

## MD1- Scale & Distribution of Development

### Key Issues & SC Response:

1. **Housing requirement/meeting the full, objectively assessed housing needs/need for an early review/extend Plan period to provide for 15 years housing land supply;**
2. **Sufficiency of provision overall and in particular areas/spatial zones/towns/key centres and other settlements/the rural areas to meet the housing requirements of the Core Strategy/more development should be allocated to areas of higher demand/consistency with Core Strategy policies/lack of evidence to demonstrate that step change in housing delivery will be achieved;**
3. **Over-reliance on windfall development/more sites should be allocated;**
4. **Insufficient evidence/justification/consideration of alternatives regarding the scale and distribution of development between the market towns and key centres/localism;**
5. **Approach to the rural areas/identification of Community Hubs and Community Cluster Settlements/localism/sustainable development;**
6. **Housing guidelines for settlements are too restrictive/should be minimum requirements.**

### Summary of Key Issues:

1. **Housing requirement/meeting the full, objectively assessed housing needs/need for an early review/extend Plan period to provide for 15 years housing land supply:** A number of representations (including 032,137, 226 and 266) consider that the Core Strategy housing requirement of 27,500 dwellings reflects the revoked RSS, is pre-NPPF, and is not based on the most up-to-date evidence, and so cannot be said to be meeting the full, objectively assessed needs for housing. CPRE (207) consider the housing target to be too high. A number of representations also question the extent to which the requirement has been reached in co-operation with neighbouring authorities (Duty to Co-operate).

**Response:** SHMA Update and March 2014 Technical Background Paper, in combination with additional work following publication of 2014 ONS population projections (set out in a Housing Needs Technical Background Paper) show that the Plan housing requirement is appropriate. CLG 2014 household projections are awaited, at which time further assessments can be undertaken. It is recognised that an early review will be needed in order to extend the Plan period. The national Planning Practice Guidance states that Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in years 11-15. No changes proposed.

2. **Sufficiency of provision overall and in particular areas/spatial zones/towns/key centres and other settlements/the rural areas to meet the housing requirements of the Core Strategy/more development should be allocated to areas of higher demand/consistency with Core Strategy policies/lack of evidence to demonstrate that step change in housing delivery will be achieved:** A number of representations (including 213, 222, 223 and 224) question the sufficiency of the planned provision, often linked to promoting the allocation of additional sites in particular places. Settlement specific representations are considered under the appropriate settlement policies, but the broader issues are addressed under Policy MD1;

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**Response:** No changes proposed. The March 2014 Technical Background Paper, July 2014 Housing Delivery Technical Background Paper and SHLAA Update (2014) demonstrate that planned provision is sufficient to meet housing requirements and accords with spatial strategy of Core Strategy. Rationale for individual settlements included set out in March 2014 Technical Background Paper.

- 3. Over-reliance on windfall development/more sites should be allocated:** A number of representations (including 213, 222, 223 and 224) suggested that there was an over-reliance on windfall in some areas, particularly the north-east, and in the rural areas generally.

**Response:** No changes proposed. The SHLAA Update (2014) and Housing Delivery Technical Background Paper 2014 provide evidence on windfall sites and rates for the County, including the rural areas, demonstrating that the provision being allowed for from this source is appropriate.

- 4. Insufficient evidence/justification/consideration of alternatives regarding the scale and distribution of development between the market towns and key centres/localism:** A number of representations consider that the approach to the determination of the scale and distribution of development in relation to the towns has not been sufficiently robust, and/or the proposals for specific towns, are not appropriate.

**Response:** No changes proposed. Rationale for individual settlements included set out in March 2014 Technical Background Paper. Approach to towns/key centres has been driven by need to meet strategic housing requirements in the context of Policies CS1 and CS3, informed by the evolving evidence base and consultation responses. Settlement specific representations are considered under the appropriate settlement policies.

- 5. Approach to the rural areas/identification of Community Hubs and Community Cluster Settlements/localism/sustainable development:** A number of representations (including 213, 222, 223 and 224) questioned the soundness of the approach taken by the Council and, in particular, the reliance on the views of Parish Councils/Meetings in the identification of Community Hubs and Clusters and consideration of housing guidelines and policies. Some consider that this meant that the Plan has not properly assessed alternatives in those respects (as part of the sustainability appraisal of the Plan's policies) leading to a situation where the rural area does not become more sustainable, with development in some villages with no facilities and no open market development in some villages with good facilities.

**Response:** No changes proposed. Rationale for individual settlements included set out in March 2014 Technical Background Paper. Approach to rural areas is consistent with localism principles espoused by NPPF, even if it produces inconsistencies in comparison to traditional approach to determining scale and distribution of new development in the rural areas. The alternative of a 'non-localism' approach to the rural areas was considered in the preparation of the Core Strategy. Strenuous efforts were made by the Council to engage with rural communities, focussing on the Parish Councils/Meetings as the most local tier of local government and representatives of their communities. Non-identification as a Community Hub or Cluster settlement does not mean no development can take place, and Policy MD1 provides guidance on the process for additional communities to opt in at a later date. Settlement specific representations are considered under the appropriate settlement policies.

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6. **Housing guidelines for settlements are too restrictive/should be minimum requirements:** A number of representations (including 248) have raised issues regarding the housing guidelines proposed for settlements, partly linked to concerns about the delivery of the overall housing requirements.

**Response:** See response under Policy MD3, where changes are proposed. However, settlement housing figures are expressed as 'guidelines', with Policy MD3 providing further flexibility, setting out considerations for responding to both under and proposed over provision in settlements. The housing guideline whilst being a significant consideration is not the only one and, as set out in Policy MD3 and it is recognised that the NPPF presumption in favour of sustainable development applies in any event, with added relevance if the Council is unable to demonstrate a 5 years' supply.

## **MD2 – Sustainable Design**

### **Key issues & SC Response:**

1. **Information requirements and locally responsive design;**
2. **Guidance on sustainability;**
3. **Open space provision for non-residential development;**
4. **Impact on European protected sites in north Shropshire (Ellesmere, Wem and Whitchurch).**

1. **Information requirements and locally responsive design:** Concern is expressed about the level of information needed at planning application stage, including concerns that requirements for locally distinctive development are too prescriptive. The policy should include a criterion which recognises that viability is crucial to delivery and allows flexibility where development might otherwise become unviable, consistent with the requirements of national policy. There are concerns that the requirement to achieve 'local aspirations for design' in MD2(1) is too prescriptive and it is unclear how a developer should respond where such aspirations have not been published;

**Response:** A change is proposed to amend MD2(1) to require development to "respond positively" to local design aspirations wherever possible. Amend the last sentence of paragraph 4.7 for consistency. The preferred policy approach is designed to ensure that local design considerations are at least considered as part of the development management process, including respect for local aspirations 'wherever possible'. This does not imply undue prescription or represent an unrealistic aspiration. Paragraph 4.15 describes how the issue of viability is already addressed;

2. **Further guidance on sustainability:** There is concern that MD2 doesn't provide explicit detailing over the information required to show the sustainability of the proposal. There is an issue over whether this is a requirement over and above Design and Access Statements. It is felt further guidance is needed within the policy;

**Response:** No changes proposed. It is envisaged that applicants will incorporate their response to any local design guidance or locally distinctive or valued character as an integral part of any D&A statement, or where this is not required, any statement in support of their application. Further guidance regarding the amount and type of accompanying information will be provided in the update to the existing Sustainable Design SPD;

3. **Open space provision:** One respondent has expressed concern over the detailing of paragraph 4.13. There is an objection to open space provision for non-residential development in that the way it has been calculated applies only to residential

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development. It is felt that this is unjustified as the evidence is based on the needs of the resident population;

**Response:** A Change is Proposed to amend paragraph 4.13 to delete reference to the application of the 30sqm per person standard to non-residential development and replace with “For non-residential developments, open space provision should be design-led, informed by the character and context of the development proposed, together with any requirement identified in the relevant Place Plan and the environmental networks approach set out in Policy CS17 and the natural environment SPD.”

**4. Impact on European protected sites in north Shropshire (Ellesmere, Wem and Whitchurch).**

Natural England feel that the Plan and associated HRA do not adequately assess and protect Colemere, Fenns and Whixall’s Mosses and Brown Moss. They are concerned that development in the above Place Plan areas may result in increased visitor pressure at these European protected sites.

**Proposed change:** Amend **MD2(5)** to provide for the open space requirement to be increased and/or developer contributions required towards visitor management measures where development could have an adverse effect on the integrity of a European or nationally designated site through increases in visitor pressure.

**5. Natural England:** Recreational space may need to exceed the authority-wide standard of 30m<sup>2</sup> per person due to the need to mitigate increased recreational pressure on internationally designated sites.

**Proposed change:** A co-ordinated approach has been taken to addressing the issues raised by Natural England with respect to MD12 and to the recommendations arising from the SAMDev HRA. Further detail will be given in a Statement of Common Ground which will be prepared between Shropshire Council and Natural England. Consequent changes to Policy MD2 are:

**Insertions and deletions to point 5 of policy:**

Consider design of landscaping and open space holistically as part of the whole development to provide safe, useable and well-connected outdoor spaces which respond to and reinforce the character and context within which it is set, in accordance with Policy CS17 and MD12 and MD13, including;

- i. Natural and semi-natural features, such as, trees, hedges, woodlands, ponds, wetlands, and watercourses, as well as existing landscape character, geological and heritage assets and;
- ii. providing adequate open space of at least 30sqm per person that meets local needs in terms of function and quality and contributes to wider policy objectives such as surface water drainage and the provision and enhancement of semi natural landscape features. For developments of 20 dwellings or more, this should comprise an area of functional recreational space for play, **recreation, formal or informal uses** ~~and recreation uses including semi-natural open space~~;
- iii. **where an adverse effect on the integrity of an internationally designated wildlife site due to recreational impacts has been identified, particular consideration will be given to the need for semi-natural open space, using 30sqm per person as a starting point,**
- iv. ensuring that ongoing needs for access to manage open space have been provided and arrangements are in place for it to be adequately maintained in perpetuity.

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**Insert to explanatory text after paragraph 4.13. Create new paragraphs 4.14 and 4.15 and re-number paragraphs as appropriate thereafter.**

4.13 Adequate open space is set at a minimum standard of 30sqm per person (equivalent to 3ha per 1,000 population). For residential developments, the number of future occupiers will be based on a standard of one person per bedroom. For non-residential developments, the number of future occupiers is based on estimated number of employees. For developments of 20 dwellings and more, the open space needs to comprise a functional area for play and recreation. This should be provided as a single recreational area, rather than a number of small pockets spread throughout the development site, in order to improve the overall quality and usability of the provision. On very large sites, it may be appropriate to divide the recreational open space into more than one area in order to provide accessible provision across the development. In such instances it is important that each recreational area is of a sufficient size to be functional;

**4.14 Whilst national policy protects internationally designated wildlife sites from development which would damage their special interests, planning proposals may still lead to indirect effects on such sites. The HRA for the Plan identifies those internationally protected sites which could be affected by development and Policy MD12 provides for mitigation measures to remove the impact. This policy sets out those measures necessary to mitigate the effect of increased recreational pressure. These may include an increase in the amount of open space provided by a development over and above the 30sqm per person with a significant proportion of this being semi-natural. Additional mitigation measures may include developer contributions in line with Policy MD12;**

4.15 The types of open space provided need to be relevant to the development and its locality and should take guidance from the Place Plans. The ongoing needs for access to manage open space must be provided for and arrangements must be in place to ensure that the open space will be maintained in perpetuity whether by the occupiers, a private company, a community organisation, the local town or parish council, or by Shropshire Council;

## **MD3 - Managing Housing Development**

### **Key Issues and SC Response:**

- 1. Adequacy of provision, allocations and windfall;**
- 2. Clause 2 - evidence of intention to deliver too onerous;**
- 3. Clause 3, including the role of guidelines/maxima/minima for settlements and sites, and scope of criteria/considerations;**
- 4. Clause 4, including when additional sites should come forward;**
- 5. Development boundaries.**

- 1. Adequacy of provision, allocations and windfall**

There were a number of representations suggesting that there should be less reliance on urban and windfall sites, there was an over reliance on existing commitments together, and that there was a need for flexibility to allow housing sites to come forward before the end of the Plan period. There were also suggestions that the wording in the Policy implies that there is a shortfall of housing over the Plan period together with the ability to provide a 5 year supply of housing land. One representation (SM07) considered that there was a failure to allocate sites for gypsies

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and travellers and that the Policy was inconsistent with National Policy in that it failed to establish pitch targets for gypsies and travellers.

**Response:** No changes proposed. As set out under Policy MD1, the March 2014 Technical Background Paper, July 2014 Housing Delivery Technical Background Paper and SHLAA Update (2014) demonstrate that planned provision is sufficient to meet housing requirements, including years 1 – 5, and accords with spatial strategy of the Core Strategy and the NPPF in respect of housing supply policies. The SHLAA Update (2014) and the Housing Delivery Technical Background Paper 2014 provide evidence on windfall sites and rates for the County, including the rural areas, demonstrating that the provision being allowed for from this source is appropriate. The Policy aims to encourage sustainable and deliverable development in line with the NPPF. The Policy is considered to be flexible and positive, whilst being reflective of the fact that circumstances vary in each settlement. The Policy provides for flexibility through the planning applications process. The Housing Delivery Technical Background Paper 2014, informed by GTAA update, demonstrates that there is adequate provision for gypsy and traveller accommodation, with Core Strategy Policy CS12 providing the appropriate mechanism for additional sites to come forward.

**2. Clause 2 - evidence of intention to deliver too onerous**

Two representations considered that the requirement to provide evidence of deliverability in respect of renewal applications too onerous at Policy MD3 Clause 2.

**Response:** The aim of Clause 2 is to encourage deliverable development with a view to boosting housing supply in line with the NPPF. The policy requirement is not considered onerous in requiring evidence of intention to deliver for renewal applications, and no changes are proposed.

**3. Clause 3, including the role of guidelines/maxima/minima for settlements and sites, and scope of criteria/considerations**

A number of representations expressed concern with regard to the development guidelines in the Settlement Policies, suggesting that these should be regarded as minima, that thought should be given to widening the criteria for considering additional sites, and that where housing supply falls below 5 years, sustainability and character of location should determine approval rather than a locally defined housing requirement. However, one representation considered that once a settlement boundary had been reached no more houses should be built and viewed the policy as being too weak in protecting towns and villages.

**Response:** The 'guideline' is a 'guideline', not prescriptive and not minima or maxima, with both settlement and site guidelines being expressed as 'around'/'approximately', while Policy CS1 of the Core Strategy referred to 'around' 27,500 new homes. Policy MD3 provides considerations for responding to both under and proposed over provision in settlements. It is considered that there is a need for appropriate flexibility to ensure delivery, but also appropriate safeguards, hence the considerations in Policy MD3 Clause 3. However, a change is proposed to include an additional sub-clause after (iv) (The benefits) to read '(v) The impacts of the development, including the cumulative impacts of a number of developments in a settlement', with an associated amendment to the last sentence of related paragraph 4.22 of the Explanation. Also, in order to reflect that the matters to which regard should be had set out in Clause 3 are broad considerations rather than precise criteria, it is proposed to replace the word 'criteria' in Clause 4 with 'considerations'. The housing guideline whilst being a significant consideration is not the only one and, as set out in the policy, it is recognised that the NPPF presumption in favour of

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sustainable development applies in any event, with added relevance if the Council is unable to demonstrate a 5 years' supply. Issues raised relating to individual settlements are considered under the relevant settlement policies S1-18.

**4. Clause 4, including when additional sites should come forward**

A number of representations propose that further sites should be allocated to avoid having to bring forward additional sites at the end of the Plan period and that, where there was evidence of early deliverability, there should be a mechanism to bring these sites forward in sustainable locations. There was a representation that, whilst the ability to bring forward additional sites forward at the end of the Plan period could be considered pragmatic, it also suggested that the Plan was unsound. Some representations were concerned that no timescales are given which set out when additional sites will be released for development or what 'triggers' their release.

**Response:** No changes proposed. The SAMDev Plan Technical Background Paper March 2014, Housing Delivery Technical Background Paper July 2014 and SHLAA Update (2014) demonstrate planned provision will be sufficient to meet housing requirements. However, the Policy needs to be responsive to changing circumstances and to reflect that circumstances vary in each settlement, so the timescales for when the release of additional sites could be justified cannot be set out in advance. The Policy provides flexibility through Clauses 3 and 4, applied through the planning applications process. As per paragraph 4.20 of the Explanation, should there not be a five year supply of housing land in Shropshire, then paragraph 49 of the NPPF effectively allows sustainable housing developments to take place beyond the settlement development boundaries.

**5. Development boundaries**

Some representations referred to inconsistencies regarding the identification of development boundaries for settlements. One representation expressed concern with regard to the expectation of delivery within historic settlement boundaries, which was considered to be flawed on the basis that sites would have already have been developed if they were going to be.

**Response:** The Plan deliberately takes a mixed approach to the use of development boundaries, providing scope for flexibility to local circumstances. However, as not all settlements have development boundaries, for clarity, a change is proposed to the second sentence of paragraph 4.20 of the Explanation under Policy MD3 to replace the words 'development plan boundary' with 'settlement development boundaries'. The scope for development within boundaries is addressed through the SHLAA Update (2014), which evidences the continuing scope for windfall development in settlements in the County.

## **MD4 - Managing Employment Development**

**Key issues & SC Response:**

- 1. Support for approach to recycling and environmental industries;**
- 2. Minor wording amendments to Policy;**
- 3. Suitability and Flexibility of employment opportunities in Settlement Policies**

**1. Support for approach to recycling and environmental industries.**

**Response:** No changes are proposed. Support for the SAMDev Plan and proposed Policy MD4 is welcomed.

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2. **Minor wording amendments to Policy.** Response from one respondent regarding the minor amendment of wording of criteria 1.iii within the policy. A change in the terminology will allow for greater flexibility to introduce employment related opportunities outside those in a class B use. Greater flexibility will also help to enhance rural economies.

**Response:** No changes are proposed. Sufficient flexibility is already provided in Core Strategy and SAMDev Plan policies and in context of the NPPF. The land in question is a strategic employment site for Shrewsbury where the emphasis needs to be on B1, B2 and B8 uses. The proposed amendment to the policy wording would significantly alter the intent and purpose of the policy. This would freely permit a broad range of uses in addition to Class B to come forward on allocated employment sites.

3. **Suitability and Flexibility of employment opportunities in Settlement Policies.**

**Response:** No changes are proposed to SAMDev Policy MD4 however proposed changes have been recommended to proposed Policies S4.1 – Oswestry (site ELR072), S16.1 – Shrewsbury (Shrewsbury West SUE – land at Churncote Island), S1 – Albrighton: Albrighton Garden Centre is an existing developed site for predominantly retail uses and as such is expected to continue to operate in this use or may be redeveloped should the current use cease. The potential for relatively unrestricted redevelopment opportunities are likely to assist the recycling of the land, therefore a specific designation of the site may not be helpful.

## **MD5: Sites for Sand & Gravel Working**

### **Key issues & SC Response:**

- **Adequacy of Local Aggregates Assessment;**
- **Clarification of the contribution from ‘committed’ mineral sites;**
- **Phasing and windfall sites and the tests for their consideration;**
- **The exclusion of the previous Preferred Site at Cannebuff;**
- **The availability of detailed evidence regarding impacts on water resources and the historic environment at Wood Lane;**

7. **Local Aggregates Assessment:** The Minerals Products Association consider that the Plan is not justified or consistent with NPPF (145) because the Local Aggregates Assessment (LAA) has yet to be endorsed by the West Midland Aggregates Working Party and the forecast demand has been prepared in a way inconsistent with NPPF (62);

**Response:** Changes are proposed to update the current draft LAA to reflect stakeholder comments, including those from MPA, to add more detail and testing alternative forecasting to move away from reliance on historical trends. The revised LAA was considered by WMAWP at a meeting in June 2014;

8. **MD5(1):** The agent for the existing commitment at Woodcote Wood requests clarification in the Plan that the term ‘existing permitted sites’ includes both permitted and specific sites where there exists a resolution by the MPA to grant planning permission subject to the completion of a legal agreement (‘committed’ sites);

**Response:** Changes are proposed to amend paragraph 4.37 and MD5.2 to define and clarify the contribution assumed from ‘committed’ sites, including naming the sites concerned;

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9. **MD5(2):** The Minerals Products Association opposes the proposed phasing of allocations and the tests and potential working restrictions relating to the release of second phase sites;

**Response:** Changes are proposed to replace use of the term 'need' in 2i and add additional explanatory text regarding Morville / Bridgwalton cumulative impacts to clarify need for 2ii;

10. **MD5(3):** The Minerals Products Association and Staffordshire County Council are concerned about the application of cumulative tests relating to the release of windfall sites;

**Response:** Changes are proposed to amend MD5(3) to the effect that 3i and either 3ii or 3iii will apply as tests;

11. **Cannebuff:** Representations on behalf of the landowner and a potential operator for Cannebuff seek to cast doubt on the deliverability of the committed Barnsley Lane and Woodcote Wood sites, and therefore the ability of the Plan to address the established mineral requirements for the plan period. They consider that insufficient weight has been attached to the need to address the market demand for sand and gravel mineral from neighbouring authorities (Staffordshire and West Midlands conurbation) likely to emanate during the plan period due to the potential reduction in mineral reserves in southwest Staffordshire (also acknowledged by Staffordshire CC). They are concerned that the proposed level of provision is based on unrepresentative historic data which does not accurately reflect the availability of reserves, nor sufficiently addresses the mineral demands of the market area. Whilst they accept that this might be addressed through existing policy provision for windfall, they consider this to provide insufficient flexibility. They seek to promote Cannebuff as a deliverable alternative resource to address any shortfall;

**Response:** No changes proposed. The Plan makes more than adequate provision to meet identified requirements over the Plan period and does not rely, to any significant extent, on reserves in site commitments which have remained unworked. The preferred allocations, together with the proposed windfall policy, provide sufficient certainty and flexibility to maintain an adequate and steady supply of sand and gravel consistent with the established production guideline;

12. **Wood Lane:** English Heritage considers that a full assessment of the historic environment and any harm to heritage assets is required prior to allocation for conformity with the NPPF. The potential impacts should be known to the authority prior to allocation so that either the site is not allocated or appropriate mitigation measures are established in a development plan policy to ensure the protection of any nearby heritage assets. Natural England recommends that the findings of the HRA for Wood Lane should be included within the SAMDev text to ensure compliance with the Habitats Regulations and to assist developers in its application. They also welcome the requirement for site restoration to deliver "significant wildlife and recreation benefits", but query why this hasn't been included in relation to the Morville Extension;

**Response: Proposed Change:** The suggested clause was not included in Moreville Extension because there is limited recreational potential by virtue of the location and characteristics of the site. However, insert to Schedule MD5b in relation to Morville Extension a new criterion 4, to read 'a site restoration scheme will be designed to deliver significant wildlife benefits'.

**Further issues raised by Natural England on Policy MD5 and Wood Lane North quarry extension are addressed below.**

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A full heritage assessment is considered inappropriate and disproportionate in the context of national policy NPPF (128; 158; 169-170). In any case, a detailed Heritage Assessment is being prepared by the site promoter in support of a planning application for development of this site which is likely to be determined before adoption of the SAMDev Plan;

13. **Natural England:** The wording of point 1 should be changed to make it clear that Habitats Regulations Assessment (HRA) assesses impacts on Natura 2000 sites and their features of interest only, and not nationally designated wildlife sites as is currently implied. However, we welcome the requirement that permission cannot be granted if there will be an adverse impact on any protected site.

**Response: Proposed Change:** A co-ordinated approach has been taken to addressing the issues raised by Natural England with respect to MD12 and to the recommendations arising from the SAMDev HRA. Further detail will be given in a Statement of Common Ground which will be prepared between Shropshire Council and Natural England. Consequent changes to Policy MD5 are as follows:

Delete the following text from Schedule MD5a, point 1 and insert new text to read:  
'1. the completion of a **project-level** Habitats Regulations Assessment (HRA) ~~to demonstrate that development will not adversely affect the integrity of a European Site, or a nationally designated wildlife site. Permission cannot be granted if there will be an adverse impact on protected sites;~~ **in accordance with Policy MD12. Particular regard should be paid to effects on water quality and to impacts arising from sedimentation, hydrological changes and dust on the Cole Mere Ramsar site and the White Mere Ramsar site. Permission will not be granted if adverse effects on the integrity of either site cannot be avoided or mitigated in line with Policy MD12.'**

Delete the following text from paragraph 4.44 of the Explanation to Policy MD5 and insert new text to read:

- ~~4.44 It is a legal requirement for Local Authorities to prepare a Habitat Regulation Assessment (HRA) for plans and projects which have potential to impact upon habitats of European importance. Due to their size and location, mineral sites often have this potential. Whilst initial screening was carried out in support of the preparation of the Core Strategy in 2009, further screening has now been completed for the proposed mineral site allocations to identify any potential effect pathways by which those mineral allocations might impact upon European Designated Sites. The proposed site allocation at Morville has been screened out due to being over 10km from the nearest European Designated Site and the proposed site allocation at Gonsal has been screened out as there is no likely significant effect on European Sites. The remaining proposed site allocation at Wood Lane North Extension cannot be 'screened out' of the HRA process at this stage and will require a full Appropriate Assessment to be carried out when the planning application is made.~~

- '4.44 **The SAMDev Minerals HRA indicates that the Wood Lane North extension could adversely affect the integrity of the Cole Mere Ramsar site and the White Mere Ramsar site and that a project-level HRA is required at the planning application stage. Detailed information and an analysis of water movements as well as stringent mitigation management plans will be required to support this HRA.. If the HRA indicates that harm arising from the disturbance of ground or surface water flows, reduced water quality, increased sedimentation and the effects of dust cannot be avoided or mitigated in line with Policy MD12,**

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**then permission will be refused.. Further information is also available in the SAMDev Minerals Habitats Regulation Assessment.'**

14. **MD5a & MD5b:** The Environment Agency suggest that since quarrying activities have the potential for significant impacts on the water environment, it is essential that these impacts are more fully considered at an early stage and suggest the inclusion of extensive additional wording to address their concerns;

**Response:** A change is proposed to insert reference to hydrogeology in the development guidelines for Wood Lane. Whilst Impacts on the water environment are already generally addressed by CS18 and for minerals in MD17, supplement these by inserting additional supporting text for Policy MD17.

## **MD6 - Green Belt & Safeguarded Land**

### **Key issues & SC Response:**

1. **Review of the greenbelt needed.** Soundness is challenged on the basis that an immediate review of the greenbelt is needed in order to be consistent with NPPF
2. **Safeguarded land should be referred to.** A respondent submits that there has been no mention of safeguarded land within the policy; it is thought that the policy should be amended to include such as change.
3. **Policy contrary to NPPF criteria for inclusion in Green Belt.** A respondent who owns an area of land adjoining greenbelt designation has objected on the grounds the policy is contrary to the NPPF. They consider that Hilton is a village with no demonstrable open character which does not meet NPPF criteria for inclusion in Green Belt and therefore that it should be removed as a designation and their site allocated for housing.
4. **Policy contrary to NPPF criteria relating to infill and affordable development.** An objection is raised on the basis that the Policy shouldn't restrict infill and affordable housing to specific settlements such as hubs and clusters
5. **Development needs in the greenbelt.** One respondent has stated no objection to the protection of greenbelt land in principle. An issue has been raised asking how development needs which are in the greenbelt will be met. Another response seeks that MD6 should be amended allow for sustainable extensions to settlements. .

**Response:** No change proposed to Policy MD6. Policy MD6 is supported by the strategic policy framework in the Core Strategy which seeks to enhance the sustainability of communities in the Green Belt. Policy CS5 for the countryside and Green Belt, provides for sustainable development needs through provision for anticipated expansion at Shifnal and Albrighton, recognising the purpose and location of safeguarded land for further, long term sustainable development within the Green Belt. Policy CS5, , in conjunction with Policy CS4, also makes provision for limited local needs affordable housing and infilling for open market housing in settlements identified as Community Hubs and Clusters. The process of determining Community Hubs and Clusters has also considered the sustainability objectives of the NPPF in para 86. It is considered that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target and that the Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements identified. It is considered, therefore, that sufficient provision has been made for sustainable development in the Green Belt and in the absence of specific proposals to change safeguarded land designations, there is no justification to further address these issues in Policy MD6. Hilton village, specifically has not been

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identified as a Community Hub or Cluster and so, is not an appropriate location for development. The village does contribute to the Green Belt purposes having previously being designated in the Bridgnorth District Local Plan (2006). However, the SAMDev Plan makes provision to review this position during the next plan period.

## **MD7a - Managing Housing Development in the Countryside**

### **Key issues & SC Response:**

- 1. Policy should make provision for market housing cross subsidy on rural exception sites;**
- 2. Size & permitted development right restrictions on affordable dwellings on all exception sites are inappropriate;**
- 3. Lack of consistency in/inappropriate use of development boundaries;**
- 4. Financial test for agricultural workers dwelling not consistent with NPPF;**
- 5. Inappropriate to require affordable housing contributions in association with applications for the removal of occupancy conditions from previously unrestricted existing dwellings;**
- 6. Methodology & process for the selection of Community Hubs and Community Clusters (i.e. the land not subject to countryside policy), not appropriately evidence based;**
- 7. Policy only addresses new build and does not adequately address other types of development;**
- 8. Support for the ethos of appropriate conversion to achieve retention of heritage assets but wording should be amended to support sensitive reuse;**
- 9. The Plan's approach to rural areas needs reconsidering in order to demonstrate compliance with national policy.**

- 1. Policy should make provision for market housing cross subsidy on rural exception sites** – a representation made on behalf of West Midlands RSLs has asked for policy provision for cross subsidy.

**Response: No Change.** The approach reflects that in Core Strategy Policy CS11. Through this the Council seeks to focus affordable delivery on allocated/windfall market housing sites and via its existing exceptions policy. The Type & Affordability of Housing SPD, Appendix G, Paragraph 8, also makes provision for cross subsidised affordable housing for rent on exception sites. NPPF para 54 makes provision for allowing market housing to facilitate the provision of significant additional affordable housing to meet local needs. Thus proposals for cross subsidised schemes could be considered on their merits in relation to NPPF and other material considerations.

- 2. In Policy MD7a (1) the size of the dwelling and restrictions on the permitted development rights of affordable dwellings are not appropriate to all exception sites.**

**Response: Proposed Change to Policy MD7a (1) on page 40.** As this provision is intended to apply only to single plot exception dwellings this requires clarification through amendment of policy wording. It is proposed to delete 'affordable' and

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replace with 'single plot' so that the sentence reads, 'In order to protect the long term affordability of **single plot** affordable exception dwellings, they will be subject to size restrictions and the removal of permitted development rights, as well as other appropriate conditions or legal restrictions.'

**3. Lack of consistency in/inappropriate use of development boundaries –**

Representations submitted on behalf of the development industry suggest that boundaries either need to be used universally for all identified settlements or not used at all and clear criteria provided to guide development. It is also submitted that it is inappropriate to rely on settlement boundaries as the main basis for decision making on development which needs to be based on a full sustainability assessment of the development proposed.

**Response. No Change.** These comments relate to the principle of development boundaries and only relate indirectly to the countryside. The issues raised therefore relate directly to the operation of Policy MD3 and are considered in detail in relation to this policy.

**4. Financial test for agricultural workers dwellings not consistent with NPPF –** It is highlighted that para 2b of the Policy requires financial and functional tests.

Financial test should not be included as the NPPF refers only to essential need.

**Response: No Change.** It is agreed that the NPPF refers to essential need but the reference to relevant financial tests is intended to provide guidance and clarity for applicants for planning permission regarding the assessment of applications. It is considered appropriate to apply a financial test as well as functional to establish permanent essential need for a dwelling. The financial test also provides evidence of the size of dwelling which the unit can sustain in line with the Policy approach which provides for essential rural worker's dwellings.

**5. Inappropriate to require affordable housing contributions in association with applications for the removal of occupancy conditions from previously unrestricted existing dwellings on the enterprise –** It is suggested that the policy places a requirement for affordable housing contribution on previously unrestricted existing dwellings on the enterprise which have subsequently had occupancy conditions attached only as a result of a permission for an additional essential dwelling for the enterprise, thus conflicting with the remainder of the paragraph which refers to 'primary and additional rural dwellings permitted prior to the adoption of the Core Strategy'.

**Response: Proposed Change to paragraph 4.60 of explanation to Policy MD7a on page 43.** It is not the intention to seek contributions on existing dwellings which have retrospectively had occupancy conditions attached to them in association with planning permissions for new rural workers dwellings. The clarity of policy intentions can be addressed by additional explanatory text at the end of paragraph 4.60, '**An affordable housing contribution will however not be required from pre-existing dwellings which have retrospectively become subject to occupancy conditions as a result of a planning approval for a new rural workers dwelling for the enterprise.**'

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6. **Methodology & process for the selection of Community Hubs and Community Clusters (i.e. the land not subject to countryside policy), not appropriately evidence based** – It is considered that the approach fails to make comprehensive planned provision using appropriate evidence base for housing to meet local need & support rural community sustainability.

**Response: No Change.** Criticisms of Community Hubs & Community Clusters methodology and approach are considered under MD1. Rationale for individual settlements included is set out in Technical Background Paper (March 2014). Non-identification as a Community Hub or Cluster settlement does not mean no development can take place, and Policy MD1 provides guidance on the process for additional communities to opt in at a later date. The Council however considers that the Plan currently identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target and that the plan policies make appropriate provision for development to support rural community sustainability.

7. **Policy only addresses new build and does not adequately address other types of development** – The respondent considers that the Policy fails to recognise the growing demand, potential benefits and sustainability of live/work units and does not make provision for this form of development in accordance with NPPF, paragraph 21.

**Response: No Change.** Whilst the Core Strategy and SAMDev Plan do not identify live/work units as a specific form of residential development (other than in paragraph 4.67 of the explanation to Policy MD7b) this form of development would be permitted within the policy approach in countryside policies CS5 and MD7a and MD7b. This form of development is also identified as ‘sustainable development’ by its inclusion in the NPPF paragraph 21 and so, is a material consideration for the conversion of ‘rural’ buildings or new build residential developments. Proposals for live/work development are therefore, generally supported by national policy and specifically supported by the countryside policies of the Local Plan and their delivery will be determined on the merits of any applications to provide this particular form of residential development.

8. **Support for the ethos of appropriate conversion to achieve retention of heritage assets but wording should be amended to support sensitive reuse.**

**Response: Proposed Change to Policy MD7a (1) on page 40.** In paragraph 1 insert ‘sensitive’ before ‘re-use & retention’ as suggested and additional text in paragraph 4.62 as set out below . As there are a number of changes proposed to paragraph 1 of the Policy as result of different issues identified a composite paragraph showing all these alterations is provided below for the purposes of clarity. English Heritage proposed specific wording changes to the Policy and explanatory text can be incorporated, in part as minor amendments. In the case of comments relating to the change of use of existing holiday properties into permanently occupied residential dwellings (paragraph 5c and Para 4.62) it would be inappropriate to include these changes in the Policy or explanation. English Heritage have indicated in a recent meeting that it was not fully understood that this part of the policy relates to existing holiday let properties and the principle of the

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removal of condition to allow full time accommodation (rather than the actual conversion which has already taken place). Reference can however be made in explanatory text to where additional alterations are proposed to existing conversions which are heritage assets and additional wording (in bold) is proposed in paragraph 4.62 .

The explanatory text in paragraph 4.62 be amended to read, ‘...Open market residential use will only be accepted where the conversion has met the criteria set out in Policy CS5 and retains identifiable heritage value. **Where additional alterations are proposed these must respect the significance of the heritage asset, its setting and the local landscape character.** An affordable housing contribution...’

9. **The Plan’s approach to rural areas needs reconsidering in order to demonstrate compliance with national policy.**

**Response: No Change.** See response to Points 6 & 7 above

## **MD7b - General Management of Development in the Countryside**

### **Key issues & SC Response:**

1. **Requirement for agricultural development to be related to viable agricultural enterprise is inappropriate and unjustified;**
2. **Policy needs to be broader in scope, including reference to other forms of development.**

1. **Requirement for agricultural development to be related to viable agricultural enterprise is inappropriate and unjustified** - The objection highlights that the requirement is overly restrictive, contrary to Core Strategy Policy and NPPF and would be onerous to implement because of the need to assess viability in respect of planning applications.

**Response: Proposed Change to Policy MD7b (3a) on page 44.** It is agreed that Policy MD7b(3a) is overly restrictive in terms of the requirement to show the viability of the agricultural enterprise when seeking further agricultural development. It is proposed to amend Policy MD7d(3a) to read:

‘3. Planning applications for agricultural development will be permitted where it can be demonstrated that the development is:  
a. ~~Required in connection with a viable agricultural enterprise and is~~ of a size/ scale and type which is consistent with its required agricultural purpose and the nature of the agricultural enterprise that it is intended to serve;’

2. **Policy needs to be broader in scope, including reference to other forms of development** - The objection specifically identifies renewable energy as generally requiring a countryside location and therefore needing inclusion.

**Response: No Change.** Policy MD7b forms part of a policy framework with the NPPF, Core Strategy and other SAMDev policies (including Policy MD8 to manage energy infrastructure development) which together provide comprehensive guidance for the consideration of development proposals in the countryside.

## **MD8 - Infrastructure Provision**

### **Key issues & SC Response:**

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1. **Definition of “Heritage Assets”;**
2. **Social and cultural infrastructure;**
3. **Support for wind energy;**
4. **Rail infrastructure;**
5. **Water resources.**

1. **Definition of “Heritage Assets”:** English Heritage request changes to 3(iv) to clarify the application of the policy to heritage assets;

**Response:** A change is proposed to amend 3(iv) to remove ‘recognised’ and insert cross reference to MD13 to provide reference to significance. Reference to setting is already included;

2. **Social and cultural infrastructure:** The Theatres Trust requests inclusion of reference to the protection and enhancement of social and cultural infrastructure;

**Response:** No changes proposed. Such infrastructure is already addressed in CS8 and the value of cultural facilities is already explicitly recognised as part of the Council’s published Infrastructure & Implementation Plan and Place Plans, which are clearly referenced as a key part of the delivery mechanism for policies CS8 and MD8. No additional detailed guidance is required;

3. **Wind energy:** RES UK consider that the policy should be worded more positively to provide greater support and guidance for wind energy developments;

**Response:** No changes proposed. Positive encouragement for renewable energy development is established by Policy CS8 to which this policy is supplementary. Further positive support is provided in MD8(3).

4. **Rail infrastructure:** Network Rail request a policy to specifically addressing the issue of level crossings and consider that developer contributions should be sought to mitigate the impacts of increased footfall at railway stations as a result of new residential or commercial development;

**Response:** No changes proposed. Shropshire Council operates a comprehensive infrastructure plan which identifies infrastructure investment priorities for each parish in Shropshire and updates these annually. Network Rail have previously contributed to this process and have the ability to assess potential capacity constraints related to their stations derived from the impact of new development and to nominate these as investment priorities in the infrastructure plan.

5. **Water resources and ecology:** The Environment Agency requests that MD8(4iii) should include ‘water resources’ and ‘ecology’ as relevant impacts and the availability of a comprehensive and detailed evidence base should prevent the need for a reactive approach as described in MD8(4iv) and 4.69;

**Response:** A change is proposed to insert reference to ‘ecology’ in 4(iii). No changes proposed in respect of water resources since it is unclear how this differs from flood risk and water quality which are already referred to. As a development management policy MD8 references relevant tests or issues which will help inform planning decisions. Water related evidence changes frequently but the Plan needs to be flexible and resilient over an extended period.

6. **New Strategic Infrastructure:** An objector considers that the policy is subjective and it is unclear how item MD8(3) would be applied in practice. In the absence of clearly defined terms it is considered that the policy does not adequately protect the interests of “sensitive neighbouring land uses”;

**Response:** No changes proposed. The Council does not agree that the policy as drafted is ‘highly subjective’. MD8(3) identifies the considerations which are likely to be material

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in reaching a judgment regarding whether the contribution which an application for strategic infrastructure to help meet agreed objectives (e.g. a new road) outweighs the potential for adverse impacts. Where an application strategic infrastructure is held to generate adverse impacts on: “Residential and other sensitive neighbouring land uses” (MD8(3i) or relating to “Noise, air quality, dust, odour and vibration” (MD8(3vi), then the policy establishes that these considerations will be given particular consideration in reaching a decision. The Council considers that this approach, together with the policies of the adopted Core Strategy and national guidance, will adequately protect the interests of “sensitive neighbouring land uses”.

## **MD9 - Protecting Employment Areas**

### **Key issues & SC Response:**

- 1. Protection of the land adjacent to the Registered Battlefield;**
- 2. Wording of MD9 does not allow for flexibility;**
- 3. Objections regarding specific sites identified under Policy MD9;**

- 1. Protection of the land adjacent to the Registered Battlefield, north of Shrewsbury.** English Heritage and Haston Reynolds have raised concerns over the protection of land at Battlefield Enterprise Park adjacent to the Registered Battlefield, which has been identified under Policy MD9 as a protected employment area. There are concerns that the land has not been allocated without being subject to a Sustainability Appraisal or Habitats Regulations Assessment and with no assessment as to the potential impacts on the historic environment and Battlefield. English Heritage also requests that areas of the Registered Battlefield that have been included as part of the protected employment area be removed and the Battlefield be identified as a heritage asset designation only.

**Response:** Policy MD9 does not allocate land for employment, it safeguards existing sites and areas and, as regards the land at Battlefield Enterprise Park, consent for employment development on the land has already been granted and some development taken place, including the Food Enterprise Centre and around the periphery of the site (Waste Transfer Station and Energy from Waste Facility). The principle of development has therefore been established through planning applications. As the site is protected employment land, it is considered that a Sustainability Appraisal or HRA is not required.

A change is proposed to the boundaries of the employment area safeguarded under Policy MD9 at Battlefield Enterprise Park to exclude any land forming part of the Registered Battlefield. Any development which is proposed on the employment area will be considered in the context of the Draft Interim Planning Guidance for the Registered Battlefield and its design principles (to be incorporated within the Historic Environment SPD) and Battlefield 1403.

- 2. Wording of MD9 does not allow for flexibility.** Concerns expressed over the wording of MD9 and the implications of the proposed designations on employment areas. It is considered that the policy does not provide the most appropriate strategy for dealing with existing employment land. There is a desire to see greater flexibility to explore other class uses for employment sites and to allow for less restricted re-use of employment land. If a designation of the site were sought at a future date the SEAS would provide transparency over the assessment of the site and the significance of the possible designation in relation to Policy MD9 (2).

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**Response:** No changes proposed. The purpose of referring to the Policy MD9(1) tests in seeking to make further site designations is to ensure that such sites will be assessed and protected in the same manner to those sites already included in Policy MD9(1) and shown on the Policies Map, thereby providing a process which is fair, reasonable and appropriate.

3. **Objections regarding specific sites identified under Policy MD9.** In addition to land at Battlefield Enterprise Park (see 1 above), a number of representations have been received regarding the inclusion of specific sites under Policy MD9 Protecting Employment Areas, including land at Harlescott Lane, Battlefield Road and Whitchurch Road, Shrewsbury.

**Response:** No changes proposed, as the identification of the sites is supported by the evidence base, and the policy provides sufficient flexibility to enable appropriate redevelopment/regeneration schemes to come forward and to address concerns raised.

## **MD10a - Managing Town Centre Development (also Shrewsbury Strategy S16 and Ludlow Strategy S10).**

### **Key Issues and SC Response**

1. **Evidence base in relation to Shrewsbury**
2. **Need for additional retail site allocations in Shrewsbury**
3. **Extent of Ludlow Primary Shopping Areas**

### **Summary of Key Issues:**

- 1 **Evidence Base:** NJL Consultants, representing the managers and owners of Meole Brace Retail Park, argue that the evidence behind the SAMDev's retail policy for Shrewsbury is out-of-date. They argue both population and expenditure capacity forecasts have increased since the data which informed the Shrewsbury Retail Study 2012 update. They argue the lack of up-to-date evidence means the Plan is not consistent with the NPPF requirements and therefore unsound. NJL have provided their own information based upon 2013 Experian population and expenditure capacity forecasts.

**Response:** No Change Proposed: Further evidence is currently being prepared by Peter Brett Planning Consultants on the Council's behalf to ascertain the updated position regarding available expenditure capacity within Shrewsbury up to 2026 and the level of retail need. This work will be available in late June and will inform any changes necessary to the proposed retail strategy for Shrewsbury.

- 2 **Need for more additional site allocations in Shrewsbury:** NJL Consultants, representing the managers and owners of Meole Brace Retail Park, argue that their assessment of current evidence shows there is a greater need for additional comparison floorspace beyond what is currently being planned for through the SAMDev. They also consider there to be potential concerns over the delivery of the New Riverside scheme and that it is appropriate for the Council to adopt a contingency approach should the development not come on stream. Given these two factors, they argue that given this identified need for a further allocation at Meole Brace Retail Park, which in their view offers the most suitable, deliverable and available location. Without this contingency plan they argue the retail strategy for Shrewsbury is not consistent with national policy or

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justified. Ignis Asset Management and Shearer Property Group on behalf of UKCPT, representing the interests of the approved town centre New Riverside scheme, have confirmed the Riverside scheme is a medium to long term commitment and that the allocation or policy relaxation of further out-of-centre retail would cause significant harm to the ability of the New Riverside scheme.

**Response:** No Change Proposed: Further evidence is currently being prepared by Peter Brett Planning Consultants on the Council's behalf to update the Shrewsbury Retail Study and importantly to provide an up-to-date picture on retail need up to 2026. The final report will be available in late June, but ahead of this the initial outcomes show that the Council's retail approach is soundly based. This position has taken into account the most recent population and expenditure forecasts and has factored in existing commitments. It is considered the New Riverside scheme continues to be deliverable and is a major town centre commitment. Given this, it is considered that the SAMDev's retail strategy is sound based upon the most up-to-date evidence and that no changes are required.

- 3 Primary Shopping Areas:** Indigo Planning, on behalf of Mrs D Prosser, propose a change to the extent of the proposed Primary Shopping Area (PSA) for Ludlow. This would remove Upper Galdeford and Tower Street from the PSA, whilst retaining the rest of the proposed PSA area. They consider Tower Street to have a greater mix of uses and that its identification would be overly restrictive towards retail.

**Response: Proposed Change.** Amend the Policies Inset Map for Ludlow to remove Tower Street from the PSA, but retain the existing premises of One Stop and Sommerfield within the PSA. It is agreed that this would more appropriately reflect the mix of uses along Tower Street whilst maintaining suitable policy management over two centrally located retail units

## **MD10b - Impact Assessments for Town and Rural Centres**

### **Key Issues and SC Response**

- 1. Thresholds for Impact Assessments**
- 2. Consistent use of terminology for rural settlements**
- 3. Reference to the impact on town centres in part 2 of policy MD10b**

### **Summary of Key Issues:**

- 1. Thresholds for Impact Assessments:** Balfours question why the proposed thresholds set for District and Principal Centres of 200 and 300 sqm floorspace respectively are less than Class M of the General Permitted Development Order threshold of 500 sqm for the change of use of an agricultural building to a shop

**Response: Proposed Change:** A change is proposed which would insert the phrase "where permission is required" into the opening paragraph of the policy. This change clarifies the policy's proposed thresholds do not conflict with the GPDO.

- 2. Consistent use of terms village centre and rural centre:** Balfours consider there is confusion over the use of these terms in the policy. Assumed it relates only to Community Hubs and Clusters but this need to be clarified.

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**Response:** No Change Proposed: The policy reference to village centre and other rural centres is aimed at all centres, not only community hubs and clusters and therefore it is considered the existing wording is appropriate and clear.

3. **Reference to the impact on town centres in part 2 of policy MD10b:** Balfours question why this section of the policy only refers to assessing the significance of impact on town centres whilst the rest of the policy indicates that Impact Assessment could be required for applications in rural centres.

**Response: Proposed Change:** In order to provide consistency throughout the policy it is proposed to make minor amendments to Part 2 of the policy and explanatory text. These changes make it clear the assessment of impact relates to both to town and rural centres, and clarifies that a proportionate approach is applied depending on the role of the settlement.

## **MD11: Tourism facilities and visitor accommodation**

### **Key issues & SC Response:**

1. **Conversion of rural buildings for tourism/leisure use;**
2. **Restrictions on use of new visitor accommodation development**

#### **1. Conversion of rural buildings for tourism/leisure use**

A small number of representations raise concerns that the importance of supporting appropriate conversion of rural buildings to tourism/leisure use is not adequately reflected in the policy as drafted.

**Response:** - Policy CS5 of the Core Strategy already supports conversions that make a positive contribution to the character to the countryside with small scale economic development and employment uses, including tourism/leisure proposals, a priority for re-use. MD11 does not seek to contradict or restrict the approach in CS5 and a wording change is suggested to clarify this overall policy approach. A minor change is proposed to 11.8 (page62) to read: "Holiday let development that does not conform to the legal definition of a caravan, **and is not related to the conversion of existing appropriate rural buildings,** will be resisted in the countryside, following the approach ...".

#### **2. Restrictions on use of new visitor accommodation development**

One representation questioned the reference regarding restricting new applications to holiday accommodation use in policy para 11 of the policy. They felt that this should be clarified to ensure its deliverability.

**Response:** - It is agreed that this section of the policy is not as clear as it could be and a suggested wording change to clarify this part of the policy will be put forward. A minor change is proposed to 11.11 (page 63) to read: "To retain the economic benefit to the visitor economy, ~~the Council will apply appropriate conditions to restrict applications for visitor accommodation to tourism uses~~ **will be applied to new applications for visitor accommodation to ensure the accommodation is not used for residential occupation.**"

## **MD12 - Natural Environment**

### **Key issues & SC Response**

1. **Policy does not conform to NPPF**
2. **Omission of heritage assets**

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**3. The policy should make it clear that the various 'natural assets' have differing levels of importance and significance**

**1. Policy does not conform to NPPF.**

Natural England consider that the Plan is not sound as the policy does not make it clear that planning permission would be refused if significant harm cannot be avoided, mitigated or as a last resort, compensated for in line with NPPF. Also the policy does not cover soils or best or most versatile agricultural land.

**Response; Change proposed** to the wording to bring it in line with NPPF.

**No changes proposed** to the inclusion of soils or best and most versatile agricultural land as an environmental asset in the policy. Best and most versatile agricultural land is covered in CS6 and there is no accepted definition of a valued soil nor is Shropshire Council aware of any maps of such soils so development certainty cannot be provided.

**2. Omission of heritage assets.** English Heritage considers the Plan to be unsound because the policy does not include a clause on historic landscapes. They recommend inserting a paragraph on historic landscapes and how they will be dealt with in planning applications.

**Response:** Change proposed. Add a paragraph in the explanation to clarify that landscape character and local distinctiveness includes historic landscapes and expand on the value of historic landscapes.

**3. The policy should make it clear that the various 'natural assets' have differing levels of importance and significance.**

**Response:** Change proposed to include the respondents suggested wording.

## **MD13 - Historic Environment**

### **Key issues & SC Response:**

- 1. The Plan does not provide enough detail or adequate clarity**
- 2. The policy cannot be effectively managed**
- 3. The Historic Environment SPD**
- 4. The key to the Proposals map is incorrect**

**1. The Plan does not provide enough detail or adequate clarity.**

English Heritage considers that the Plan is not sound because it does not provide enough detail or adequate clarity and certainty about how planning applications affecting heritage assets will be considered. The agency is willing to work with Shropshire Council to produce appropriate wording.

**Response:**

Agree policy re-wording with English Heritage through a Statement of Common Ground.

**2. The policy cannot be effectively monitored**

English Heritage considers that the Plan is unsound as the policy cannot be effectively monitored. A number of changes are suggested and agency is willing to work with Shropshire Council to devise appropriate indicators.

**Proposed changes:** Change heritage features to heritage assets, delete the phrase 'as and when' and Include World Heritage Site Management Plans as both evidence base and the indicator documents

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The Council is tasked with putting forward a sound Plan to deliver the Core Strategy requirement for growth. This involves preparing policies to prevent harm to the significance of historic assets but does not extend to producing a positive strategy for the enjoyment of the historic environment. The State of the AONB Report monitors the effect of the AONB Management Plan. It is thus a different document and should be included as an indicator.

**3. The Historic Environment SPD**

The policy refers to an SPD but is no indication about what this document will contain and clarity and detail should not be left to an SPD.

**Response: No change to the policy** but provide a timetable for the production of the SPD and an outline of contents for the Examination.

**4. The key to the Proposals map is incorrect.**

English Heritage consider that the key to the Proposals Map should read Registered Battlefields rather than Historic Battle site.

**Response: Change proposed.** Amend key accordingly

## **MD14 - Waste Management Facilities**

### **Key issues & SC Response**

1. **Clarification of environmental impacts:** The Environment Agency suggest a number of minor changes to improve clarity regarding environmental impacts which may also be subject to regulation under environmental permitting or pollution control regimes.

**Response:** A number of changes are proposed to improve clarity.

## **MD15 - Landfill and Land Raising Sites**

### **Key issues & SC Response**

1. **'Need' for landfill:** The Environment Agency suggest a minor amendment to clarify the consideration to be applied to need in the context of windfall applications for landfill sites;

**Response:** Changes are proposed to amend wording in MD15(2ii) and 4.148 for clarity;

2. **Historic Environment:** English Heritage would like specific reference in this policy to how the historic environment will be considered when deciding applications for this use of development and the insertion of cross references to CS6 / 17 and MD13;

**Response:** No changes are proposed: NPPF (128), existing policies CS6 and CS17 and proposed policy MD13 (4.138) already adequately address potential impacts on archaeology from landfill development. Specific cross references to other policies in the local plan are superfluous since the Plan must be read as a whole.

## **MD16 - Mineral Safeguarding**

### **Key issues & SC Response:**

1. **Exemptions;**
2. **PEDL Licence Areas;**
3. **Historic Environment;**
4. **Shrewsbury South SUE;**
5. **Mapping.**

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1. **Exemptions:** The Coal Authority are concerned that the nature of applications of 'national, regional and local importance' are not defined in criterion xi of paragraph 4.151 and that this lack of definition could lead to exemptions which are inappropriate and unjustified;

**Response:** No changes proposed. The approach proposed is derived directly from national guidance regarding the 'safeguarding toolkit' on page 16 of: "A Guide to Mineral Safeguarding in England" (Oct 2007);

2. **PEDL Licence Areas:** The Coal Authority are concerned that Petroleum Exploration and Development Licence Areas (PEDL) are not illustrated in the Policies Map or in the SAMDev Plan and no reference is made to it in the policy or supporting text;

**Response:** A change is proposed to update the policies map to include PEDL licence areas for compliance with NPPG (105);

3. **Historic Environment:** English Heritage would like specific reference in this policy to how the historic environment will be considered when deciding applications for this type of development and the insertion of cross references to CS6 / 17 and MD13 and the EH Stone Study;

**Response:** No changes proposed. It is unclear how a mineral safeguarding policy would generate impacts on sub-surface archaeology which is not already addressed through other local plan policies. The Plan should be read as a whole, and NPPF (128), existing policies CS6 and CS17 and proposed policy MD13 (4.138) already adequately address potential impacts on archaeology. Additional guidance on specific issues will be provided as part of the proposed Historic Environment SPD. The inclusion of specific cross references to other policies in the local plan is superfluous since the Plan must be read as a whole. The value of quarries in supplying locally distinctive building materials is already recognised in the Core Strategy (CS6, CS17 & CS20). Paragraph 4.150 already includes a cross reference and a link to additional online information from the English Heritage and BGS Strategic Stone Study concerning local stone resources;

4. **Shrewsbury South SUE:** The site promoter for the Shrewsbury South SUE would like the MSA to be illustrated in the Plan and considers that the policy is unduly restrictive and the safeguarding of minerals located in the SUE should be secondary to its development if its delivery is not to be threatened.

**Response:** No changes proposed. The effect of MD16 on the Shrewsbury South SUE has been misinterpreted: Consistent with the explicit requirements of NPPF (143), the policy requires preparation of a Mineral Assessment (MD16[3]) to accompany the planning application to demonstrate to the satisfaction of the MPA that mineral interests have been adequately considered and that known mineral resources will be prevented, where possible, from being sterilised or unduly restricted by other forms of development occurring on or close to the resource. Where the applicant can demonstrate that the mineral resource concerned is not of economic value or that mineral can be extracted to prevent the unnecessary sterilisation of the resource prior to the development taking place without causing unacceptable adverse impacts on the environment and local community, then development can proceed. The published site assessment for the site acknowledged that the site is within both a Coal Authority Referral Area and a Mineral Safeguarding Area. These issues have been addressed in pre-application advice, which has established that it was unlikely that the Council as Minerals Planning Authority would object to development on the grounds of sterilisation of a mineral resource. However, appropriate consideration should be given to prior working of any viable sand and gravel deposit as part of any subsequent ground preparation works, particularly if ground preparation necessitated removal of sand and gravel from the site.

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5. **Mapping:** The Mineral Products Association consider that the Plan is currently unsound because the Policies Map does not differentiate between the different minerals which are protected by the existing MSA layer;

**Response:** A change is proposed to insert additional explanatory text to cross reference more detailed information on an 'interactive' mineral safeguarding map.

## **MD17 - Managing the Development and Operation of Mineral Sites**

### **Key issues & SC Response**

1. **Water Resources;**
2. **Heritage Assets;**
3. **Output restrictions;**
4. **Production of locally distinctive building and roofing stone;**
5. **Quantity and quality of mineral.**

1. **Water Resources:** The Environment Agency suggest adding a reference to in MD17(2) to "contributing to Water Framework Directive objectives" to support multi-functional after use schemes including environmental enhancements; for example flood management and biodiversity benefits from wet washland attenuation as part of a mineral sites restoration plan;

**Response:** A change is proposed to add appropriate reference to 4.156 to supplement existing consideration in CS18 and MD17 (1v.) Insert supporting additional text concerning 'hydro-geological risk assessment', 'groundwater level monitoring' and 'water features survey' as suggested under MD5;

2. **Heritage Assets:** English Heritage suggests adding a reference to the need for development to protect, conserve and enhance the setting and significance of heritage assets;

**Response:** No change proposed. The Plan should be read as a whole and this issue is already addressed in CS6 / CS17 & MD13 (3);

3. **Output Restrictions:** The Mineral Products Association object to the unilateral imposition of output restrictions in text at the end of MD17(1);

**Response:** A change is proposed to amend reference to output restrictions to remove 'imposed' and clarify that output restrictions may be sought and agreed with the operator to make a development proposal environmentally acceptable;

4. **Production of locally distinctive building and roofing stone:** The Mineral Products Association are concerned that the proposed wording of MD17(5) may lead to unfairly lenient regulation of small producers and damage competitiveness;

**Response:** A change is proposed to make clear that all applications for building stone will generally be supported as a preface to specific guidance on small producers of vernacular materials;

5. **Quantity and quality of mineral:** The Mineral Products Association suggest that an additional criterion is added to require applications to demonstrate the quantity and quality of mineral present according to a professionally undertaken programme of drilling and mineral assessment.

**Response:** A change is proposed to amend MD17(1viii) to include reference to the quantity & quality of mineral and include additional supporting text to refer to demonstrating this through a "professionally undertaken programme of drilling and mineral assessment";

## **S1 – Albrighton Area**

### **Key issues & SC Response:**

- 1. Objection to Land at White Acres' (ALB003) suitability for retirement homes**
- 2. Impact of Land at White Acres (ALB003) on the setting of heritage assets**
- 3. Provision for long term employment growth Albrighton Garden Centre**

#### **1. Objection to Land at White Acres' (ALB003) suitability for retirement homes**

Key issues have been raised regarding site ALB003. One representation, although supporting allocation for residential uses, objected to the identification of the site at ALB003 Land at White Acres for retirement homes, the size of dwellings advocated and the number houses proposed. This was not supported due to its suitability for a wider range of homes and lack of consultation with landowners.

**Response:** - The evidence outlined in paragraph 5.4 of the SAMDev Plan identifies the current housing stock within Albrighton, as well as housing need. This is also explored in the Technical Background Paper (March 2014). The local Albrighton community led Plan, which was informed by significant consultation and local survey and is endorsed by Shropshire Council for development management purposes, identifies a local need for 1-2 bed housing. Meeting retirement age needs is in accordance with NPPF para 50 and helps to rebalance the housing stock. The housing guideline for the site reflects some of the limiting constraints on the site although this is a guideline and is not considered to be a 'maximum' with further consideration required through a detailed planning application. It is proposed to amend Schedule S1.1a to include reference to 'lifetime homes' standard to ensure that the houses would be capable of meeting the needs of the retirement age population but enable an element of flexibility in delivery for the site promoter. Amend S1.1a (page 86) to read "Development to deliver housing that is appropriate for people of retirement age **by meeting 'lifetime homes' standards**. A high proportion of the development should be one and two-bed units **is sought within the development**"

#### **2. Impact of Land at White Acres (ALB003) on the setting of heritage assets**

Key concerns about how the site at White Acres was assessed in relation to the impact on the setting of the Conservation Area were raised by English Heritage.

**Response:** - The Plan makes provision for heritage assets through policies MD13 and MD2, as well as Core Strategy Policies CS6 and CS17. All potential sites have been assessed for environmental impacts as part of the site assessment process. Schedule S1.1a identifies the need for development on this site to respect and enhance the setting of the Conservation Area. No changes are proposed.

#### **3. Provision for long term employment growth and inclusion of Albrighton Garden Centre**

One representation has been made regarding Albrighton Garden Centre. It is considered that the Albrighton Neighbourhood Plan Light makes provision for long term growth. However, it is not felt that as it stands, SAMDev makes provision for long term employment growth across the whole of the Plan period. Albrighton Garden Centre should be included within the Plan as a long term employment allocation, as it provides an ideal opportunity to provide new land without having a detrimental effect on the greenbelt.

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Response: - See *response under MD4*

## S2 – Bishops Castle Area

Key issues & SC Response:

### Bishops Castle

10. Scale and distribution of windfall development in Bishop's Castle town should be restricted;

11. HRA for the River Clun SAC

### Bucknell

12. Non-compliance with the Habitats Regulations in Bucknell affecting the River Clun SAC;

13. The reliance on BUCK001 as a single allocation to meet the housing requirements in Bucknell is unsustainable;

### Clun

14. Non-compliance with the Habitats Regulations in Clun affecting the River Clun SAC;

15. Relative capacity of housing allocation CLUN002 should be increased and windfall development controlled;

### Lydbury North

16. Policy delivery and non-compliance with the Habitats Regulations in Lydbury North affecting the River Clun SAC;

17. Policy delivery and non-compliance with national and strategic policy on protection of the historic environment;

18. Suitability of allocated housing sites LYD007, LYD008, LYD009;

19. Availability of allocated housing site LYD009;

20. Probity of the openness and transparency of the preparation of Policy S2.2(iv);

21. Justification for a causal relationship between changes in the River Clun SAC and development in the Clun catchment;

### Clungunford

22. Non-compliance with the Habitats Regulations in Clungunford affecting the River Clun SAC;

### Worthen with Shelve

23. Justification for objectively assessed housing need and proper designation of settlements in Worthen with Shelve Parish;

### Bishops Castle Area Policy

24. Non-compliance with the Habitats Regulations affecting the River Clun SAC;

25. Justification for a causal relationship between changes in the River Clun SAC and development in the Clun catchment.

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**Policy S2.1 - Bishops Castle town**

1. **Scale and distribution of windfall development in Bishop's Castle town should be restricted.** Hemmings supports Policy S2.1 and the allocation of housing site BISH013. Hemmings wishes windfall development to be restricted to a maximum limit with control over the distribution of windfall development to manage the impacts on the narrow local highway network in the town. Longstanding employment sites are recommended for windfall housing development.

**Response:** No changes proposed. Policy S2.1 addresses the issue of windfall development by restricting such development to suitable opportunities within the existing development boundary around the town. This includes existing employment areas but restrictive policies on the redevelopment of employment sites may further limit the supply of new windfall housing.

2. **HRA for the River Clun SAC.** Policy S2 should refer to the phasing of development to take account of infrastructure improvements and should identify those developments which will be phased later in the SAMDev Plan timeframe

**Response: Proposed Change see response to Natural England in relation to Policy S2.3.** A co-ordinated approach had been taken to addressing the issues raised by Natural England with respect to MD12 and the recommendations arising from the SAMDev HRA. Further detail is given in the Statement of Common Ground between Shropshire Council and Natural England. Consequent changes to settlement strategies and supporting text are as follows:

Delete text from Policy S2.1 point 5 of Bishop's Castle and insert text to read: '~~All development in Bishop's Castle must have regard to the conservation targets for the River Clun catchment as set out in the Nutrient Management Plan and any agreed management strategy for the river catchment.~~ **Mitigation measures will be required to remove the adverse effects of development in Bishop's Castle on the integrity of the River Clun SAC in accordance with Policy MD12.**'

Insert new paragraph 5.16a into the Explanation to Policy S2.1 to read: '**The Plan HRA indicates that development in Bishop's Castle may adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site in accordance with Policy MD12. Further information is also available in the SAMDev Habitats Regulation Assessment.**'

Insert new second paragraph into Policy S2.2 Community Hub and Cluster Settlements to read: '**Mitigation measures will be required to remove the adverse effects of development in the Bishop's Castle area on the integrity of the River Clun SAC in accordance with Policy MD12.**'

**Policy S2.2(i) - Community Hub : Bucknell**

3. **Non-compliance with the Habitats Regulations in Bucknell affecting the River Clun SAC.** Natural England suggest that to comply with the Habitat Regulations it is necessary for development in Bucknell to either be phased in accordance with the Severn Trent Water – Asset Management Programme or development should be required to ensure that effluent arising is pumped out of the River Clun catchment

**Response: Proposed Change:** A co-ordinated approach had been taken to addressing the issues raised by Natural England with respect to MD12 and the recommendations arising from the SAMDev HRA. Further detail is given in the

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Statement of Common Ground between Shropshire Council and Natural England.  
Consequent changes to Policy S2.2(i) are:

~~Delete the following paragraph in Policy S2.2 (i). All development in Bucknell Parish must have regard to the conservation targets for the River Clun catchment as set out in the Nutrient Management Plan and agreed management strategy for the river catchment.~~

4. **The reliance on BUCK001 as a single allocation to meet the housing requirements in Bucknell is unsustainable.** Mr and Mrs Morgan suggest that the proposed allocation BUCK001 is unreliable as it is a longstanding and undeliverable housing allocation. Mr & Mrs Morgan promote (as landowners) the allocation of BUCK003 to meet the housing requirement for Bucknell, to 'boost significantly' the supply of housing and to deliver a wide choice of high quality homes in the settlement.

**Response:** No changes proposed. The purpose of Policy S2.2(ii) was to make local provision for the development needs of Bucknell and to safeguard the long term sustainability of the community. At the Preferred Option stage of the SAMDev Plan in March 2012, it was proposed this be achieved by allocating site BUCK003 alongside the existing mixed use commitment of BUCK001. Prior to July 2013, the viability of site BUCK001 was given serious consideration in relation to the scale of housing being proposed and the suitability, therefore, of continuing with the longstanding employment allocation on this site. BUCK001 was confirmed as the preferred option in July 2013 being the most sustainable development option in Bucknell. The site accommodated existing employment opportunities with the potential to create new employment floorspace and with the land capacity to satisfy the housing needs of the town (including a significant element of affordable housing) and to deliver new employment opportunities and essential communities facilities. Bucknell already has committed development on existing permitted housing sites and further housing is still required to be delivered through windfall development, balancing overall provision in the town. To test this position, a current application 14/00340/OUT has been submitted for the site BUCK003 – land adjoining Redlake Meadows and this application has yet to be determined.

**Policy S2.2(iii) – Community Hub : Clun**

5. **Non-compliance with the Habitats Regulations in Clun affecting the River Clun SAC.** Natural England suggest that to comply with the Habitat Regulations it is necessary for development in Clun to either be phased in accordance with the Severn Trent Water – Asset Management Programme or development should be required to ensure that effluent arising is pumped out of the River Clun catchment

**Response: Proposed Change. Proposed Change:** A co-ordinated approach had been taken to addressing the issues raised by Natural England with respect to MD12 and the recommendations arising from the SAMDev HRA. Further detail is given in the Statement of Common Ground between Shropshire Council and Natural England. Consequent changes to Policy S2.2(iii) are:

~~Delete the following paragraph in Policy S2.2 (iii). All development in Clun Parish must have regard to the conservation targets for the River Clun catchment as set out in the Nutrient Management Plan and the agreed management strategy for the river catchment~~

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6. **Relative capacity of housing allocation CLUN002 should be increased and windfall development controlled.** Clun Town Council require a greater degree of certainty over the delivery of housing development in the town to ensure that the housing allocation CLUN002 will deliver a MINIMUM of 60 dwellings to ensure that there will be no more than a MAXIMUM of 10 dwellings provided on windfall sites in the town.

**Response: Proposed Change.** Policy S2.2(iii) to be amended to read: “the single allocation **CLUN002** is expected to deliver a **minimum of 60 dwellings** the majority of the housing development and to provide a sustainable mix of housing types and sizes to meet the local needs for affordable and family housing. The balance of development **up to a maximum of 10 dwellings** will be delivered through opportunities for small scale development on windfall sites within the existing development boundary. ~~Windfall development on small sites will be permitted within the development boundary to deliver an allowance of around 10 dwellings or to balance the level of development on CLUN002 to deliver the housing requirement for the town.~~ **The management of windfall development in the town will respect the historic character of the settlement and the constraints imposed on the development potential of the town by the historic, narrow and restricted street pattern**”. ‘Development Guidelines’ be changed to read “Development to deliver around a **minimum of 60 dwellings on a site area with the capacity to** subject to the capacity of the site to deliver an appropriate mix, layout and design of housing and acceptable landscaping and open space provision....”. ‘Provision’ to read: **“60+dwellings”**

**Policy S2.2(iv) - Community Hub : Lydbury North**

7. **Policy delivery and non-compliance with the Habitats Regulations in Lydbury North affecting the River Clun SAC.** Natural England suggest that to comply with the Habitat Regulations it is necessary for development in Lydbury North to either be phased in accordance with the Severn Trent Water – Asset Management Programme or development should be required to ensure that effluent arising is pumped out of the River Clun catchment. Various respondents identify that development in Lydbury North would affect the River Clun SAC and so Policy S2.2(iv) and the proposed allocations are undeliverable at this time. A further respondent suggests that the protection of the River Clun Special Area of Conservation is no longer necessary due to habitat changes and the restriction on development in Lydbury North should be removed.

**Response: Proposed Change. Proposed Change:** A co-ordinated approach had been taken to addressing the issues raised by Natural England with respect to MD12 and the recommendations arising from the SAMDev HRA. Further detail is given in the Statement of Common Ground between Shropshire Council and Natural England. Consequent changes to Policy S2.2(iv) are:

Delete the following paragraph in Policy S2.2 (iv). ~~All development in Lydbury North Parish must have regard to the conservation targets for the River Clun catchment as set out in the Nutrient Management Plan and the agreed management strategy for the river catchment~~

8. **Policy delivery and non-compliance with national and strategic policy on protection of the historic environment.** English Heritage recommend that Policy

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S2.2(iv) recognise the impacts of the proposed development on the Conservation Area and the setting of listed buildings, require evidence about the proposed developments to assess these impacts and consider the need for further guidance through the preparation of Conservation Areas Management Plans or other methods to protect the heritage assets of the village

**Proposed Change.** The guidance in Policy S2.2(iv) could usefully be strengthened in relation to the degree of protection to be afforded to heritage assets in Lydbury North. This guidance should also refer explicitly to the protection of the settings of heritage assets which is not clearly referenced as a key objective in Policy S2.2(iv) in accordance with PPS5 Revision Note – The Setting of Heritage Assets. Accordingly, settlement policy S2.2(iv) to be amended to read "...Development will **protect and enhance** respect the character of the village and its heritage assets **and their settings** particularly within the central Conservation Area...". Other detailed matters in relation to the conservation of heritage assets, their settings and the character of the Conservation Area will be addressed through the development management process on submission of an application(s) to develop sites LYD007 – LYD009 and LYD011.

9. **Suitability of allocated housing sites LYD007, LYD008, and LYD009.** Various respondents object to the development of these allocated sites on the basis that they are not suitable for development, should not be developed as a single development proposal and contend that site LYD009 may not be available due to the reluctance of the landowner to release the site for development.

**Response:** No changes proposed. The strategy set out in Policy S2.2(iv) including proposed allocated sites LYD007 – LYD009 and LYD011 has been supported through the process to prepare the SAMDev Plan and is considered to provide the most sustainable pattern of development for the town, utilising an important but visually intrusive brownfield redevelopment opportunity. Site assessments of the proposed housing allocations LYD007 – LYD009 have not raised insurmountable issues in relation to the highway access and the junction onto the principal B4385. The potential for conflict from the close proximity of the sites is reflected in the policy requirement for "local highway / junction safety improvements as part of the development of the allocated housing sites". The Proposed Changes to the Pre-Submission Plan also proposes to reduce the capacity of site LYD009 to just two dwellings thereby reducing potential new traffic movements around this junction. Other detailed matters in relation to the conservation of heritage assets, their settings and the character of the Conservation Area will be addressed through the development management process on submission of an application(s) to develop sites LYD007 – LYD009 and LYD011.

10. **Availability of allocated housing site LYD009.** Mr Philip Needham the landowner of allocated housing site LYD009 wishes to remove this site from Policy S2.2(iv).

**Response: Proposed Change :** Amend Policy S2.2(iv) second paragraph, first sentence to read: "*Site LYD009 has frontage highway access directly onto the B4385 and is expected to be developed independently from the adjoining allocations at LYD007 and LYD008*" Amend Policy S2.29(iv) development guidelines for site LYD009 to read: "*Brownfield redevelopment opportunity on an under used and*

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*visually intrusive former garage site ~~which includes~~ **including** an existing residential bungalow **which is expected to remain on the site.** .....The site could accommodate **2 new dwellings** ~~around 3~~ subject to dwelling type and size **and the impacts of a covenant affecting part of the site**". ~~The existing bungalow also affords the opportunity for a replacement dwelling to increase the overall site capacity to 4 dwellings.~~ Amend column on 'Provision' to show '2' new dwellings*

**11. Probity of the openness and transparency of the preparation of Policy S2.2(iv).**

Various respondents object to Policy S2.2(iv) because the strategy does not satisfy the requirements of the Lydbury North Housing Needs Survey nor fully consider the results of local consultation on proposed development sites and the decisions taken by Lydbury North Parish Council on the SAMDev strategy have not been available for public scrutiny because they are not reasonable and sound due to personal interests held by Parish Councillors

**Response:** No changes proposed. It is acknowledged that the integrity of the habitats protected by the Special Area of Conservation in the River Clun are at risk due to the effects of operations and development in the catchment of the River Clun. This matter is being investigated by the relevant stakeholders through the preparation of a Nutrient Management Plan from which an action strategy for the Clun catchment to ensure that operations and development may proceed again in the near future including the development strategy for Lydbury North. This development strategy has been prepared in consultation with the local community in accordance with the Statement of Community Involvement. Consultations were undertaken in June 2010, March 2012, July 2013 and March 2014. In addition, local consultations by the Parish Council included minuted Council and public meetings and a Housing Needs Survey (July 2012) and Consultation on Development Sites (June 2013). Whilst, sites LYD001 and LYD002 were initially preferred, these two sole options identified early in the process did not meet the demands of the community for smaller development located around the village. This latter option of choosing smaller sites, provided the opportunity to manage the impacts of development in the historic core of the settlement, more readily integrate new development and to redevelop a sustainable brownfield opportunity now known as site LYD009 – see response to Needham SM12, 074. Although not preferred to the same extent as the larger site LYD001 initially identified, the strategy for smaller sites comprising LYD007 – LYD009 and LYD011 was a preferred option. This latter strategy now included in the SAMDev provides a more responsive approach to development with a number of sites that can each be delivered and completed in a phased programme during the plan period.

**12. Justification for a causal relationship between changes in the River Clun SAC and development in the Clun catchment.**

Plowden Estates (c/o Balfours) suggest that restrictions in Policy S2.2(iv) on development in the Clun catchment are unnecessary because there is a general presumption for conservation in the Core Strategy and the River Clun SAC is protected by statute as an internationally recognised habitat but that evidence suggests that the fresh water pearl mussels are functionally extinct as evidenced by the draft Nutrient Management Plan. These respondents therefore suggest that the restrictions on development in Policy S2.2(iv) are not justified because Lydbury North is 10km from the River Clun SAC and there

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is no causal link between development and the obsolescence of the mussel colony. The unrealistic phosphate stripping requirements for discharge into the River Clun and the proposed management strategy for the Clun catchment are therefore unnecessary.

**Response:** No changes proposed. *See response to 2 above*

**Policy S2.2(vi) – Clungunford Cluster**

13. **Non-compliance with the Habitats Regulations in Clungunford affecting the River Clun SAC.** Natural England suggest that to comply with the Habitat Regulations it is necessary for development in Clungunford Parish to either be phased in accordance with the Severn Trent Water – Asset Management Programme or development should be required to ensure that effluent arising is pumped out of the River Clun catchment

**Response: Proposed Change. Proposed Change:** A co-ordinated approach had been taken to addressing the issues raised by Natural England with respect to MD12 and the recommendations arising from the SAMDev HRA. Further detail is given in the Statement of Common Ground between Shropshire Council and Natural England. Consequent changes to Policy S2.2(vi) are:

Delete the following paragraph in Policy S2.2 (vi). ~~All development in Clungunford Parish must have regard to the conservation targets for the River Clun catchment as set out in the Nutrient Management Plan and the agreed management strategy for the river catchment~~ Insert new paragraph 5.18A to the explanation to Policy S2.2 to read: **‘The Plan HRA indicates that development in the Community Hubs of Bucknell, Clun, Lydbury North, and the Community Cluster of Abcot, Beckjay, Clungunford, Hopton Heath, Shelderton and Twitchen (Three Ashes) may adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site in accordance with Policy MD12. Further information is available in the SAMDev Habitats Regulation Assessment.**

**Policy S2.2(x) - Worthen with Shelve Cluster**

14. **Justification for objectively assessed housing need and proper designation of settlements in Worthen with Shelve Parish.** Hereford Diocesan Board of Finance objects to the housing growth target in Worthen with Shelve Parish and the reduction to 30 dwellings (from 60 dwellings) and question whether this is based on an objectively assessed need. This respondent also objects to the designation of Worthen and Brockton in a Community Cluster and consider that their role and function indicate they are jointly a Community Hub. It is considered that these issues and possible phasing of development provide insufficient flexibility over housing growth. Encouragement for windfall development in Policy S2.2(x) is supported and land at Brookside Gardens, Worthen is promoted as a windfall site.

**Response:** No changes proposed. The Policy S2.2(x) has been developed to enable the communities of Worthen and Brockton to meet their existing and future development needs whilst conserving their individual identity and the character of their respective settlements. The Policy has therefore identified a Cluster of settlements around each of the two principal settlements and seeks to ensure that each principal settlement maintains its separate identity. In this respect, a Cluster of

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complementary settlements is more appropriate than a Hub of two artificially linked villages. The Parish Council have influenced the housing guideline on the basis of local knowledge which has led to the reduction in the guideline from 60 dwellings to 30 dwellings through the removal of potential allocated site WORTH002. This site was considered to be unsustainable due to a number of related site constraints. The residual housing strategy provides for significant small scale housing opportunities across the 9 potential development settlements of the Cluster.

**Policy S2.3 – Bishops Castle Area Policy**

**15. Non-compliance with the Habitats Regulations affecting the River Clun SAC.**

Natural England considers that the Plan is not sound with respect to the River Clun SAC. In particular, they state that policy S2.3 (area wide policies and other allocations) is not in compliance with the Habitat Regulations as it does not provide sufficient guidance and would benefit from more detail on the management of development. They suggest that the detailed phasing of developments be included in the policy. If, (because the Nutrient Management Plan has not been completed) this is not possible, then the policy must set out when such information will become available and how it will be incorporated into the Plan, possibly through the preparation of a River Clun SAC SPD.

**Response: Proposed Changes** A co-ordinated approach had been taken to addressing the issues raised by Natural England with respect to MD12 and the recommendations arising from the SAMDev HRA. Further detail is given in the Statement of Common Ground between Shropshire Council and Natural England. Consequent changes to Area Policy S2.3 are:

Delete first paragraph to Policy S2.3 and insert new text to read: ~~'The River Clun Special Area of Conservation (SAC) will be protected by ensuring that all development in the River Clun catchment, including in the town of Bishop's Castle, clearly demonstrates that it will not adversely affect the integrity of the SAC. New development must incorporate measures to protect the SAC. These includes phasing development appropriately to take account of infrastructure improvements, particularly waste water infrastructure, and applying the highest standards of design, in accordance with Policies CS6 and CS18 and the guidance in the Sustainable Design SPD and the Water Management SPD. The Plan HRA indicates that development in the Bishop's Castle area may adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site in accordance with Policy MD12. Further information is also available in the SAMDev Habitats Regulation Assessment.'~~

Delete paragraphs paragraphs 5.20 and 5.21 to the Explanation to Policy S2.3 and insert new paragraph 5.20 to read:

~~'5.20 Much of the south-western part of the Bishop's Castle area is in the river Clun catchment. Part of the river Clun is a Special Area of Conservation (SAC) which is afforded the highest levels of protection under the Conservation of Habitats and Species Regulations 2010 (as amended – the Habitats Regulations) and the Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (Habitats Directive). Although the river is an important environmental asset, the particular feature for which the SAC is notified is the~~

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~~Freshwater Pearl Mussel. The SAC is currently assessed as being in an unfavourable condition for a number of reasons, including high levels of silt and nutrients (particularly Nitrogen and phosphate) which affect the health of the pearl mussel population. Natural England and the Environment Agency are producing the River Clun SAC Nutrient Management Plan (NMP), due to be published by April 2014. The aim of the NMP is to provide a long term, whole catchment view of the options that will be required to restore the River Clun SAC to favourable condition;~~

~~5.21 Whilst this integrated catchment approach is important, ensuring a wide range of measures are employed to reduce nutrient loads, it is vital that new development contributes positively alongside wider land management measures. In accordance with Policy CS18, new development must contribute to sustainable water management, by enhancing and protecting water quality and ensuring there is adequate water infrastructure in place to serve the proposed development. New development must be phased appropriately to take account of improvements to infrastructure and apply the highest standards of sustainable design in accordance with CS6 and MD2. In addition, a Habitat Regulation Assessment must be carried out by the LPA for any new development within the Clun catchment and applicants will be required to supply any appropriate information to allow the LPA to do so. Any development that cannot be shown to not adversely affect the integrity of the River Clun SAC will not be granted planning permission;~~

**5.20 The Plan HRA indicates that development in the Bishop's Castle area may adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site in accordance with Policy MD12. Further information is also available in the SAMDev Habitats Regulation Assessment.**

**16. Justification for a causal relationship between changes in the River Clun SAC and development in the Clun catchment.** Plowden Estates (c/o Balfours) suggest that restrictions in Policy S2.2(iv) on development in the Clun catchment are unnecessary because there is a general presumption for conservation in Core Strategy and the River Clun SAC is protected by statute as an internationally recognised habitat but that evidence suggests that the fresh water pearl mussels are functionally extinct as evidenced by the draft Nutrient Management Plan. These respondents therefore suggest that the restrictions on development in Policy S2.2(iv) are not justified because Lydbury North is 10km from the River Clun SAC and there is no causal link between development and the obsolescence of the mussel colony. The unrealistic phosphate stripping requirements for discharge into the River Clun and the proposed management strategy for the Clun catchment are therefore unnecessary.

**Response:** No changes proposed. *See response to 2, 7 and 15 above*

### **S3 – Bridgnorth Area**

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**Key Issues & response:**

1. **Legal Compliance with:**
  - the Shropshire Statement of Community Involvement 2011;
  - the Shropshire Sustainability Appraisal and Summary Report 2014;
  - the Strategic Housing Market Assessment 2014;
  - the Strategic Housing Land Availability Assessment 2014.
2. **Local preference for a smaller scale of housing (1,000 dwellings) and employment growth (approx. 6 hectares) comprising (1) housing development contained within the town on brownfield redevelopment sites and (2) reliance on the remaining development capacity of existing employment sites;**
3. **Cannebuff: Representations on behalf of the landowner and a potential operator for Cannebuff seek to cast doubt on the deliverability of the committed Barnsley Lane and Woodcote Wood sites and seek to promote Cannebuff as a deliverable alternative resource to address any shortfall;**
4. **Suitability and flexibility of development opportunities in Bridgnorth;**
5. **The SAMDev Plan should set out a robust, transparent and inclusive process for Parish Councils to determine the need for new Community Hubs and Clusters through the preparation of Neighbourhood or community Led Plans;**
6. **A review of the Green Belt should have been included in the current SAMDev Plan;**
7. **A flexible policy to permit the oversupply of housing land to increase the delivery of affordable housing above current policy requirements.**

**Policy S3.1 - Bridgnorth town**

2. **Legal Compliance with:**
  - a. **the Shropshire Statement of Community Involvement 2011.** Bridgnorth Civic Society asserts that the plan and Policy S3.1 has not been prepared in accordance with the Shropshire SCI 2011 and so, is not legally compliant.  
**Response:** No changes proposed. This development strategy has been prepared in consultation with the local community in accordance with the Statement of Community Involvement. Consultations were undertaken in June 2010, March 2012, July 2013 and March 2014. In addition, these local consultations have been supported by regular meetings with the Town and Parish Councils affected by the extensive proposals at Tasley.
  - b. **the Shropshire Sustainability Appraisal and Summary Report 2014.** Bridgnorth Civic Society and other respondents assert that the Sustainability Appraisal of Policy S3.1 does not adequately assess the Bridgnorth strategy and makes ungrounded assumptions about the investments and benefits arising from higher levels of development including the quality of the design which anecdotally is better in smaller housing schemes  
**Response:** No changes proposed. It is accepted that, at the heart of the discussion over the future of Bridgnorth, there is tension between balancing the protection of this historic town with the need to attract investment and maintain the town as a focal point for the south-east of the County. There are clear sustainability benefits from a more constrained strategy to progressively develop urban brownfield development opportunities in Bridgnorth. However, the SAMDev Plan addresses the need to take significant decisions to open up new areas of land to accommodate the town's long term future. This recognises that Bridgnorth is the second largest Market Town in Shropshire which requires a significant supply of good quality development land to capture the opportunities created by the location, situation and role and function of the town.

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- c. **the Strategic Housing Market Assessment 2014.** Bridgnorth Civic Society asserts that the Shropshire Strategic Housing Market Assessment required in NPPF, para 159 has not addressed the need to co-operate with neighbouring authorities including Telford & Wrekin Borough Council to address the full range of cross boundary housing needs.

**Response:** No changes proposed. Bridgnorth is the second largest of 5 Market Towns in Shropshire which are key to the sustainable growth of the rural areas of Shropshire. Bridgnorth town located on the western edge of the West Midland conurbation also offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets. The opportunities arising from the provision of a good quality supply of employment land are therefore significant and require an appropriate scale of development to capture these opportunities. In turn, the demand for housing in Bridgnorth from those who would commute between homes and employment could create an unsustainable pattern of development which would be harmful to the local community, in the absence of good quality, developable employment land. This strategy will inevitably lead to a degree of tension between the requirement for Bridgnorth to meet its own needs and the interests of neighbouring areas. The provision of good quality employment land in areas close to administrative boundaries will, however, provide a long term benefit by improving the range and choice of investment options in this location.

- d. **the Strategic Housing Land Availability Assessment 2014.** Various respondents recommend that available brownfield redevelopment opportunities in Bridgnorth town recognised in the Shropshire Strategic Housing Land Availability Assessment should be utilised before new greenfield and is released for development on the edge of the town.

**Response:** No changes proposed. The eastern side of Bridgnorth is unfortunately constrained by the West Midland Green Belt. The proposed new development has, by necessity, been located to the west extending into adjoining parishes and lessening cross boundary conflicts, in order to access suitable sites capable of accommodating the required scale of development. The proposed site allocations represent a comprehensive mixed use scheme with no landownership or co-ordination barriers to delivery. This comprehensive development has the potential to deliver a sustainable urban extension to Bridgnorth to meet the housing, employment and service needs of the town over the plan period. This comprehensive scheme will also deliver essential infrastructure investments to benefit the town and those communities within and around the extensive development sites. It is considered that the benefits of this scheme in terms of its scale, investment potential, developability, viability and longer term potential exceed the potential sustainability benefits offered by a strategy to progressively redevelop existing urban brownfield sites.

3. **Local preference for a smaller scale of housing (1,000 dwellings) and employment growth (approx. 6 hectares) comprising (1) housing development contained within the town on brownfield redevelopment sites and (2) reliance on the remaining development capacity of existing employment sites.**

Bridgnorth Town Council and other respondents recommend that the scale of development be reduced to 1,000 dwellings and 12.4 hectares of employment land which will permit the removal of allocated sites around Wenlock Road and Church Lane and to retain the existing Livestock Market on its current site and to review the need for employment land south of the A458 in the SAMDev Submission Plan.

**Response:** No changes proposed. Bridgnorth is the second largest of 5 Market Towns in Shropshire which are key to the sustainable growth of the rural areas of Shropshire. Bridgnorth town located on the western edge of the West Midland

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conurbation also offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets. The opportunities arising from the provision of a good quality supply of employment land are therefore significant and require an appropriate scale of development to capture these opportunities. In turn, the demand for housing in Bridgnorth from those who would commute between homes and employment could create an unsustainable pattern of development which would be harmful to the local community, in the absence of good quality, developable employment land. This strategy will inevitably lead to a degree of tension between the requirement for Bridgnorth to meet its own needs and the interests of neighbouring areas. The provision of good quality employment land in areas close to administrative boundaries will, however, provide a long term benefit by improving the range and choice of investment options in these location. The eastern side of Bridgnorth is unfortunately constrained by the West Midland Green Belt. The proposed new development has, by necessity, been located to the west extending into adjoining parishes and lessening cross boundary conflicts, in order to access suitable sites capable of accommodating the required scale of development. The proposed site allocations represent a comprehensive mixed use scheme with no landownership or co-ordination barriers to delivery. This comprehensive development has the potential to deliver a sustainable urban extension to Bridgnorth to meet the housing, employment and service needs of the town over the plan period. This comprehensive scheme will also deliver essential infrastructure investments to benefit the town and those communities within and around the extensive development sites. It is considered that the benefits of this scheme in terms of its scale, investment potential, developability, viability and longer term potential exceed the potential sustainability benefits offered by a strategy to progressively redevelop existing urban brownfield sites.

4. **Cannebuff:** Representations on behalf of the landowner and a potential operator for Cannebuff seek to cast doubt on the deliverability of the committed Barnsley Lane and Woodcote Wood sites and seek to promote Cannebuff as a deliverable alternative resource to address any shortfall;

**Response:** No changes proposed. **See response to Policy MD5**

5. **Suitability and flexibility of development opportunities in Bridgnorth**

**Response: Proposed changes.** Development Guidelines for site ELR011b in Policy S3.1 should be changed to read “Allocated for the relocation of the existing livestock market together with its existing *or alternative* ancillary uses only. Suitable landscaping and woodland planting will be provided along the site edge”. Amend Policy S3.1(2) to read “Around 1,400 **dwelling** ~~homes~~ and around ~~19~~ **12.4** hectares of employment land **with 6.6 hectares to relocate the existing Livestock Market** will be delivered in Bridgnorth on a mix of windfall and allocated sites...” Amend the Schedules in Policy S3 to reflect the standard formatting for the SAMDev document.

### **Policy S3.3 – Bridgnorth Area Policy**

6. **The SAMDev Plan should set out a robust, transparent and inclusive process for Parish Councils to determine the need for new Community Hubs and Clusters through the preparation of Neighbourhood or community Led Plans**

**Response:** No changes proposed. The process of determining Community Hubs and Clusters has also considered the sustainability objectives of the NPPF in para 86. The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target and that the Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements identified. The proposed network of Community Hubs and Cluster settlements can be reviewed as part of the proposed regular reviews of the Local Plan.

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7. **A review of the Green Belt should have been included in the current SAMDev Plan.** Various respondents assert that a review of the Green belt in the current SAMDev Plan would have presented more development opportunities around Bridgnorth permitting the release of land for housing adjoining Stanmore Industrial Estate with access to existing employment and economic development opportunities and a lower visual and environmental impact on the setting of Bridgnorth town. This could also be applied to areas of east Shropshire including Ditton Priors and Worfield. **Response:** No changes proposed. In relation to Policy S3.1 it should be noted that para 5.24 of the explanation states that: "Great concerns were raised by the local community about the concentration of development at Tasley and crossing the bypass, but at present time the town has little option but to extend in a north-west direction due to Green Belt, topographical and landscape constraints in all other directions. **It is recognised that the Green Belt will need to be reviewed in the next Local Plan review**".
8. **A flexible policy to permit the oversupply of housing land to increase the delivery of affordable housing above current policy requirements.** The Needs family assert that the review of the Green Belt could have permitted a more flexible policy to permit the development of rural land where the landowner agreed to deliver 50% of the new housing to meet the local affordable housing need. **Response:** No changes proposed. The Core Strategy sets the strategic approach to sustainable development including provision in Policy CS5 for the countryside and Green Belt. This provides for sustainable development needs through provision for anticipated expansion at Shifnal and Albrighton. The Policy in conjunction with Policy CS5 makes provision for appropriate development in the Green Belt, including some local needs affordable housing on exception sites.

## **S4 – Broseley Area**

### **Key issues & SC Response**

- 1. Strategy in reference to Broseley's historic environment thought to be unclear**
- 2. Housing guideline and lack of housing allocations**
- 3. Employment land reduction**
- 4. Lack of hubs and clusters identified within Broseley**
- 5. Alteration of the development boundary**

- 1. Strategy in reference to Broseley's historic environment thought to be unclear**

One representation considered Broseley's settlement strategy to be unclear in relation to the historic environment, with amendments needed. Comments were made regarding reference to historic assets and the policy's relationship with MD13 and potential adverse impacts on the World Heritage Site at Ironbridge.

**Response:** - With regards to the World Heritage Site Core Strategy Policy CS17 makes clear reference to the importance of the setting of World Heritage Sites in Shropshire and no changes are proposed. A minor change is proposed to clarify the Policy S4.5 (page 108) in relation to heritage assets to read: "Tourist related development will be supported where it enhances an existing business on the same site, offers a conservation gain by restoring or improving the sustainable use of a heritage ~~asset feature~~ **in accordance with MD13**, or creates a new tourism related business on a suitable infill or brownfield site."

- 2. Housing guideline and lack of housing allocations**

A representation has been received stating that the SAMDev Plan sets out an unrealistically low level of future development in the town due to existing commitments and completions

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and it therefore leads to a lack of housing allocations which otherwise should be included. It is felt that sites in Broseley should be considered. A further representation has been received which stated that the potential sites for Broseley have been assessed in isolation, with no realistic options assessed. As such, it is considered the Plan doesn't conform to NPPF requirements. One respondent has put forward a site for promotion within the Plan (Land at Benthall) and a number of sites to the south of the town have been suggested.

**Response:** - The housing guideline reflects outstanding commitments and past completions in Broseley and takes into account the outcomes of significant local consultation as set out in the Technical Background Paper and Consultation Statement. It is considered to be realistic when assessed against infrastructure and environmental constraints and is in line with the indicative requirements set out in Core Strategy. It is felt the remainder of the housing guideline can be dealt with through windfall development (as set out in the Technical Background Paper (March 2014)) taking into account completions and commitments, which are considered deliverable. There is therefore no need to allocate housing sites.

### **3. Employment land reduction**

An objection has been raised to the reduction of employment land, which is thought would undermine the future success of Broseley. Issue raised about the alteration of the development boundary, which is felt may limit opportunities to the north west of the town.

**Response:** - The proposed SAMDev Policy S4: Broseley states that "over the period 2006 to 2026, around 2 hectares of employment land are planned for Broseley". It is expected that this will largely be delivered (1.3ha) on land south of Avenue Road which is allocated for employment generating development comprising small scale office, workshop and light industrial uses (Class B1 uses) with access directly off Avenue Road. It is expected that the balance of development (0.7ha) will have already been developed in part, or will comprise future small scale growth and expansion within the town. There is no intention to limit employment growth in Broseley to less than 2ha. Broseley was identified in the Shropshire Employment Land Review as having only a limited supply of available employment land and requiring further employment land to be provided. No changes proposed.

### **4. Lack of hubs and clusters identified within Broseley**

A representation was received that highlighted concerns with the lack of Community Hubs and Clusters in the rural area.

**Response:** - The approach to the rural areas is consistent with localism principles espoused by NPPF, even if it produces inconsistencies in comparison to traditional approach to determining scale and distribution of new development in the rural areas. No changes are proposed.

### **5. Alteration to the development boundary**

An objection has been raised to the alteration of the development boundary, which will remove a number of undeveloped sites from the Broseley area.

**Response:** - The development boundary for Broseley has undergone significant local consultation (through the community led planning exercise (as set out in the Technical Background Paper) and has been extended in the north east of the town. It is considered to be appropriate to meet the local development needs of the town through the application of Policies MD3 and S4.

## **S5 - Church Stretton Area**

### **Key issues & SC Response**

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- **The allocation of the School Playing Fields (CSTR018)**
- **The housing guideline**
- **The release of further greenfield land to the east of the A49 for housing**
- **The allocation of The Leasowes (CSTR019)**
- **The reliance on windfall development**
- **The strategy does not meet the objectively assessed need for housing.**

**1. The allocation of the School Playing Fields (CSTR018)**

Many respondents object to the allocation of the school playing fields. There is concern that development would adversely affect visual amenity and thus negatively impact on tourism, that the site is undeliverable as there is no evidence that the landowner agreement has been reached yet and that the site would not be needed if the housing guideline were lower,

**Response: No changes proposed.**

The Council is tasked with putting forward a sound Plan to deliver the Core Strategy requirement for growth in Church Stretton that balances environmental constraints with meeting local needs. This involves the identification of sufficient suitable and deliverable sites for housing development. The allocation of this site is the culmination of a long process of considering the best way to provide for new housing in the town in the period to 2026. This has identified and assessed options in the light of both an evolving evidence base and the issues arising from three public consultations. As a result of this, the Council is confident that this site is an appropriate location for housing development in Church Stretton and that its allocation will contribute to the delivery of Core Strategy requirements.

**2. The housing guideline.**

Some respondents considered the Plan to be unsound because the housing guideline is too high. There is concern that; it is not based on local need; the tourism industry would be adversely affected because the scale and nature of the town would be changed; it is contrary to NPPF para 115 which give great weight to the protection of AONBs; it would cause an unacceptable increase in population and there is no evidence to support such a high target. Two site promoters consider that the guideline is too low and should be increased so that (their) additional sites (New House Farm, Snatchfields) can be allocated.

**Response: No changes proposed.**

The need for housing and employment land need has been determined by the Core Strategy which also sets out the strategic approach to delivery. The rationale for individual settlements is set out in the Technical Background Paper (March 2014). The development strategy for Church Stretton is designed to enhance the long term sustainability of the town whilst minimising other impacts including any which might affect the tourism industry. The Technical Background Paper addresses consistency with the NPPF (para 115) requirements to protect the AONB.

**3. The release of further greenfield land to the east of the A49 for housing.**

The nature of the comments from many of the respondents (including from the Town Council) suggests an assumption that this part of the settlement policy means that the New House Farm site(s) CSTR027 and ELR070 will be included in the Plan. Many respondents object on the grounds that the (assumed) inclusion of these sites is contrary to CS6, CS17, NPPF paragraph 115 (which gives great weight to conserving the landscape and scenic beauty of AONBs) and is inconsistent or duplicates MD3. Other respondents cite the strong community opposition to these sites at the Revised Preferred Options stage.

**Response: No changes proposed.**

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The Council considers that this direction of growth helps to deliver CS3 and that the site assessment process on which the policy is based complements, rather than conflicts with CS17. Furthermore, the policy provides clarity on the most appropriate direction of growth should the development guideline for the town not be met and is thus in line with MD3, para 4.

The policy is not site specific and does not indicate a preference for one site over another. The direction of growth indicated is based on the site assessment process carried during the preparation of the Plan (detailed assessment sheets are included in evidence base: Church Stretton housing sites assessment). The direction indicated reflects known constraints as follows:

- ❖ to the west of the town - natural and historic environment designations
- ❖ to the south west - flood risk
- ❖ to the north west- sites already allocated in the Plan. Good practice suggests that a range of sites in different locations will better enable delivery of Core Strategy housing requirements. Additionally, further development in this direction during the Plan period would be contrary to community concerns about the coalescence of settlements.

The views of the community have been taken into account: following representations to the Shropshire Council Cabinet meeting of 19th February 2014 it was decided at the Council meeting of 27th February that the Final Plan should propose the deletion of the two New House Farm sites for housing and employment (CSTR027 and ELR070) and replace these with the school playing fields (CSTR018) and the Leasowes (CSTR019) and Springbank Farm (ELR078).

**4. The Leasowes (CSTR019).**

Many respondents object to the allocation of The Leasowes. The main concerns are that the site is too far from the shops and the school and thus not in a sustainable location, that its allocation will exacerbate existing traffic problems on Sanford Avenue and/or that the existing infrastructure is insufficient, that the revised figure of 50 houses will create development at too high a density, that the changed housing figures have not been properly consulted on and that allocation conflicts with CS6.

**Response: No changes proposed.**

Following representations to the Shropshire Council Cabinet meeting of 19th February 2014 it was decided at the Council meeting of 27th February that the Final Plan should propose the deletion of the two New House Farm sites for housing and employment (CSTR027 and ELR070) and replace these with the school playing fields (CSTR018) and the Leasowes (CSTR019) and Springbank Farm (ELR078). Shropshire Council considered this to be an appropriate strategy to deliver the guideline of around 370 houses and around 1 ha of employment land whilst balancing environmental, social and economic concerns.

**5. The reliance on windfall development**

Two objections concern the allowance for windfall housing in the policy. This is considered to conflict with NPPF para 182. The main concerns are that the allowance does not provide for a reasonable certainty of delivery and that much of the windfall development since 2006 has been on exception sites or in residential gardens, the latter being excluded from windfall calculations by NPPF para 48.

**Response: No changes proposed**

See the Housing Delivery Statement and the SHLAA update 2014.

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**6. The strategy for Church Stretton is not based on the objectively assessed need for housing.**

The objection centres on the removal of the New House Farm site (CSTR027) from the Final Plan by Shropshire Council Members following pressure from the Town Council and local residents. It is suggested that the site was correctly objectively and positively assessed by professional planning officers and that there is no provision for this course of action in the NPPF, the Localism Act or the plan making section of the Planning and Compulsory Purchase Act 2004.

**Response: No changes proposed.**

Following representations to the Shropshire Council Cabinet meeting of 19th February 2014 it was decided at the Council meeting of 27th February that the Final Plan should propose the deletion of the two New House Farm sites for housing and employment (CSTR027 and ELR070) and replace these with the school playing fields (CSTR018) and the Leasowes (CSTR019) for about 50 houses each and Springbank Farm (ELR078) for 1.27 hectares of office space. Shropshire Council considered this to be an appropriate strategy to deliver the guideline of around 370 houses and around 1 ha of employment land whilst balancing environmental, social and economic concerns.

## **S6: Cleobury Mortimer Area**

### **Key issues & SC Response**

- 1. More housing should be identified in Cleobury Mortimer and wider area**
- 2. The number of houses allocations should be increased in Cleobury Mortimer**
- 3. Housing sites should be allocated at Hopton Wafers and Farlow**

**1. More housing should be identified in Cleobury Mortimer and wider area**

One representation questioned the overall ability of the SAMDev Plan to deliver the level of growth in the Cleobury Mortimer area required to meet a five year supply of land.

**Response:** - The housing requirement is considered to be realistic when assessed against infrastructure and environmental constraints and reflects local development aspirations and the overall housing approach set out in CS1 of the Core Strategy. The Technical Background Paper shows the amount of housing completed and that 'in the pipeline' for development. This demonstrates there is not a shortfall of 333 houses and with recent permissions the Plan needs to find around another 37 dwellings in the town. The Housing Delivery Technical Background Paper sets out evidence in relation to delivery across Shropshire as a whole. No changes are proposed.

**2. Housing allocations should be increased in Cleobury Mortimer**

One representation questioned whether enough land has been allocated in the town to meet the overall housing requirement in the Cleobury Mortimer and stated the Plan was therefore not effective.

**Response:** - The SAMDev Plan allocates appropriate sites to help meet the residual residential requirement in the town over the remainder of the Plan Period taking into account past delivery rates and existing commitments. This is outlined in the Technical Background Paper which shows the amount of housing completed and that 'in the pipeline' for development. No changes are proposed.

**3. Sites should be allocated at Hopton Wafers and Farlow**

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Tied in with the previous key issues land was put forward in Community Cluster settlements of Hopton Wafers and Farlow.

**Response:** - These sites have not previously been promoted during production of the SAMDev Plan. These settlements will have limited development over the Plan period and are not settlements where allocations are identified. The sites put forward will be included in the SHLAA database and future potential for housing development assessed through that mechanism. No changes are proposed.

## **S7 – Craven Arms**

### **Key issues & SC Response:**

- 1. Sound use of evidence about the natural and historic environment;**
- 2. Partnership working to deliver the ambitious strategy for Craven Arms;**
- 3. Local preference for alternative site proposals for the relocation of Euro Quality Lambs comprising (1) allocating only 3 hectares of employment land at Newington Farm and (2) using other employment sites for further value added processes;**
- 4. Suitability of meeting Craven Arms affordable housing needs on exceptions site CRAV002 in an adjoining Parish;**
- 5. Non-compliance with the Habitats Regulations in Craven Arms Area and Hopesay Parish affecting the River Clun SAC.**

### **Policy S7.1 - Craven Arms town**

- 1. Sound use of evidence about the natural and historic environment.** English Heritage considers that Policy S7.1 should address the key issues of landscape character (including the AONB) and the historic environment (including heritage assets and archaeology). The re-use, design, massing and materials for the redevelopment of CRAV030 - Newington Farmstead should particularly refer to evidence from the Historic Farmstead Project. Policy S7.1 should also identify policy links with Policy MD13 especially in relation to the need for archaeological assessments and surveys for the development of allocated sites in Craven Arms.

**Response: Proposed change.** . Policy S7.1 (5) should be amended to read: "...Development proposals will be required to satisfy the requirements of Policies **CS6**, CS13, CS14, CS15, CS16, **CS17**, **MD2**, MD3, MD4, MD10a, MD10b, **and** MD11, **MD12 and** MD13 as appropriate". It is recognised that Craven Arms is situated in close proximity to potentially significant archaeological remains and other physical evidence of previous settlement. This inter-relationship between the contemporary built form of the town and the archaeological evidence and built heritage assets of previous settlement may impact upon a number of the proposed allocated sites in Policy S7.1. The degree to which these conservation issues may be affected by the proposed strategy in Policy S7.1 is considered to be greater due to the scale of the development being proposed in the town. It is considered that, whilst any Local Plan should be properly be treated as a whole, specific cross referencing between Policy S7.1 and the broader policy framework of the Local plan will be helpful on this important point Other detailed matters in relation to the conservation of archaeological remains and heritage assets and their settings will be addressed

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through the development management process on submission of an application(s) to develop sites allocated for housing or employment use in Policy S7.1.

**2. Partnership working to deliver the ambitious strategy for Craven Arms.**

Highway Agency recognises the need for partnership working with Shropshire Council (and Network Rail) on the options for the location and configuration of a strategic highway junction to ELR053 and ELR055, possible revised access arrangements for Craven Arms Business Park, alterations to the existing strategic road junction on the A49T at Long Lane in order to deliver employment allocations ELR053, ELR055 and Craven Arms Business Park. Network Rail seeks policies within the SAMDev Plan specifically addressing investment in rail stations and level crossing in the Plan area.

**Response: No changes proposed.** Shropshire Council operates a comprehensive infrastructure plan which identifies infrastructure investment priorities for each parish in Shropshire and updates these annually. Network Rail have previously contributed to this process and have the ability to assess potential capacity constraints related to their stations derived from the impact of new development and to nominate these as investment priorities in the infrastructure plan. It is recognised in the supporting text (para 5.71) to Policy S7.1 that Network Rail have programmed the automation of the Long Lane level crossing over the Manchester to Cardiff rail line as part of their national improvement programme. Network Rail is therefore addressing, in part, the issue of the level crossing at Craven Arms. However, Policy S7.1 (para5.71) also recognises that automation of the level crossing could potentially lead to access constraints or traffic congestion on the A49 trunk road and at the junction with Long Lane. Network Rail are also exploring with Shropshire Council and other partners whether an alternative highway access solution in north Craven Arms would be technically and financially viable. This would be expected to take the form of a bridging solution over the rail line linking to the strategic and local road networks. This alternative highway configuration would then remove the need for the Long Lane level crossing. This potential new highway access solution would be delivered in part with proposed employment allocations ELR053 and ELR055 requiring the provision a new roundabout junction in the A49 trunk road at the north of the town. This potential alternative highway and bridge configuration would also require the support of the landowners of sites ELR053 and ELR055 and the support of the Highway Agency responsible to the strategic road network. The Highways Agency has also recognised this potential highway access configuration and their duty to co-operate in investigating this possible infrastructure solution to traffic and transport movements in north Craven Arms.

**3. Local preference for alternative site proposals for the relocation of Euro Quality Lambs comprising (1) allocating only 3 hectares of employment land at Newington Farm and (2) using other employment sites for further value added processes.** Various respondents suggest that a smaller area comprising only 3 hectares of land should be allocated at Newington Farm for the relocation of Euro Quality Lambs and the development of a new abattoir facility. These respondents suggest that any further development (i.e. for value added processes) be identified to the west of the A49T preferably on existing or new employment sites. This

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alternative development strategy advocates the existing employment allocation identified by the saved South Shropshire Local Plan (2005).

**Response: No changes proposed.** The previous allocation of 3ha of land at Newington Farmstead for the relocation of the Euro Quality Lambs (EQL) abattoir, adopted 9 years ago in the South Shropshire Local Plan (2005), has not been implemented because the smaller allocation does not satisfy the needs of the company for their relocation, expansion and growth and further restrictions on the site including restricting further value added operations around the abattoir, rendered the companies relocation plans, unviable. The proposed allocation of site ELR053 to the north of the previous allocation, properly addresses the needs of the company for a suitable and deliverable site for the relocation and growth of their company. The site of ELR053 has been shown to provide a suitable and available site with a potential highway access configuration onto the A49 trunk road, subject to the approval of the Highway Agency. Policy S7.1 recognises the challenges of delivering this significant development proposal. However, all other detailed matters in relation to the development of Newington Farm may be addressed through the development management process on submission of an application(s) to develop site ELR053 as recognised by Policy S7.1. and Schedule S7.1b.

4. **Suitability of meeting Craven Arms affordable housing needs on exceptions site CRAV002 in an adjoining Parish.** Various respondents concerned with the character and sustainability of Sibdon Carwood Parish question the suitability of CRAV002 for the development of affordable housing in Sibdon Carwood Parish. The respondents recommend that Craven Arms affordable housing need should be satisfied on sites within the built area of Craven Arms and not in the neighbouring Parish where there is no proven local need.

**Response: No changes proposed.** No change. The proposed allocation CRAV002 is located immediately to the west of Craven Arms. The site comprises open grazing land, situated in the countryside adjoining the roman road of Watling Street which marks the development boundary of Craven Arms running along the eastern boundary of site CRAV002. The land has been acquired (for sometime) by a Registered Social Landlord with the intention to provide an exceptions housing development to meet local needs. In the light of the proposed new funding programme by the Homes and Communities Agency, the RSL concerned has sought permission for site CRAV002 in relation to the objective of national policy and Core Strategy Policy CS11. The proposed development of CRAV002 is considered to be consistent with the NPPF and Core Strategy Policy CS11 which seeks "housing developments which help to balance the size, type and tenure of the local housing stock". In relation to the proposed development of site CRAV002, all other detailed matters may be addressed through the development management process.

**Policy S7.2(i) - Hopesay Cluster**

- 5a. **Non-compliance with the Habitats Regulations in Hopesay affecting the River Clun SAC.** Natural England suggest that to comply with the Habitat Regulations it is necessary for development to the west of Craven Arms to either be phased in accordance with the Severn Trent Water – Asset Management Programme or

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development should be required to ensure that effluent arising is pumped out of the River Clun catchment

**AND**

**Policy S7.3 – Craven Arms Area Policy**

- 5b. Compliance with the Habitats Regulations; River Clun SAC.** Natural England considers that the Plan is not sound with respect to the River Clun SAC. In particular, they state that policy S2.3 (area wide policies and other allocations) is not in compliance with the Habitat Regulations as it does not provide sufficient guidance and would benefit from more detail on the management of development. They suggest that the detailed phasing of developments be included in the policy. If, (because the Nutrient Management Plan has not been completed) this is not possible, then the policy must set out when such information will become available and how it will be incorporated into the Plan, possibly through the preparation of a River Clun SAC SPD.

**Response: Proposed Changes.** A co-ordinated approach has been taken to addressing the issues raised by Natural England with respect to MD12 and to the recommendations arising from the SAMDev HRA. Further detail will be given in a Statement of Common Ground which will be prepared between Shropshire Council and Natural England. Consequent changes to settlement strategies and supporting text have been proposed where relevant.

Insert new paragraph at end of Policy S7.2 and Policy 7.3 Cluster Development Strategy to read: **‘Mitigation measures will be required to remove the adverse effects of development in the Craven Arms area on the integrity of the River Clun SAC in accordance with Policy MD12.’**

Insert new paragraph 5.78a in explanation to read: **‘The Plan HRA indicates that development in the Community Cluster of Aston on Clun, Hopesay, Broome, Horderley, Beambridge, Long Meadow End Rowton and Round Oak may adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site in accordance with Policy MD12. Further information is available in the SAMDev Habitats Regulation Assessment.’**

Delete the second paragraph of Policy S7.2(i) as follows: ~~‘The River Clun Special Area of Conservation (SAC) will be protected by ensuring that all development in the River Clun catchment, including in Hopesay Parish, clearly demonstrates that it will not adversely affect the integrity of the SAC. New development must incorporate measures to protect the SAC. These includes phasing development appropriately to take account of infrastructure improvements, particularly waste water infrastructure and applying the highest standards of design, in accordance with Policies CS6 and CS18 and the guidance in the Sustainable Design SPD and the Water Management SPD.’~~

Delete paragraphs 5.80 and 5.81 in the explanation to Policy S7.3 and insert new paragraph 5.80 to read: **‘The Plan HRA indicates that development in the Craven Arms area may adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water**

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**quality impacts on this internationally designated site in accordance with Policy MD12. Further information is also available in the SAMDev Habitats Regulation Assessment.'**

## **S8 – Ellesmere Area**

### **Key issues & SC Response:**

1. **Ellesmere;**
2. **Site ELL003 (Land South of Ellesmere);**
3. **Site ELL009 (Land off Church Street);**
4. **ELL016 (Land adj. cemetery);**
5. **Schedule S8.1c Leisure/Tourism Sites;**
6. **Cockshutt;**
7. **Dudleston Heath;**
8. **Welshampton**

1. **Ellesmere:** several site promoters consider it inappropriate to limit development opportunities to just a single site because it is too risky a strategy for the number of dwellings involved and may undermine delivery and limit choice for potential home owners in terms of location and house types. The deliverability of the preferred allocation is questioned in the context of flood risk. The possibilities for development in Ellesmere should be reassessed and further sites should be allocated;

**Response:** No changes proposed. The preferred site has been comprehensively assessed and is considered deliverable. The completed FRA for the site concludes that the development proposals will completely address flood risk issues on site, essentially reordering the floodplain to ensure that all types of development proposed (including more vulnerable) will be appropriate here in terms of flood risk. A range of alternative options for development in Ellesmere were considered and consulted on at Revised Preferred Options stage (2013) leading to allocation of the current site. No further or alternative site allocations are therefore required.

2. **ELL003:** Natural England is concerned that the Habitats Regulations Assessment undertaken to inform the SAMDev Plan is insufficient, and that the Habitats Regulations requirements are being inappropriately pushed down to the project stage. They consider that it would be more appropriate to assess possible mitigation options at Plan stage as it is possible that a strategic solution could be required, such as the provision of a country park and/or contributions to visitor management referred to in relation to ELL003a. English Heritage remains concerned that the development of the site may harm the significance and setting of the Ellesmere Conservation Area and a number of Listed Buildings because it is not clear whether the area closest to the Conservation Area and Listed Buildings has been taken out as we previously requested. The Environment Agency suggest that the policy text should highlight the need for a detailed FRA to demonstrate developable areas, to inform the final masterplan /development proposals;

**Response: Proposed Changes.** These changes are proposed are for consistency with updated HRA to address Natural England's concerns in relation to the Policy and Explanation for S8.1, Schedules S8.1a, S8.1c, the Policy and Explanation for S8.2 and to the Policy and Explanation for S8.3 and to the Development Guidelines for the Wood Lane Quarry Extension.

No other changes are proposed to ELL003. The site is allocated for leisure and tourism uses in principle, subject to further development guidelines which include the need to respect the setting of the Ellesmere Conservation area, the proximity of listed buildings at Ellesmere Yard and the setting and character of the Shropshire Union and Llangollen Branch canals. A supporting statement prepared by the site promoter indicates that a

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Heritage statement has been prepared which recognises the issue of the setting of the Listed Buildings. The Master Plan for the site has been amended in order to respond to this issue and the Historic Building Report is being updated to reflect this. This issue will be a key consideration (as set out in Policy MD13) during the consideration of any application to develop the allocated site. An FRA has been completed for the site and concludes that the development proposals will completely address flood risk issues on site, essentially reordering the floodplain to ensure that all types of development proposed (including more vulnerable) will be appropriate here in terms of flood risk.

3. **ELL009:** the promoter objects to the proposed boundary change which would exclude this site;

**Response:** No changes proposed. The Plan proposals for Ellesmere make adequate provision to deliver the development guideline and the potential contribution of this site must be balanced against the need to protect the Mere and its setting from development;

4. **ELL016:** The site promoter objects to draft Policy S8 on the grounds that it fails to address the urgent objectively assessed need for additional burial land within the town and suggests that should be identified for a small scale housing scheme, with a substantially increased area of land to be used as an extension to the adjoining cemetery;

**Response:** No changes proposed. The removal of this site was based on a wide range of significant potential impacts on the environment and economy of the town and this outcome was reinforced by the outcome of the subsequent appeal against refusal of planning consent for 2 homes. The need for additional burial land is recognised in the current Infrastructure Plan (Place Plan) for the town, but does not justify allocation of the site.

5. **Schedule S8.1c Leisure/Tourism Sites:** the Canal & River Trust request the replacement of the word “*including*” in the development guidelines with “*such as*” to overcome any issues relating to deliverability of the marina given the competing factors and variables between the Trust’s own application process, the planning process and the timescales involved in both plan preparation/adoption and actual delivery of marina schemes from initial proposal to commencement of work on site;

**Response:** A change is proposed to Schedule S8.1c to replace the word “*including*” in the development guidelines with “*such as*”:

6. **Cockshutt:** a site promoter considers that the current the current guideline for housing growth is too low and is not based on any objective assessment of its capacity for growth. It should therefore accept a greater level of development and further sites for housing development should be identified. A different site promoter considers that Cockshutt needs to deliver more houses than currently planned and whilst the preferred allocations within Cockshutt are broadly acceptable some or all of the identified growth should be redirected to site CO002a. There an objection to access to site CO002a via Church Green.

**Response:** No changes proposed. The housing guideline and the location and extent of preferred sites for Cockshutt are the product of extensive community engagement consistent with the principles of localism. The Plan makes adequate provision for the delivery of the level of housing in North-west Shropshire envisaged in the Core Strategy. The preferred sites have been comprehensively assessed and are considered deliverable and no further or alternative site allocations are therefore required.

7. **Dudleston Heath:** Welsh Water do not expect the proposed development to have an adverse impact on their sewerage network, but note that the site is crossed by a public sewer which may restrict development density for the site, or require an easement width or a possible diversion;

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**Response:** Change proposed to amend the development guidelines for the site to include reference to the need for the layout of the site to reflect the presence of a public sewer crossing the site.

8. **Welshampton** Welsh Water do not expect that the proposed level of growth would have an adverse impact upon their sewerage network, but note that the treatment works at Welshampton is very small and consideration should be given to the use of non-mains sewerage incorporating septic tanks in any new development to avoid the proposed level of growth overloading the capacity of the works.

**Response:** No changes proposed. The development guidelines for Welshampton already establish that all new development is subject to establishing adequate foul drainage and water supply.

## **S9: Highley area:**

### **Key issues & SC Response:**

- 1. Highley's housing requirement**
- 2. Development boundary not up to date**
- 3. Additional housing site for allocation**
- 4. Allocation of Land at Rhea Hall/Coronation Street (HIGH003)**

#### **1. Highley's housing requirement**

A number of representations consider the housing requirement for Highley in Policy S9. One representation suggested a higher overall requirement of 243 over the remainder of the Plan to reflect Highley's role as a key centre and due to the high number of completions and commitments already in the village. Another representation suggested that housing requirement should reflect up to date information on the expected level of development in the village (to effectively account for a recent application approval on the western edge of the town). A number of representations advocated a lower requirement stating that any new development will increase the need to travel, that road infrastructure is poor and development would increase carbon emissions, and that any development will negatively affect the character of the village.

**Response:** - Highley is already established as a Key Centre and is therefore considered to be a sustainable settlement for new housing development. The housing guideline reflects outstanding commitments and past completions in the village and takes into account the availability of deliverable development opportunities, and the outcomes of consultation. It is considered to be realistic when assessed against infrastructure and environmental constraints. The recent approved commitment for 58 houses at Jubilee Drive is considered to be additional to the planned requirement in the SAMDev Plan. All new development will have regard to the character of the village in accordance with CS6, CS7, MD2, MD12 and MD13. No changes are proposed.

#### **2. Development boundary considered not up to date**

One representation highlighted that the development boundary should be amended to include a recent outline permission for residential development at Jubilee Drive for 58 dwellings granted after the publication of the SAMDev Plan to provide clarity for the community and developers.

**Response:** - The application was approved following publication of the SAMDev Plan. It is considered to be additional to the proposals in the SAMDev Plan and was approved during a

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period where the Council could not demonstrate a five year supply of housing land. Although it was considered sustainable development in terms of the NPPF in relation to consideration of a planning application at that time it is not part of the overall SAMDev approach for development in Highley. No changes are proposed to amend the boundary at this stage.

**3. Additional housing site for allocation**

One representation from the site promoter suggested inclusion of an additional site for residential development at Redstone Drive (HIGH016).

**Response:-** This site has been assessed during preparation of the SAMDev Plan and an alternative site (HIGH003) was identified for inclusion as an allocation in preference to help meet Highley's housing requirement. No changes are proposed.

**4. Removal of HIGH003 as a housing allocation**

A number of representations suggested the removal of HIGH003 (land at Rhea Hall/Coronation Street). They were concerned about the loss of an open area, the lack of public open space as part of any new development, land contamination issues, and that removal of soil might lead to flooding for Park View to the east of the site. The representations were also concerned that an outline planning application granted on the site (12/02334/OUT) identified a lower housing capacity than outlined in the SAMDev. The representations also considered that the Council's Ecologist's comments on the application should be incorporated in to the SAMDev Plan.

**Response:** - The site has been subject to a thorough site assessment which also incorporated the Sustainability Appraisal. It is now subject to an outline planning consent (subject to S106) which has addressed technical issues appropriate to that level of planning permission and does identify a slightly lower capacity on the site than the SAMDev Plan. The SAMDev Plan recognises the need to mitigate/compensate for any potential impacts on protected species in schedule S9.1a. No changes are proposed.

## **S10 – Ludlow area**

### **Key issues & SC Response:**

- 1. Ludlow's housing guideline**
- 2. Allocation of land south of Rocks Green (LUD017)**
- 3. Allocation of land east of the Eco Park (ELR059/LUD034) for residential/employment purposes**
- 4. Allocation of land south for Sheet Road (ELR058) for employment purposes**
- 5. Alternative/additional sites**
- 6. Development boundary changes**
- 7. Additional Community Hub/Clusters in the Ludlow area**

**1. Ludlow's housing guideline**

One representation contended that the housing requirement does not meet the spatial zone guidelines for delivery set out in the Core Strategy (in conjunction with the other market towns in the south) or the figures in the 2008 SHMAA and does therefore not meet the requirement to fulfil objectively assessed need as set out in the NPPF. Another representation contended that the balance of around 80 houses after allocations will not be delivered within the development boundary which undermines delivery of the housing requirement. The representations contend that additional or alternative site allocations should be identified to meet the housing requirement.

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**Response:** - The housing guideline reflects outstanding commitments and past completions in the town and takes into account the availability of deliverable development opportunities, and the outcomes of consultation. It is considered to be realistic when assessed against infrastructure and environmental constraints and is in line with the indicative range in the Core Strategy. Policy MD3 provides flexibility for the identification of further sites where it is considered unlikely housing guidelines for settlements will be met. The residual requirement equates to around 8 dwellings a year as windfall development. Although a number of brownfield opportunities have been taken up in recent years there remain some potential brownfield sites with a number of 'accepted' sites within the development boundary in the 2014 Draft SHLAA. The Housing Delivery Technical Background Paper sets out further information on windfall delivery. No changes are proposed.

**2. Allocation of land south of Rocks Green (LUD017)**

A number of representations were received regarding the allocation of land south of Rocks Green (LUD017). Two Representations stated that a full assessment of the implications on vehicular and pedestrian access and the level of infrastructure required to support development in this location was needed before it should take place. It was considered by one representation that the site was more remote than other alternatives, west of the A49, and therefore not consistent with the NPPF's overall aim of achieving sustainable development. An alternative site promoter objected on the basis that the site was considered to be not deliverable as any pedestrian crossing improvements would be costly and alternative sites should be considered that would not require such infrastructure investment. It was also objected to on the basis of its impacts on the landscape.

**Response:** - The identification of this site in the SAMDev Plan has been informed by a site assessment process which considered deliverability and incorporated Sustainability Appraisal. Alternative site options were also assessed. Policy S10 schedule S10.1a recognises the need for highways improvements and contribution towards appropriate provision if required. The Council is involved in ongoing discussion with the Highways Agency under the Duty to Co-operate to establish the most effective process to take this forward. The site promoter is supportive of this approach. Policy S10 includes the need for development proposals to take account of infrastructure constraints and requirements set out in the LDF Implementation Plan and Place Plans and positively contribute towards infrastructure improvements. This is further outlined in MD8 which provides overriding policy on delivery of infrastructure.

**3. Allocation of land east of the Eco Park (ELR059/LUD034) for residential/employment purposes**

A number of representations were received regarding the allocation of land east of the Ludlow Eco Park (LUD034/ELR059). Objections related to highways and access arrangements for the site especially when taken in combination with other potential development proposed south of Sheet Road. Two representations stated that a full assessment of the implications on vehicular and pedestrian access and the level of infrastructure required to support development in this location was needed before it should take place. It was also considered that the site was more remote than other alternatives, east of the A49, and therefore not consistent with the NPPF's overall aim of achieving sustainable development. It was also objected to on the basis of its impacts on the landscape.

**Response:** - The identification of this site in the SAMDev Plan has been informed by a site assessment process which considered deliverability and incorporated Sustainability

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Appraisal. Alternative site options were also assessed. This site also scores highly in the Employment Land Review. Achievement of suitable access and highways arrangements has been considered as part of the site assessment. Schedule S10.1a refers to the need to provide suitable access arrangements off Sheet Road and appropriate highways improvements. Policy S10 includes the need for development proposals to take account of infrastructure constraints and requirements set out in the LDF Implementation Plan and Place Plans and positively contribute towards infrastructure improvements. This is further outlined in MD8 which provides overriding policy on delivery of infrastructure. No changes are proposed.

**4. Allocation of land south for Sheet Road (ELR058) for employment purposes**

Representations were received regarding the allocation of Land south of Sheet Road (ELR058) relating to the impact on Sheet Road east of the A49 and the implications for achieving safe access, especially when considered in combination with the site north of Sheet Road and existing development west of the A49/Sheet Road junction. It was considered by one representation that the land should only be considered for employment development when existing brownfield sites in the town have been taken up. It was also considered to not be justified as the local Parish Council had expressed preference to have employment development located between Sheet Road and Rocks Green.

**Response:** - The site has been assessed as part of the site assessment process and is considered to be the most appropriate for employment uses in the town. This site also scores very highly in the Employment Land Review. The allocation of the site south of Sheet Road, east of the Eco Park and protection of existing employment areas identified on the Policies Map allows for a range and choice of employment land to help meet the needs of the town which is recognised as a key centre for employment in the area. Achievement of suitable access and highways arrangements has been considered as part of the site assessment. Schedule S10.1a refers to the need to provide suitable access arrangements off Sheet Road and appropriate highways improvements. No changes are proposed.

**5. Alternative/additional sites**

In relation to objections to the housing requirement and site allocation choices two alternative/additional sites were put forward for inclusion in the SAMDev Plan. Land at Foldgate Lane (LUD002/015) west of the A49 was put forward as an alternative and was considered by the representation to be a more sustainable location for development. Land north of Rocks Green (LUD019) was put forward as additional site for inclusion in Plan to help meet the overall housing requirement which was considered to be too low. The representation also considered that the Plan was not effective as it did not provide an allocation of additional retail floor space in Ludlow.

**Response:** - These sites were assessed during preparation of the SAMDev Plan, which also incorporated Sustainability Appraisal, and alternative sites have been identified for inclusion as an allocation in preference to help meet the housing requirement. The Development Boundary is considered to be appropriate to manage development in the town through the application of Policies S10 and MD3. Regarding the suggested retail allocation, the representation states that the town centre is constrained but provided no evidence (in terms of sequential and impact tests, retail expenditure capacity expenditure or qualitative/quantitative need) relating to why the allocation of retail development would be required in the town. No changes are proposed.

**6. Development boundary changes**

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Representations stated that the Policy was not sound as it did not include two areas of the development boundary. The first of these put forward a change around Camp Lane in the south west of the town. The representation suggested this was not justified by evidence or physical features and excludes a garden area from the boundary when other gardens in the location are included. The second representation referred to land at the Linney, to the north of the town centre. The omission was considered to be not justified by evidence as they had provided a supporting FRA and the land had been previously consulted on as potentially being within the boundary at Preferred Option stage.

**Response:** - The Development Boundary is considered to be appropriate to manage development in the town through the application of Policies S10 and MD3. No changes are proposed.

## **7. Additional Community Hub/Clusters**

Representation from site promoter considers that the sites allocated in Ludlow alone do not meet the requirements for the area and the SAMDev Plan is therefore not in line with the NPPF. The representation states that Ashford Carbonell should be included in the SAMDev Plan and a site allocated.

**Response:** - The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target and that the Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements identified, including sites allocated following appropriate assessments and consultations, as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement. No changes are proposed.

## **S11 – Market Drayton area**

### **Key issues & SC Response:**

- 1. Cheswardine: the principal of the settlement's identification as a Community Hub;**
- 2. Hinstock: Increasing the housing guideline and including additional site allocations;**
- 3. Tyrley Cluster: the sustainability of the Cluster in relation to other reasonable options;**
- 4. Market Drayton: Over reliance on windfall to meet the housing guideline of 1,200 dwelling 2006-2026:**
- 5. Market Drayton: Deliverability of the greenfield sports facility**

- 1. Cheswardine:** It is felt that Cheswardine, having been allocated as a hub, would be unable to cope with any further development, due to the lack of public transport and poor infrastructure. However it is also thought that as Cheswardine has been identified as a community hub, a site should be allocated to help meet housing need. Support has been given to the inclusion of land south of Westcott Lane, as it is considered suitable for future residential development;

**Response:** No changes proposed. The new housing guideline for Cheswardine of 11 new dwellings is the product of extensive community engagement consistent with the principles of localism. The preferred delivery strategy for windfall development with the recent approval of 24 dwellings at Cheswardine Farm will ensure new development will deliver essential infrastructure investment whilst respecting the character of the village and conserving its historic core;

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2. **Hinstock:** Whilst there is support for Hinstock as it is considered a sustainable settlement, it is felt that further sites could be allocated, thereby increasing the housing guideline to take full advantage of the services available. Alternative sites have been promoted for future development, which are considered to have good access to amenities and the A49;

**Response:** No changes proposed. The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target. The Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements. These housing guidelines are the product of extensive community engagement consistent with the principles of localism. In the Community Hub of Hinstock the two preferred allocations and opportunities for limited infilling will satisfy the housing guideline for 60 dwellings as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement supporting the SAMDev Plan;

3. **Tyrley Cluster:** It is felt by one respondent that the cluster of Tyrley, Woodseaves (Sutton Lane), Woodseaves (Sydnall Lane) is not sustainable, as reasonable alternatives have not been considered. It is proposed that development will not be sustainable due to poor infrastructure and a lack of housing need. An alternative hub, Buntingsdale, has been proposed. Further issues have been raised by respondents wishing to promote their sites and to have them included within the Plan;

**Response:** No changes proposed. The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target. The Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements. These housing guidelines are the product of extensive community engagement consistent with the principles of localism. In the Community Cluster of Tyrley and Woodseaves (comprising Sutton Lane and Sydnall Lane only) the opportunities for limited infilling with existing commitments and built development will satisfy the housing guideline for 10 to 15 dwellings as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement supporting the SAMDev Plan;

4. **Market Drayton: over reliance on windfall:** There is considered to be an over reliance on windfall and infill sites to meet the housing target in Market Drayton. It is thought that this decision is not in accordance with NPPF and further Greenfield land should be allocated. Land has been promoted to Shropshire Council to make up this supply;

**Response:** No changes proposed. The proposed allocations with Market Drayton take account of existing boundaries to the south and north of the town in terms of the Tern Valley and town bypass (A53). Whilst the windfall allowance appears relatively high, this does reflect opportunities provided by identified sites within the SHLAA, alongside the level of delivery provided via housing completions and commitments. In addition, it also reflects the potential for development at Greenfields Lane later in the Plan period, following achievement of the local aspiration to relocate the Greenfields Sports Facility. This has been identified as the highest priority within Shropshire by the Football Association and is being pursued via an options appraisal and feasibility study. Further flexibility is provided by Policy MD3 and the Market Drayton settlement strategy which set out a future direction for growth to the north of the town taking into account identified opportunities along Adderley Road which are adjacent to the existing development boundary and do not require additional access off the A53;

5. **Market Drayton: Deliverability of the greenfield sports facility:** As part of the residential scheme for the town, new infrastructure includes an expansion to the Greenfield sports facility. It has been questioned about how deliverable this site is. There is a concern that part of the site may be used for housing and whether these

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housing figures have been included in the overall housing allocation. An issue has been raised over how this will stay in line with CIL requirements;

**Response:** No changes proposed. The proposed allocations were considered to provide a natural extension to the town whilst providing the opportunity to deliver a coordinated residential scheme for the town which can assist in the delivery of the long term aspiration for enhancing the Greenfields Sports Facility. The NPPF recommendation for testing the CIL alongside the Plan relates to the introduction of a CIL Charging Schedule rather than the use of those developer contributions. Shropshire Council has already undergone an independent examination of its CIL Charging Schedule which was found to provide the right balance and subsequently came into effect on 1 January 2012. The relocation of the Greenfields Sports facility has been identified as the number one priority within Shropshire by the Football Association and is reflected in the LDF Implementation Plan (Place Plans) as the mechanism by which infrastructure requirements and relative priority are identified, in accordance with Core Strategy Policy CS9. The current site is not deemed suitable for long term development and an options appraisal and feasibility study is therefore underway to assess the requirements for a replacement to the Greenfields Recreation Ground. Whilst relocation of the site will provide opportunity for additional residential development, the SAMDev Plan is not reliant on this to deliver housing within the plan period. The preferred allocations, existing commitments, completions and identified sites within the SHLAA alongside the flexibility provided by Policy MD3 will ensure new development will be delivered within the plan period.

## **S12 – Minsterley – Pontesbury area**

### **Key issues & SC Response:**

- 1. The strategy for the Minsterley and Pontesbury area is supported by Pontesbury Parish Council;**
- 2. Best practice procedures not used to present, explain and consult on the preferred allocations of development land in Policy S12.1;**
- 3. Development at Hall Bank, Pontesbury is supported by the landowner but issues raised in relation to Flood Risk Assessment, traffic and amenity impacts and an alternative site is proposed in preference to Hall Bank, Pontesbury;**
- 4. Inclusion of additional land adjoining site at Minsterley Road, Pontesbury requested;**
- 5. Development at Hall Farm, Minsterley to secure conservation of historic farm buildings is supported but issues raised in relation to protection of heritage assets and an alternative site proposed at The Grove in preference to Hall Farm, Minsterley;**
- 6. Development at Callow Lane, Minsterley is generally supported but issues raised in relation to protection of adjoining SSSI and an alternative site proposed at The Grove in preference to Callow Lane, Minsterley;**

- 1. The strategy for the Minsterley and Pontesbury area is supported by Pontesbury Parish Council including the housing development guideline for the Minsterley and Pontesbury area.**

**Response:** Support for the SAMDev Plan and Policy S12.1 is welcomed

- 2. Best practice procedures have not been used to present, explain and consult on the preferred allocations of development land in Policy S12.1 and so, the preferred sites are not consistent with the NPPF. In addition, the housing**

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**allocation at Minsterley Road increased from 0.2ha to 0.9ha without an adequate explanation of this change.**

**Response: No Change.** Sites have been allocated following appropriate assessments and consultations, as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement. It is considered that the preferred sites have been comprehensively assessed, are consistent with national guidance and any appropriate corrections or clarifications that have been made to supporting information are minor in nature and would not have materially affected the site selection processes.

- 3. Development at Hall Bank, Pontesbury is supported by the landowner but the Environment Agency require a Flood Risk Assessment to inform the detailed development proposals. However, concerns are raised regarding loss of amenity and character and the traffic impacts of the proposed Hall Bank development on the central one way road system in the village and on north-bound through traffic on the A488 passing along Hall Bank. An alternative development location is proposed on two adjacent sites at Main Road (PBY025) and adjoining David's Avenue (PBY030) to mitigate the traffic impacts of new development in the village.**

**Response: No Change.** Support for Policy S12.1 and the allocation of Hall Bank, Pontesbury is welcomed from the Environment Agency and the landowner, the Hereford Diocesan Board of Finance. The detailed guidance from the Environment Agency on developing Hall Bank, Pontesbury is noted. Sites have been allocated following appropriate assessments and consultations, as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement.

- 4. The proposed housing allocation at Minsterley Road, Pontesbury (PBY019) should also enclose the further plots of OS4512 (with proven lead contamination) and part of OS4922 as previously developed sites in the countryside. These additional plots should also be enclosed within the proposed development boundary for Pontesbury. The inclusion of these sites would not add a significant number of additional dwellings to the capacity of the proposed allocation at Minsterley Road, Pontesbury.**

**Response: No Change.** Sites have been allocated following appropriate assessments and consultations, as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement. It is considered that the preferred sites have been comprehensively assessed, are consistent with national guidance and any appropriate corrections or clarifications that have been made to supporting information are minor in nature and would not have materially affected the site selection process.

- 5. Development at Hall Farm, Minsterley to secure reuse and conservation of historic farm buildings is supported by English Heritage but they require that the heritage assets at the adjacent listed Minsterley Hall and its setting and the historic barns at Hall Farm will be protected and enhanced through the proposed development. An alternative development location is proposed at The Grove, Minsterley (MIN005R) to mitigate the adverse impacts of developing Hall Farm.** English Heritage supports the mixed use redevelopment of Hall Farm, Minsterley to secure an appropriate re-use and conservation of the historic farm buildings but the redevelopment must respect the principles and building layout in the

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Shropshire Historic Farmstead Mapping Project and respect the setting of the setting of the adjacent Grade I listed Minsterley Hall. Land at The Grove should be allocated for 65 dwellings as an alternative to the proposed allocations at Hall Farm and Callow Lane. Flood issues can be addressed at The Grove, the site is well related to the settlement and facilities & there are no other significant environmental or physical constraints to the development of the land. The site is expected to be more attractive to the market being larger and offers a more viable and deliverable allocation.

**Response: Proposed Change to paragraph 5.122 to Policy S12.1 on page 159.**

The wording of the policy explanation in para 5.122 should be amended to clarify that the redevelopment of Hall Farm, Minsterley is not proposed as enabling development for the adjacent Minsterley Hall. No further changes are required as the development guidelines for Hall Farm require “a comprehensive development scheme for the whole site which secures the appropriate re-use and conservation of historic farm buildings at Hall Farm’.

- 6. Development at Callow Lane, Minsterley is generally supported by Natural England and the Environment Agency but requires measures to conserve Minsterley Meadows SSSI and should control the impacts on downstream flood risks. An alternative development location is proposed at The Grove, Minsterley (MIN005R) to mitigate the adverse impacts of developing Callow Lane.** Natural England supports the requirement in the development guidelines for Callow Lane, Minsterley for the provision of a buffer zone on the eastern boundary to protect the adjoining Minsterley Meadows SSSI. It is recommended that the buffer zone should include the creation of Priority Habitat to contribute to national and local targets for habitat conservation. Environment Agency recommend that the ordinary watercourse downstream of the site should be modelled to assess the potential impact on the known flood risk downstream of the proposed housing allocation.
- Response: Proposed Changes to Schedule S12.1a for MIN007 Callow Lane Minsterley on page 157:**

- The wording of the development guidelines in S12A for Callow Lane, Minsterley should be amended to read: ‘The development will incorporate a buffer zone to the eastern boundary, appropriate landscaping and any other mitigation measures required to safeguard the adjoining SSSI. **Priority habitat should be created in the buffer zone to complement the adjacent SSSI habitat.** As part of the development, improved pedestrian access will be provided to the existing recreational area to the South of the site and other facilities.’
- The development guidelines for Callow Lane, Minsterley should also be changed to reflect the need for watercourse modelling on the site as part of the Strategic Flood Risk Assessment commissioned by this authority. Any necessary changes to the development guidelines for Callow Lane, Minsterley can be addressed as a minor change to the Plan on receipt of this new modelling data.
- Natural England’s support for the SAMDev Plan and Policy S12.1 is also welcomed.

## **S13 Much Wenlock area:**

### **Key issues & SC Response:**

- 1. The SAMDev Plan does not include any proposals for Much Wenlock**
- 2. Evidence to support housing delivery in the town**
- 3. Inclusion of a housing allocation in Much Wenlock**

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**4. Additional Community Hub/Clusters in the Much Wenlock area**

**1. The SAMDev Plan does not include any proposals for Much Wenlock**

One representation stated that the SAMDev Plan would not be effective or justified if it did not include proposals for Much Wenlock equivalent to the other market towns and key centres identified in Core Strategy Policy CS3. The representation argued that there is uncertainty around the Neighbourhood Plan referendum and the NP examination had agreed a housing requirement (equivalent to 260 dwellings between 2006 and 2026) which should be identified in the SAMDev Plan.

**Response:** In the Much Wenlock Neighbourhood Plan (MWNP) referendum held on 22 May, the majority of voters supported using it for determining planning applications. The MWNP is now due to be 'made' by Shropshire Council at a full Council meeting on 17 July. When the Plan is made its policies will be part of the formal Shropshire Council Development Plan covering the parish of Much Wenlock. The MWNP has been independently examined and is considered to set out an appropriate approach to sustainable development in the town and wider parish. No changes are proposed to the SAMDev Plan in light of the progress of the MWNP.

**2. Evidence to support housing delivery in the town**

Linked to the first issue is the concern raised about the lack of evidence to support deliverability of the housing requirement of 130 dwellings from 2011 to 2026 (irrespective of whether the NP is supported in the referendum or not). They argue that the tightly drawn development boundary would not provide the capacity and this is supported by evidence in the SHLAA.

**Response:** The MWNP independent examiner considered the plan to be deliverable. He also recommended a change to the Plan to ensure it was reviewed after 3 years with a specific focus on housing delivery in order to assess the progress on the granting of planning permissions and/or the delivery of housing in the Plan area. This change has been incorporated into the MWNP. No changes are proposed to the SAMDev Plan in light of the progress of the MWNP.

**3. Inclusion of a housing allocation**

Linked to the issues above the site promoter put forward a site at Land East of Bridgnorth Road for 85 dwellings. The representation argues that regardless of the outcome of the NP referendum the examination into the NP had agreed it is a sustainable site (and was included for around 25 dwellings in the submitted NP). The representation argues that to show delivery of the housing *requirement* in the NP an allocation is needed in the SAMDev Plan.

**Response:** The MWNP independent examiner considered the plan to be deliverable. He also recommended a change to the Plan to ensure it was reviewed after 3 years with a specific focus on housing delivery in order to assess the progress on the granting of planning permissions and/or the delivery of housing in the Plan area. This change has been incorporated into the MWNP. No changes are proposed to the SAMDev Plan in light of the progress of the MWNP.

**4. Additional Community Hub/Clusters in the Much Wenlock area**

A representation from site promoter considers that the approach taken to Community Hubs and Cluster identification means that the SAMDev Plan is not positively prepared

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and therefore not in line with the NPPF. The representation states that Cressage should be included in the SAMDev Plan and a site allocated.

**Response:** The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target and that the Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements identified, including sites allocated following appropriate assessments and consultations, as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement. No changes are proposed.

## **S14 Oswestry Place Plan Area:**

### **Key issues & SC Response:**

1. Oswestry
2. Site OSW004 (Land off Whittington Road);
3. Sites OSW002 (land off Gobowen Road) & OSW003 (Oldport Farm);
4. Strategic Urban Extension (SUE);
5. Site OSW029 (Former Oswestry Leisure Centre)
6. Site OSW030 (The Cottams, Morda Road);
7. Oswestry Rural;
8. Kinnerley;
9. Weston Rhyn;
10. St Martins;
11. Llanymynech;
12. West Felton;
13. Park Hall Cluster.

1. **Oswestry:** A co-ordinated approach has been taken to addressing the issues raised by Natural England with respect to MD12 and to the recommendations arising from the SAMDev HRA. Further detail will be given in a Statement of Common Ground which will be prepared between Shropshire Council and Natural England. Consequent changes to settlement strategies and supporting text have been proposed where relevant.

#### **Response: Proposed Changes.**

Insert new paragraph at end of Policy S14.2 Hub and Cluster Settlements to read:  
**‘Mitigation measures will be required to remove the adverse effects of development in the Oswestry area on the integrity of the Montgomery Canal SAC in accordance with Policy MD12.’**

Delete part of Policy S14.2(iii): Llanymynech & Pant to read: ‘...Key development constraints for Llanymynech and Pant include ~~potential impacts on the Montgomery Canal Special Area of Conservation (SAC),~~ protected species and the historic environment. Critical infrastructure...’

Delete the second paragraph of the Development Guidelines for Land north of playing fields (LLAN009) as follows:  
~~‘The completion of a Habitats Regulations Assessment (HRA) to demonstrate that development will not adversely affect the integrity of the Montgomery Canal SAC.’~~

Insert new paragraph 5.139a into the Explanation to Policy 14.2 to read: **‘The Plan HRA indicates that development in the Community Hub of Llanymynech and**

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**Pant may adversely affect the integrity of the Montgomery Canal SAC. Mitigation measures are required to remove harm arising from hydrological impacts on this internationally designated site in accordance with Policy MD12. Further information is available in the SAMDev Habitats Regulation Assessment.'**

2. **Site OSW004:** A significant number of respondents, including the Town Council consider that the continued allocation of site OSW004: Land at Whittington Road would have a significant adverse impact on the setting of Oswestry hillfort, and the archaeological potential of nearby land contrary to national guidance. Concerns are raised that public opinion regarding the site has been ignored in a way inconsistent with the Council's own SCI and that the Council has relied on unrepresentative evidence and has ignored alternative evidence commissioned by the protest group HOOOH. A number of respondents consider that the site is undeliverable since it is unlikely to receive planning consent and Shropshire Council has failed to sufficiently investigate and consider alternative sites such as brownfield sites within the town and Oswestry's SUE. A number of respondents consider that, in the context of the removal of sites OSW002 & 003, it will fail to deliver the package of benefits originally envisaged and should therefore be removed. English Heritage consider that whilst some development may be appropriate subject to 'design quality and its landscaping', design principles and master planning should be included within the Plan rather than deferred to planning applications stage. EH require a set of clear design principles on how the site could be brought forward in the context of its relationship to the hillfort and request a Masterplan to be developed in accordance with the design principles set out in the Plan and a Heritage Impact Assessment produced by the Local Authority to assess the impact, harm and mitigation solutions;

**Response:** Change proposed: English Heritage has accepted that it may be possible for some development to be allocated in this area subject to 'design quality and its landscaping' taking into account 'local topography and the existing built form'. English Heritage advises that there should be an overarching framework to guide the planning and design of the development, and is seeking the requirements for good design principles and a masterplan to be included within the Plan. In the Council's view, policies CS6 and MD2 provide appropriate generic guidance with regard to design principles, and the Council is producing an Historic Environment SPD to augment this. The Council also considers that the development guidelines for the site highlight appropriate considerations to which regard should be had at planning application stage. However, the Council accepts that a change to the guidelines is appropriate to include a specific requirement for a masterplan to be prepared to guide the proposed development. No other changes are proposed. The value and significance of the hillfort and its setting has been recognised in preparing the Plan. Shropshire Council does not accept that development of the site would result in substantial harm to the hillfort (NPPF 132) and any impact must therefore be weighed against the public benefits of the proposal, including securing its optimum viable use (NPPF134). The allocation of this site is the culmination of a long process of considering the strategic requirements for the development of Oswestry over the period up to 2026, identifying and assessing options with regard to an evolving evidence base including the objectives of the recently adopted Oswestry 2020 Town Plan, and consideration of issues arising from consultations. The Council is tasked with putting forward a sound Plan to help to achieve the sustainable growth of the town, identifying sufficient suitable and deliverable sites. It is considered that the overall proposals for the town, which includes an increase in the potential delivery from the Eastern Gateway Sustainable Urban Extension strike an appropriate balance. In reaching its view, the Council has had regard to all of the evidence

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available and the professional expertise of its officers in making its assessments and coming to a view as regards the suitability of sites for allocation for development. The Council considers that more detailed consideration of archaeological information and issues is appropriate at the planning application stage (see NPPF paragraph 128 relating to the determination of applications) but is not necessary at the current Plan-making stage (having regard to paragraphs 158 and 169 of the NPPF). The Council considers that it has met the requirements of the statutory Plan-making processes including providing the necessary opportunities for the making of representations and has made extensive efforts to engage with local communities and stakeholders in the preparation of the Plan consistent with the approach identified in tables 4.2 and 4.3 its SCI. The fact that not all parties agree with the outcome of the Plan-making decisions by the Local Planning Authority does not mean that it has not consulted appropriately, considered the issues and reached a balanced view on the way forward;

3. **Sites OSW002 & OSW003:** The site promoter objects to the removal of these sites on the grounds that target growth for Oswestry does not meet objectively assessed requirements, does not comprise the most appropriate strategy against reasonable alternatives and has not been based upon proportionate evidence base. English Heritage supports the removal of site OSW002 on the grounds that its development would lead to the erosion of the Hillforts open and rural setting. In the case of OSW003, English Heritage considers that whilst previous proposals would potentially have an adverse impact on the significance and setting of the heritage asset, there could be an opportunity to reduce the visual impact of development on the setting by using the historic courtyard plan form of the farmstead to inform a future development rather than the current footprint which over time has extended towards the hillfort;

**Response:** No changes proposed. In considering the draft Final Plan, and in the wider context of overall proposals for future housing development in the town, councillors decided not to allocate sites OSW002 and OSW003. This outcome represents the culmination of a long process of considering the strategic requirements for the development of Oswestry over the period up to 2026, identifying and assessing options with regard to an evolving evidence base, and consideration of issues arising from consultations. The Council is tasked with putting forward a sound Plan to help to achieve the sustainable growth of the town, identifying sufficient suitable and deliverable sites. It is considered that the overall proposals for the town, which includes an increase in the potential delivery from the Eastern Gateway Sustainable Urban Extension strike an appropriate balance.

4. **Strategic Urban Extension (SUE):** Allocation generally supported, including by the Town Council, but the site promoter is seeking an equitable apportionment of infrastructure costs associated with each site in respect of sustainable transport measures and the provision of improved or new links serving development;

**Response:** A change is proposed to amend Schedule S14.1a for Site OSW024 after ' .... Middleton Road,' in line 9, to state: "facilitation, through provision of land, if required, of improvement to the A5/A483 trunk road junction and sustainable transport improvements associated with the site, and on site pedestrian and cycle provision to facilitate linkages to the Town Centre and proposed employment land at Mile End East". Also amend Schedule S14.1b for Site ELR072 to state: "Development subject to access off and improvements to the A5/A483 trunk road junction, contributions towards sustainable transport improvements associated with the site, and provision of pedestrian and cycle link across the A5 to the proposed Eastern Gateway Sustainable Urban Extension and contributions towards pedestrian/cycle links to/from Oswestry town centre, and landscape buffers to A5". Amend supporting explanatory text for consistency;

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5. **OSW029:** The Environment Agency notes that this land is in flood zone 1, but has an ordinary watercourse within it and SFRA should be assessing the flood risk from this ordinary watercourse;

**Response:** No changes proposed. This issue will be addressed by an update to the SFRA which is currently in progress;

6. **Site OSW030:** An objector considers that the site has been included in error since it is not within the Town Council boundary, has the wrong boundary and is unsustainable due to inadequate local infrastructure;

**Response:** No changes proposed. The Council is tasked with putting forward a sound Plan to help to achieve the sustainable growth of the Oswestry, identifying sufficient suitable and deliverable sites, including (sites such as this one) which are adjacent to, but not within the existing administrative boundary of Oswestry Town Council. The allocation of this site is the culmination of a long process of considering the strategic requirements for the development of Oswestry over the period up to 2026, identifying and assessing options with regard to an evolving evidence base, and consideration of issues arising from consultations. This site (together with a range of other sites including brownfield infill development and the SUE) represents an integral part of the most appropriate package to help deliver the objectives of the housing development guideline for Oswestry which has been agreed with the Town Council to secure the delivery of the Core Strategy and the Oswestry 2020 Plan;

7. **Oswestry Rural:** Some respondents consider that the opting out of Oswestry Rural is undemocratic and in conflict with Community Led policy details. A site promoter considers that Maesbury Marsh is a sustainable settlement which should have been identified as a development settlement in the SAMDev document and that this decision has not taken place on the basis of any objective assessment of its capacity to accept further development. A site promoter considers that the lack of provision for housing in Trefonen is not based on evidence but opinion and that specific provision should be made for self-build plots as required in NPPF;

**Response:** No changes proposed. The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target. The development status of Oswestry Rural is the product of extensive community engagement consistent with the principles of localism;

8. **Kinnerley:** The PC requests that the Neighbourhood Plan is referred to as a "community led NEIGHBOURHOOD plan" on page 172;

**Response:** A change is proposed to amend reference on page 172 as suggested;

9. **Weston Rhyn:** The site promoter for WRN010 questions the deliverability of WRN016 and considers that the whole of site WRN010 should therefore be included for development. The site promoter for site WRN016 considers that Weston Rhyn should be a Community Hub rather than a Community Cluster with Wern and Chirk Bank and that site WRN010 should be deleted in favour of the allocation of a larger area of WRN016 with an increase in capacity from 20 to 45. Another site promoter considers that Weston Rhyn has capacity to cater for considerably more growth and suggests a site to the north of the village off High Street Welsh Water note that there are isolated incidents of flooding in the public sewerage system downstream of both WRN010 and WRN016 which will need to be overcome either by waiting for Welsh Water to resolve the flooding issue, or by the developer funding the improvements themselves. Both sites are also crossed by a public sewer which will restrict development density for the site.

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**Response:** Whilst the development guidelines for the WRN010 acknowledge that development will be subject to appropriate drainage design, a change is proposed to include: "The layout of the site will need to reflect the presence of a public sewer crossing the site." No other changes are proposed. The Council considers that the current preferred sites are suitable, deliverable and appropriate and represent the best balance, having identified and assessed the options, with regard to an evolving evidence base and to due consideration of issues arising from consultations, within the overall context of needing to enable the delivery of appropriate levels of development to enable Weston Rhyn to grow and to maintain its role as a sustainable settlement;

10. **St Martins:** The landowner strongly supports the proposed allocation of STM029, but suggests a refinement to the development guidelines so that the development of the site is appropriately defined and realised. A site promoter recommends allocation of Land East of Stan's Store (STM004?) in preference to the allocated site at Rhos-y-Llan site (STM029). Welsh Water point out that developers would be expected to carry out hydraulic modelling during pre-planning stages, to establish whether sufficient capacity exists within the sewerage network. The provision of off-site sewers may be required;

**Response:** A change is proposed to refine the development guidelines for STM029. The Council considers that the current preferred site is suitable, deliverable and appropriate and represents the best balance, having identified and assessed the options, with regard to an evolving evidence base and to due consideration of issues arising from consultations, within the overall context of needing to enable the delivery of appropriate levels of development to enable St Martins to grow and to maintain its role as a sustainable settlement. Both the SAMDev development strategy for St Martins and the current Place Plan already acknowledge that waste water treatment infrastructure is a critical infrastructure investment priority. The need for hydraulic modelling is understood by the site promoter and has formed part of pre-application discussions;

11. **Llanymynech:** The site promoter for LLAN009 is concerned about the deliverability of site LLAN001 and objects to the reference to 'up to 67 dwellings' which they interpret as a cap on development that can come forward from the two sites;

**Response:** A change is proposed to amend S14.2 (iii) to refer to the development of 'around 67 dwellings' rather than 'up to 67 dwellings';

12. **West Felton:** A site promoter considers that this is a sustainable settlement which should have been identified as a development settlement in the SAMDev document and that this decision has not taken place on the basis of any objective assessment of its capacity to accept further development;

**Response:** No changes proposed. The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target and that the Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements identified, including sites allocated following appropriate assessments and consultations, as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement. The development status of West Felton is the product of extensive community engagement consistent with the principles of localism;

13. **Park Hall Cluster:** A site promoter considers that site PARK004 should be allocated in preference to PARK001 to help deliver additional growth consistent with Core Strategy targets for NW Shropshire. The promoter of PARK001 supports allocation of the site;

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**Response:** No changes proposed. The housing guideline and the location and extent of preferred sites for Park Hall are the product of extensive community engagement consistent with the principles of localism. The Plan makes adequate provision for the delivery of the level of housing in North-west Shropshire envisaged in the Core Strategy. The preferred sites have been comprehensively assessed and are considered deliverable and no further or alternative site allocations are therefore required.

## **S15 – Shifnal area**

### **Key Issues and SC Response**

- 1. Housing numbers**
- 2. Employment land**
- 3. Development boundary**
- 4. Future safeguarded land at Lodge Hill:**
- 5. Further proposed residential development**

### **Summary of Key Issues**

- 1. Housing numbers:** A consistent issue raised by several representations concerns Shifnal's housing guidelines. The site promoters of residential land North of Wolverhampton Road (proposed allocated site SHIF006), land between Lawton Road and Stanton Road (proposed allocated site SHIF004b), and land at the Uplands (not allocated SHIF002) have all questioned the validity of the housing guideline of 1,250 for Shifnal. They all consider there is no technical evidence behind the lowering of the target from 1,600 to 1,250 between Revised Preferred Options in 2013 and the Pre-Submission Draft Plan in 2014. Conversely, one representation questioned the sustainability of any new development in Shifnal as the town wouldn't be able to cope with the added highway issues. The objections on Shifnal's housing numbers also relates to draft policies MD1 and MD3 in that they question the validity of the overall housing target since the revocation of the RSS, and the need for new targets to be objectively assessed. Consider that greater weight should be given to the ambitions of the market in identifying settlement strategies, which would increase housing provision in the East Spatial Zone.

Response: No Change Proposed. It is considered the housing guideline of 1,250 represents a positive growth target which respects infrastructure and policy constraints, notably the tightly drawn Greenbelt to the west of the town, whilst reflecting the practical realities of outstanding planning applications on non-allocated sites to the east of the town on safeguarded land. Policy MD3 provides flexibility for the identification of further sites where it is considered unlikely housing guidelines for settlements will be met.

- 2. Employment land:** The promoters of the proposed employment allocation between Lawton Road and Lamledge Lane (SHIF004/C) argue this site should be considered for further residential instead, citing the lack of evidence provided on employment need in the town.

**Response:** No Change Proposed. Land at SHIF004/c has been proposed for one of two employment sites in the town and will cater for B1 and B3 uses. This allocation reflects the need to balance the significant increase in housing expected in the town to ensure a sustainable growth strategy. Please note this site is currently subject to a planning application for residential use (13/05136/OUT).

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- 3. Development boundary changes:** Barton Willmore on behalf of Taylor Wimpy North Midlands and Gallagher Estates Ltd have requested that the boundary of the recently approved site at Wolverhampton Road (SHIF006) be reflected in the SAMDev Plan. Also the promoters of the Coppice Green site (now approved subject to Section 106) argue the development boundary should acknowledge this approved scheme by encompassing this approved site.

**Response: Change Proposed:** Amend the extent of the site boundary for SHIF006 to reflect the approved planning application 14/00062/OUT. It is considered this minor change would clarify the boundary of the site and bring it in line with the approved scheme. However, it not proposed to change the boundary for the site at Coppice Green. This site was approved in the context of the lack of five year housing supply and is not being promoted through the SAMDev Plan. Whilst the site is a sustainable option in the context of the NPPF, its delivery is not essential for the delivery of the Shifnal strategy and therefore it is not considered necessary to amend the development boundary to encompass this site.

- 4. Future safeguarded land at Lodge Hill:** One representation argues for the plan needs to assess the deliverability of the remaining 'safeguarded' land to the east of the town, and should consider whether it is necessary to identify additional 'safeguarded' land to the west of the settlement on land at Lodge Hill to cater for development beyond 2026. This site, currently in the Green Belt, has been promoted for a potential mixed use development including community, retail and retirement facilities.

**Response:** No Change Proposed. Policy MD6 covers Greenbelt policy and together with the Core Strategy provides the strategic policy framework which seeks to enhance the sustainability of communities in the Green Belt. Policy CS5 for the countryside and Green Belt, provides for sustainable development needs through provision for anticipated expansion at Shifnal and Albrighton, recognising the purpose and location of safeguarded land for further, long term sustainable development within the Green Belt. Policy CS5, , in conjunction with Policy CS4, also makes provision for limited local needs affordable housing and infilling for open market housing in settlements identified as Community Hubs and Clusters. It is considered that sufficient provision has been made for sustainable development in the Green Belt and in the absence of specific proposals to change safeguarded land designations, there is no justification to further address these issues in Policy MD6.

- 5. Further proposed residential development:** Further to the issues raised regarding insufficient housing numbers, several sites have been proposed as additional allocations for the SAMDev to consider:
- a. **Land north of Thomas Beddoes Court:** promoted by Taylor Wimpy on the land currently with permission for a medical centre for between 40-45 dwellings
  - b. **Land east of Thomas Beddoes Court:** promoted by Gallagher Estates for around 200 dwellings
  - c. **Land at the Uplands (SHIF002):** promoted by Redrow for up to 70 dwellings (currently subject to a planning application)
  - d. **Land at Meadow Drive (SHIF018):** promoted by Barratt Homes

**Response:** No Change Proposed. Within the context of the proposed housing guideline for the town it is not considered necessary or appropriate to specifically allocate further residential allocations. The Council have recently resolved to grant permission subject to S106 for land at the Uplands (SHIF002) for 70 dwellings. Policy MD3 provides flexibility for the identification of further sites where it is considered unlikely housing guidelines for settlements will be met.

## **S16 – Shrewsbury area**

### **Key Issues & SC Response:**

- 1. Protection of Heritage Assets;**
- 2. Objections/Amendments to proposed allocation sites in Shrewsbury;**
- 3. Additional housing sites in Shrewsbury;**
- 4. Other policy issues for Shrewsbury;**
- 5. Objections/Amendments with regard to the identification of Community Hub and Community Cluster Settlements;**
- 6. Objections/Amendments to housing guidelines/development boundaries/sites in proposed Community Hub and Community Cluster Settlements;**
- 7. Additional housing sites in proposed Community Hub and Community Cluster Settlements;**
- 8. Habitats Regulations Assessment (HRA).**

- 1. Protection of Heritage Assets:** English Heritage (252) raises issues and seeks some amendments with regard to the protection, conservation and enhancement of heritage assets, including particularly with regard to the Registered Battlefield site (with implications for Policies MD9, and housing and employment land allocations in the north of Shrewsbury) and reference to the Interim Planning Battlefield Guidance note. A further representation (251) has objected to the identification of the Greenhills Business Park at Battlefield Enterprise Park as safeguarded employment land under Policy MD9 in view of its proximity to the Battlefield site (see 4 below).

**Response:** It is considered appropriate to identify the land at Battlefield Enterprise Park as safeguarded employment land, but various amendments are proposed to address the English Heritage concerns (including to Policy MD13 – see under that policy).

- 2. Objections/Amendments to proposed allocation sites in Shrewsbury:** Objections have been received, on the one hand, regarding the identification of the Shrewsbury West SUE and related consultations and, on the other hand, seeking the inclusion of additional land at Oxon Caravan Park; an objection has been received to site SHREW027 – land off Preston Street and London Road and the promoter has sought amendment to the key guidelines for the proposed site; objections have been received to sites SHREW001, SHREW073, SHREW016 and SHREW212 (seeking their replacement by site SHREW118); and amendment is sought to the development guidelines in relation to Shrewsbury South SUE and to two of the areas shown on the Land Use Plan, while one representation seeks higher environmental design standards and protection of green spaces/corridors. The Environment Agency submitted comments on a number of sites with regard to flood risk.

**Response:** No changes are proposed with regard to the Shrewsbury West SUE, with its designation and the preparation of its adopted masterplan having been subject to appropriate consultation processes, or to SHREW027, SHREW001, SHREW073, SHREW016 and SHREW212, as the sites proposed to be allocated have been identified following appropriate assessments and consultations. Some changes are proposed regarding the Development Guidelines in Schedule S16.1a in relation to

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Shrewsbury South SUE, maintaining consistency with the adopted SUE masterplan, and for three housing sites, to include reference to the need for site specific flood risk assessments.

3. **Additional housing sites in Shrewsbury:** Promoters of alternative/additional sites have questioned whether the sites included in the Plan will be sufficient overall and ensure delivery, including in the early years of the Plan period. One representation objects to the non-identification of 'reserve sites' as set out in Policy CS2, and to the distribution of the proposed allocations/consistency of the allocations with Core Strategy policies relating to the Northern Corridor Regeneration Strategy linked to the promotion of an alternative site on land west of Ellesmere Road. The main additional sites put forward are – land at Longden Road/Nobold Lane, two sites off Ellesmere Road, land off Holdgate Drive and Sundorne Road, and a redevelopment site at Whitchurch Road;

**Response:** No changes are proposed as the sites proposed to be allocated have been identified following appropriate assessments and consultations, the Council considers that it has allocated sufficient sites to ensure delivery, and the alternatives proposed are not considered appropriate/necessary for reasons set out.

4. **Other policy issues for Shrewsbury:** a number of representations have been received regarding the inclusion of specific sites under Policy MD9 Protecting Employment Areas, and to Clause 9 of Policy S16.1 regarding development on land west of Ellesmere Road.

**Response:** General issues relating to Policy MD9 are considered under that policy, but no changes are proposed in relation to the specific sites in Shrewsbury, except to amend the boundaries of the employment area safeguarded under Policy MD9 at Battlefield Enterprise Park to exclude any land forming part of the Registered Battlefield. No change is proposed regarding Clause 9 of Policy S16.1 as it is considered appropriate to restrict development on land west of Ellesmere Road unless co-ordinated with and helping to fund the construction of the Shrewsbury North West Relief Road.

5. **Objections/Amendments with regard to the identification of Community Hub and Community Cluster Settlements:** As well as objections to the approach taken to identifying Community Hubs and Clusters (see Policy MD1), more specific objections have been received and amendments are sought to identify Cressage as a Community Hub, Old Woods (in Pimhill parish) as a Community Cluster settlement, and an area in Halfway House as a location for development. Support has also been expressed for a number of settlements identified, primarily by Parish Councils and site promoters.

**Response:** No changes are proposed to the Community Hubs and Community Cluster settlements identified in the Shrewsbury area as the Council considers that the approach to the rural areas is consistent with localism principles espoused by NPPF, even if it produces inconsistencies in comparison to traditional approach to determining scale and distribution of new development in the rural areas, and that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target.

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6. **Objections/Amendments to housing guidelines/development boundaries/sites in proposed Community Hub and Community Cluster Settlements:** Objections have been received with regard to the proposed site allocation at Hanwood, one of the sites in Baschurch, the housing guidelines and proposed site allocation for Nesscliffe, and the policies for Bayston Hill and Bicton. Support has also been expressed for the policies and proposals for a number of settlements, primarily by Parish Councils and site promoters.

**Response:** No changes are proposed to the policies and proposals for the Community Hubs and Community Cluster settlements in the Shrewsbury area as the Council considers these to be appropriate following the assessments and consultations carried out and forming part of the Plan's evidence base.

7. **Additional housing sites in proposed Community Hub and Community Cluster Settlements:** Additional sites have been put forward in Baschurch, Nesscliffe and Uffington.

**Response:** No changes are proposed as the sites proposed to be allocated have been identified following appropriate assessments and consultations, and the alternatives proposed are not considered appropriate/necessary for the reasons set out.

8. **Habitats Regulations Assessment (HRA):**

**Issue/Response: Proposed Change:** A co-ordinated approach has been taken to addressing the issues raised by Natural England with respect to MD12 and to the recommendations arising from the SAMDev Plan HRA. Further detail will be given in a Statement of Common Ground which will be prepared between Shropshire Council and Natural England. Consequent changes to settlement strategies and supporting text have been proposed where relevant:

Insert new paragraph at end of Policy S16.2 Community Hub and Cluster Settlements to read: **'Mitigation measures will be required to remove the adverse effects of development in the Shrewsbury area on the integrity of the Fenemere Ramsar site in accordance with Policy MD12.'**

Insert new paragraph 5.168a in the Explanation to Policy S16.2 to read: **'The Plan HRA indicates that development in the Community Hub of Baschurch may adversely affect the integrity of the Fenemere Ramsar site. Mitigation measures are required to remove the harm arising from hydrological impacts on this internationally designated site in accordance with Policy MD12. Further information is available in the SAMDev Habitats Regulation Assessment.'**

Delete text in Policy S16.2(i) Baschurch as follows: ~~'Fenemere SSSI (part of the Midlands Moors and Mosses RAMSAR site), to the north-west of the village, is likely to be vulnerable from both surface water abstractions within the catchment and groundwater abstraction from the sand and gravel aquifer. Development proposed in the village needs to demonstrate that it will not adversely affect the integrity of the site, including the completion of a Habitats Regulations Assessment, if required.'~~

## **S17 - Wem Place Plan area:**

### **Key Issues and SC Responses:**

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1. **Habitats Regulations Assessment (HRA);**
2. **Wem Development Strategy;**
3. **WEM012 (Land at Tilley);**
4. **WEM003 (Land off Pyms Road);**
5. **Hadnall;**
6. **Harmer Hill;**
7. **Employment land allocation ELR031 (Land adjacent to Shawbury Rd).**

1. **Habitats Regulations Assessment (HRA):** Natural England considers that the settlement strategy is not compliant with the Habitats Regulations, because the wording changes recommended in section 5.3.5 of the HRA have not been incorporated;

**Response: Proposed Changes** A co-ordinated approach has been taken to addressing the issues raised by Natural England with respect to MD12 and to the recommendations arising from the SAMDev HRA. Further detail will be given in a Statement of Common Ground which will be prepared between Shropshire Council and Natural England. Consequent changes to the settlement strategy and supporting text for Wem town are as follows:

Insert new paragraph at end of Policy S17.1 Wem town to read: **'Mitigation measures will be required to remove the adverse effects of development in Wem on the integrity of the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site in accordance with Policy MD12.'**

Insert new paragraph 5.175a after Policy S17.1 to provide explanatory text to read: **'The Plan HRA indicates that development in Wem may adversely affect the integrity of the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site Mitigation measures are required to remove the harm arising from increased recreational pressure on this internationally designated site in accordance with Policy MD12. Further information is also available in the SAMDev Habitats Regulation Assessment.'**

2. **Wem Development Strategy:** The Town Council is concerned that the current proposals for Wem do not reflect community views and suggests a change to the development boundary to reflect updated flood risk assessment. An objector is concerned that the housing development guideline for Wem was based on an unrepresentative sample of community opinion and is too low. Wem is considered to be a sustainable location for higher levels of growth to transfer growth away from Whitchurch;

**Response:** The development strategy and housing guideline for Wem are the product of extensive community engagement consistent with the principles of localism, together with a realistic assessment of the constraints imposed by infrastructure capacity issues. Shropshire Council has worked closely with Wem TC to prepare the development strategy for Wem in the draft Plan. The current preferred sites were explicitly endorsed by the Town Council in writing following a briefing on 25 January 2012. A change is proposed to amend Development Boundary in the vicinity of Mill Street to reflect the extent of the latest flood risk boundary;

3. **WEM012:** Objectors raised a range of concerns about the soundness of this allocation in the context of surface water management and infrastructure capacity;  
**Response:** No changes proposed. The site assessment demonstrates that the site is not subject to flood risk from the River Roden, and the development guidelines in Schedule S17.1a already require measures to address groundwater flood risk which will also help to address existing local surface water management issues. The updated Shropshire Water Cycle Study (2014) indicates that there is adequate

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sewerage network capacity in Wem, but that development of the site will be subject to further hydraulic modelling at planning application stage and sustainable surface water management. The published site assessment process has assessed a range of infrastructure capacity issues, including traffic congestion for both this site and potential alternative sites promoted for development in Wem;

4. **WEM003:** An objector has raised concerns about the soundness of this allocation in the context of the impact of its strategic location on existing traffic management problems in Wem and suggests that alternative directions for growth would be preferable;

**Response:** No changes proposed. The housing growth guideline for Wem has been set at a level significantly below that of previous years (2003-2013). Any housing development in Wem will generate some additional traffic wherever it is located, unless its' occupants choose to avoid the town completely, in which case little benefit will be derived. The housing growth guideline has been reduced twice during the Plan preparation process, to limit impacts on local infrastructure, particularly traffic, whilst also providing the opportunity for a small amount of growth and accompanying infrastructure investment in the town over the period to 2026;

5. **Hadnall:** Several objectors considers that the decision for Hadnall to 'opt out' of taking any development has not taken place on the basis of any objective assessment of the capacity of the settlement to accept further development. The identification of Hadnall as a community hub should be re-examined, to see if it has the capacity to accept further development;

**Response:** No changes proposed. The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target. The development status of Hadnall is the product of extensive community engagement consistent with the principles of localism.

6. **Harmer Hill:** An objector consider that the Plan will fail to deliver sufficient housing for North-East Shropshire and that the guideline for Harmer Hill is not deliverable as there is too little remaining infill opportunity within the settlements of the cluster and they promote a site for allocation to address these issues;

**Response:** No changes proposed. The Council considers that the Plan identifies sufficient Community Hubs and Community Cluster settlements to ensure the delivery of the rural areas housing target and that the Plan policies enable sufficient sites to come forward to meet the housing guidelines for the individual settlements identified, including sites allocated following appropriate assessments and consultations, as set out in the Technical Background Paper (2014), Sustainability Appraisal Report and Consultation Statement. The housing guideline for Harmer Hill is the product of extensive community engagement consistent with the principles of localism. The Council considers that there is sufficient infill potential within the cluster settlements to deliver the identified level of housing growth over the Plan period and no further or alternative site allocations are therefore required;

7. **ELR031:** An objector opposes this allocation in what is considered to be a prominent position on greenfield land due to concerns about landscape impact and noise and light impacts on residential amenity. Existing employment provision is considered to be sufficient to meet need and less damaging alternatives are available. Need for additional office space is undermined by existing vacancy rates and the move towards home working;

**Response:** No changes proposed. The allocation of this site is the culmination of a long process of considering the strategic requirements for the development of Wem over the period up to 2026, identifying and assessing options with regard to an

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evolving evidence base, and consideration of issues arising from consultations. The Council is tasked with putting forward a sound Plan to help to achieve the sustainable growth of the town, identifying sufficient suitable and deliverable sites. Additional employment land is needed to help deliver a better balance between housing and employment in Wem, and to provide a range and choice additional local employment opportunity to help reduce the need to commute out of the town for work. It is considered that the overall proposals for the town strike an appropriate balance.

## **S18 – Whitchurch area**

### **Key Issues & SC Responses:**

- 1. Housing Guideline for Whitchurch**
- 2. Inclusion of land at Mount Farm (WHIT046) for 100 dwellings**
- 3. Over-reliance on land at Tilstock Road (WHIT009)**
- 4. Inclusion of Land at Waymills (WHIT051) for 60 dwellings**
- 5. Exceptional Release of Additional Housing Sites**
- 6. Windfall Allowance**
- 7. HRA**
- 8. Waste Water Capacity**
- 9. Prees Community Cluster**

- 1. Housing Guideline for Whitchurch:** Some objections questioned the housing guideline of 1,200 for Whitchurch. Some suggested that the objectively assessed need hadn't been fully considered and that Whitchurch should accommodate more dwellings. Others suggested the lack of infrastructure and employment means the guideline should be lower.

**Response:** No Change Proposed – The housing guideline of 1,200 dwellings is in line with Core Strategy Policy CS3 and is considered to represent a sustainable figure for the town having considered past development/market trends, the strategy to re-balance the town's employment provision, as well as known infrastructure constraints and the expected lead-in time required to overcome them. Policy MD3 provides flexibility for the identification of further sites where it is considered unlikely housing guidelines for settlements will be met.

- 2. Inclusion of land at Mount Farm (WHIT046) for 100 dwellings:** The majority of responses object to the inclusion of land at Mount Farm (WHIT046) for 100 dwellings. Most of these objections come from residents of Wellfield Way. The objections, which also relate to the detailed layout and design proposed by David Wilson Homes in their outstanding full planning application focus on: the density of the site being too high; insufficient buffering between the proposed houses and existing dwellings on Wellfield Way; landscape/visual impact of the site from North West and Tarporley Road; Access from Haroldgate, especially in poor weather conditions; lack of primary school in walkable distance; and drainage concerns.

**Response:** No Change Proposed - The site has been subject to a technical assessment including consideration of landscape, access and site infrastructure issues. This considered it appropriate in principle for residential development. The site is currently subject to a full planning application, which will consider further the detail of the specific scheme, layout and density and access, amongst other material considerations.

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- 3. Over-reliance on land at Tilstock Road (WHIT009):** One comment relates to the overreliance on this large site and the length of time it will take to develop.

**Response:** No Change Proposed - It is not considered this site represents an overconcentration of development. The delivery of the site is not of concern given the site is subject to a current planning application. Four additional residential allocations to the Tilstock Road site, all of which are considered to be deliverable (or partially deliverable) in the first five years following submission of the plan. This spread of sites will mitigate any potential lead-in delays with the delivery of the Tilstock Road site.

- 4. Inclusion of Land at Waymills (WHIT051) for 60 dwellings:** One comment relates to concerns over development at Waymills (WHIT051/ELR033) due to amenity impact on Mill Park.

**Response:** No Change Proposed - Schedule S18.1a states that the completion of appropriate visual mitigation measures to the eastern and western boundaries of the site will be necessary as part of Phase 1 of development on this site.

- 5. Exceptional Release of Additional Housing Sites:** One objector questioned policy S18's specific reference to long term development opportunities within the A49 on the West of the town.

**Response: Proposed Change:** It is proposed to remove Section 5 of Policy S18 concerning the exceptional release of additional housing land. It is considered this issue is covered adequately in Policy MD3 and therefore does not need repeating. It is also considered the locally specific reference to "land within the A41 by-pass to the west of the town" does not add any additional certainty and can also therefore be removed.

- 6. Windfall allowance:** Two objections from site promoters question the proposed windfall allowance of around 170 dwellings, and consider the delivery of the strategy could be made more certain by the allocation of sites at Wrexham Road (WHIT037) and Chester Road (WHIT005) both for 50 dwellings.

**Response:** No Change Proposed – It is considered the windfall allowance of 167 dwellings is a minimum figure for Whitchurch, but continues to be important to ensure brownfield opportunities are utilised appropriately without the threat of significantly exceeding the overall housing guideline for the town. It is considered the windfall allowance is broadly consistent with past trends and potential opportunities during the plan period, identified in the SHLAA. The range of greenfield site allocations proposed offers choice and flexibility to the market, whilst the windfall allowance will ensure a contribution towards meeting the County wide target of 60% residential brownfield development. Policy MD3 provides flexibility for the identification of further sites where it is considered unlikely housing guidelines for settlements will be met.

- 7. HRA:** Natural England have recommend that additional greenspace provision be provided in new development as a mitigation measure against the potential recreational impacts on Brown Moss SAC/Ramsar, and that this should exceed policy standard of 30m<sup>2</sup> per person.

**Response: Proposed Changes:** A co-ordinated approach has been taken to addressing the issues raised by Natural England with respect to MD12 and to the recommendations arising from the SAMDev HRA. Further detail will be given in a Statement of Common Ground which will be prepared between Shropshire Council and Natural England. Consequent changes to settlement strategies and supporting text have been proposed where relevant and are explained in the Schedule of Responses. The changes to the settlement policies for the Whitchurch area clarify the position with regards to the application of the Habitat Regulations Assessment and the need to ensure suitable mitigation measures within development proposals to ensure protection for the Brown Moss SAC and Ramsar.

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- 8. Waste Water capacity:** Welsh Water have indicated there is insufficient capacity in the sewerage network to accommodate the foul flows generated from sites WHIT009 (Tilstock Road); WHIT021 (Alport Road); and WHIT046 (Mount Farm). It will be necessary to carry out hydraulic modelling assessment to determine the point of contact to the public sewerage and that developers should fund investigations at pre-planning stages.

**Response:** No Change Proposed – Policy MD8 ‘Infrastructure Provision’ is cross referenced in schedule S18.1a as a specific consideration for planning applications on allocated sites. MD8 states that development should only take place where there is sufficient existing infrastructure capacity or where the development includes measures to address a specific capacity shortfall.

- 9. Prees Community Cluster:** One comment relates to the potential to include Lower Heath in the proposed Cluster, whilst another promotes the inclusion of the Heathwood Nurseries site at Higher Heath as a brownfield development opportunity.

**Response:** No Change Proposed – The approach to both the identification of the proposed Prees Community Clusters and allocated sites in Prees have been consistent with localism principles espoused by the NPPF. The removal of Lower Heath from the proposed Cluster was considered in the Revised Preferred Options consultation in July 2013 and received support from the majority of those who responded. The strategy for Higher Heath has reflected the presence of a significant undeveloped brownfield site at Heathwood Road with planning consent for up to 150 new dwellings and associated community facilities, and thus it has been considered appropriate to limit further development in this area to infill development; an approach which has received local support. Policy MD3 provides flexibility for the identification of further sites where it is considered unlikely housing guidelines for settlements will be met.

## **Sustainability Appraisal**

### **Key issues & SC Response:**

- 1. Sustainability issues not properly considered**
  - 2. SA fails to adequately assess alternative options**
  - 3. Levels of delivery in towns and key centres**
  - 4. Issues and Options Summary for Bridgnorth**
  - 5. Environment Agency concerns over flood risk**
  - 6. English Heritage have raised concerns over the identification of sites and heritage assessments**
1. **Sustainability issues not properly considered.** The Coal Authority considers that the Plan is not compliant with NPPF because the SA objectives do not cover unstable land or mineral sterilisation. English Heritage considers that the Plan is not sound as it is unclear how heritage assets have been considered through the site assessment process.

**Response:** No change: The Issue of unstable land is covered by sustainability objective 18. It is considered that development on unstable land offers opportunities for remediation. This is seen as a positive rather than a negative.

The issue of mineral sterilisation is covered in the Stage 2b assessments. These give regard to a Coal Authority Referral Area or a Mineral Safeguarding Area.

The issue raised at the Preferred Options stage is not directly related to the Sustainability Appraisal, but to Policy MD17 Mineral Safeguarding and Policy MD18 Managing Development and Operations of Mineral Sites.

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2. **SA fails to adequately assess alternative options.** The Plan is considered not legally compliant or sound because it fails to consider alternative options for the development management policies and for the identification of hubs and clusters. The suggestion is that the SA should be expanded to include all the villages in Shropshire, not just those which have come forward through community support. It is also thought that development in areas that have not been identified as hubs and clusters should be evaluated. It is thought that the assessment of sites has been done in isolation rather than considered as a whole town. It is felt that the reasons some sites have been chosen over others is not always clear.

**Response:**

The issue concerning hubs and clusters relates to the localism approach followed by Shropshire Council. This determines the scale and distribution of development in the rural areas and allows those communities outside the 18 market towns to *opt-in* to development (via the community hub or community cluster route). This approach creates only two options for rural settlements: they are either a hub/cluster, or they are classed as countryside. Policies CS5, MD7a and MD7b cover countryside settlements. These policies have already been subject to SA, so the non-designation of a settlement as a hub or cluster has not been appraised separately. Conversely, the designation of each hub and cluster has been subject to SA and any future designations will be similarly appraised.

The Core Strategy sets the framework for the development management policies. The Issues and Options stage outlined key policy themes based on the direction set by the Core Strategy. The Issues and Options consultation asked whether there were '*any other policy areas that you think we need to cover?*' Responses to this as well as the Issues and Options SA were taken into account in the preparation of the Draft Development Management Policies, Revised Preferred Options and Final Plan. However, once the Issues and Options stage was complete, policies were refined, developed, subject to SA and consulted on, but alternative approaches to each policy theme were not generated (Table 1 in the Executive Summary illustrates the derivation of the Final Plan policies). This approach to policy preparation is consistent with an iterative and responsive Plan process as envisaged by NPPG paragraphs 17 and 18; '*reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach*' and '*the development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals.*'

Since discretely different policy options for each policy theme did not exist after the Issues and Options stage, the need to carry out SA on alternatives to each policy was not applicable or practical. This is consistent with NPPG paragraph 18 which states that '*reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable*'

3. **Levels of delivery in towns and key centres.** Each town has been assessed separately, with the balance of development between towns not considered. Changing housing levels has not been assessed under SA.

**Response:** See response above

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4. **Issues and Options Summary for Bridgnorth.** Concerns that the summary does not reflect accurately social, economic and environmental factors. The summary contains unsupported assertions regarding the benefits of higher scales of development.

**Response:** No change: Levels of development have been set by Core Strategy policy CS3. Shropshire Council feels that the Sustainability Appraisal objectives for social, economic and environmental factors have been applied appropriately

5. **Environment Agency have raised concerns over flood risk.** Concerns that the outcome of further work on flood risk and waste water infrastructure could have an impact on SA

**Response:** No change: Any significant modifications to the Plan arising from EA concerns will be subject to Sustainability Appraisal.

6. **English Heritage have raised concerns over the identification of sites and heritage assessments.** English Heritage have been unable to assess how the principles of sustainable development have been applied to the sites identified within the Plan and whether alternative sites have been considered. Issue raised as to whether heritage assessments have been undertaken for site allocations.

**Response:** No change: SC has assessed the potential impact of the sites on heritage assets as part of a consistent site assessment process. A full heritage assessment is not possible in the case of a Plan allocation since full details of the development are not available. The principles of sustainable development have been assessed through the site assessment process and through the Sustainability Appraisal Framework.

## **Gypsies and Travellers:**

### **Key issues & SC Response:**

1. **The approach to rural areas in the SAMDev Plan needs to demonstrate compliance with national policy.**
2. **The SAMDev Plan does not allocate new Gypsy and Traveller sites nor facilitate consideration of new site proposals.**
3. **The SAMDev Plan does not implement the objectives of Core Strategy Policy CS12 and the Planning Policy for Travellers Sites and so will be ineffective** – the Plan does not establish pitch targets for gypsies and travellers and plot targets for travelling show people and identify a five years supply of specific identifiable sites with alternative site options. The SAMDev Plan should also provide a further identified provision up to year 15 of the Plan.
4. **the SAMDev Plan is not legally compliant in relation to Gypsy and Traveller Provision** – the Plan has not fulfilled its duties with regard to the Human Rights Act 1998, the Duty to Cooperate with neighbouring local authorities to address the needs of gypsies and travellers and has not adequately considered alternative approaches to addressing the needs of gypsies and travellers as part of the Sustainability Appraisal Regulations.

**Response:** No change proposed to the Gypsy and Traveller Provision in the SAMDev Plan. Gypsy and Traveller provision in the County will be informed by the current review of the Gypsy and Traveller Accommodation Assessment (GTAA, 2014) which is part of a rolling programme updating the GTAA (2008). The current

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GTAA review identifies a justified need for 142 pitches over the immediate 5 year period and describes how the supply of available sites and proposed new pitches exceeds this 5 year requirement on authorised sites. The supply includes a comprehensive programme of improvements at the public site at Park Hall, Oswestry including a committed partial refurbishment and a proposed extension to increase pitch numbers in this significant location on the strategic road network between Shropshire/West Midlands region and the north-west of England and Wales. The baseline supply of sites in the period for years 6 to 10 comprises the excess supply of available and proposed sites (years 6 and 7 approx.) with anticipated turnover on existing sites (equal to 1.25 years approx.) and continuation of windfall development rates. This future supply will be further assessed through the rolling review of the GTAA. This will identify changing needs, the position on available sites and will help identify future provision of new public and private pitches to replenish / roll forward the 5 year supply in Shropshire for years 6 to 10. The adopted Core Strategy Policy CS12 (2011) and the published SPD on Type and Affordability of Housing (2012) set out the guidance on the determination of new site / pitch proposals for Gypsy and Traveller accommodation. This includes the exception test for small sites in the countryside where the applicant was required to show genuine Gypsy status and a 'local' connection to the locality of the proposed new sites / pitches. Recent changes to the national Planning Policy for Traveller Sites (2014) to remove the requirement to show a 'local connection' will introduce even greater flexibility in the determination of proposals for new sites / pitches in Shropshire. This will further support the Core Strategy objectives for Gypsy and Traveller provision and further supplement the accommodation already identified by the revised GTAA (2014). Core Strategy Policy CS12 along with the Type and Affordability of Housing SPD will therefore provide a flexible and proactive approach to Gypsy and Traveller accommodation provision as identified in para 5.26 of Policy CS12. Therefore, no further additions to the policy framework for Gypsy and Traveller provision are considered necessary in the SAMDev Plan. This policy framework is further strengthened by the rolling programme of revisions to the GTAA and the significant supply of site / pitches currently identified. Therefore, no further additions to the existing and proposed supply of sites / pitches are required in the SAMDev Plan beyond any additional windfall provision that might be encouraged by national and strategic policy.

In addition to the provisions in the GTAA (2014) for specific deliverable sites for gypsy accommodation, it is proposed to provide a further Traveller site for a single family relocating from a strategic development site in Oswestry, committed for development as part of the sustainable growth of the town. This family is proposed to be relocated close to their existing site and with ready access to the strategic road network, in a location that will serve their combined needs for storage and operational land and their residential accommodation needs.

The Planning Policy for Traveller Sites, para 9 states that identification of a supply of sites or broad locations for years 11 to 15 is only necessary, where it is possible to identify such provision. The SAMDev Plan will make provision over a 10 year period but will require a review to meet the needs in years 11 to 15 beyond the current Plan period. It is therefore expected that provision of Gypsy and Traveller accommodation in years 11 to 15 will be addressed in the rolling programme of 5 year reviews of the GTAA to inform the next Local Plan for Shropshire.

## **Duty to Co-operate**

### **Key issues & SC Response:**

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A number of representations stated that the Plan could not be considered legally compliant as no evidence regarding compliance with the Duty to Co-operate had been published.

**Response:** - A Duty to Co-operate Statement demonstrating compliance with the relevant regulations will be submitted alongside the SAMDev Plan.

### **Statement of Community Involvement**

#### **Key issues & SC Response:**

##### **1. Community Involvement**

A number of representations stated that the Plan could not be considered legally compliant since they allege that the community has not had sufficient opportunity to contribute as described in the Council's adopted Statement of Community Involvement (SCI).

**Response:** No changes proposed. The Council considers that it has met the requirements of the statutory Plan-making processes including providing the necessary opportunities for the making of representations and has made extensive efforts to engage with local communities and stakeholders in the preparation of the Plan consistent with the approach identified in tables 4.2 and 4.3 its SCI. The fact that not all parties agree with the outcome of the Plan-making decisions by the Local Planning Authority does not mean that it has not consulted appropriately, considered the issues and reached a balanced view on the way forward;.

### **Environment Agency**

#### **Key issues & SC Response:**

- 1. Water Evidence:** The Environment Agency are concerned that the Plan may not be based on adequate evidence from an updated Water Cycle Study and that this may have implications for the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the Plan.

**Response:** Evidence on flood risk is constantly being refined and updated as more detailed modelling work is undertaken. In accordance with the NPPF requirement to keep the evidence base up to date, a further update to the SFRA is being undertaken which incorporates the latest fluvial and pluvial data and provides an assessment of ordinary watercourses and climate change. The Council considers that if the Plan were to be altered, resulting in significant changes, the Sustainability Appraisal Report and HRA would be amended accordingly