through additional windfall development where it meets proposed criteria set out in Draft Policies S13 and S14 of the Draft Local Plan.
- 5.15 The updated Site Assessments, which are to be made available as part of the Regulation 19 consultation, provide more detail on the rationale for these proposed changes. Whilst clearly of local significance, it is not considered any of these changes compromise the delivery of the Plan’s Strategic Approach.
- 5.16 It is not proposed to amend any proposed Community Hub settlements, and therefore the schedule of Community Hubs remains the unchanged from that consulted on in August/September 2020, and is now included in Schedule SP2.2 of the Draft Local Plan. Whilst it is recognised there remains some concern locally regarding the methodology behind the identification of Community Hubs within the overall strategic hierarchy, officers remain of the view that the proposed approach offers a sound and consistent basis to make these recommendations. These issues have been given very detailed consideration by officers in arriving at the current position. With regards to Community Cluster settlements, in acknowledging the continuation of the Parish Council ‘opt in’ approach to their identification, it is proposed that the Maesbrook, Dovaston and Knockin Cluster be removed on the request of the Knockin Parish Council, and that Newcastle and Whitcott Keysett be included as a new Community Cluster on the request of Newcastle on Clun Parish Council. All other Community Cluster settlement remain unchanged and are listed in Schedule SP2.3 of the Draft Local Plan.

Strategic approach to growth and distribution of development

- 5.17 PolicySP2 of the Pre-Submission Draft of the Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares of employment land, equating to around 1,400 dwellings and 15ha of employment land per annum. This represents a marginally lower growth level than that proposed in the Preferred Scale and Distribution of Growth consultation carried out in early 2018, and is broadly in line with past rates of growth seen in the County.

- 5.18 This level of housing growth proposed across the 22 years covered by the Plan Period seeks to respond in the first instance to the most up-to-date calculation of housing need in the County, currently 25,894 dwellings over the Plan Period, and then accommodates an additional uplift in this capacity in order to respond positively to the overall 'high growth' strategy. It is considered this uplift will further support the delivery of family and affordable housing to support local needs; increase the opportunity for specialist housing and the needs of other groups; support the diversification of the workforce; support greater opportunities to support the Council's wider economic growth aspirations; and support the opportunity for the Council to respond positively to appropriate cross boundary needs.
- 5.19 It is recognised that the Government has recently consulted on a significant alteration to the way in which housing need is calculated at a local authority level, which in Shropshire's case would lead to a considerable increase in annual housing requirement to a level far in excess of the proposed Local Plan housing requirement. However, the Council have raised significant issues with the Government's proposed methodology, along with many other Local Authorities, and as things stand this proposal has not moved beyond its consultation stage. It is therefore considered appropriate for Shropshire to progress with its Local Plan on the basis of the current housing need methodology.
- 5.20 The approach to distribution of development reflects the Council's previously stated preferred option, favouring an 'urban focussed' approach. It is considered that by virtue of the infrastructure and services Shropshire's largest settlements generally provide, there is a greater opportunity to deliver larger scale mixed use schemes, in doing so providing better conditions to support additional employment delivery and providing a better balance of growth.
- 5.21 It is legal requirement for Local Planning Authorities to fulfil the duty to cooperate with neighbouring and closely related Local Planning Authority areas on strategic matters. The Council has been engaged in discussions with these areas over the course of the plan preparation process. Ahead of the proposed submission of the Local Plan in January 2021, a series of Statements of Common Ground will be prepared and agreed with these areas.
- 5.22 At the July Cabinet, as part of Shropshire's Duty to Cooperate, it was agreed that 'in principle' Shropshire Council would accept up to 1,500 dwellings from the identified housing need of the Association of Black Country Authorities (ABCA) and that this would be incorporated into the housing requirement for Shropshire and distributed in line with the Strategic Approach included in draft Policy SP2. Meeting this 'unmet' need responded positively to the obligations placed on the Council as part of the Duty to Cooperate and has been met with broad support from ABCA. In accepting this need in principle, Shropshire joined a number of other Local Planning Authorities in the West Midlands in doing so.
- 5.23 Whilst ABCA are supportive of Shropshire's approach with regard to meeting unmet housing need, they have also responded to the recent consultation seeking further clarification on the Council's approach to employment land provision and requesting the Council considers accepting an element of their

unmet employment land need. In broad summary, the ABCA's employment land supply provides around 305ha, leaving a shortfall of at least 263 hectares needing to be provided outside the Black Country Local Plan area.

- 5.24 Since July, the Council has further developed its consideration of economic need over the plan period, and an Economic Development Needs Assessment (EDNA) will be published alongside the Regulation 19 consultation. By way of early summary of this position, it is recognised that similar to the proposed housing requirement for the County, the proposed employment land provision of 300 hectares over the plan period is beyond the 'baseline' need scenario when looking at forecasted growth. This position is deliberate and responds to the Council's desire to see a 'step change' in economic growth in the County over the plan period; a position advanced by the Economic Growth Strategy.
- 5.25 With this in mind, it is therefore considered reasonable and appropriate for the Council to supplement its 'in principle' offer of housing need with an 'in principle' offer to meet up to 30 hectares of employment land from ABCA. It is again considered that this need can be accommodated in a sustainable manner in line with the Local Plan's proposed distribution of growth proposed in draft policy SP2, and would not require the identification of additional land in order to ensure its sustainable delivery. This offer is considered to respond effectively to Council's legal obligations under the Duty to Cooperate and if agreed, will be incorporated into the emerging Statement of Common Ground between the two planning areas.
- 5.26 At this advanced stage of plan making there are no other substantive issues arising from the conversations with adjoining authorities as part of the Duty to Cooperate.

Localised Strategies for individual settlements

- 5.27 In following the urban focussed approach the majority of the County's growth is captured in settlement specific strategies for Shropshire's network of Market Towns. For the majority of areas this includes proposed site allocations and guidelines on how development on these sites will be managed. It should be remembered that whilst the allocation of a site provides an 'in principle' support that development in this location can be supported, these will continue to be subject to the grant of future planning approval where the details of the development will be considered. Where local communities are currently preparing Neighbourhood Plans this has been reflected within the proposed strategies.
- 5.28 Whilst the focus of the plan is on the urban area, it continues to be important to plan effectively for Shropshire's rural areas, but in doing so recognising that growth opportunities in these areas should be more closely aligned with the ability of villages to provide a suitable standard of services and facilities. For this reason the Council opted early in the plan preparation process to provide a consistent methodology to the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The conclusions of this process are included in schedule SP2.2 of the Pre-Submission Draft Plan, which identifies those areas which are proposed to act as Community Hubs. Policy SP7, along with individual Settlement specific policies, seeks to

provide a framework for how development will be managed in these areas effectively and in keeping with the local character.

Strategic Sites and Settlements

- 5.29 The Pre-Submission version of the Local Plan proposes to allocate three strategic settlements/sites at the following locations:
- The Former Ironbridge Power Station which will form a new strategic settlement;
 - Clive Barracks, Tern Hill which will form a new strategic settlement; and
 - RAF Cosford which will facilitate MOD use and associated activities

Former Ironbridge Power Station

- 5.24 The former Ironbridge power station occupies a 350 acre site south of the River Severn near Buildwas. The power station ceased operation in 2015 and was purchased by Harworth Group in 2017 with a view to regenerating the site. The proposed inclusion of the site for inclusion within the Local Plan was consulted on as a preferred option in summer 2019. An outline planning application was subsequently submitted to the Council in December 2019 for a major mixed use development including 1,000 dwellings. Whilst the planning application is yet to be determined, it remains appropriate for the Council to continue to seek the site's inclusion within the Local Plan. It is expected that subject to the grant of planning approval, the site will be fully developed by the end of the plan period. The proposed development principles for the site are included in Policy S20 of the Pre-Submission Draft Local Plan

Clive Barracks, Tern Hill

- 5.25 Clive Barracks is a 50 hectare military site on the A41 near Market Drayton which is currently home to the Royal Irish Regiment. MOD announced the intention to close the barracks in March 2016, and have subsequently confirmed they now plan to complete the vacation and disposal of the site by 2025. The proposed inclusion of the site for inclusion within the Local Plan to form a significant mixed use proposal was consulted on as a preferred option in summer 2019. Local engagement on the site up to this point has helped to shape the proposed development guidelines for the site, which is proposed to provide employment land and around 750 homes as part of a new settlement, together with local services and facilities. Given the timeframe of the proposed disposal of the site, it is expected that around 600 homes will be delivered during the plan period to 2038. The proposed development guidelines for the site are included in Policy S19 of the Pre-Submission Draft Local Plan.

RAF Cosford

- 5.26 The national defence review has confirmed RAF Cosford as a key Ministry of Defence asset, but it is considered the potential for the area to meet its future operational defence requirements is restricted by its Green Belt location. Having considered the impact on national Green Belt objectives, as well as

the benefits of doing so, it is considered there are exceptional circumstances for the site to be released from the Green Belt. In summary the strategic site will build upon its existing role as a centre of excellence for both UK and International Defence Training, host a specialist aviation academy, support opportunities to co-locate other Ministry of Defence units and activities, facilitate the intensification and expansion of the RAF Museum Cosford and allow the formation of a new headquarters for the Midland Air Ambulance Charity. The proposed development guidelines for the site are included in Policy S21 of the Pre-Submission Draft Local Plan

Other Strategic Site Considerations

- 5.27 In July, Cabinet agreed with the officer recommendation to omit land adjacent Junction 3, M54 from the Local Plan Review. This decision followed a long period deliberation, including a period of public consultation as part of the Strategic Sites consultation in summer 2019 where the Council confirmed it was considering the potential inclusion of land north of Junction 3 within the Local Plan. For the sake of clarity the land at Junction 3 has been actively promoted for a new garden village consisting of around 3,000 dwellings and 50ha of employment land, as well as the inclusion of local facilities and services. The decision in July recognised that, in the view of the Council, that there were insufficient exceptional circumstances in order to release this land from the Green Belt.
- 5.28 As part of the Regulation 18 consultation on the Draft Local Plan, Bradford Estates (site promoter for Junction 3), whilst maintaining their wider Garden Village proposal, have provided an additional proposition consisting solely of a strategic employment site, without residential development. Given the change in proposal the Council has taken the opportunity to reconsider the proposal. The Site Assessments, which will be published alongside the Regulation 19 consultation, provides a detailed overview of the council's considerations. In summary, it is maintained that in weighing up the competing considerations, including the benefits of providing a strategic employment area, there remains insufficient justification to release this land from the Green Belt. Accordingly it remains the view of officers that land at Junction 3 should not be included in the Local Plan and that this should area should remain as Green Belt.

Green Belt Release

- 5.29 Green Belt is perhaps one of the most widely known designations in the planning system. Green Belts cover parts of many local authority areas; in Shropshire's case significant areas in the east of the County are covered by the West Midlands Green Belt designation. The key purposes of the designation is to check unrestricted sprawl; prevent neighbouring towns merging; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration.
- 5.30 Permanence is a key feature of Green Belt boundaries, and their extent should only be altered where exceptional circumstances apply. It is however, appropriate for Local Plans to review Green Belt boundaries when required,

and in Shropshire's case this was prompted in 2015 by the conclusions of the SAMDev Inspector's Report, which instructed that a review of Shropshire's Green Belt be carried out as part the Local Plan review process. To this end, in 2017 the Council commissioned a Green Belt Assessment in order to assess the extent to which the land within the Green Belt in Shropshire performs against the purposes of Green Belts (outlined in para 5.18). This was followed in 2018 by the publication of a Green Belt Review, which provides an assessment of the harm to the Green Belt purposes should particular parts of the Green Belt be released. The Council therefore have a comprehensive evidence base with which to support decision taking.

- 5.31 It is important to note that before seeking to release land from the Green Belt, the NPPF places a clear need for the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to accommodating the needs of RAF Cosford, and having considered local circumstances of need, the Pre-Submission version of the Local Plan proposes the removal of land from the Green Belt for allocations for employment development within the plan period to 2038 in Shifnal and Bridgnorth, and for mixed use and housing development in Alveley. The Pre-Submission Draft Plan also seeks the removal of land from Green Belt for to act as 'safeguarded land' for potential development beyond the plan period in Albrighton, Shifnal and Alveley.
- 5.32 The Council are aware that over the last few months there has been a particular focus on future development options at Bridgnorth. Bridgnorth acts as Shropshire's third largest settlement but which is constrained by Green Belt on its eastern side. The Regulation 18 consultation on the draft Local Plan in August and September this year proposed a major Garden Village proposal at Tasley as the preferred option to grow the town in a sustainable manner. This represented a significant shift in position from an earlier iteration of the Plan, which had suggested land at Stanmore to the east of the town within the Green Belt as the preferred direction for significant growth as part of the initial Preferred Sites consultation in 2018. It should be recognised that the recent consultation has led to a significant level of opposition to the preferred Tasley proposal. However, it should equally be acknowledged there has also been a significant number of responses welcoming the proposed removal of the proposed Garden Village scheme at Stanmore.
- 5.33 The Council's proposed inclusion of land to the south of the A458 at Tasley within the most recent Draft Local Plan followed an extensive site assessment process. This recognised the site's location outside the Green Belt, but also went further to assess the site against a range of material considerations. The consultation in summer 2020 led to a significant level of response from residents of Bridgnorth, alongside those from local town and parish councils. It also prompted further detailed information from the site promoters of both the Tasley and Stanmore site promoters on a range of material planning considerations. Given the level of new information provided, as well as the significant of level of local interest, the Council has undertaken a re-appraisal of the two site options for the town.
- 5.34 Appendix 2 to this report provides a detailed summary of the site assessment considerations undertaken by the Council since the close of the recent

Regulation 18 consultation. In summary, having considered the competing site proposals against a full range of material considerations, it is maintained that the Tasley Garden Village proposal should be preferred for development to support a comprehensively planned mixed use development to meet the housing needs of Bridgnorth over the plan period. Conversely, it continues to be recommended that the majority of the Stanmore proposal should remain designated as Green Belt and should not be identified for future development. The exception to this is land north and west of the existing Stanmore Industrial Park, where it continues to be considered that the release of land from the Green Belt would be beneficial in supporting the future expansion needs of the Industrial Park to meet employment requirements.

Strategic and Development Management Policies to Guide New Development

- 5.35 The NPPF states that Local Plans should contain policies that are clearly written and unambiguous, and that a development plan must include strategic policies to address an area's priorities for the development and use of land in its area. A Local Plan can also include a series of non-strategic (or detailed) policies to address other more specific issues.
- 5.36 The Regulation 19 Pre-Submission Draft version of the Local Plan contains a number of Strategic and Development Management policies, covering a wide spectrum of issues and considerations relevant to the pursuit of sustainable development including climate change; supporting high quality design; managing development in the countryside; delivering affordable housing; ensuring a suitable residential mix of development; and managing and minimising flood risk. When adopted, these policies will replace the current development management policies in the Core Strategy and the SAMDev Plan.
- 5.37 Whilst the Local Plan should be the starting point for taking decisions on planning applications it does not sit in isolation. To this end many of the proposed development management policies make reference to other strategies being prepared by the Council, including the adopted Economic Growth Strategy 2017-2021, the emerging Housing and Climate Change Strategies, and the Shrewsbury Big Town Plan. In doing so these strategies will be a material factor in decision making.

6 Next steps

- 6.1 Subject to Cabinet approval, the Pre-Submission Draft of the Local Plan, along with the associated documents will be published for consultation for a period of seven weeks. It is proposed this consultation will begin on Wednesday 16th December and run until Wednesday 3rd February 2021, subject to the considerations outlined in para 6.2. Throughout the plan preparation process officers have sought to engage constructively with communities, Parish and Town councils, and elected representatives on

emerging preferred options. Whilst in many cases this has led to a consensus of opinion on issues, it is recognised there remains areas where there is likely to be opposition to proposals and that in some areas elected representatives have voiced their objections to proposals included within the Regulation 19 Pre-Submission Draft Plan. The statutory consultation process is an opportunity for communities, Parish and Town Councils and elected representatives to submit their comments on the soundness of the Plan, and these will be considered ahead of the proposed submission of the Local Plan to Government for examination in January 2021. All responses which are made to the Regulation 19 consultation will be made public, and will be submitted to the Planning Inspectorate for consideration at the Independent Examination.

- 6.2 The Consultation on the Pre-Submission Draft of the Local Plan must meet the Town and Country Planning (Local Planning) (England) Regulations 2012, as a minimum. For clarity this means the Pre-Submission Draft of the Local Plan must be made available for inspection at the Council's principal office (in this case Shirehall) and at such other places within the authority area as the Council consider appropriate, which has in previous stages of consultation been libraries. It is acknowledged that due to the Covid 19 national emergency there have been restrictions placed on public access into Council premises, and it is recognised that this will need to be addressed as a matter of priority before the consultation can begin. Consultation arrangements must also meet the requirements of the Council's Statement of Community Involvement (SCI). A significant number of organisations and individuals will continue to be notified directly of the publication of the consultation documents in accordance with the SCI. Electronic responses are encouraged to reduce printing and distribution costs and to reduce the time spent collating and analysing paper responses.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)
Cabinet Member (Portfolio Holder) Robert Macey, Portfolio Holder for Housing and Strategic Planning
Local Members All
Appendices 1. Shropshire Local Plan 2016-2038: Regulation 19 Pre-Submission Draft Local Plan plus associated Policies Map and Inset Plans 2. Bridgnorth Development Options Assessment – November 2020 3. Local Development Scheme (LDS) – November 2020 4. Summary of Responses on the Regulation 18 Draft Local Plan Consultation