

Shropshire Council Response:

Matter 3 – Development Strategy (Policies SP1 – SP15)

Issue

Whether the Development Strategy is justified, effective and consistent with national policy.



Questions

Question 1. How do the strategic policies in the Local Plan accord with paragraphs 20-23 of the Framework?

Shropshire Council Response:

- 1.1. Shropshire Council considers that the strategic policies within the draft Shropshire Local Plan accord with Paragraphs 20-23 of the National Planning Policy Framework (NPPF).
- 1.2. Table 1.1 below demonstrates how each of the draft strategic policies are consistent with Paragraphs 20 and 21 of the NPPF:

Table 1.1: Strategic Policies' Consistency with Paragraph's 20 and 21 of the NPPF

Strategic Policy	Paragraph 20	Paragraph 21*
SP1: The Shropshire Test	Establishes those issues and objectives considered of most importance in supporting Shropshire's growth to occur in a sustainable manner. These objectives inform and form part of the overall strategy for Shropshire.	It is considered necessary to address the strategic priorities of the area as it identifies the strategic objectives underpinning the draft vision and supporting Shropshire growth to occur in a sustainable manner.
SP2: Strategic Approach	Establishes the 'core' of the spatial strategy for the level and distribution of development – which is expanded upon within the wider draft Policies. This spatial strategy make sufficient provision for various forms of development (including housing, employment, retail, leisure and other commercial development, infrastructure, and community facilities); positively contributes to the consideration and enhancement of the natural, built, and historic environment; and will result in a sustainable pattern of development.	It is considered necessary to address the strategic priorities of the area as it identifies the 'core' of the spatial strategy for the level and distribution of development across Shropshire, which it is considered will contribute to achieving sustainable development and the long term sustainability of Shropshire.
SP3: Climate Change	Establishes a clear and overarching strategy to support the transition to a zero-carbon economy in Shropshire. This is a key component of the overall spatial strategy, influencing development patterns, scale and design quality.	It is considered necessary to address the strategic priorities of the area as it identifies the overarching strategy to support the transition to a zero-carbon economy in Shropshire.
SP4: Sustainable Development	<i>See response to Question 10 of Matter 3.</i>	<i>See response to Question 10 of Matter 3.</i>
SP5: High-Quality Design	Establish clear and overarching strategies for high-quality design and the health and wellbeing of individuals, communities and places respectively. These are key components of the overall spatial strategy, in the context of design quality of places.	Considered necessary to address the strategic priorities of the area as it identifies the strategy for the 'design quality of places', including through the identification of key strategic design considerations and the and wellbeing of individuals, communities and places including through the
SP6: Health and Wellbeing		

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Strategic Policy	Paragraph 20	Paragraph 21*
		identification of key strategic health and wellbeing considerations, respectively.
SP7: Managing Housing Development	Forms part of the spatial strategy for the level and distribution of development – providing mechanisms to manage housing delivery.	It is considered necessary to address the strategic priorities of the area as it provides the mechanisms to manage the delivery of housing and thereby underpins and forms part of the achievement of the overarching spatial strategy.
SP8: Managing Development in Community Hubs	Form part of the spatial strategy for the level and distribution of development – specifically providing the overarching strategy for managing development in Community Hubs, Community Clusters, the wider rural area, and Green Belt/safeguarded land respectively.	Considered necessary to address the strategic priorities of the area, providing detailed strategies for the management of development within Community Hubs, Community Clusters, the wider rural area, and Green Belt/safeguarded land respectively, which are key components of the overarching spatial strategy for the level and distribution of development.
SP9: Managing Development in Community Clusters		
SP10: Managing Development in the Countryside		
SP11: Green Belt and Safeguarded Land		
SP12: Shropshire Economic Growth Strategy	Establish the clear and overarching strategy for economic development and provides the mechanisms to manage the delivery of economic development. These are key component of the overarching spatial strategy.	Considered necessary to address the strategic priorities of the area, providing a strategy for economic development in Shropshire and mechanisms to manage the delivery of economic development. These are key components of the overarching spatial strategy for the level and distribution of development.
SP13: Delivering Sustainable Economic Growth and Enterprise		
SP14: Strategic Corridors		
SP15: Whole Estate Plans	Identifies the strategic considerations when preparing WEPs, within the context of the overall spatial strategy. <i>See response to Question 20 of Matter 3.</i>	Significant areas of land in Shropshire are owned by Estates and as such it is recognised that these Estates have the potential to play an important role in the long-term management of land within the County. <i>See response to Question 20 of Matter 3.</i>
SP16: Strategic Planning for Minerals	Establishes a clear and overarching strategy for planning for minerals and waste management infrastructure respectively, in the context of the overall spatial strategy.	Considered necessary to address the strategic priorities of the area, providing a strategy for minerals and waste management infrastructure in the context of the overarching spatial strategy.
SP17: Waste Management Infrastructure		

*General matters applicable to all policies addressed below.

- 1.3. With regard to Paragraph 21 of the NPPF, in addition to the information provided within Table 1.1 above, Shropshire Council considers that the format of the draft Shropshire Local Plan clearly identifies draft Policies SP1-SP17 as 'Strategic' Policies. Furthermore, it is considered that in combination, the draft strategic policies provide a clear framework for subsequent and more applied development management, settlement and strategic site policies, and that the draft strategic policies do not extend to matters more appropriately addressed within non-strategic policies.
- 1.4. With regard to Paragraph 22 of the NPPF, the draft Shropshire Local Plan, including all of the proposed strategic policies, covers the period to 2038. It is considered that this period is sufficient to allow for the draft Shropshire Local Plan to look forward 15 years from its adoption and to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 1.5. The draft Shropshire Local Plan is subject to the transitional arrangements set out in Annex 1 of the NPPF regarding the expectation that where proposals involve larger scale development: *'policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.'*
- 1.6. With regard to Paragraph 23 of the NPPF:
 - a. The draft Shropshire Local Plan is accompanied by a Policies Map which illustrates geographically the proposed land use designations and allocations within the draft Shropshire Local Plan.
 - b. The draft strategic policies provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to achieve the proposed housing and employment land requirements. These requirements meet objectively assessed needs, deliver identified strategic priorities, and contribute to achieving both sustainable development and the long-term sustainability of Shropshire over the proposed plan period. In particular:
 - i. Draft Policy SP2 provides the 'core' of the spatial strategy for the level and distribution of development.
 - ii. Draft Policy SP7 provides mechanisms to manage housing development.
 - iii. Draft Policies SP8 and SP9 provide the overarching strategy for the management of development within Community Hubs and Community Clusters respectively.
 - iv. Draft Policies SP10 and SP11 provide the overarching strategy for the management of development within the

wider rural area and Green Belt/safeguarded land respectively.

- v. Draft Policies SP12, SP13 and SP14 provide the overarching strategy for economic development and the mechanisms to manage economic development.
- vi. Draft Policies SP16 and SP17 provide the overarching strategy for minerals and waste management infrastructure and the management of these forms of development respectively.

Question 2. Does Policy SP1 include criteria to assess development proposals against? Does it replicate other policies in the Local Plan? Is it necessary and effective?

Shropshire Council Response:

Does Policy SP1 include criteria to assess development proposals against?

- 2.1. Draft Policy SP1 is a 'gateway' policy which establishes those issues and objectives considered of most importance in enabling Shropshire's growth to occur in a sustainable manner.
- 2.2. As a strategic policy, its primary purpose is to contribute to the establishment of the overall strategy for the pattern, scale and design quality of places, consistent with the requirements of Paragraph 20 of the National Planning Policy Framework (NPPF). It also establishes a clear starting point for the detailed development and settlement policies of the draft Shropshire Local Plan, consistent with the requirements of Paragraph 21 of the NPPF.
- 2.3. However, in so doing, it does provide specific high-level criteria/policy requirements against which development proposals can be assessed, which will contribute to the achievement of the objectives within the draft policy itself and the implementation of the overall strategy for Shropshire.
- 2.4. These high-level criteria/policy requirements are then appropriately expanded upon within other policies of the draft Shropshire Local Plan.

Does it replicate other policies in the Local Plan?

- 2.5. Shropshire Council does not consider that draft Policy SP1 replicates the requirements of other draft policies within the draft Shropshire Local Plan; rather it provides the starting point for the more detailed development and settlement policies of the draft Shropshire Local Plan, consistent with Paragraph 21 of the NPPF.

Is it necessary and effective?

- 2.6. Shropshire Council considers that the content of draft Policy SP1 is both necessary and effective. Specifically:
- a. The draft policy is considered necessary as it forms an important component of the “*overall strategy for the pattern, scale and design quality of places*” consistent with the expectations of Paragraph 20 of the NPPF. It also establishes a “*clear starting point*” for the detailed development and settlement policies of the draft Shropshire Local Plan consistent with the expectations of Paragraph 21 of the NPPF.
 - b. The draft policy is considered effective as there is a clear mechanism for its implementation and in securing its implementation it will contribute towards achieving sustainable and well-designed development. Specifically, the draft policy is implementable as it includes high-level criteria/policy requirements against which development proposals can be assessed, which are then appropriately expanded upon within the detailed policy requirements of a number of the development and settlement policies of the draft Shropshire Local Plan.

Question 3. What is the basis for the overall spatial strategy and broad distribution of growth set out in Policy SP2? What options were considered and why was this chosen?

Shropshire Council Response:

What is the basis for the overall spatial strategy and broad distribution of growth set out in Policy SP2?

- 3.1. The proposed spatial strategy for the level and distribution of development (spatial strategy) is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan, and then expanded upon within the wider draft Policies of the draft Shropshire Local Plan.
- 3.2. The Council has provided a comprehensive summary of the residential components of the proposed spatial strategy within Paragraphs 2.7-2.18 of the Housing Topic Paper (**GC4i**).
- 3.3. The Council has also provided a comprehensive summary of the employment components of the proposed spatial strategy within Paragraphs 3.1-3.6, 4.1-4.52, 7.1-7.28 of Chapters 3, 4 and 7 of the Employment Strategy Topic Paper (**GC4n**).
- 3.4. In summary, the identification of the proposed spatial strategy has been informed by an iterative process, involving careful

consideration of the proportionate and robust evidence base and the responses to the five Regulation 18 'Plan Making' consultations undertaken to inform the Shropshire Local Plan Review.

- 3.5. Key components of the evidence base that has informed the proposed spatial strategy are the Sustainability Appraisal (**SD006.01-SD006.22**), the Habitats Regulations Assessment (**SD008.01-SC008.03**), and Equality and Social Inclusion Impact Assessment (**SD010**). These documents both inform and assess proposals. They have been prepared for each stage of the draft Plan process using an iterative process reflecting that undertaken to develop the Plan itself.
- 3.6. Other important components of this evidence base included the Local Housing Need Assessment (**EV069**), the Strategic Housing Market Assessment (SHMA) Part 1 and Part 2 (**EV097.01** and **EV097.02**), the Shropshire Economic Growth Strategy (**EV044**), the Economic Development Needs Assessment (EDNA) (**EV043**), the Town Centres Study (**EV114**), the Hierarchy of Settlements (**EV060**), the Strategic Land Availability Assessment (SLAA) and wider Site Assessment Process (**EV106.01-EV106.10** and **SD006.03-SD006.22**), the Place Plans (**EV067.01-EV067.18**), and the Infrastructure and Investment Plan (**GC4t**).
- 3.7. Dealing with 'level' and 'distribution' in turn:
- 3.8. With regard to the 'level' of development within the proposed spatial strategy, draft Policy SP2 specifies that over the proposed plan period from 2016 to 2038, around 30,800 new dwellings (the proposed housing requirement) and around 300 ha of employment land (the proposed employment land requirement) will be delivered. This equates to around 1,400 dwellings and around 14ha of employment land per annum. It also explains that new development will be supported by necessary infrastructure and be of a high-quality which positively responds to its setting, local needs and our changing climate.
- 3.9. Paragraph 3.6 of the explanation to draft Policy SP2 summarises the considerations that informed the proposed housing requirement. These include supporting the "*long-term sustainability of the County*" and "*meet housing need*". The latter has been calculated using the Government's standard methodology and is summarised within the Local Housing Need Assessment (2020) (**EV069**).
- 3.10. Paragraph 3.7 of the explanation to draft Policy SP2 then explains that the proposed housing requirement includes a contribution of up to 1,500 dwellings towards the unmet housing

need forecast to arise within the Black Country (agreed within the Statement of Common Ground with the Black Country Authorities (**EVO41**)).

- 3.11. Paragraph 3.17 of the explanation to draft Policy SP2 summarises the considerations that informed the proposed employment land requirement. Paragraph 3.18 of the explanation to draft Policy SP2 then explains that the proposed employment land requirement includes a contribution of up to 30ha towards the unmet housing need forecast to arise within the Black Country (as agreed in the Statement of Common Ground with the Black Country Authorities (**EVO41**)).
- 3.12. With regard to the 'distribution' of development within the proposed spatial strategy, draft Policy SP2 explains that a core principle is 'urban focus', by which the majority of residential development will be directed into identified 'urban' areas. These urban areas are:
- a. Shrewsbury, the proposed Strategic Centre of Shropshire;
 - b. The five proposed Principal Centres and 11 proposed Key Centres of Shropshire;
 - c. The two new proposed Strategic Settlements in Shropshire; and
 - d. The proposed Strategic Site of RAF Cosford in Shropshire.
- 3.13. However, recognising that Shropshire is predominantly a rural county, and that the long-term sustainability of rural communities is vital, development in urban areas will be positively complemented by appropriate new development within proposed Community Hubs and to a lesser extent Community Clusters¹. Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification.
- 3.14. This proposed approach to the distribution of development is summarised in paragraphs 3.22-3.25 of the explanation to draft Policy SP2 and further expressed by the wider draft policies.
- 3.15. Shropshire Council also considers that the overall spatial strategy meets the requirements of the National Planning Policy Framework (NPPF). In particular:
- a. Consistent with Paragraphs 20 and 21 of the NPPF, it sets out an overall strategy for the pattern, scale and design quality of places, which are then expanded upon within the wider policies of the draft Shropshire Local Plan.

¹ Community Clusters reflect Shropshire Council's positive approach to localism. As communities with aspirations maintain or enhance their sustainability can 'opt-in' to take an appropriate proportion of development, managed through a proposed policy mechanism (draft Policy SP9).

- b. Consistent with Paragraphs 7-11, 20, 23 and 60-61 of the National Planning Policy Framework, the proposed housing requirement is sufficient to meet local housing need (as calculated using Governments Standard Methodology – see document **EV069**). It has also been informed by proactive engagement and duty to cooperate discussions with adjoining and closely related Local Planning Authorities and incorporates the 1,500 dwelling contribution towards the unmet housing need forecast to arise within the Black Country – further information on this process is provided earlier in this response.
- c. Consistent with Paragraphs 81-85, it sets out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, will support economic growth and productivity, contributes to addressing barriers to investment and is sufficiently flexible to respond to changing needs. It will also help create the conditions in which businesses can invest, expand and adapt, recognises the locational requirements of different sectors, and supports appropriate rural employment development which will contribute to a prosperous rural economy.
- d. Consistent with Paragraph 86, it will support the role that town centres play at the heart of local communities.
- e. Consistent with Paragraph 34, its sets the framework for the provision of the infrastructure necessary to support development.

What options were considered and why was this chosen?

- 3.16. The Council has provided a comprehensive summary of the process undertaken to establish the proposed spatial strategy for the level and distribution of residential development within Paragraphs 2.20-2.103 of Chapter 2 of the Housing Topic Paper (**GC4i**).
- 3.17. The Council has also provided a comprehensive summary of the process undertaken to establish the proposed spatial strategy for the level and distribution of employment development within Paragraphs 3.1-3.6, 4.1-4.52, 7.1-7.28 of Chapters 3, 4 and 7 of the Employment Strategy Topic Paper (**GC4n**). The summary of the process to establish the proposed spatial strategy for the level and distribution of employment development is supported by the Employment (Requirement) Topic Paper (**EV112**).
- 3.18. The proposed strategy for the 'level' of residential development and employment land, was identified through an iterative process, informed by careful consideration of best available evidence, technical assessments and extensive consultation.

- 3.19. At each stage of this iterative process a Sustainability Appraisal (**EV003.03, EV004.03, EV005.03.01-EV005.03.02, EV006.03, EV007.04.01-EV007.04.21** and **SD006.01-SD006.22**), Habitats Regulations Assessments (**EV003.05, EV004.05.01-EV004.05.02, EV005.05.01- EV005.05.04, EV006.05, EV007.06.01-EV007.06.03** and **SD008.01-SD008.03**) and Equality and Social Inclusion Impact Assessments (**EV003.07, EV004.07, EV005.07, EV006.07, EV007.08** and **SD010**) were undertaken (technical assessments). These documents both inform and assess proposals.
- 3.20. Proposals at each stage of this iterative process were also informed by consideration of relevant policy objectives, including:
- a. delivery of affordable housing, which is a key priority in Shropshire;
 - b. housing needs of other groups within the community, particularly older people given the demographics of Shropshire;
 - c. the objective to deliver a step change in the economic growth and productivity of the Shropshire economy;
 - d. the intention to pursue a broad-based strategy to promote the growth of the local economy;
 - e. the intention to identify major employment sites and growth corridors to provide specific development opportunities;
 - f. the delivery of a plan led approach to achieving sustainable development through the Local Plan Review process.
- 3.21. A summary of the key stages and options considered is as follows.
- 3.22. Initially, three options for the 'level' of residential development and employment land were identified and were the subject of consultation within the Issues and Strategic Options document (**EV003.01**).
- 3.23. For residential development, these options were termed:
- a. 'Moderate Growth' (equating to around 1,325 dwellings per annum);
 - b. 'Significant Growth' (equating to around 1,375 dwellings per annum); and
 - c. 'High Growth' (equating to around 1,437 dwellings per annum).
- 3.24. For employment land, these options were termed:
- a. Economic Option 1: Significant Growth – to continue the current strategy in the adopted Local Plan maintaining the current level of aspiration, rolling forward the existing employment land requirement, providing a comparable level

of employment land to the adopted Local Plan and delivering a similar level of new jobs;

- b. Economic Option 2: High Growth - to establish a revised strategy to deliver a higher level of aspiration in the draft Shropshire Local Plan supported by an appropriate employment land requirement but providing a greater supply of employment land and delivering a higher level of new jobs;
 - c. Economic Option 3: Productivity Growth - to establish a new strategy that captures the potential for new investment in Shropshire, to influence the structure of the local economy, improve the productivity of its sectors and the range, type and quality of new employment. This would create a higher aspiration, providing more 'higher value' jobs whilst setting a lower employment land requirement with potentially, a lower overall provision of new jobs.
- 3.25. These options were informed by the aforementioned technical assessments and relevant policy objectives. They were also informed by consideration of the available evidence, including: the Full Objectively Assessed Housing Need (FOAHN) for Shropshire (assessment published in July 2016)², the objectives of the emerging Shropshire Economic Growth Strategy (published April 2017) (**EV044**) and initial productivity growth forecasts (**EV090**).
- 3.26. Preferred options for the 'level' of residential and employment land were subsequently identified and were the subject of consultation within the Preferred Scale and Distribution of Development document (**EV004.01**).
- 3.27. The preferred option for the 'level' of residential development was termed 'High Growth' (equating to around 1,437 dwellings per annum). The preferred option for the 'level' of employment land was termed 'balanced' employment growth (equating to around 15ha of employment land per annum).
- 3.28. These preferred options were informed by careful consideration of the responses received to the Issues and Strategic Options document, the aforementioned technical assessments and relevant policy objectives, and consideration of all available evidence, including: the Full Objectively Assessed Housing Need (FOAHN) for Shropshire (assessment published in July 2016)³ and consideration of Government's newly proposed standard methodology for calculating housing need, the Shropshire Economic Growth Strategy (**EV044**), initial productivity growth

² Superseded by the Local Housing Need Assessment (EV069).

³ As this has since been superseded, this document has not been submitted as part of the evidence base for the draft Shropshire Local Plan.

forecasts prepared by Oxford Economics (**EV090**) and Business Grow On Space report (**EV017**).

- 3.29. The proposed 'levels' of residential development and employment land (known as the housing requirement and employment land requirement respectively) were identified within the Regulation 18 Pre-Submission document (**EV007.01**).
- 3.30. The proposed housing requirement equated to around 30,800 dwellings (around 1,400 dwellings per annum). The proposed employment land requirement equated to around 300ha (around 15ha per annum which subsequently corrected to around 14ha per annum).
- 3.31. These proposed requirements were informed by careful consideration of the responses received to all previous stages of consultation undertaken as part of the Local Plan Review, the aforementioned technical assessments and relevant policy objectives, and consideration of all available evidence, including: Local Housing Need calculated using Government's proposed standard methodology for calculating housing need (**EV069**), consideration of the Strategic Housing Market Assessment (SHMA) (**EV097.01** and **EV097.02**), the Shropshire Economic Growth Strategy (**EV044**), initial productivity growth forecasts (**EV090**) and Business Grow On Space report (**EV017**), and the emerging Economic Development Needs Assessment (EDNA) (**EV043**).
- 3.32. Duty to cooperate discussions with adjoining and closely related Local Planning Authorities were also considered, in particular those with the Black Country Authorities, with which a potential contribution of up to 1,500 dwellings toward unmet housing need was agreed⁴.
- 3.33. To inform the preparation of the Regulation 19: Pre-Submission Draft Shropshire Local Plan, careful consideration was given to the responses to all previous stages of consultation, the evidence base prepared to inform the Local Plan Review, the aforementioned policy objectives and technical assessments, and other relevant information available.
- 3.34. It was ultimately concluded that a proposed housing requirement equating to around 30,800 dwellings (around 1,400 dwellings per annum) and a proposed employment land requirement equating to around 300ha (around 14ha per annum) were appropriate.
- 3.35. These proposals were the subject of consultation. Representations were carefully considered before the decision was made to seek full Council approval to submit the Draft Local Plan for examination.

⁴ Further information on this subject is provided within Chapter 3. Association of Black Country Authorities Unmet Housing Need of this Housing Topic Paper.

3.36. The proposed strategy for the distribution of development was identified through an iterative process, informed by careful consideration of best available evidence, technical assessments and extensive consultation. A summary of the key stages and options considered is provided within Figure 3.1:

Figure 3.1: Key Stages in Identifying the Proposed Strategy for the Distribution of Development

Stage of Consultation	Proposals relating to the distribution of development	Key considerations
<p>Regulation 18: Issues and Strategic Options</p>	<p>- Three potential options for the distribution of development within three general categories of settlement. These were:</p> <p>Option A: 'Current Policy - Rural Rebalance': This option provides a continuation of the current Core Strategy Policy CS1. This option is most closely aligned with actual levels of housing delivery seen over the previous 10 years and represents the aspiration for 'rural rebalance' as advocated in the Core Strategy and SAMDev. Monitoring shows that the current policy framework is working effectively.</p> <p><i>Levels of development would equate to 25% of development in Shrewsbury; 40% of development in the Market Towns and Key Centres; and 35% of development in the rural area.</i></p> <p>Option B: 'Urban Focus': This option provides a greater focus for growth around Shrewsbury and the market towns and key centres, with around 75% of growth to these areas. Whilst the rural area would continue to accommodate some growth, this would be at a level below current policy and past trends.</p> <p><i>Levels of development would equate to 30% of development in Shrewsbury; 45% of development in the Market Towns and Key Centres; and 25% of development in the rural area.</i></p> <p>Option C: 'Balanced Growth': This option effectively provides a middle ground between Options A and B, balancing needs and opportunities across the urban and rural areas. Compared to current policy, this option would accommodate more growth in Shrewsbury and less in the rural areas, but would maintain a similar rate of growth in the market towns and key centres.</p> <p><i>Levels of development would equate to 30% of development in Shrewsbury; 40% of development in the Market Towns and Key Centres; and 30% of development in the rural area.</i></p> <p>- As initial methodology for the 'Hierarchy of Settlements' Assessment was also identified.</p>	<p>- The adopted Local Plan.</p> <p>- Initial evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, national policy and guidance, the principles of sustainable development, and potential policy objectives.</p> <p>- Technical assessments including the Sustainability Appraisal (EV003.03), Habitats Regulations Assessment (EV003.05) and Equality and Social Inclusion Impact Assessment (EV003.07).</p>

Stage of Consultation	Proposals relating to the distribution of development	Key considerations
<p>Regulation 18: Preferred Scale and Distribution of Development</p>	<ul style="list-style-type: none"> - Preferred option for the distribution of development within three general categories of settlement. This involved an 'Urban Focused' distribution of development: <ul style="list-style-type: none"> >Shrewsbury – around 30% >Principal Centres – around 24.5% >Key Centres – around 18% >Rural Areas – around 27.5% With development at strategic sites such as Ironbridge Power Station and Clive Barracks, and potential new Garden Village settlements in strategic locations. - Proposed settlement hierarchy. - Proposed residential development and employment land guideline for each of the proposed Strategic, Principal and Key Centres. - Proposed approach to managing development within proposed Community Hubs, proposed Community Clusters and the wider rural area. 	<ul style="list-style-type: none"> - Consultation responses to the previous Issues and Strategic Options Consultation (summarised in EV003.02). - Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics / constraints / opportunities of specific settlements, our understanding of the importance of ensuring the long term vitality and sustainability of communities, the initial Hierarchy of Settlements Assessment, national policy and guidance, the principles of sustainable development, and potential policy objectives. - Technical Assessments including the Sustainability Appraisal (EV004.03), Habitats Regulations Assessment (EV004.05.01 and EV004.05.02) and Equality and Social Inclusion Impact Assessment (EV004.07).
<p>Regulation 18: Preferred Sites</p>	<ul style="list-style-type: none"> - Refinement of the proposed settlement hierarchy. - Proposed strategy (including where appropriate, proposed allocations) for achieving proposed residential development and employment land guidelines for proposed Strategic, Principal and Key Centres. - Proposed residential development guidelines for updated proposed Community Hubs. - Proposed strategy (including where appropriate, proposed allocations) for achieving the proposed residential development guidelines for the updated proposed Community Hubs. 	<ul style="list-style-type: none"> - All previous consultation responses (summarised in EV003.02 and EV004.02). - Evidence including an updated Hierarchy of Settlements Assessment, data for specific settlements, characteristics / constraints / opportunities of specific settlements, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and comprehensive site assessments. - Technical Assessments including the Sustainability Appraisal (EV005.03.01 - EV005.03.02), Habitats Regulations Assessment (EV005.05.01 and EV004.05.06) and Equality and Social Inclusion Impact Assessment (EV005.07).

Stage of Consultation	Proposals relating to the distribution of development	Key considerations
<p>Regulation 18: Strategic Sites</p>	<p>- Potential strategic sites that could complement strategies for existing settlements.</p>	<p>- All previous consultation responses (summarised in EV003.02, EV004.02 and EV005.02 (including EV005.02.01- EV005.02.18)).</p> <p>- Available evidence, including comprehensive site assessments.</p> <p>- Technical Assessments including the Sustainability Appraisal (EV006.03), Habitats Regulations Assessment (EV006.05) and Equality and Social Inclusion Impact Assessment (EV006.07).</p>
<p>Regulation 18: Pre-Submission Draft of the Shropshire Local Plan</p>	<p>-Proposed strategy for the distribution of development.</p> <p>‘Urban focus’, by which the majority of development will be directed into identified ‘urban’ areas:</p> <ol style="list-style-type: none"> Shrewsbury (Strategic Centre); 5 proposed Principal Centres and 11 proposed Key Centres; Two proposed Strategic Settlements and the proposed Strategic Site. <p>Complemented by appropriate new development within the proposed Community Hubs and to a lesser extent Community Clusters.</p> <p>Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification.</p> <p>-Refinement of the proposed settlement hierarchy.</p> <p>- Refinement of the proposed residential development and employment land guidelines, strategies for achieving them (including where appropriate, proposed allocations) for Strategic, Principal and Key Centres.</p> <p>- Refinement of the proposed residential development guidelines, strategies for achieving them (including where appropriate, proposed allocations) for updated proposed Community Hubs.</p> <p>-Refinement of the proposed approach to managing development within proposed Community Clusters and the wider rural area.</p>	<p>- All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01- EV005.02.18), and EV006.02).</p> <p>- Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics / constraints / opportunities of specific settlements, a further updated Hierarchy of Settlements Assessment, comprehensive site assessments, national policy and guidance, the principles of sustainable development, and potential policy objectives.</p> <p>- Technical Assessments including the Sustainability Appraisal (EV007.04.01- EV007.04.21), Habitats Regulations Assessment (EV007.06.01- EV007.06.03) and Equality and Social Inclusion Impact Assessment (EV007.08).</p>

Stage of Consultation	Proposals relating to the distribution of development	Key considerations
<p>Regulation 19: Pre-Submission Draft of the Shropshire Local Plan</p>	<p>- Proposed strategy for the distribution of development. 'Urban focus', by which the majority of development will be directed into identified 'urban' areas:</p> <ol style="list-style-type: none"> a. Shrewsbury (Strategic Centre); b. 5 proposed Principal Centres and 11 proposed Key Centres; c. Two proposed Strategic Settlements and the proposed Strategic Site. <p>Complemented by appropriate new development within the proposed Community Hubs and to a lesser extent Community Clusters. Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification.</p> <p>-Refinement of the proposed settlement hierarchy. - Refinement of the proposed residential development and employment land guidelines, strategies for achieving them (including where appropriate, proposed allocations) for Strategic, Principal and Key Centres. - Refinement of the proposed residential development guidelines, strategies for achieving them (including where appropriate, proposed allocations) for updated proposed Community Hubs. -Refinement of the proposed approach to managing development within proposed Community Clusters and the wider rural area</p>	<p>- All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02 and EV007.03).</p> <p>- Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics / constraints / opportunities of specific settlements, a further updated Hierarchy of Settlements Assessment, comprehensive site assessments, national policy and guidance, the principles of sustainable development, and potential policy objectives.</p> <p>- Technical Assessments including the Sustainability Appraisal (SD006.01-SD006.21), Habitats Regulations Assessment (SD008.01-SD008.03) and Equality and Social Inclusion Impact Assessment (SD010).</p>
<p>Submission</p>		<p>- All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02, EV007.03).</p> <p>- The representations to the Regulation 19 consultation (summarised in SD014.01 and SD014.02).</p>

- 3.37. In conclusion, the identification of the proposed spatial strategy has been informed by an iterative process, involving careful consideration of the proportionate and robust evidence base and the responses to the five Regulation 18 'Plan Making' consultations undertaken to inform the Shropshire Local Plan Review.
- 3.38. The Council considers that the proposed spatial strategy reflects the principles of sustainable development as; it will help to build a strong, responsive and competitive economy; support strong, vibrant and healthy communities; and protect and enhance our natural, built and historic environment.
- 3.39. In so doing it will make sufficient provision for various forms of development (including housing, employment, retail, leisure and other commercial development, infrastructure, and community facilities). It will positively contribute to the consideration and enhancement of the natural, built, and historic environment. It will result in a sustainable pattern of development where the majority of development occurs within the urban areas with the most extensive range of services, facilities and infrastructure to support new development but also allows appropriate and complementary development within the rural areas (particularly Community Hubs and Community Clusters) to support the long-term sustainability of rural communities.
- 3.40. Shropshire Council strongly believes that the proposed spatial strategy will positively contribute to the achievement of sustainable development and the long-term sustainability of Shropshire. It is also considered to directly respond to the unique and varied characteristics of Shropshire and the needs of our diverse communities.

Question 4. Should Policy SP2 define the scale of development expected in the various urban locations and rural settlements?

Shropshire Council Response:

- 4.1. The proposed spatial strategy for the level and distribution of development across Shropshire is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan. This proposed strategy is then expanded upon within the wider draft Policies of the draft Shropshire Local Plan.
- 4.2. In establishing the 'core' of the proposed spatial strategy for the level and distribution of development across Shropshire, draft Policy SP2 identifies the overarching strategy for the distribution of development. Schedules SP2.1, SP2.2 and SP2.3 then identify the settlements in each of the proposed 'settlement categories'

which form part of the strategy for the distribution of development.

- 4.3. The draft settlement policies (S1-S21) further expand on this, identifying:
 - a. The specific levels of residential development proposed within each settlement⁵; and
 - b. The proposed strategy for achieving the levels of development proposed within each settlement⁵.
- 4.4. Shropshire Council considers that this approach is both consistent with national policy and pragmatic, having regard to the size and diverse nature of Shropshire and its settlements.
- 4.5. In particular, it is considered that this approach is consistent with Paragraphs 20, 21, 22 and 23 of the National Planning Policy Framework (NPPF) which address strategic policies. The strategic policies of the draft Shropshire Local Plan:
 - a. Set out the overall strategy for the pattern and scale of development which is considered to make sufficient provision for various forms of development, supporting infrastructure and conservation of the natural, built and historic environment.
 - b. Provide a clear starting point for the non-strategic policies.
 - c. Do not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.
 - d. Looks ahead over a minimum 15 year period from adoption.
 - e. Alongside other draft strategic policies provides a clear strategy for bringing forward land to meet the identified local housing need.
- 4.6. As such, it is not considered necessary for draft Policy SP2 to define the scale of development expected in the various urban locations and rural settlements. It is considered that this is effectively and consistently addressed within the settlement policies (S1-S21), alongside the detailed strategy for achieving the level of development proposed within each settlement.
- 4.7. However, if it is the Planning Inspectors' view that the inclusion of the proposed residential development guidelines for settlements within Schedules SP2.1-SP2.2 would be clearer, then Shropshire Council would have no objection to considering this as a modification.

⁵ The exception is the proposed Community Clusters, where it is not considered necessary to identify a proposed residential development guideline. The proposed strategies for proposed Community Clusters therefore seeks to support the achievement of sustainable development.

Question 5. The spatial strategy in the Core Strategy has a rural focus, while the submitted Local Plan's spatial strategy is urban focussed. The latter holds a list of 'saved sites' in appendix 2 which the Council intends to rely upon to meet the new spatial strategy and development requirements. Do the 'saved sites' accord with the spatial distribution of the submitted Local Plan? What will be the policy basis for these 'saved sites'? By relying upon such an approach, is the Local Plan positively prepared, justified, effective and consistent with national policy?

Shropshire Council Response:

Do the 'saved sites' accord with the spatial distribution of the submitted Local Plan?

- 5.1. Shropshire Council has provided a detailed summary of its approach to proposed 'saved' site allocations within the document **GC4** -specifically paragraphs 188-232.
- 5.2. The Council has also provided a comprehensive summary of the process of establishing the proposed spatial strategy for the level and distribution of development within Chapter 2 of the Housing Topic Paper (**GC4i**).
- 5.3. The role of the proposed 'saved' site allocations in this process can be summarised as follows:
- 5.4. The proposed 'saved' site allocations are allocated within the adopted Development Plan (specifically the SAMDev Plan).
- 5.5. The SAMDev Plan included a commitment to an early review of the Development Plan, which Shropshire Council commenced shortly after its adoption. However, the scope of this review needed to be carefully considered to ensure that it addressed all relevant matters but also that it complemented rather than undermined the implementation of the adopted Development Plan.
- 5.6. Ultimately, for a number of reasons it was concluded that the scope of the review needed to be extensive. However, it was recognised that the site allocations had only recently been allocated within an adopted Plan (the SAMDev Plan was adopted in late 2015 and the Local Plan Review formally commenced in late 2016 / early 2017).
- 5.7. It was also recognised that these site allocations had been informed by a proportionate and robust site assessment process, technical assessments (including Sustainability Appraisal - incorporating the requirements of Strategic Environmental Assessment Regulations -and Habitats Regulations Assessment) and had been through examination and found sound and legally compliant. It was also considered that these site allocations

could contribute to the vision and spatial strategy within the Local Plan Review.

- 5.8. As such, it was concluded that these site allocations (including the site's location, extent, development guidelines and approximate provision figures) should remain outside the scope of the Local Plan Review and would instead complement this process by forming an integral part of the spatial strategy for Shropshire to 2038.
- 5.9. Therefore, when devising the proposed spatial strategy for the level and distribution of development across Shropshire, the presence of these sites and indeed other commitments (sites with planning permission or Prior Approval) and completions achieved within the earlier part of the proposed plan period were carefully considered and informed proposals. These sources were also carefully considered and informed proposals for individual settlements.
- 5.10. Given that this is the case, Shropshire Council is of the firm opinion that the proposed 'saved' site allocations accord with the proposed spatial strategy for the level and distribution of development within the draft Shropshire Local Plan.
- 5.11. This spatial strategy is primarily captured within draft Policy SP2 and expanded upon within wider draft Policies within the draft Shropshire Local Plan.
- 5.12. A core principle of the proposed spatial distribution of development within this proposed spatial strategy is 'urban focus', by which the majority of development will be directed into identified 'urban' areas. These urban areas are:
 - a. Shrewsbury, the proposed Strategic Centre of Shropshire;
 - b. The five proposed Principal Centres and 11 proposed Key Centres of Shropshire;
 - c. The two new proposed Strategic Settlements in Shropshire; and
 - d. The proposed Strategic Site of RAF Cosford in Shropshire.
- 5.13. However, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of our rural communities, development in urban areas will be positively complemented by appropriate new development within the proposed Community Hubs and to a lesser extent Community Clusters⁶. Development within the wider rural area will consist of

⁶ Community Clusters reflect Shropshire Council's positive approach to localism. As communities with aspirations maintain or enhance their sustainability can 'opt-in' to take an appropriate proportion of development, managed through a proposed policy mechanism (draft Policy SP9).

affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification.

- 5.14. Appendix 2 of the draft Shropshire Local Plan identifies the proposed 'saved' site allocations. However, in seeking to positively respond to Initial Questions (**ID2**) raised by the Planning Inspectors and recognising the significant progress made on many of the proposed 'saved' site allocations since the 31st March 2019 base date utilised within Appendix 2 of the draft Shropshire Local Plan, Shropshire Council has subsequently provided an updated position on proposed 'saved' site allocations, with a number of sites no longer proposed to be 'saved' following their build-out.
- 5.15. As a result, it is proposed that 77 residential or residential-led mixed use site allocations are to be 'saved'.
- 5.16. Of these 77 proposed residential or residential-led mixed use 'saved' site allocations, 34 (around 44.16%) are located in a settlement proposed for inclusion within the urban area - the focus for the majority of development within the proposed spatial strategy for the distribution of development in Shropshire. Specifically:
- a. 7 are located in the Strategic Centre of Shrewsbury.
 - b. 14 are located in one of the proposed Principal Centres.
 - c. 13 are located in one of the proposed Key Centres.
- 5.17. These 34 proposed residential or residential-led mixed use 'saved' site allocations have a total capacity for around 7,499 dwellings (86.60% of total dwellings on proposed 'saved' site allocations). Excluding completions already achieved on these sites as at the 31st March 2021, they have capacity for around 5,890 dwellings (85.29% of total dwellings on proposed 'saved' site allocations, excluding completions already achieved as at the 31st March 2021). As such, it is apparent that the majority of the dwellings on proposed 'saved' site allocations are concentrated in the urban area.
- 5.18. A further 37 of these proposed residential or residential-led mixed use 'saved' site allocations are located in a proposed Community Hub or Community Cluster settlement, which are the focus for the complementary development within the rural area within the proposed spatial strategy for the distribution of development. Specifically:
- a. 26 are located at one of the proposed Community Hubs.
 - b. 11 are located at one of the proposed Community Cluster settlements.
- 5.19. These proposed residential or residential-led mixed use 'saved' site allocations have a total capacity for around 1,111 dwellings

(12.83% of total dwellings on proposed 'saved' site allocations). Excluding completions already achieved on these proposed 'saved' site allocations as at the 31st March 2021, these 37 sites have capacity for around 996 dwellings (14.03% of total dwellings on proposed 'saved' site allocations, excluding completions already achieved as at the 31st March 2021).

- 5.20. The remaining 6 proposed residential or residential-led mixed use 'saved' site allocations are located within the wider rural area. These 'saved' site allocations have a total capacity for around 49 dwellings (0.57% of total dwellings on proposed 'saved' site allocations). Excluding completions already achieved on proposed 'saved' site allocations as at the 31st March 2021, these 6 sites have capacity for around 47 dwellings (0.68% of total dwellings on proposed 'saved' site allocations, excluding completions already achieved as at the 31st March 2021). Of these proposed 6 'saved' site allocations, 3 benefit from an extant planning permission and the remainder have capacity for 17 dwellings (8, 5 and 4 dwellings respectively).
- 5.21. As such, it is apparent that the majority of the dwellings on proposed 'saved' site allocations outside the urban area, are concentrated in the proposed Community Hubs and Community Clusters, consistent with the proposed spatial strategy.
- 5.22. Shropshire Council considers that this effectively demonstrates that the locational profile of the proposed residential or residential-led mixed use 'saved' site allocations fully aligns with the proposed spatial strategy for the level and distribution of development within the draft Shropshire Local Plan.
- 5.23. With regard to employment land, it is proposed that 25 employment site allocations are to be 'saved'. Furthermore, 5 of the residential-led mixed use site allocations proposed to be 'saved' contain a significant employment land component.
- 5.24. Of the proposed employment 'saved' site allocations, 24 (around 96%) are located in a settlement proposed for inclusion within the urban area. Furthermore, three (60%) of the residential-led mixed use site allocations proposed to be 'saved' that contain a significant employment land component are also located in a settlement proposed for inclusion within the urban area. Specifically:
- a. 2 are located in the Strategic Centre of Shrewsbury (3 of the residential-led mixed use 'saved' site allocations with a significant employment land component are also located in the Strategic Centre of Shrewsbury).
 - b. 9 are located in one of the proposed Principal Centres.
 - c. 13 are located in one of the proposed Key Centres.

- 5.25. These proposed 'saved' employment site allocations contain around 134.46ha of employment land (gross), equating to around 99.78% of total employment land (gross) on proposed 'saved' employment site allocations.
- 5.26. These proposed residential-led mixed use 'saved' site allocations with a significant employment land component contain around 34.99ha of employment land (gross), equating to around 94.85% total employment land (gross) on proposed residential-led mixed use 'saved' site allocations with a significant employment land component.
- 5.27. These proposed 'saved' allocations are identified in the strategic employment land supply of the Employment Strategy Topic Paper (**GC4n**) at 128ha for the monitoring position as at March 2020. This comprises 117.5ha of employment allocations plus 4.8ha of land now developed at Mile End East, Oswestry for a new strategic road interchange to serve the proposed Oswestry Innovation Park. This also comprises 5.5ha of employment land on mixed use saved allocations. The residual areas of the saved allocations noted in paragraphs 5.25 and 5.26 above are recorded as sites with planning permission.
- 5.28. The remaining proposed employment 'saved' site allocation is located in the wider rural area, adjoining an existing rural business park. This site contains around 0.30ha of employment land (gross), equating to around 0.22% of total employment land (gross) on proposed 'saved' employment site allocations.
- 5.29. The remaining 2 residential-led mixed use site allocations proposed to be 'saved' that contain a significant employment land component are located in proposed Community Hubs. These sites contain around 1.90ha of employment land (gross), equating to around 5.15% of total employment land (gross) on proposed residential-led mixed use 'saved' site allocations with a significant employment land component.
- 5.30. As such, it is apparent that the majority of the employment land on proposed 'saved' site allocations is concentrated in the urban area.
- 5.31. It is considered that this information effectively demonstrates that the locational profile of the proposed employment 'saved' site allocations and residential-led mixed use 'saved' site allocations with a significant employment land component fully aligns with the proposed spatial strategy for the level and distribution of development within the draft Shropshire Local Plan.
- 5.32. Shropshire Council would therefore reiterate that it considers that the distribution of the proposed 'saved' site allocations accords with the proposed spatial strategy for the level and

distribution of development within the draft Shropshire Local Plan.

What will be the policy basis for these 'saved sites'?

- 5.33. One of the factors influencing the decision to continue to seek to 'save' site allocations (including the site's location, extent, development guidelines and approximate provision figures) that benefit from an extant planning permission is to provide certainty about the site-specific policy requirements. Specifically, it is to ensure that it is clear to all parties (including the decision maker, landowner/developer and community) that the site's location, extent, development guidelines and approximate provision figures, which were considered both necessary and appropriate at the time of the allocation, will continue to apply in circumstances where an alternative or varied planning application is submitted.
- 5.34. Similarly, for proposed 'saved' site allocations that do not benefit from an extant planning permission, the policy basis for site specific policy requirements including the site's location, extent, development guidelines and approximate provision figures, will remain the those within the adopted Local Plan.
- 5.35. With regard to the wider policy requirements, this will be dependent on the current planning status of the proposed 'saved' site allocation. In circumstances where the site benefits from an implemented or implementable planning permission, the wider policy requirements will be those at the point that the planning permission was granted. In circumstances where the site does not benefit from an implemented or implementable planning permission or a new planning application is subsequently submitted, the wider policy requirements will be those within the adopted Local Plan at the point the planning application is determined.

By relying upon such an approach, is the Local Plan positively prepared, justified, effective and consistent with national policy?

- 5.36. Shropshire Council considers that the decision to propose to 'save' site allocations (including the site's location, extent, development guidelines and approximate provision figures) within the adopted SAMDev Plan and incorporate them as an integral part of the spatial strategy for Shropshire to 2038 is entirely appropriate.
- 5.37. It is also considered that this approach positively contributes towards the draft Shropshire Local Plan and in particular the proposed spatial strategy for the level and distribution of development (primarily captured within draft Policy SP2 and expanded upon within wider draft Policies of the draft Shropshire

Local Plan) being positively prepared, justified, effective and consistent with national policy.

- 5.38. It is considered that the proposed spatial strategy for the level and distribution of development is 'positively prepared'. The level of development proposed is sufficient to meet the area's objectively assessed need and also makes an appropriate contribution to the unmet housing and employment need identified within the Black Country Authorities administrative area (no unmet needs were identified within adjoining Local Planning Authority administrative areas).
- 5.39. The proposed 'saved' site allocations represent an important component of the supply of land identified to achieve the level of development proposed within the proposed spatial strategy.
- 5.40. It is considered that the proposed spatial strategy for the level and distribution of development is 'justified' as it provides a clear and appropriate strategy that will contribute towards the achievement of a sustainable and appropriate pattern and level of development in Shropshire.
- 5.41. Again, the proposed 'saved' site allocations represent an important component of the supply of land needed to achieve the proposed pattern and level of development within the proposed spatial strategy.
- 5.42. This proposed spatial strategy for the level and distribution of development has been informed by a proportionate and robust evidence base. This includes a hierarchy of settlements assessment (**EV060**), an assessment of Local Housing Need (**EV069**), a Strategic Housing Market Assessment (**EV097.01 and EV097.02**), the Economic Growth Strategy for Shropshire (**EV044**), the Economic Development Needs Assessment (**EV043**), the Employment Land Review (**EV046**), the Strategic Land Availability Assessment (**EV016**) and the comprehensive site assessment (and the various sources of information that informed this assessment) (**SD006.03-SD006.22**).
- 5.43. It was also informed by careful consideration of wider information, including that relating to the demographics and characteristics of Shropshire; past development trends; commitments and completions for specific settlements; the characteristics, constraints, and opportunities of specific settlements; national policy and guidance; the principles of sustainable development; and potential policy objectives.
- 5.44. A number of Regulation 18 'Plan Making' consultations have also been undertaken to inform the proposed spatial strategy. Consultation responses received were carefully considered and have informed subsequent proposals.

- 5.45. Furthermore, Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessments (**SD008.01-SD008.03**) and Equality and Social Inclusion Impact Assessments (**SD010**) were undertaken throughout the Plan preparation process. These documents both inform and assess proposals.
- 5.46. Throughout the various consultations undertaken to inform the draft Shropshire Local Plan, the intention to retain existing allocations within the SAMDev Plan as a component of the supply needed to achieve the proposed spatial strategy has been clear.
- 5.47. It is also considered that the proposed spatial strategy for the level and distribution of development is 'effective'. The spatial strategy itself provides a clear approach to its implementation over the proposed plan period and is supported by a number of policy mechanisms within the wider draft strategic and non-strategic policies.
- 5.48. The proposed 'saved' site allocations are considered to be deliverable, with specific timescales for their delivery documented within the Five Year Housing Land Supply Statement (**GC4j**) and Authority Monitoring Report (**EV012**). Development on these sites will directly contribute to the 'effective' achievement of the proposed spatial strategy for the level and distribution of development within the draft Shropshire Local Plan.
- 5.49. Shropshire Council considers that the proposed spatial strategy for the level and distribution of development is 'consistent with national policy'. In particular:
- 5.50. It is considered that the proposed spatial strategy consistent with Paragraphs 20, 21, 22 and 23 of the National Planning Policy Framework (NPPF) which address strategic policies. The strategic policies of the draft Shropshire Local Plan:
- a. Set out the overall strategy for the pattern and scale of development which is considered to make sufficient provision for various forms of development, supporting infrastructure and conservation of the natural, built and historic environment.
 - b. Provide a clear starting point for the non-strategic policies.
 - c. Do not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.
 - d. Looks ahead over a minimum 15 year period from adoption.
 - e. Alongside other draft strategic policies provides a clear strategy for bringing forward land to meet the identified local housing need.

5.51. The proposed spatial strategy is consistent with Chapter 5 of the NPPF which addresses delivering a sufficient supply of homes, as:

- a. The level of residential development proposed is considered to meet local housing need, informed by a Local Housing Need Assessment (**EV069**) undertaken using the government's standard methodology. It also includes an appropriate contribution to the unmet housing need identified within the Black Country Authorities administrative area (no unmet needs were identified within adjoining Local Planning Authority administrative areas).
- b. It provides a clear starting point for the policies which address the needs of different groups in the community.
- c. It will facilitate the delivery of small, medium and large-scale residential sites (including at least 10% of the proposed housing requirement on sites of no more than 1ha and larger strategic sites in appropriate locations), through the identification of a sustainable and appropriate strategy for the level and distribution of development.
- d. It is supported by a high-level trajectory. This will be complemented by a more detailed trajectory within the Authority Monitoring Report (AMR), which ensures that the detailed housing trajectory can be updated periodically to reflect current understanding of future delivery rates.
- e. It recognises the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of the rural communities. As such, it specifies that development in urban areas will be positively complemented by appropriate new development within the proposed Community Hubs and Community Clusters.
- f. Beyond Community Hubs and Community Clusters, it enables appropriately located rural exception sites within the wider rural area, where there is evidenced local needs. More detailed non-strategic policies ensure such sites do not result in isolated homes (subject to specific exceptions).

5.52. The proposed spatial strategy is consistent with Chapter 6 of the NPPF which addresses building a strong, competitive economy, as:

- a. It sets out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, positively informed by the Shropshire Economic Growth Strategy (**EV044**).
- b. It establishes a sustainable and appropriate strategy for the distribution of development, facilitating the identification of proposed strategic employment sites for local and inward investment.

- c. It sets out an overall strategy for the pattern and scale of development which is considered to make sufficient provision for various forms of development, supporting infrastructure and conservation of the natural, built and historic environment.
 - d. It provides a framework which is sufficiently flexible to enable a rapid response to changes in economic circumstances.
 - e. It establishes a sustainable and appropriate pattern of development which allows for, where appropriate, a positive response to the clustering and accessibility requirements of employers.
 - f. It recognises the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities. As such, it specifies that development in urban areas will be positively complemented by appropriate new development within the proposed Community Hubs and Community Clusters.
 - g. Beyond Community Hubs and Community Clusters, it allows for appropriate rural employment and economic diversification within the wider rural area.
- 5.53. As documented earlier in this response, Shropshire Council considers that the proposed 'saved' site allocations accord with and will contribute to the achievement of the proposed spatial strategy for the level and distribution of development within the draft Shropshire Local Plan. As such they are also considered to contribute toward the proposed spatial strategy being considered 'consistent with national policy'.
- 5.54. Further information on the proposed spatial strategy is provided in response to Question 3 of Matter 3 regarding draft Policy SP2 of the draft Shropshire Local Plan.

Question 6. Is it appropriate to show 'saved sites' on the proposals map given they are not site allocations in the submitted Local Plan, bearing in mind regulation 9 of The Town and Country Planning (Local Planning) (England) Regulations 2012?

Shropshire Council Response:

- 6.1. Regulation 9(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 stipulates that *“(1) The adopted policies map must be comprised of, or contain, a map of the local planning authority's area which must—*

(a) be reproduced from, or be based on, an Ordnance Survey map;

(b) include an explanation of any symbol or notation which it uses; and

(c) illustrate geographically the application of the policies in the adopted development plan.” (my emphasis).

6.2. The proposed ‘saved’ site allocations consist of sites that are already allocated within the adopted Development Plan (specifically the SAMDev Plan component of the adopted Development Plan). It is proposed that these sites (including the site’s location, extent, development guidelines and approximate provision figures) should remain outside the scope of the Local Plan Review, and instead complement the Local Plan Review process by forming an integral part of the Spatial Strategy for Shropshire to 2038.

6.3. To clearly document this position for decision makers, developers and local communities, Shropshire Council has proposed to identify these sites as ‘saved’ site allocations within the draft Shropshire Local Plan – this planning terminology and its meaning is generally well understood and has been used on that basis.

6.4. As such, these sites are currently allocated within the adopted Development Plan and it is proposed that they will continue to form part of the Development Plan moving forward.

6.5. The status of these ‘saved’ site allocations is outlined within the draft Shropshire Local Plan which explains within the introduction (paragraph 2.17) that;

“Upon adoption the policies of the Shropshire Local Plan 2016 to 2038 will replace the policies of the Core Strategy and SAMDev Plan, except for the SAMDev site allocations which have yet to be delivered, which will be ‘saved’ and therefore continue to form part of the Development Plan. The policies and proposals within adopted formal Neighbourhood Plans which conform with the Shropshire Local Plan 2016 to 2038 will also continue to apply.”

6.6. This is also outlined within Appendix 1 and Appendix 2 of the draft Shropshire Local Plan, which include

“Where a Core Strategy or SAMDev Plan policy is ‘saved’ the issues addressed within the policy are considered to continue to be relevant and have not been addressed within a Local Plan policy, as such it will continue to form part of the Local Plan for Shropshire.” and “Where a SAMDev Plan allocation is ‘saved’ it will continue to form part of the Local Plan for Shropshire. The ‘saved’ status applies to the site location,

extent, development guidelines and approximate provision figures identified within the SAMDev Plan."

- 6.7. The draft settlement policies (S1-S21) of the draft Shropshire Local Plan also provide appropriate cross-references to these 'saved' SAMDev allocations.
- 6.8. As such, it is considered that the identification of the proposed 'saved' site allocations on the Policies Map is entirely appropriate and consistent with regulation 9 of The Town and Country Planning (Local Planning) (England) Regulations 2012, as these sites represent allocations within the Development Plan (specifically the component of the SAMDev Plan that it is proposed will not be superseded by the draft Shropshire Local Plan). The intention of the Policies Map is to illustrate geographically the application of the policies in the adopted Development Plan, including the component of the SAMDev Plan that it is proposed will not be superseded by the draft Shropshire Local Plan.

Question 7. What proportion of housing supply comes from the 'saved sites'?

Shropshire Council Response:

- 7.1 Appendix 2 of the draft Shropshire Local Plan identifies the proposed 'saved' site allocations. However, in seeking to positively respond to Initial Questions raised by the Planning Inspectors in their document **ID2** and recognising the significant progress made on many of the proposed 'saved' site allocations since the 31st March 2019 base date utilised within Appendix 2 of the draft Shropshire Local Plan, Shropshire Council has subsequently provided an updated position on proposed 'saved' site allocations, with a number of sites no longer proposed to be 'saved' following their build-out.
- 7.2 As a result, it is proposed that 77 residential or residential-led mixed use allocations would be identified as 'saved' site allocations. These sites combined have capacity for around 8,659 dwellings. Of these 8,659 dwellings, 1,753 dwellings had been completed as at 31st March 2021, leaving an outstanding capacity on proposed saved allocations for around 6,906 dwellings, as at 31st March 2021.
- 7.3 These 6,906 dwellings equate to around 22.42% of the proposed housing requirement of 30,800 dwelling for the period from 2016-2038. The 6,906 dwellings also equate to around 26.75% of the identified housing land supply to 2038 of some 25,820 dwellings, as at 31st March 2021.

- 7.4 Please Note: the identified housing land supply (as at 31st March 2021) excludes completions already achieved in the first five years of the proposed plan period. When these completions are added to the identified housing land supply to 2038, the supply is sufficient to achieve the proposed housing requirement.

Question 8. What proportion of the 'saved sites' have an extant planning permission and what is their level of contribution to the housing supply?

Shropshire Council Response:

- 8.1 As documented in the response to Question 7 of Matter 3 above, it is proposed that 77 residential or residential-led mixed use allocations are identified as 'saved' allocations. These sites have capacity for around 8,659 dwellings. Of these 8,659 dwellings, 1,753 dwellings had been completed as at 31st March 2021, leaving an outstanding capacity on proposed saved allocations for around 6,906 dwellings, as at 31st March 2021.
- 8.2 Of these 6,906 dwellings, 4,247 dwellings benefitted from an extant planning permission as at 31st March 2021.
- 8.3 Furthermore, as a result of the monitoring undertaken to inform the assessment of the Housing Land Supply as at 31st March 2021, there are consents granted shortly after the 31st March 2021 for a further 319 of the dwellings on proposed 'saved' allocations.
- 8.4 As such, 4,566 of the 6,906 dwellings on proposed saved allocations are understood to benefit from an extant planning permission at or shortly after the 31st March 2021. This equates to around 66.12% of the total remaining dwellings on proposed 'saved' allocations.
- 8.5 These 4,566 dwellings equate to around 14.83% of the proposed housing requirement of 30,800 dwelling for the period from 2016-2038. The 4,566 dwellings also equate to around 17.68% of the identified housing land supply to 2038 of some 25,820 dwellings, as at 31st March 2021.
- 8.6 This means that proposed 'saved' allocations have capacity for around 2,340 dwellings without an extant planning permission. This equates to around 33.88% of the total remaining dwellings on proposed 'saved' allocations.
- 8.7 These 2,340 dwellings equate to around 7.60% of the proposed housing requirement of 30,800 dwelling for the period from 2016-2038. The 2,340 dwellings also equate to around 9.06% of

the identified housing land supply to 2038 of some 25,820 dwellings, as at 31st March 2021.

- 8.8 However, it is important to note that a significant number of these 2,340 dwellings are located on either multi-phase sites that are currently under-construction/earlier phases have been built-out; or are on sites currently the subject of a Planning Application. Specifically:
- a. 830 dwellings are located on multi-phase sites with earlier phases either under construction or built-out. This includes 454 dwellings on the SHREW002, 035, 083, and 128/ELR64, 67, and 68) the West Sustainable Urban Extension of Shrewsbury.
 - b. 722 dwellings are located on sites currently the subject of a Planning Application. This includes 500 dwellings on BRID001/BRID020b and BRID020a at Bridgnorth, which are the subject of Hybrid Planning Application (21/05023/OUT) that also addresses two employment allocations at the town (ELR011/a and ELR001/b).
- 8.9 This is reflective of the fact that alongside the Local Plan Review, Shropshire Council has been proactively seeking to implement the adopted Local Plan.

Question 9. Is Policy SP3 justified, effective and consistent with national planning policy and Planning Practice Guidance (PPG)?

Shropshire Council Response:

- 9.1. Shropshire Council considers that draft Policy SP3 is justified, effective and consistent with national policy. In summary:
- 9.2. Draft Policy SP3 is justified as it provides a clear and overarching strategy to support the transition to a zero-carbon economy in Shropshire. The key policy provisions include; reducing carbon emissions; integrating and supporting the delivery of on- and off-site renewable and low carbon energy; maximising carbon sequestration; and mitigating and adapting to the impacts of climate change.
- 9.3. This overarching strategy has been directly informed by and appraised by the Sustainability Appraisal (SA) (**SD006.01-SD006.22**), Habitats Regulations Assessment (HRA) (**SD008.01-SC008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**). These assessments were carried out on an iterative basis to both inform and assess proposals throughout the Plan preparation process.

- 9.4. The draft policy has also been informed by several Regulation 18 consultations during the Draft Local Plan preparation process. Responses received to these consultations were carefully considered at each stage and informed subsequent stages of the process.
- 9.5. Draft Policy SP3 was consulted on at the Regulation 19 pre-submission stage. Representations were carefully considered before full Council approval was given to submit the Draft Local Plan.
- 9.6. A proportionate and robust evidence base supports the overarching strategy. The SA Scoping Report (**EV002**) includes a robust consideration of different emission sources at a Shropshire level and identifies likely trends for the Local Plan period. This data informed the issues relating to climate change in the SA and helped to define the Sustainability Objectives (SO). These have been used to assess the Plan's draft policies and proposed site allocations throughout its preparation process. This is in line with paragraph 007 Reference ID: 6-007-20140306 of the NPPG Climate Change section.
- 9.7. Shropshire Council declared a Climate Emergency on 19th December 2019 and published a Climate Change Strategy Framework. This identifies the risks posed by the current climate crisis to Shropshire and establishes an overall goal of making Shropshire Council net greenhouse gas neutral by 2030.
- 9.8. The Local Plan is also supported by a Strategic Flood Risk Assessment (**EV095.01-EV095.66** and **EV096.01-EV096.39**) and a Water Cycle Study (**EV117.01-EV117.03**). These provide information on climate change risks for the water environment and the actions needed to avoid or mitigate these. The Statements of Common Ground with Severn Trent Water (**EV026**) and Dwr Cymru Welsh Water (**EV021**) show how such actions will be implemented.
- 9.9. Draft Policy SP3 is effective as its overarching strategy of supporting the transition to a zero-carbon economy is reflected in its key provisions. Each provision is expanded upon by sub-sections which set out a clear range of actions needed to deliver the relevant aspect of the strategy. As such, it is considered that the draft policy is capable of being implemented through the development management process during the Plan period.
- 9.10. Draft Policy SP3 is consistent with national policy and guidance as set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) as follows:

NPPF

Paragraph 152 states *"The planning system should support the transition to a low carbon future in a changing climate, taking*

full account of flood risk....It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions.....and support renewable and low carbon energy and associated infrastructure."

Paragraph 153 states "*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood riskwater supply, biodiversity....*"

Paragraph 154 states "*New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure....*"

Paragraph 155 states "*To help increase the use and supply of renewable and low carbon energy and heat, plans should:*

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development.....*
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems...."*

Paragraph 156 states "*Local planning authorities should support community-led initiatives for renewable and low carbon energy.."*

9.11. Table 9.1 below shows how draft Policy SP3 is consistent with these paragraphs.

Table 9.1: Policy SP3 consistency with NPPF

Part of SP3	NPPF Paragraph	NPPF text
1g	152	<i>contribute to a radical reduction in greenhouse gas emissions.</i>
2 (a-c)	152	<i>support renewable and low carbon energy and associated infrastructure.</i>
	155a and c	<i>a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development..... c) identify opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply systems....</i>
2d	156	<i>Local planning authorities should support community-led initiatives for renewable and low carbon energy.</i>
3b and c	154a	<i>avoid increased vulnerability to the range of impacts arising from climate change.care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.</i>
4a	153	<i>Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk.</i>

Part of SP3	NPPF Paragraph	NPPF text
4b and c	154a	<i>avoid increased vulnerability to the range of impacts arising from climate change.care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.</i>
4c	153	<i>Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for.. biodiversity.</i>
4d	153	<i>Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for... water supply.</i>

NPPG: Climate Change Section

Paragraph: 003 Reference ID: 6-003-20140612, "How can the challenges of climate change be addressed through the Local Plan?"

Examples of mitigating climate change by reducing emissions:

- *Reducing the need to travel and providing for sustainable transport*
- *Providing opportunities for renewable and low carbon energy technologies*
- *Providing opportunities for decentralised energy and heating*
- *Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design*

Examples of adapting to a changing climate:

- *Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime*
- *Considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development*
- *Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality*
- *Promoting adaptation approaches in design policies for developments and the public realm"*

Paragraph: 004, Reference ID: 6-004-20140612, "How can adaptation and mitigation approaches be integrated?..."

- *through district heating networks that include tri-generation (combined cooling, heat and power); or*
- *through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding, and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle."*

Paragraph: 005, Reference ID: 6-005-20140306, "How can planning deal with the uncertainty of climate risks when promoting adaptation in particular developments?"

The impact of climate change needs to be taken into account in a realistic way. In doing so, local planning authorities will want to consider:

- *identifying no or low-cost responses to climate risks that also deliver other benefits, such as green infrastructure that improves adaptation, biodiversity, and amenity..."*

9.12. Table 9.2 below shows how draft Policy SP3 is consistent with these paragraphs.

Table 9.2: Policy SP3 consistency with NPPG

Part of SP3	NPPG Paragraph	NPPG Text
1 a and b	003	<i>Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime.</i>
1 a, b, d, e, and f	003	<i>Reducing the need to travel and providing for sustainable transport. Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime.</i>
1g	003	<i>Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design.</i>
2 a, b,	003	<i>Providing opportunities for renewable and low carbon energy technologies.</i>
2 c	003	<i>Providing opportunities for decentralised energy and heating.</i>
	004	<i>through district heating networks that include tri-generation (combined cooling, heat and power).</i>
2 d	003	<i>Providing opportunities for decentralised energy and heating.</i>
4 a	003	<i>Considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development. Promoting adaptation approaches in design policies for developments and the public realm.</i>
4b	003	<i>Promoting adaptation approaches in design policies for developments and the public realm.</i>
	004	<i>through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding, and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.</i>
4c	005	<i>Consider.....identifying no or low-cost responses to climate risks that also deliver other benefits, such as green infrastructure that improves adaptation, biodiversity, and amenity.</i>
4 d	004	<i>Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality.</i>

Question 10. Is Policy SP4 necessary as it rehearses national planning policy, contrary to the advice in PPG (Paragraph: 036 Reference ID: 61-036-20190723)?

Shropshire Council Response:

- 10.1. It is recognised that Paragraph 36 of the National Planning Practice Guidance (NPPG) on plan-making states that *“there is no need for a plan to directly replicate the wording in paragraph 11 in a policy.”*
- 10.2. Draft Policy SP4 is intended to be consistent with, but provide local distinction on, the operation of the presumption in favour of sustainable development in Shropshire. As such, it is intended that draft Policy SP4 complements rather than simply repeats the wording of Paragraph 11 of the National Planning Policy Framework (NPPF).
- 10.3. However, if it is the Planning Inspectors’ view that this draft Policy is unnecessary, then Shropshire Council would have no objection to considering the removal of draft Policy SP4 as a main modification to the draft Shropshire Local Plan.

Question 11. The Framework at paragraph 28 advises that ‘non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods, or types of development. This can include...the provision of infrastructure and community facilities at a local level...establishing design principles...’ Are Policies SP5 and SP6 strategic policies or development management policies?

Shropshire Council Response:

- 11.1. Shropshire Council considers that draft Policies SP5 and SP6 are strategic policies.
- 11.2. The National Planning Policy Framework (NPPF) (particularly paragraphs 8 and 126) recognise that good design and health and wellbeing are fundamental to achieving sustainable development.
- 11.3. Furthermore, achieving high-quality design and the health and wellbeing of individuals, communities and places represent strategic priorities for Shropshire Council.
- 11.4. Draft Policy SP5 seeks to succinctly identify the overarching strategy for the ‘design quality of places’, including through the identification of key strategic design considerations.
- 11.5. Draft Policy SP6 seeks to succinctly identify the overarching strategy for health and wellbeing, including through the

identification of key strategic health and wellbeing considerations – in the context of ‘design quality of places’.

- 11.6. Draft Policies SP5 and SP6 form an important component of the strategy for Shropshire within the draft Shropshire Local Plan. Furthermore, these draft policies establish the starting point for, and are directly supplemented by, the detailed policies of the draft Shropshire Local Plan.
- 11.7. This includes draft policies as follows: DP1 on Residential Mix; draft Policy DP3 on affordable housing provision; DP11 on Minimising Carbon Emissions; DP14 on Green Infrastructure; DP15 on Open Space and Recreation; DP16 on the Landscaping of New Development; DP18 on Pollution and Public Amenity; DP24 on the Shropshire Hills Area of Outstanding Natural Beauty (AONB); DP25 on Infrastructure Provision; DP28 on Communications and Transport; settlement policies S1-S21.
- 11.8. This approach is considered to be consistent with the expectations of strategic policies as documented within Paragraphs 17, 20 and 21 of the NPPF. Specifically:
- Consistent with Paragraph 17 of the NPPF, *“The development plan must include strategic policies to address each local planning authority’s **priorities for the development and use of land in its area**”*. (my emphasis).
 - Consistent with Paragraph 20 of the NPPF, contribute to the *“overall strategy for the pattern, scale and **design quality of places...**”* (my emphasis).
 - Consistent with Paragraph 21 of the NPPF, *“**limited to those necessary to address the strategic priorities of the area**” and “provide a clear starting point for any non-strategic policies that are needed”*. Furthermore, Shropshire Council considers that these draft policies do not *“extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.”* (my emphasis).
- 11.9. Furthermore, Paragraph 127 of the NPPF includes:
- “Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.”*
- 11.10. Shropshire Council considers that draft Policies SP5 and SP6 contribute to the provision of a clear design vision and design expectations that provide certainty to the decision maker, applicant and local communities. Shropshire Council also considers that their status as strategic policies within the draft Shropshire Local Plan represents the ‘most appropriate level’, given that high-quality design and the health and wellbeing of

individuals, communities and places represent strategic priorities for Shropshire Council and the emphasis placed on these interrelated issues within the NPPF in the context of achieving sustainable development.

- 11.11. Whilst it is recognised that Paragraph 28 of the NPPF specifies that *“Non-strategic policies should be used by local planning authorities and communities to set out...design principles”*, Shropshire Council considers that draft Policies SP5 and SP6 address overarching strategy for the ‘design quality of places’. As such, they form an important component of the overall strategy for Shropshire.
- 11.12. Therefore, it is considered that it is appropriate and important for draft Policies SP5 and SP5, given the issues they address, to be strategic policies.

Question 12. What is the status of the West Midlands Design Charter and does Policy SP5 align with its principles? Is there any scope for tension between Policy SP5 and Policy DP24? Is Policy SP5 justified, effective and consistent with national policy?

Shropshire Council Response:

What is the status of the West Midlands Design Charter and does Policy SP5 align with its principles?

- 12.1. The West Midlands Design Charter (Charter) (**EV124**) is not intended to set local design policies but seeks to provide a clear and consistent understanding of the West Midlands’ place-making expectations, create a level playing field for developers across the region, define ‘good design quality’ and indicate what is expected from developers when Planning Applications are submitted.
- 12.2. The Charter is a non-statutory document, which concisely addresses the issue of design quality in a manner which complements and supplements existing and emerging policies on design, prepared by Local Planning Authorities.
- 12.3. The Charter was prepared by the West Midland Combined Authorities (WMCA) Housing and Land Delivery Board, informed by collaborative working with Local Planning Authorities, including Shropshire Council, across the region.
- 12.4. Shropshire Council has endorsed the Charter as a material consideration in the Planning Application decision making process. It has also endorsed its use in informing policy development through the Local Plan Review.
- 12.5. The Charter consists of 12 principles based around the six themes, these themes are: Character, Connectivity and Mobility,

Future-Readiness, Health and Wellbeing, Engagement and Stewardship and Delivery. Shropshire Council had full regard to these principles when preparing draft Policy SP5, draft Policy SP6 (which focuses on health and well-being within new development) and other relevant strategic and non-strategic policies of the draft Shropshire Local Plan.

- 12.6. As a result, it is considered that draft Policy SP5, draft Policy SP6 and all other relevant strategic and non-strategic policies of the draft Shropshire Local Plan align with the principles of the Charter.

Is there any scope for tension between Policy SP5 and Policy DP24?

- 12.7. The draft Shropshire Local Plan recognises the interplay between draft Policies SP5 and DP24. Specifically:

- a. Paragraph 3.41 of the explanation to draft Policy SP5 includes a cross-reference to draft Policy DP24, specifying that *“Where development proposals are located within the Shropshire Hills Area of Outstanding Natural Beauty (AONB), Policy DP24 which addresses the need to achieve highest quality design which respects the natural beauty and built heritage of the Shropshire Hills AONB; enhances the sense of place and local character; and enables better management of wildlife sites, heritage assets or the wider countryside also applies.”*
- b. Paragraph 1 of Draft Policy DP24 which encourages development to positively and appropriately contribute towards conserving and enhancing the natural beauty of the AONB through the achievement of highest quality design, includes a specific cross-reference to draft Policy SP5.

- 12.8. Whilst there is an acknowledged interplay between these two draft policies, it is not considered that this creates any scope for tension between them, rather Shropshire Council is of the opinion that they are complementary.

- 12.9. Indeed, draft Policy DP24 specifically recognises that the delivery of the ‘highest quality of design’ within the AONB include compliance with the requirements of draft Policy SP5.

- 12.10. In this sense, draft Policy DP24 provides the ‘context’ for compliance with the following requirements of Policy SP5 with respect to the Shropshire Hills AONB - namely that the design of development should:

- a. Respect the natural beauty and built heritage of the Shropshire Hills AONB;
- b. Enhance the sense of place and local character; and

- c. Enable better management of wildlife sites, heritage assets or the wider countryside.
- 12.11. As such, to achieve the 'highest quality design' within the AONB encouraged within draft Policy DP24 the design requirements in SP5 remain appropriate considerations, with draft Policy DP24 providing 'context' for the consideration of compliance with these requirements and of course encouraging their 'optimum' achievement (when considered individually and cumulatively).
- 12.12. Therefore, Shropshire Council considers that draft Policies SP5 and DP24 are complementary and form important components of the policy framework for managing development within the AONB.

Is Policy SP5 justified, effective and consistent with national policy?

- 12.13. Shropshire Council considers that draft Policy SP5 is justified, effective and consistent with national policy. In summary:
- 12.14. Draft Policy SP5 is considered to be 'justified' as it provides a clear and appropriate overarching strategy for the 'design quality of places', including through the identification of key strategic design considerations. It is considered that this will contribute to achieving high-quality places, high-quality development and as such forms an important component of the strategy for Shropshire within the draft Shropshire Local Plan.
- 12.15. The overarching strategy including the strategic design considerations within draft Policy SP5, has been directly informed by and appraised within the Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessment (**SD008.01-SC008.03**), and Equality and Social Inclusion Impact Assessment (**SD010**), undertaken to inform and appraise the proposals within the draft Shropshire Local Plan, using an iterative process reflecting that used for the preparation of the draft Shropshire Local Plan.
- 12.16. A proportionate and robust evidence base has informed the development of draft Policy SP5. This includes the aforementioned Sustainability Appraisal, Habitats Regulations Assessment, and Equality and Social Inclusion Impact Assessment; the West Midlands Design Charter (**EV124**); and the Shrewsbury Big Town Plan (**EV099**). Draft Policy SP5 has also informed by and positively respond to the National Planning Policy Framework (NPPF) expectations regarding design quality.
- 12.17. Furthermore, proposals have been informed by Regulation 18 'Plan-Making' Consultations undertaken to inform the draft Shropshire Local Plan. Responses received to these consultations were carefully considered and informed subsequent proposals.

- 12.18. Proposals were also consulted upon as part of the Regulation 19 'Pre-Submission' Consultation. Following this consultation representations were carefully considered before full Council approval was sought to submit the draft Shropshire Local Plan for examination.
- 12.19. Draft Policy SP5 is considered to be 'effective' as it includes key strategic design considerations which are directly implementable. Alongside the requirements of other strategic and non-strategic policies which complement and expand on them, they will contribute to the achievement of the overarching strategy for the 'design quality of places'.
- 12.20. Furthermore, a clear mechanism is available for monitoring its use and effectiveness (the proportion of planning consents in which the policy is referenced in planning conditions consistent with the policy criteria).
- 12.21. As previously documented, development of draft Policy SP5 has been informed by the West Midlands Design Charter (**EV124**), which seeks addresses design considerations at a regional level. This was prepared by the WMCA housing and land delivery board, informed by collaborative working with Local Planning Authorities.
- 12.22. Draft Policy SP5 is considered to be 'consistent with national policy' as the NPPF recognise that good design is fundamental to achieving sustainable development. Indeed, section 12 of the NPPF specifically focuses on achieving well-designed places.
- 12.23. Paragraph 126 of the NPPF states *"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."*
- 12.24. Paragraph 127 of the NPPF continues, stating: *"Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable."*
- 12.25. Shropshire Council considers that the draft Shropshire Local Plan, particularly draft Policy SP5, are consistent with the principles of paragraph 126 and 127 of the NPPF, providing a clear design vision and design expectations that provide certainty to the decision maker, applicant and local communities. Draft Policy SP5 also provides a clear indication of how

compliance with the policy will be tested in the Planning Application process (informed by appropriate engagement on the Planning Application) and documents the implications (in the context of this particular matter) of proposals deemed to represent high-quality design or otherwise.

- 12.26. Paragraphs 130-131 of the NPPF address specific design considerations. It is considered that draft Policy SP5 and other draft policies of the draft Shropshire Local Plan are consistent with and appropriately expand on these matters, providing local distinction.
- 12.27. Paragraph 132 of the NPPF addresses the importance of early discussions between the Local Planning Authority, applicant and community on design factors. This is a principle strongly supported by Shropshire Council and reflected in our approach to pre-application discussions on Planning Applications.
- 12.28. Paragraphs 20-23 of the NPPF address strategic policies. Shropshire Council considers that draft Policy SP5 is consistent with these expectations, as documented in its response to Question 11 of Matter 3.
- 12.29. Ultimately, it is considered that draft Policy SP5, provides a clear and appropriate overarching strategy for the 'design quality of places' and key strategic design considerations/expectations which are directly implementable. It has been informed by a proportionate evidence base and is considered to positively respond to and align with national policy.
- 12.30. As such, in conclusion Shropshire Council considers that draft Policy SP5 is justified, effective and consistent with national Policy.

Question 13. How have the health impacts of the Local Plan been assessed and addressed? Is Policy SP6 justified, effective and consistent with national policy?

Shropshire Council Response:

How have the health impacts of the Local Plan been assessed and addressed?

- 13.1. The health and wellbeing impacts of the draft Shropshire Local Plan have primarily been assessed through the Sustainability Appraisal (**SD006.01-SD006.22**).
- 13.2. Many of the key sustainability issues identified within the Sustainability Appraisal Scoping Report (**EVO02**) either directly or indirectly relate to health and wellbeing. The most relevant

are set out below (with an indication of where they can be found in the SA Scoping Report):

- a. Promote sustainable modes of transport, particularly cycling and walking (Table 4.2)
- b. Reduce inequalities and improve safe access to services (Table 4.2)
- c. Use the natural environment to deliver mental and physical health benefits and encourage community participation in activities that promote wellbeing (Table 4.3)
- d. Increase physical activity levels (Table 4.3)
- e. Protect people and the natural environment from air pollution (Table 4.6)

13.3. Additionally, many of the sustainability objectives identified as a result of a consideration of the key issues within the Sustainability Appraisal Scoping Report (**EVO02**) also either directly or indirectly relate to health and wellbeing. The most relevant are set out below (taken from Table 5.1 in the SA Scoping Report):

- a. SO4: Promote access to services for all sections of society
- b. SO5: Encourage the use of sustainable means of transport
- c. SO7: Support active and healthy communities
- d. SO11: Conserve and enhance Shropshire's air quality and reduce the risk of air pollution

13.4. The Sustainability Appraisal process undertaken for the draft Shropshire Local Plan has been iterative, reflecting the process employed in the preparation of the Plan itself. Both the draft policies and proposed site allocations have been assessed against these SO (or derivations of them – see Tables 5.6 and 5.7 in the SA Scoping Report (**EVO02**)) at every stage of the Local Plan's development, with the SA of sites forming an integral part of the wider site assessment process.

13.5. Shropshire Council considers that this approach to assessing the health and wellbeing implications of the draft Shropshire Local Plan is proportionate and robust. Further information on the Sustainability Appraisal process is provided in the Council's response to Questions 2 and 3 of Matter 1.

13.6. Ensuring the health and wellbeing of individuals, communities and places is a fundamental priority for Shropshire Council which is directly reflected within the draft Shropshire Local Plan.

13.7. The draft Spatial Vision reflects this and includes *"In 2038, communities will be safe and healthy..."*. The proposed strategic objectives captured within draft Policy SP1 also reflect this priority, including the expectation that development *"Supports the health, well-being and safety of communities"*.

- 13.8. It is also a principle which has informed the proposed spatial strategy for the level and distribution of development. The proposed spatial strategy includes an urban focus, whereby the majority of development is intended to occur in those locations with the greatest availability of services and facilities to support the occupiers of new developments. This will be complemented by appropriate levels of development with rural areas, recognising the importance of ensuring the long-term sustainability of our rural communities.
- 13.9. It is also perhaps most strongly reflected by the presence of a draft strategic policy (SP6) which focuses on the health and wellbeing of individuals, communities and places. This draft policy seeks to succinctly identify the overarching strategy including the strategic health and wellbeing considerations, in the context of 'design quality of places', as it is recognised that health and wellbeing considerations are fundamental to achieving well-designed places. This overarching strategy including the identification of key strategic health and wellbeing considerations, complement and integrate into the wider strategy for Shropshire within the draft Shropshire Local Plan.
- 13.10. It is also recognised that health and wellbeing considerations strongly link to other key principles within the draft Shropshire Local Plan, such as climate change, energy efficiency and renewable energy; the natural environment; and the historic environment.
- 13.11. Furthermore, draft Policy SP6 establishes the starting point and is directly supplemented by the detailed policies of the draft Shropshire Local Plan. This includes draft Policy DP1 on Residential Mix; draft Policy DP14 on Green Infrastructure; draft Policy DP15 on Open Space and Recreation; draft Policy DP16 on the Landscaping of New Development; draft Policy DP18 on Pollution and Public Amenity; draft Policy DP25 on Infrastructure Provision; draft Policy DP28 on Communications and Transport; and draft settlement Policies S1-S21.

Is Policy SP6 justified, effective and consistent with national policy?

- 13.12. Shropshire Council considers that draft Policy SP6 is justified, effective and consistent with national policy. In summary:
- 13.13. Draft Policy SP6 is considered to be 'justified' as it provides a clear and appropriate overarching strategy for the health and wellbeing of individuals, communities and places, in the context of 'design quality of places'. It is considered that this will contribute to enhancing the health and wellbeing of individuals, communities and places and as such forms an important

component of the strategy for Shropshire within the draft Shropshire Local Plan.

- 13.14. This overarching strategy including the strategic health and wellbeing considerations within draft Policy SP6, has been directly informed by and appraised within the Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessment (**SD008.01-SC008.03**), and Equality and Social Inclusion Impact Assessment (**SD010**), undertaken using an iterative process reflecting that used for the preparation of the draft Shropshire Local Plan.
- 13.15. A proportionate and robust evidence base supports the proposals within draft Policy SP6. This includes the aforementioned Sustainability Appraisal, Habitats Regulations Assessment, and Equality and Social Inclusion Impact Assessment; the Shropshire Health and Wellbeing Strategy (**EV059**); West Midlands Design Charter (**EV124**); and Sport England and Public Health England guidance on the '10 principles for active design' (**EV107**). They are also informed by and positively respond to the National Planning Policy Framework (NPPF) expectations regarding health and wellbeing.
- 13.16. Furthermore, proposals have been informed by Regulation 18 'Plan-Making' Consultations undertaken to inform the draft Shropshire Local Plan. Responses received to these consultations were carefully considered and informed subsequent proposals.
- 13.17. Proposals were also consulted upon as part of the Regulation 19 'Pre-Submission' Consultation. Following this consultation representations were carefully considered before full Council approval was sought to submit the draft Shropshire Local Plan for examination.
- 13.18. Draft Policy SP6 is considered to be 'effective' as it includes key strategic health and wellbeing considerations which are directly implementable. Alongside the requirements of other strategic and non-strategic policies which complement and expand on them, they will contribute to the achievement of the overarching strategy for the health and wellbeing of individuals, communities and places within the context of 'design quality of places'.
- 13.19. Furthermore, a clear mechanism is available for monitoring its use and effectiveness (the proportion of planning consents in which the policy is referenced in planning conditions).
- 13.20. As previously documented, development of draft Policy SP6 has been informed by the West Midlands Design Charter (**EV124**), which seeks addresses design considerations at a regional level. This was prepared by the WMCA housing and land delivery board, informed by collaborative working with Local Planning Authorities.

- 13.21. Draft Policy SP6 is considered to be 'consistent with national policy' as the NPPF recognises that the health and wellbeing of individuals, communities and places is fundamental to achieving sustainable development. Indeed, section 8 of the NPPF specifically focuses on promoting healthy and safe communities.
- 13.22. Consistent with Paragraph 92 and 93 of the NPPF, the key strategic health and wellbeing considerations within draft Policy SP6:
- a. Promotes integrated communities – including by ensuring that *"new housing is well located to employment opportunities, community services and facilities and transport connections, links and routes"*.
 - b. Requires safe and accessible places – including through the promotion of *"the '10 principles of active design'"*, requiring *"safe and well-lit high-quality walking and cycling routes, cycle parking, changing facilities and secure lockers in destinations such as places of work, to increase people's activity rates"*, and expecting development to have regard to being *"accessible and inclusive, ensuring that people of any age, gender, ethnicity and ability can use and access the development and "the Police Secured by Design principles to reduce opportunities for crime and antisocial behaviour"*.
 - c. Supports healthy lifestyles – including through *"Protecting, retaining or enhancing sports, leisure, recreation... or creating new facilities in accessible locations..."*, considering *"the '10 principles of active design'"* and *"safe and well-lit high-quality walking and cycling routes..."*.
 - d. Promotes use of shared spaces, community facilities and local services - including by ensuring that *"new housing is well located to...community services and facilities and transport connections, links and routes"*, creating sustainable communities through *"the retention of existing and the provision of new community infrastructure" and provision of "safe and well-lit high-quality walking and cycling routes..."*.
 - e. Takes into account and support local strategies to improve health and wellbeing – including specific reference to having regard to Shropshire Council's Health and Well-Strategy.
 - f. Guards against the unnecessary loss of valued facilities and services and provide flexibility for such facilities to modernise. – including through expecting the *"retention and development of existing local services and community facilities, including local shops, meeting places, sports venues, open space, cultural buildings and facilities, public houses and places of worship..."*
 - g. Ensuring an integrated approach to considering the location of housing, economic uses and community facilities and

services – including by ensuring that *“new housing is well located to employment opportunities, community services and facilities and transport connections, links and routes”*.

- 13.23. Paragraphs 20-23 of the NPPF address strategic policies. Shropshire Council considers that draft Policy SP6 is consistent with these expectations, as documented in its response to Question 11 of Matter 3.
- 13.24. Ultimately, it is considered that draft Policy SP6, provides a clear and appropriate overarching strategy for the health and wellbeing of individuals, communities and places, in the context of ‘design quality of places’ and key strategic health and wellbeing considerations/expectations which are directly implementable. It has been informed by a proportionate evidence base and is considered to positively respond to and align with national policy.
- 13.25. As such, in conclusion Shropshire Council considers that draft Policy SP6 is justified, effective and consistent with national Policy.

Question 14. Is Policy SP7 positively prepared, justified, effective and consistent with national policy? How have the residential guidelines been derived? Do these policies duplicate parts of other policies?

Shropshire Council Response:

Is Policy SP7 positively prepared, justified, effective and consistent with national policy?

- 14.1. Draft Policy SP7 forms part of the proposed spatial strategy for the level and distribution of development (which is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan, and then expanded upon within the wider draft Policies of the draft Shropshire Local Plan), with a specific focus of managing housing delivery.
- 14.2. Specifically, draft Policy SP7:
- a. Recognises the role of site allocations and windfall residential development on appropriate sites (particularly appropriate brownfield sites);
 - b. Recognises the role of development boundaries and the importance of residential development guidelines for settlements and identifies the key considerations in circumstances when determining Planning Applications where these appear likely to be exceeded; and
 - c. Provides the mechanism for bringing forward additional market housing development outside settlement

development boundaries, where there is clear evidence that the residential development guideline for the associated settlement is unlikely to be met over the plan period.

- 14.3. The proposed spatial strategy for the level and distribution of residential development is 'positively prepared' as it has been informed by and will meet local housing need, as calculated using Government's Standard Methodology. Furthermore, it has also been positively informed by engagement and 'duty to cooperate' discussions undertaken with adjoining and closely related Local Planning Authorities. Further information on this matter is provided in response to Question 1 of Matter 4.
- 14.4. Draft Policy SP7 forms a component of the proposed spatial strategy for the level and distribution of residential development. It provides policy mechanisms which manage the delivery of housing and as such support the achievement of the envisaged level and distribution of development. As such, draft Policy SP7 is also considered to be 'positively prepared'.
- 14.5. Draft Policy SP7 is considered to be 'justified' as it positively contributes to and provides confidence regarding the deliverability of the proposed spatial strategy for the level and distribution of residential development across Shropshire. Shropshire Council strongly believes that this proposed spatial strategy will positively contribute to the achievement of sustainable development and the long-term sustainability of Shropshire. It is also considered to directly respond to the unique and varied characteristics of Shropshire and the needs of our diverse communities.
- 14.6. Furthermore, the policy mechanisms within draft Policy SP7:
 - a. Ensure that proposed residential development guidelines for settlements are given appropriate 'status' within the draft Shropshire Local Plan and within the Planning Application decision making process. This 'status' is important, given that the proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community as part of the Local Plan Review process.
 - b. Positively contribute to and provide confidence regarding the deliverability of proposed residential development guidelines for settlements. Shropshire Council considers that the achievement of the proposed residential development guidelines for settlements will meet local housing needs and contribute to ensuring the long term sustainability of our communities.
- 14.7. Draft Policy SP7 has been informed by a proportionate and robust evidence base, in particular it has been informed by and

appraised within the Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessment (**SD008.01-SD008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**) undertaken using an iterative process reflecting that undertaken to prepare the draft Shropshire Local Plan.

- 14.8. The approach to development guidelines within draft Policy SP7 is also responsive to and reflects discussions undertaken with key infrastructure providers and the levels of development considered within the evidence base prepared to inform the draft Shropshire Local Plan.
- 14.9. The proposed policy mechanisms in draft Policy SP7 have also been subject to Regulation 18 'Plan Making' consultation, with the responses to this consultation informing subsequent proposals.
- 14.10. Proposals were also consulted upon as part of the Regulation 19 'Pre-Submission' Consultation. Following this consultation representations were carefully considered before full Council approval was sought to submit the draft Shropshire Local Plan for examination.
- 14.11. Draft Policy SP7 is considered to be 'effective' as it contains policy mechanisms that are directly implementable through the Planning Application process. These mechanisms provide certainty to all (the decision maker, applicants and communities) regarding the key considerations in circumstances where either proposed residential development guidelines for settlements will be exceeded or where there is clear evidence that the residential development guideline for a settlement is unlikely to be met over the plan period.
- 14.12. Importantly these mechanisms support the delivery of the proposed spatial strategy for the level and distribution of residential development (which has been informed by 'duty to cooperate' discussions undertaken with adjoining and closely related Local Planning Authorities).
- 14.13. Furthermore, a clear mechanism is available for monitoring the use and effectiveness of draft Policy SP7 (net additional dwellings in settlements with proposed residential development guidelines and in the wider rural area).
- 14.14. Draft Policy SP7 is considered to be 'consistent with national policy'. In summary:
- 14.15. The proposed policy mechanisms in draft Policy SP7 manage the delivery of housing and support the delivery of the proposed spatial strategy for the level and distribution of residential development, as such it is considered to be consistent with

Paragraphs 11 and 60-61 of the National Planning Policy Framework (NPPF).

- 14.16. Consistent with Paragraph 20 of the NPPF, draft Policy SP7 provides mechanisms which will support the achievement of the overall strategy for the level and distribution of residential development and also ensures due consideration is given to provision of infrastructure and community facilities in circumstances where a residential development guideline for a settlement appears likely to be exceeded as the result of a Planning Application.
- 14.17. Draft Policy SP7 provides clear mechanisms for managing housing delivery and contributes to the overarching strategy for bringing enough land forward at a sufficient rate to achieve the proposed spatial strategy for the level and distribution of residential development, consistent with Paragraph 23 of the NPPF.
- 14.18. As such, Shropshire Council considers that draft Policy SP7 is positively prepared, justified, effective and consistent with national policy.

How have the residential guidelines been derived?

- 14.19. The proposed residential development guidelines for settlements in Shropshire are very much linked to and form an important component of the proposed spatial strategy for the level and distribution of residential development (including the principles of urban focus).
- 14.20. As such, the process utilised to identify the proposed residential development guidelines for settlements is an intrinsic component of the process undertaken to identify the proposed spatial strategy for the level and distribution of residential development. This process is summarised within Paragraphs 2.54-2.103 of Chapter 2 of the Housing Topic Paper (**GC4i**).
- 14.21. Focussing specifically on the components of this process relating to the preparation of residential development guidelines for settlements, the key stages can be summarised as follows:
- 14.22. A high-level structure for the distribution of development and an associated settlement hierarchy were established.
- 14.23. Alongside and subsequent to this process, proposed residential development guidelines for settlements were developed. The identification of these proposed residential development guidelines was informed by careful consideration of a range of information, including:
- a. Each settlement's role within the high-level structure for the distribution of residential development and settlement hierarchy.

- b. Existing commitments (including sites with Planning Permission, Prior Approval or allocated within the adopted Local Plan without Planning Permission) and completions already achieved within the proposed Plan period.
- c. Each settlement's specific characteristics, constraints and opportunities – informed by the evidence base produced to inform the preparation of the draft Shropshire Local Plan.
- d. Our understanding of the importance of ensuring the long term vitality and sustainability of communities, the hinterland they support and the principles of sustainable development.
- e. Responses to Regulation 18 'Plan Making' stages of consultation.
- f. Technical assessments (Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment) which both informed and assessed proposals, using an iterative process reflecting the development of the draft Shropshire Local Plan.
- g. The requirements of the NPPF.

Do these policies duplicate parts of other policies?

- 14.24. The proposed spatial strategy for the level and distribution of development is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan and then expanded upon within the wider draft Policies of the draft Shropshire Local Plan. Draft Policy SP7 is one such policy that expands on this proposed spatial strategy, with a specific focus on managing the delivery of residential development.
- 14.25. In this way, draft Policy SP7 is an important component of and is complementary to the wider proposed spatial strategy. Whilst there are other draft policies that contribute to this proposed spatial strategy, it is considered that they are complementary and that there is no duplication between them.
- 14.26. For instance, draft Policy SP8 provides the overarching strategy for the management of development within proposed Community Hubs. However, it specifically cross-references draft Policy SP7 for the considerations in circumstances where the proposed residential development guideline for a Community Hub will be exceeded.
- 14.27. It should be noted that proposed Community Clusters do not have proposed residential development guidelines, but draft Policy SP9 includes a policy requirement relating to the cumulative impact that broadly aligns with the approach in draft Policy SP7 (whilst also recognising the role and scale of development within the Community Cluster settlements).

- 14.28. Similarly, the draft Strategic/Principal/Key Centre and Community Hub settlement policies (within S1-S18) identify and provide strategies for achieving the proposed settlement residential development guidelines. However, these strategies are informed by the overarching strategic mechanisms for managing housing delivery identified within draft Policy SP7. These settlement policies and the proposed residential development guidelines they contain are also considered to expand on and complement rather than duplicate the proposed spatial strategy for the level and distribution of residential development.

Question 15. Is the Community Hub and Community Cluster approach to development set out in Policies SP8 and SP9 justified and effective and consistent with national planning policy? Do these policies duplicate parts of other policies?

Shropshire Council Response:

Is the Community Hub and Community Cluster approach to development set out in Policies SP8 and SP9 justified and effective and consistent with national planning policy?

- 15.1. Shropshire Council considers that the proposed strategy and approach to managing development within proposed Community Hubs, as set out within draft Policy SP8, and the approach to managing development within proposed Community Clusters, as set out within draft Policy SP9, are justified, effective and consistent with national policy.
- 15.2. Draft Policies SP8 and SP9 are considered to be 'justified' as they provide an appropriate overarching strategy for the management of development within Community Hubs and Community Clusters respectively. These overarching strategies are considered to be complementary to, informed by, and facilitate the role that the diverse range of settlements comprising Community Hubs and Community Clusters are envisaged to play within the draft spatial strategy for the level and distribution of development across Shropshire.
- 15.3. They also provide the starting point and are appropriately expanded upon within the proposed settlement policies (within S1-S18) for proposed Community Hubs and Community Clusters and other detailed policies of the draft Shropshire Local Plan.
- 15.4. Draft Policies SP8 and SP9 have been informed by a proportionate and robust evidence base. In particular they have been informed by and appraised within the Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations

Assessment (**SD008.01-SD008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**) undertaken using an iterative process reflecting that undertaken in the preparation of the draft Shropshire Local Plan.

- 15.5. Draft Policies SP8 and SP9 have also been subject to Regulation 18 'Plan Making' consultation, with the responses to this consultation informing subsequent proposals.
- 15.6. The draft policies were also consulted upon as part of the Regulation 19 'Pre-Submission' Consultation. Following this consultation representations were carefully considered before full Council approval was sought to submit the draft Shropshire Local Plan for examination.
- 15.7. Draft Policies SP8 and SP9 are considered to be 'effective' as they provide policy mechanisms, within the overarching strategy for managing development in proposed Community Hubs and Community Clusters, which are considered to be directly implementable within the Planning Application process (they are also appropriately expanded upon within the wider draft policies of the draft Shropshire Local Plan) and will contribute to the effective management of development within Community Hub and Community Cluster settlements, including delivering development that reflects individual settlement character, capacity and needs.
- 15.8. In this way draft Policies SP8 and SP9 will facilitate Community Hubs and Community Clusters achieving the role envisaged for them within the draft spatial strategy for the level and distribution of development across Shropshire. Also with regard to Community Hubs, which are the proposed focus for development in rural areas, the achievement of the proposed residential development guidelines within the proposed settlement policies (within S1-S18).
- 15.9. Furthermore, clear mechanisms are available for monitoring the use and effectiveness of draft Policies SP8 and SP9 (particularly net additional dwellings and net additional employment floorspace within Community Hubs and Community Clusters respectively).
- 15.10. Draft Policies SP8 and SP9 are considered to be 'consistent with national policy'. In particular:
- 15.11. They complement and will contribute to the achievement of the overall spatial strategy for the level and distribution of development, by facilitating Community Hubs and Community Clusters achieving the role envisaged for them within the draft spatial strategy for the level and distribution of development across Shropshire. Also with regard to Community Hubs, draft Policies SP8 identifies the role of development boundaries and

providing a framework for the achievement of the proposed residential development guidelines within the proposed settlement policies (within S1-S18), consistent with Paragraph 20 of the National Planning Policy Framework (NPPF).

- 15.12. Consistent with Paragraph 21 of the NPPF, the overarching strategy and the policy mechanisms within draft Policies SP8 and SP9 provide a clear starting point for other draft policies within the draft Shropshire Local Plan. Indeed, they are expanded upon within a number of detailed 'thematic' and settlement policies.
- 15.13. Consistent with Paragraphs 78-80 of the NPPF, the overarching strategy for the management of development within Community Hubs and Community Clusters (appropriately supported by other proposed policies within the draft Shropshire Local Plan) will:
- a. Positively respond to local circumstances and facilitate an appropriate level, quality, type and mix of residential development within the proposed Community Hubs and proposed Community Clusters, that reflects and is responsive to local needs and the role of the settlement within the proposed spatial strategy for the level and distribution of residential development.
 - b. Facilitate the delivery of appropriate rural exception sites and appropriate cross-subsidy exception sites at Community Hubs and Community Clusters, subject to wider policy requirements.
 - c. Promote sustainable development in Community Hubs and Community Clusters. Community Hubs are significant rural service centres and the focus for development within the rural area. Community Clusters are settlements within the rural area with aspirations to maintain or enhance their sustainability.
 - d. Direct the majority of rural development to locations and settlements where it is best placed to enhance or maintain the vitality of rural communities and support local services.
 - e. In combination with other relevant draft policies, will effectively avoid isolated homes in the countryside (apart from specific exceptions).
- 15.14. Consistent with Paragraph 84 of the NPPF, the overarching strategy for the management of development within Community Hubs and Community Clusters (appropriately supported by other proposed policies within the draft Shropshire Local Plan) will:
- a. Enable the sustainable growth and expansion of all types of business in Community Hubs and Community Clusters, both through conversion appropriately located and suitable existing buildings and appropriately located and well-designed new buildings.

- b. Support the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

Do these policies duplicate parts of other policies?

- 15.15. Shropshire Council considers that draft Policies SP8 and SP9 complement and form a cohesive policy framework for managing development within proposed Community Hubs and proposed Community Clusters respectively, rather than simply duplicating parts of other draft policies. Indeed, this is recognised through the cross-referencing between the relevant draft policies.
- 15.16. The role of Community Hubs and Community Clusters within the proposed spatial strategy for the level and distribution of residential development is documented within draft Policy SP2. However, the overarching strategy for achieving the role envisaged for these settlements is captured within draft Policies SP8 and SP9 respectively.
- 15.17. The approach to Community Hubs and Community Clusters is also considered complementary to and complemented by that for the wider rural area, as documented within draft Policy SP10.
- 15.18. Within the settlement policies (S1-S18), there are policies setting out the strategies for the proposed Community Hubs and Community Clusters, grouped by Place Plan Area. These strategies are in the context of and directly cross-reference the overarching strategies for Community Hubs and Community Clusters across Shropshire (in draft Policies SP8 and SP9). In this way, the settlement policies expand upon and complement draft Policies SP8 and SP9 of the draft Shropshire Local Plan and structure the presentation of detailed settlement policies in accordance with the proposed Settlement Hierarchy.
- 15.19. This approach is not considered to constitute duplication, but rather reflects the relationship between strategic and non-strategic policies envisaged within the NPPF. It provides certainty to all parties (including the decision maker, development industry and communities) about the role of Community Hubs and Community Clusters, and the forms of development appropriate within them. It is also reflective of and responsive to the geography of Shropshire and the structure of the proposed Settlement Hierarchy.
- 15.20. Draft Policies SP8 and SP9 address at a 'strategic' or high level, development considerations such as climate change/energy efficiency, infrastructure, and protection of natural and heritage assets. These issues are then appropriately expanded upon

within the detailed 'thematic' policies of the draft Shropshire Local Plan.

- 15.21. This approach is again not considered to represent duplication, but rather reflects the relationship between strategic and non-strategic policies envisaged within the NPPF. It provides certainty to all parties, including the decision maker, development industry and communities regarding the considerations and requirements for development within Community Hubs and Community Clusters.

Question 16. Is the approach to development in the countryside, set out in Policy SP10, justified and effective and consistent with national planning policy? Should it be more flexible and less restrictive? Is the policy overly long and complicated and does some of it duplicate other policies? Would this policy be more effective as several shorter, targeted development management policies?

Shropshire Council Response:

Is the approach to development in the countryside, set out in Policy SP10, justified and effective and consistent with national planning policy?

- 16.1. Shropshire Council considers that the strategy and approach to managing development in the countryside set out in draft Policy SP10 is justified, effective and consistent with national policy.
- 16.2. Draft Policy SP10 is considered to be 'justified' as it provides an appropriate overarching strategy for the management of development within the wider rural area. This overarching strategy is considered to be complementary to, informed by, and facilitate the role that the wider rural area is envisaged to play within the draft spatial strategy for the level and distribution of development across Shropshire. It also reflects local requirements and circumstances.
- 16.3. Draft Policy SP10 also provides the starting point for and is appropriately expanded upon within the detailed policies of the draft Shropshire Local Plan.
- 16.4. Draft Policy SP10 has been informed by a proportionate and robust evidence base. In particular it has been informed by and appraised within the Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessment (**SD008.01-SD008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**) undertaken using an iterative process reflecting that undertaken in the preparation of the draft Shropshire Local Plan.

- 16.5. Draft Policy SP10 has also been subject to Regulation 18 'Plan Making' consultation, with the responses to this consultation informing subsequent proposals.
- 16.6. It was also consulted upon as part of the Regulation 19 'Pre-Submission' Consultation. Following this consultation representations were carefully considered before full Council approval was sought to submit the draft Shropshire Local Plan for examination.
- 16.7. Draft Policy SP10 is considered to be 'effective' as it provides policy mechanisms, within the overarching strategy for managing development in the wider rural area, which are considered to be directly implementable within the Planning Application process (they are also supported and appropriately expanded upon within the wider draft policies of the draft Shropshire Local Plan) and will contribute to the effective management of development within the wider rural area.
- 16.8. In this way, draft Policy SP10 will support sustainable development in the wider rural area fulfilling the role envisaged for it within the proposed spatial strategy for the level and distribution of development across Shropshire. It will also support the proposed urban areas, proposed Community Hubs and proposed Community Clusters fulfilling their roles within the proposed spatial strategy for the level and distribution of development.
- 16.9. Furthermore, clear mechanisms are available for monitoring the use and effectiveness of draft Policy SP10 (particularly net additional dwellings, net additional affordable dwellings, percentage of new and converted dwellings on previously developed land, net additional employment floorspace, and percentage of net additional employment floorspace on previously developed land within the wider rural area).
- 16.10. Draft Policy SP10 is also considered to be 'consistent with national policy'. In particular:
- 16.11. Consistent with Paragraph 16 of the National Planning Policy Framework (NPPF), it will positively contribute to a sustainable strategy for the distribution of development in Shropshire.
- 16.12. Consistent with Paragraph 20 of the NPPF, it complements and will contribute to the achievement of the overall spatial strategy for the level and distribution of development by:
 - a. Providing an overarching strategy and strategic considerations which enable the wider rural area to achieve the role envisaged for it within the draft spatial strategy for the level and distribution of development across Shropshire.

- b. Supporting the proposed urban areas, proposed Community Hubs and proposed Community Clusters fulfilling the roles envisaged for them within the draft spatial strategy for the level and distribution of development across Shropshire.
- 16.13. Consistent with Paragraph 21 of the NPPF, the overarching strategy and the strategic considerations within draft Policy SP10 provide a clear starting point for other draft policies within the draft Shropshire Local Plan.
- 16.14. Consistent with Paragraphs 78-80 of the NPPF, the overarching strategy for the management of development within the wider rural area (appropriately supported by other proposed policies within the draft Shropshire Local Plan):
- a. Is responsive to local circumstances and local needs and reflects the role of the wider rural area within the proposed spatial strategy for the level and distribution of residential development.
 - b. Promotes a sustainable and appropriate approach to development in rural areas, which ensures that rural housing is located where it will enhance or maintain the vitality of rural communities, by:
 - i. Directing the majority of the development to the proposed Community Hubs (the significant rural service centres) and Community Clusters (settlements with aspirations to maintain or enhance their sustainability).
 - ii. Allowing for appropriate complementary development within the wider rural area - including specialist rural accommodation requirements, affordable housing on rural exception sites and where necessary and appropriate a mix of open market and affordable housing on cross-subsidy sites.
 - c. Avoids the development of isolated homes in the countryside (apart from specific exceptions).
- 16.15. Consistent with Paragraph 84 of the NPPF, the overarching strategy for the management of development within the wider rural area (appropriately supported by other proposed policies within the draft Shropshire Local Plan):
- a. Enables the continuance of and appropriate sustainable growth of businesses in rural areas through:
 - i. Small-scale new economic development diversifying the rural economy, including farm diversification schemes.
 - ii. The retention and appropriate expansion of an existing established business (subject to detailed requirements).
 - iii. Sustainable reuse of redundant or disused buildings or replacement of suitably located buildings for small scale economic development / employment generating use.

- b. Supports the appropriate development and diversification of agricultural and other land-based rural businesses (including through supporting the provision of appropriate specialist housing for rural workers).
- c. Supports appropriate sustainable rural tourism, sustainable leisure or sustainable recreation proposals and the provision of required community uses and infrastructure which cannot be accommodated within settlements.

Should it be more flexible and less restrictive?

16.16. Shropshire Council considers that draft Policy SP10 is sufficiently flexible and that it would not be appropriate for the policy to be less restrictive. Whilst providing flexibility is important, so too is providing certainty (including the decision maker, applicants and communities).

16.17. Furthermore, Shropshire Council strongly believes that the approach within draft Policy SP10 is complementary to, informed by, and facilitates the proposed spatial strategy for the level and distribution of development (which is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan, and then expanded upon within the wider draft Policies of the draft Shropshire Local Plan). Specifically:

- a. It supports urban areas (Strategic, Principal and Key Centres, Strategic Settlements; and Strategic Sites) fulfilling their role as the focus for the majority of development within the proposed spatial strategy, by carefully managing the forms of development occurring within the wider rural area.
- b. It supports the proposed Community Hubs and Community Clusters fulfilling their role as the 'focus' for development within the rural area within the proposed spatial strategy, again by carefully managing the forms of development occurring within the wider rural area.
- c. It facilitates the role envisaged for the wider rural area (beyond Community Hubs and Community Clusters) within the proposed spatial strategy, where development is intended to be limited to affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.

16.18. It is also considered that the proposed approach is responsive to and reflective of the characteristics of Shropshire, including the additional policy constraints that apply in the AONB and countryside which is also Green Belt.

16.19. The proposed approach within draft Policy SP10 is considered to promote a sustainable approach to development within the rural area. Specifically, it balances the need to provide appropriate

affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification in order to support economic growth/diversification and community vitality with the need to optimise opportunities to reuse land and buildings, minimise adverse impacts of new development, appropriately conserve and enhance the historic and natural environment and our landscape and importantly support and facilitate the proposed spatial strategy for the level and distribution of development in Shropshire.

- 16.20. The proposed approach within draft Policy SP10 is also considered to be responsive to and in alignment with the National Planning Policy Framework (NPPF).
- 16.21. If greater flexibility is provided, there is a real risk that this could undermine the proposed spatial strategy for the level and distribution of residential development and the achievement of sustainable development in Shropshire.

Is the policy overly long and complicated and does some of it duplicate other policies?

- 16.22. Whilst draft Policy SP10 is long, Shropshire Council do not consider that it is overly long or that it is overly complicated. Its length and the policy requirements within it reflect the extensive range of issues that are pertinent, including some that are considered specifically important in a Shropshire context, when seeking to establish an appropriate strategy for the wider rural area and the strategic considerations for development in the rural area.
- 16.23. Draft Policy SP10 also includes sub-headings which provide 'structure' to the policy and assist with its navigation and interpretation.
- 16.24. Ultimately the draft policy is considered to be responsive to and reflective of the characteristics of Shropshire, which includes an extensive and diverse rural area.
- 16.25. Shropshire Council considers that draft Policy SP10 complements and forms part of the cohesive policy framework for managing development within the wider rural area, rather than simply duplicating parts of other draft policies. Indeed, this is recognised through the cross-referencing between the relevant draft policies, which is particularly effective in signposting the relationships between different priorities and demands on the countryside.
- 16.26. The role of the wider rural area within the proposed spatial strategy for the level and distribution of residential development is documented within draft Policy SP2. However, the overarching

strategy for achieving the role for the wider rural area is captured within draft Policy SP10.

- 16.27. Within the settlement policies (S1-S18), there are policies which provide strategies for the wider rural area, grouped by Place Plan Area. These strategies are in the context of and directly cross-reference the overarching strategy for the wider rural area within draft Policy SP10. In this way, the settlement policies expand upon and complement draft Policies SP10 of the draft Shropshire Local Plan.
- 16.28. This approach is not considered to constitute duplication, but rather reflects the relationship between strategic and non-strategic policies envisaged within the NPPF. It provides certainty to all parties (including the decision maker, development industry and communities) about the role of the wider rural area and the forms of development appropriate within it. It is also reflective of and responsive to the geography, characteristics, issues and priorities of Shropshire.
- 16.29. Draft Policy SP10 addresses at a 'strategic' or high level, development considerations such as affordable housing, rural employment provision, infrastructure, and protection of natural and heritage assets. These issues are complementary to the other strategic policies and appropriately expanded upon within the detailed 'thematic' policies of the draft Shropshire Local Plan.
- 16.30. This approach is again not considered to represent duplication, but rather reflects the approach taken within the draft Shropshire Local Plan for establishing an appropriate strategy for Shropshire and the relationship between strategic and non-strategic policies envisaged within the NPPF.

Would this policy be more effective as several shorter, targeted development management policies?

- 16.31. Shropshire Council strongly believes that draft Policy SP10 is a 'strategic' policy, as it sets out the overarching strategy for the wider rural area, including the strategic considerations for development in the rural area. This is in the context of and forms an important component of the proposed spatial strategy for the level and distribution of development.
- 16.32. It is recognised that the draft Policy covers an extensive range of issues, but this is because these issues are considered pertinent in the context of seeking to identify an appropriate strategy for the wider rural area and strategic considerations for the management of development in the rural area. As such draft Policy SP10 provides a primary reference point for the consideration of proposals for development in the countryside.

- 16.33. Ultimately the draft policy is considered to be responsive to and reflective of the characteristics of Shropshire, which includes an extensive and diverse rural area.
- 16.34. Currently, if seeking to determine what forms of development are appropriate within the wider rural area, draft Policy SP10 provides a clear 'gateway' for all (the decision maker, applicants and the community). Furthermore, 'structure' is provided to the draft policy through the use of sub-headings, which are linked to the key thematic issues.
- 16.35. If draft Policy SP10 were sub-divided into a number of policies, there is a real concern that this could create confusion for all (the decision maker, applicants and the community) about which policy is relevant in the particular circumstances. It is also likely that there will be instances where a number of these policies would be relevant which would require the navigation between them. Whilst cross-referencing will support this process, there is a risk that this could result in policy requirements being missed or misunderstood.

Question 17. Is Policy SP12 justified effective and consistent with national policy?

Shropshire Council Response:

- 17.1. Shropshire Council considers that Draft Policy SP12 is justified, effective and consistent with national policy.
- 17.2. Draft Policy SP12 is justified as it provides a clear and overarching strategy to support a 'step change' in the economic growth and productivity of the local economy in Shropshire. This strategy is based on the adopted Shropshire Economic Growth Strategy (SEGS) (2017) (**EV044**) which has been implemented from 2017 to 2022 during the preparation of the Draft Local Plan.
- 17.3. The Draft Local Plan proposes Policy SP12 to support Policy SP2 and SP14 which set out and manage the implementation of the spatial strategy. Policies SP2, SP12 and SP14 together therefore set out the spatial and thematic objectives for the decision-making process. This supports Policy SP13 in relation to the determination of the suitability and sustainability of employment development in the County.
- 17.4. Draft Policy SP12 uses the SEGS as a pathway for the economic spatial strategy to deliver sustainable economic growth and investment focused into strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations.

- 17.5. Draft Policy SP12 is effective as its overarching strategy of supporting the growth of the local economy is based on the key objectives of the SEGS comprising a broad policy spectrum to support the economic growth of the County. This is integrated into the settlement hierarchy and expressed through the scale, distribution, range and choice of development opportunities promoted by the Draft Local Plan.
- 17.6. It is considered that Draft Policy SP12 is capable of being implemented through the development management process during the Plan period. The policy explanation sets out the primary objectives for decision makers at paragraph 3.117:
- a. to facilitate sustainable economic growth, a 'step change' is needed in Shropshire's economic productivity because the County has the potential to do more and to do it better.
 - b. this is based on four key objectives to:
 - i. support and grow new and existing businesses;
 - ii. attract inward investment to the County,
 - iii. develop and retain workforce talents and skills and to
 - iv. facilitate new ways of working that transform business environments into digital 'workplaces', reducing the need to travel, changing the requirements for business premises and contributing towards a more sustainable work/life balance.
- 17.7. This spatial strategy and the related strategic policies, settlement strategies and proposed site allocations have been informed by and appraised by the Sustainability Appraisal (SA) (**SD006.01-SD006.22**), Habitats Regulations Assessment (HRA) (**SD008.01-SC008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**). These assessments were carried out on an iterative basis alongside the preparation of the Draft Shropshire Local Plan.
- 17.8. The draft policy has also been informed by several Regulation 18 consultations during the Draft Local Plan preparation process. Responses received to these consultations were carefully considered at each stage and informed subsequent stages of the process.
- 17.9. Draft Policy SP12 was consulted on at the Regulation 19 pre-submission stage. Representations were carefully considered before full Council approval was given to submit the Draft Local Plan.
- 17.10. A proportionate and robust evidence base supports the overarching strategy. This comprises the Economic Development Needs Assessment (**EVO043**) to identify the development needs of the County to support the objectives of the SEGS. The EDNA

was informed by the Shropshire Business Survey (**EV018**) and the Business Grow On Space Study (**EV017**). The Employment Land Review (**EV046**) also informed the selection of the proposed site allocations and was further supported by the M54 Strategic Study (**EV072**). These have been used to inform and assess the Plan's draft policies and proposed site allocations through its preparation process.

- 17.11. The strategy is further evidenced through an extensive discussion of Shropshire's economic opportunities and challenges in the Employment (Requirement) Topic paper (**EV112**) and the Employment Strategy Topic Paper (**GC4n**). The Strategy Topic Paper identifies the current successes of the SEGS at paragraphs 2.9-2.11 and Table 1 despite the impacts of both the Brexit decision and the Covid-19 pandemic. The further supporting evidence speaks to the deliverability of the strategy to achieve the economic potential of the County.
- 17.12. Draft Policy SP12 is consistent with national policy and guidance as set out in the National Planning Policy Framework (NPPF) in paragraphs 80-83, 147 and 177 as follows.
- 17.13. Sets out a clear vision and strategy – the Employment Strategy Topic Paper identifies that together the SEGS and the Draft Plan will harness Shropshire's economic potential, increase our productivity and utilise our opportunities and assets including skills and expertise, focusing on the following objectives in the SEGS:
 - a. Strategic locations and economic relationships within the County with its strategic and local partners, its neighbouring authorities and its other partners and stakeholders;
 - b. Major employment sites and strategic corridors for local and inward investment;
 - c. Target growing and under-represented sectors to meet identified needs;
 - d. Enable businesses to start, grow and succeed by addressing barriers to investment in those enterprises that wish to expand and across the urban and rural development settlements and in appropriate locations in the rural areas of the County;
 - e. Deliver strategic and local infrastructure to support growth in the urban and rural development settlements across the County.
 - f. Delivering a better and more attractive housing mix with a broader range of affordable housing choices;
 - g. Supporting all segments of the working age population and those wishing to extend their careers beyond retirement age

to access training and develop skills to gain employment and remain in the local labour market and to promote Shropshire's 'offer' to investors through the vision: *"To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high-quality assets"*.

17.14. Seeks to protect the environmental assets of the County - The economic spatial strategy considers the sustainability of the proposed scale of growth to ensure the vision and strategy for promoting economic development and employment opportunities and the key delivery objectives are achievable without significant impacts on key environmental assets in the County. This focuses in particular on the:

- a. Green Belt - the urban focus in the distribution of development reflects the opportunities for sustainable growth within East Shropshire including the M54 Corridor and the significant growth potential of Principal Centres and Key Centres in east Shropshire. This approach offers the best opportunity within the County to achieve sustainable housing and employment delivery and to enable Shropshire to utilise and respond positively to future investment opportunities and to achieve a sustainable pattern of growth. Policy SP12 supports the requirement to protect the Green Belt in accordance with the requirement for very special circumstances for any development that is harmful to the Green Belt.
- b. Shropshire Hills Area of Outstanding Natural Beauty (SHAONB) – the Draft Local Plan responds positively to the presence of the SHAONB covering 25% of the administrative area of Shropshire across the south of the County. The use of land within the AONB for development is restricted under national policy to ensure major development may only occur in exceptional circumstances. Policy SP12 supports this requirement to protect the AONB from major development.

Question 18. Is Policy SP13 justified effective and consistent with national policy? Should figure SP13.1 text be included within Policy SP13?

Shropshire Council Response:

18.1. Shropshire Council considers that Draft Policy SP13 is justified, effective and consistent with national policy.

- 18.2. Draft Policy SP13 is justified as it introduces the 300ha employment land requirement in the context of promoting the development of employment generating uses consistent with the changes to the planning system following the Use Class Order Amendment (2020).
- 18.3. The identification of the 300ha employment land requirement is a key mechanism whereby the Draft Local Plan demonstrates that it is positively prepared. This is because the 300ha will meet both the objective needs of the County for employment development and will also make a contribution towards unmet employment needs in the Black Country. This provision also serves to establish the presumption in the Draft Local Plan for sustainable development (NPPF paragraph 11) and that the Draft Local Plan and its spatial strategy are sound (NPPF paragraph 35).
- 18.4. These requirements are recognised in the Economic Development Needs Assessment (**EVO43**) and introduced through Policy SP13 in the Draft Local Plan. This also satisfies key objectives of the adopted Shropshire Economic Growth Strategy (SEGS) (2017) (**EVO44**) which has been implemented from 2017 to 2022 during the preparation of the Draft Local Plan.
- 18.5. In particular, the economic spatial strategy in Policy SP13 will help Shropshire to ensure there is a plan led approach to achieving sustainable development (SEGS page 8). This will include proper consideration of the County's strategic location and economic relationships. The economic spatial strategy will seek to ensure that major employment sites may be developed and that these are located in identified growth corridors (SEGS page 8). The strategy will also enable businesses to start, grow and succeed (SEGS page 15) supported by effective promotion of the County to attract new investment and deliver new employment to enable people to live and work in the County (SEGS page 28).
- 18.6. Draft Policy 13 also identifies the material considerations for decision makers to determine the suitability and sustainability of employment development in the County for allocated and windfall development. Policy SP13 also sets out the material considerations whereby decision makers may determine whether to protect existing employment land and premises for continued use by employment generating uses.
- 18.7. Policy SP13 will contribute to achieving these objectives by managing these investment demands and ensuring that properly serviced, appropriately designed and demonstrably sustainable employment development will be delivered in the County to 2038.

- 18.8. This is supported by Policies SP2, SP12 and SP14 which together set out and manage the implementation of the spatial strategy by setting out the spatial and thematic objectives for the decision-making process.
- 18.9. Draft Policy SP13 has been informed by and appraised by the Sustainability Appraisal (SA) (**SD006.01-SD006.22**), Habitats Regulations Assessment (HRA) (**SD008.01-SC008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**). These assessments were carried out on an iterative basis alongside the preparation of the Draft Shropshire Local Plan.
- 18.10. The draft policy has also been informed by several Regulation 18 consultations during the Draft Local Plan preparation process. Responses received to these consultations were carefully considered at each stage and informed subsequent stages of the process.
- 18.11. Draft Policy SP13 was consulted on at the Regulation 19 pre-submission stage. Representations were carefully considered before full Council approval was given to submit the Draft Local Plan.
- 18.12. A proportionate and robust evidence base supports the overarching strategy. This comprises the Economic Development Needs Assessment (**EV0043**) to identify the development needs of the County to support the objectives of the SEGS. The EDNA was informed by the Shropshire Business Survey (**EV018**) and the Business Grow On Space Study (**EV017**). The Employment Land Review (**EV046**) also informed the selection of the proposed site allocations and was further supported by the M54 Strategic Study (**EV072**). These have been used to inform and assess the Plan's draft policies and proposed site allocations through its preparation process.
- 18.13. The strategy is further evidenced through an extensive discussion of Shropshire's economic opportunities and challenges in the Employment (Requirement) Topic paper (**EV112**) and the Employment Strategy Topic Paper (**GC4n**). The Strategy Topic Paper identifies the current successes of the SEGS at paragraphs 2.9-2.11 and Table 1 despite the impacts of both the Brexit decision and the Covid-19 pandemic.
- 18.14. This further supporting evidence in the Topic Papers speaks to the deliverability of the strategy to achieve the economic potential of the County.

Should figure SP13.1 text be included within Policy SP13?

- 18.15. It is considered that the inclusion of the text of figure SP13.1 within Policy SP13 would be a sensible modification to the Plan.

- 18.16. The intention in Policy SP13 to protect existing employment land and premises in the County is explained in the policy explanation at paragraph 3.136. Paragraph 3.136 continues that the rationale for this protection is: *“because these established business locations accommodate our existing employers, provide grow on space and increase our capacity to accommodate new growth and investment. This ensures that strategic and local employers can secure their operational base and meet their future development needs for growth and expansion of their business.”*
- 18.17. The text of Policy SP13(7) sets out the policy tests for the protection of existing employment land and premises. These policy tests are based on the contribution of the site to the employment land supply, the suitability and viability of the site to continue to support employment uses and the degree to which the proposed alternative use would out-weigh these material considerations for the protection of the site.
- 18.18. Figure 13.1 and the explanation in paragraph 3.138 extends the intention of the policy text in SP13 to also consider the:
- a. purpose of the site; and
 - b. the significance of existing employment areas in a hierarchical ranking of sites defined by the Shropshire Strategic Sites and Employment Areas Study for Shrewsbury (Phase 1) and the Market Towns and Key Centres (Phase 2).
- 18.19. These important material considerations for protecting existing employment land and premises are found in Figure 13.1. These make a significant contribution to any decision to protect or release employment land and premises for alternative uses.
- 18.20. The Council therefore recognise the following facts:
- a. the text of Figure 13.1 may usefully be added to Policy SP13 as new criterion 8 to support the decision-making process in determining whether to protect or release existing employment areas for alternative uses;
 - b. reflecting further on the text of Policy SP13, existing criterion 7 referring to the protection of *“allocated employment land and established employment areas primarily for Class B employment uses”* might also benefit from the inclusion of Class E(g)(i),(ii),(iii).
- 18.21. Shropshire Council would therefore have no objection to considering these additions to the policy text of SP13 as modifications to the Plan.

Question 19. Is Policy SP14 justified effective and consistent with national policy? Should the corridors be marked on a map or plan? Is this policy consistent with other policies in the Local Plan? Is it the purpose of this policy to allow for significant growth in addition to that allocated in the Local Plan, including development in the Green Belt?

Shropshire Council Response:

Is Policy SP14 justified effective and consistent with national policy?

- 19.1. Shropshire Council considers that draft Policy SP14 is justified, effective and consistent with national policy.
- 19.2. Draft Policy SP14 is justified as it provides a plan led approach to managing possible consequences from the significant promotional energies and important business and sector support services of the Invest in Shropshire programme operated by Shropshire Council with its Marches LEP and business community partners and other key stakeholders. The effective promotion of Shropshire as an investment location is a key objective of the adopted Shropshire Economic Growth Strategy (SEGS) (2017) (EV044) which has been implemented from 2017 to 2022 during the preparation of the Draft Local Plan.
- 19.3. The Draft Local Plan proposes Policy SP14 to support Policy SP2 and SP12 which set out and manage the implementation of the spatial strategy. Policies SP2, SP12 and SP14 together therefore set out the spatial and thematic objectives for the decision-making process. This supports Policy SP13 in relation to the determination of the suitability and sustainability of employment development in the County.
- 19.4. Policy SP14 will contribute to achieving these objectives by managing the spatial orientation of these investment demands and ensuring that properly serviced, appropriately designed and demonstrably sustainable employment development will be delivered in the County to 2038.
- 19.5. Draft Policy SP14 uses the SEGS as a pathway for the economic spatial strategy to deliver sustainable economic growth and investment. This is intended to focus in particular on principal settlements and Strategic Settlements and Sites located in the Strategic Corridors identified in the County. This key objective for the spatial strategy and the related settlement strategies and proposed site allocations have been informed by and appraised by the Sustainability Appraisal (SA) (**SD006.01-SD006.22**), Habitats Regulations Assessment (HRA) (**SD008.01-SC008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**). These assessments were carried out on an iterative basis alongside the preparation of the Draft Shropshire Local Plan.

- 19.6. The draft policy has also been informed by several Regulation 18 consultations during the Draft Local Plan preparation process. Responses received to these consultations were carefully considered at each stage and informed subsequent stages of the process.
- 19.7. Draft Policy SP14 was consulted on at the Regulation 19 pre-submission stage. Representations were carefully considered before full Council approval was given to submit the Draft Local Plan.
- 19.8. A proportionate and robust evidence base supports the overarching strategy. This comprises the Economic Development Needs Assessment (**EV0043**) to identify the development needs of the County to support the objectives of the SEGS. The EDNA was informed by the Shropshire Business Survey (**EV018**) and the Business Grow On Space Study (**EV017**). The Employment Land Review (**EV046**) also informed the selection of the proposed site allocations and was further supported by the M54 Strategic Study (**EV072**). These have been used to inform and assess the Plan's draft policies and proposed site allocations through its preparation process.
- 19.9. The strategy is further evidenced through an extensive discussion of Shropshire's economic opportunities and challenges in the Employment (Requirement) Topic paper (**EV112**) and the Employment Strategy Topic Paper (**GC4n**). The Strategy Topic Paper identifies the current successes of the SEGS at paragraphs 2.9-2.11 and Table 1 despite the impacts of both the Brexit decision and the Covid-19 pandemic. The further supporting evidence speaks to the deliverability of the strategy to achieve the economic potential of the County.
- 19.10. The Topic Papers explain the objectives of the SEGS to increase the economic growth rate of the county and to improve our productivity in terms of our Total GVA output and our GVA per Head output which are key to the delivery of a 'step change' in the economic performance of Shropshire.
- 19.11. Policy SP14 will play a significant role in moving towards these key objectives in the SEGS. The Policy therefore represents a key mechanism by which the Shropshire Local Plan will seek to achieve the objectives of NPPF paragraph 82(a) to "**set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth**" and paragraph 82(b) to "*set criteria...for local and inward investment to match the strategy and to meet anticipated needs over the plan period*" and paragraph 82(d) to be "*flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in economic circumstances*".

- 19.12. The Draft Policy SP14 identifies Strategic Corridors to achieve a key objective of the SEGS and to set out a policy framework to manage development in these growth corridors. It is considered that this approach *“provides the framework for housing and economic delivery across the county ensuring that we have a plan-led approach to achieving sustainable development”* and that the Local Plan sets out an approach which is *“bold, ambitious and forward thinking”* and will ensure we have *“readily available serviced employment sites in the right locations [which] is key to our growth strategy and fundamental to increasing our economic productivity.”*
- 19.13. The extensive discussion of Shropshire’s economic opportunities and challenges in the Employment (Requirement) Topic paper (**EV112**) and the Employment Strategy Topic Paper (**GC4n**) identifies further evidence in relation to the need for greater efficiency in the use of employment land in Shropshire.
- 19.14. NPPF paragraph 124 advocates that planning policies support development that makes efficient use of land. The discussion in the Topic Papers identifies a less than optimal efficiency in the delivery of built floorspace on employment land in most locations except for principal settlements on Strategic Corridors.
- 19.15. Policy SP14 therefore seeks to achieve a more effective approach to the planning of development on allocated land; in particular to improve the efficiency of development in delivering built floorspace (plot ratios) and increasing the out-turn of employment to meet the needs of the County.
- 19.16. In this way, Policy SP14 is considered capable of tightening the effect of Policy SP13 in the delivery of employment floorspace and reinforcing the objectives of the spatial strategy in Policy SP2.
- 19.17. Policy SP14 will also greatly assist in managing windfall employment development across the County especially where promotion of the County and the productivity of the local economy bring forward larger windfall, expansion or inward investment proposals in Shropshire.

Should the corridors be marked on a map or plan?

- 19.18. The Council considers that the Strategic Corridors are explained in sufficient detail Policy SP14 at paragraph 3.142 to clarify the network of corridors through the County. The policy explanation provides sufficient locational indicators in terms of the highway identification in the Strategic Road Network and the principal settlements located along the route of the Strategic Corridors to identify each corridor.

- 19.19. The proposal to mark the Strategic Corridors on a Map is expected to take the form of either a Key Diagram or that the Strategic Corridors be marked on the overarching Policies Map for the County. However, it is considered that the network of Strategic Corridors are appropriately described in Policy SP14.
- 19.20. Shropshire Council acknowledge that this view might be challenged at the Examination into the Draft Local Plan. It is recognised the collective view of those making representations on Policy SP14 and a subsequent recommendation of the Inspector might be to mark the Strategic Corridors on a Map. Shropshire Council would have no objection to considering this amendment to Policy SP14 possibly as a further addition of information to the Policies Map which would also require consultation as a modification to the Plan. It is considered that such a recommendation should properly identify how the Strategic Corridors are to be appropriately mapped in the Plan.

Is this policy consistent with other policies in the Local Plan?

- 19.21. The Draft Local Plan proposes Policy SP14 to support Policy SP2 and SP12 which set out and manage the implementation of the spatial strategy. Policies SP2, SP12 and SP14 together set out the spatial and thematic objectives for the decision-making process. This supports Policy SP13 in relation to the determination of the suitability and sustainability of employment development in the County.
- 19.22. Policy SP14 will contribute to achieving these objectives by managing the spatial orientation of these investment demands and ensuring that properly serviced, appropriately designed and demonstrably sustainable employment development will be delivered in the County to 2038.
- 19.23. Policy SP14 sets out the need for decision makers to consider the provisions for employment development in the context of the policy framework of the Local Plan as a whole. The policy explanation sets out the following provisions to ensure that the policy will operate in a manner consistent with other policies in the Local Plan. These provisions include the following matters:
- “3.144. Development proposals in ‘strategic corridors’ should respond positively to the presence of environmental constraints particularly in the Shropshire Green Belt and the Shropshire Hills AONB.*
- 3.145. Development proposals in ‘strategic corridors’ should also recognise the need to protect the intrinsic character and beauty of the Countryside, landscape character and value and the significance of the natural and historic environment.*

3.146. The County accommodates a broad range of existing land uses in the countryside between settlements. As some of these land uses mature and the sites they occupy are no longer needed or prove to be unsuitable for modern business operations these sites may be capable of redevelopment for alternative uses. This has already occurred at Ironbridge Power Station (Ironbridge) and is expected to occur at the Clive Barracks, Tern Hill.

3.147. This requires the identification of sequentially preferable development in the Strategic Corridors to sustain the urban focus in the Strategic Approach of the Local Plan. The Strategic, Principal and Key settlements in these 'strategic corridors' are the primary focus for development and infrastructure investment for economic growth."

19.24. These requirements all require consideration of related policies in the Draft Local Plan in order for the decision maker to demonstrate their proper determination of proposals for employment development. This is particularly the case for sites located away from the sequentially preferable 'saved' or proposed employment allocations or mixed-use sites which contain land for employment development.

19.25. It is also considered that Policy SP14 is consistent with national policy in NPPF paragraph 21 requiring strategic policies to provide a clear starting point for non-strategic policies in the plan. Policy SP14 provides a key starting point for the decision maker by identifying the material considerations but with their detailed determination falling to considerations in other policies of the Plan.

19.26. Policy SP14 also satisfies a key consideration in national policy for building a strong and competitive economy in NPPF paragraph 82(a) to: *"be flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in economic circumstances"*.

19.27. The SEGS strategy and its objectives identify a need for such flexibility in the spatial strategy. The Plan may then respond to changes, especially increases in investment demands in Shropshire, through the period to 2038.

Is it the purpose of this policy to allow for significant growth in addition to that allocated in the Local Plan, including development in the Green Belt?

19.28. The SEGS set out the need in Shropshire for major employment sites to be delivered and for growth corridors through the County to be identified.

19.29. The SEGS sets out that:

“There will be further opportunities to bring forward new employment land to meet our economic needs and we will work with developers and partners to prepare existing sites for occupation and to identify and prioritise deliverable future sites based on a return on investment. We want to build on our rich legacy of quality business, high added value, quality of life and sustainability. The adopted Local Plan is currently under review...It provides the framework for housing and economic delivery across the county ensuring that we have a plan-led approach to achieving sustainable development.”

“Having readily available serviced employment sites in the right locations is key to our growth strategy and fundamental to increasing our economic productivity. In terms of meeting the needs of Shropshire based companies including those who are starting up and expanding, and to meet the requirements of other businesses and developers outside of the county looking to relocate and invest in the county. We will be bold, ambitious and forward thinking in our methods and approach to prioritising sites, and investing resources where needed to bring these sites forward for employment activity.”

19.30. The Draft Local Plan has therefore identified the Strategic Corridors and set out a policy framework to manage development along these corridors. It is considered that this approach *“provides the framework for housing and economic delivery across the county ensuring that we have a plan-led approach to achieving sustainable development”*. The Draft Local Plan therefore sets out an approach which is *“bold, ambitious and forward thinking”* and will ensure we have *“readily available serviced employment sites in the right locations [which] is key to our growth strategy and fundamental to increasing our economic productivity*. Further, the objectives of the SEGS to increase the economic growth rate of the County and to improve our productivity in terms of our Total GVA output and our GVA per Head output are key to the delivery of a ‘step change’ in our economic performance in Shropshire.

19.31. Policy SP14 will play a significant role in delivering the key objectives of the SEGS and to ensuring the Shropshire Local Plan achieves the objectives of NPPF paragraph 82(a), (b) and (d) to:

- a. *“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth”;*
- b. *“set criteria...for local and inward investment to match the strategy and to meet anticipated needs over the plan period”;*

- d. "be flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in economic circumstances".
- 19.32. Policy SP14 will provide a plan led approach to managing the consequences of the significant promotional energies and important business and sector support services of the Invest in Shropshire programme. This is operated by Shropshire Council along with its Marches LEP and business community partners and other key stakeholders. This is considered to be essential to the vision of the SEGS to ensure Shropshire will *"be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high-quality assets."*
- 19.33. Policy SP14 will ensure larger existing business expansions or inward investment into the County are managed effectively. The Policy will provide for the spatial orientation of these investment demands, ensure they are properly serviced, appropriately designed and are demonstrably sustainable developments. Policy SP14 sets this out in paragraph 3.143 of the Explanation, that Strategic Corridors may:
- "function as the location for the release of significant sites that are suitable and accessible for inward investment on identified 'Strategic Sites' at RAF Cosford, at Clive Barracks, Tern Hill and Ironbridge Power Station and on larger windfall"*
- 19.34. This will comprise major development (of more than 1ha or 1,000sq.m) with large and significant investment opportunities that may not be suited to sequentially preferable sites in the County. Policy SP14 will critical assess these investment demands providing spatial, land use, detailed design and conservation principles to identify the 'break points' for the suitability of such investment proposals.
- 19.35. Key to these 'break points' will be the policy tests for 'appropriate' development in the Green Belt or for the suitability of development considered in relation to 'very special circumstances' or 'exceptional circumstances' in the Green Belt or Shropshire AONB or the Countryside to protect the unique landscape, character and environmental assets of the County.
- 19.36. It should be noted that Policy SP10 managing Development in the Countryside recognises *"the need for flexibility in delivering development to support and meet economic, community and associated needs whilst ensuring that development does not result in unacceptable adverse impacts"*. Policy SP10 manages employment development in these locations in relation to the scale of new development, a focus on established businesses, or

for rural land-based enterprises. Policy SP14 provides for other circumstances in which it might be considered appropriate to extend the flexibility inherent in Policy SP10 to larger developments. SP14 provides the policy framework for considering these other circumstances.

- 19.37. Policy SP14 will be supported by a range of policies within the Plan to ensure the effective management and delivery of investment demands and employment development across the County. In particular it is noted in the explanation to policy SP14 at paragraph 3.149. that:

"The release of greenfield sites for windfall development will only be permitted in exceptional circumstances where the strategic objectives of national and local policy are fully satisfied in relation to the protection of the Green Belt, Area of Outstanding Natural Beauty, Countryside, landscape value and the natural and historic environments. These proposals are expected to be large and significant investment opportunities that cannot reasonably access sequentially preferable sites for reasons including the location, scale, availability and accessibility of those alternative sites."

Question 20. What is the national planning policy basis for Whole Estate Plans (Policy SP15)? What will be the process for endorsement and what will be their purpose? Should SP15 be a non-strategic policy?

Shropshire Council Response:

What is the national planning policy basis for Whole Estate Plans (Policy SP15)?

- 20.1. Whole Estate Plans (WEPs) will be endorsed by Shropshire Council and used as a material consideration in Planning Application decision making process, where they comply with the proposed policy requirements in draft Policy SP15.
- 20.2. The role of material considerations within the Planning Application decision making process is well established through planning law. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) and section 70(2) of the Town and Country Planning Act 1990 (as amended) specify the need to have regard to material considerations in the Planning Application decision making process.
- 20.3. Furthermore, Paragraph 47 of the National Planning Policy Framework (NPPF) addresses the role of material considerations in the Planning Application decision making process.
- 20.4. Annex 2: Glossary of the NPPF also recognises that Supplementary Planning Documents (SPD's) will represent a

material consideration in the Planning Application decision making process. It states *“Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.”*

- 20.5. In effect, where WEPs are endorsed by Shropshire Council they would be attributed status equivalent to that of a SPD, in that they cannot introduce new policy and will not form part of the statutory development plan. However, they can add further detail and aid the understanding and implementation of policies in the development plan within a specific geography, and as such can represent a material consideration in the Planning Application decision making process.

What will be the process for endorsement and what will be their purpose?

- 20.6. The WEP endorsement process will involve the following key stages:
- a. Officer review of the draft WEP to ensure objectives, policies and land use proposals are complementary to and consistent with the objectives and policies of the draft Shropshire Local Plan, particularly draft Policy SP15.
 - b. Officer review of the draft WEP to ensure that the process undertaken in its preparation (including collaboration with relevant external organisations and public engagement) is consistent with the requirements of draft Policy SP15.
 - c. Preparation of a Committee Report for Shropshire Council’s Cabinet.
 - d. Decision by Shropshire Council Cabinet.
- 20.7. Significant areas of land in Shropshire are owned by Estates and as such it is recognised that these Estates have the potential to play an important role in the long-term management of land within the County.
- 20.8. The intention of draft Policy SP15 and the proposed approach to WEPs is to encourage Estates to develop a long-term vision for their land and premises, consider how this vision will be achieved, and provide them with a mechanism by which they can develop and articulate this long-term vision and strategy for its achievement. ***However, importantly this must be within the context of the vision, objectives, spatial strategy and detailed policies of the draft Shropshire Local Plan.***

- 20.9. This approach is intended to facilitate positive discussions and engagement between the Estate and Shropshire Council and importantly between the Estate and our communities.
- 20.10. If endorsed by Shropshire Council, WEPs will form a material consideration in Planning Application decision making process.

Should SP15 be a non-strategic policy?

- 20.11. Shropshire Council identified draft Policy SP15 as a strategic policy, as it seeks to:
- a. Identify the strategic considerations when preparing WEPs.
 - b. Provide the strategic process and governance arrangements for the preparation of WEPs.
- 20.12. Furthermore, it is recognised that WEPs represent strategic documents that provide the long-term vision and strategy for an Estates management of its land and premises.
- 20.13. However, if it is the Planning Inspectors' view that re-classifying draft Policy SP15 as a non-strategic policy rather than a strategic policy would result in a more effective approach, then Shropshire Council would have no objection to considering this as a main modification.

Question 21. Does the Local Plan strategy rely on windfall development and is the windfall allowance based on paragraph 71 of the Framework? Does the windfall allowance for housing need to be set out in the Local Plan?

Shropshire Council Response:

- 21.1. Shropshire Council's approach to residential windfall development is comprehensively summarised within Chapter 6 of the Housing Topic Paper (**GC4i**). In summary:
- 21.2. The proposed spatial strategy for the level and distribution of development across Shropshire recognises the contribution that residential development on windfall sites can make to housing supply and delivery (with a specific reference to such sites contained within the explanation to draft Policy SP2, within which the spatial strategy is primarily captured) and as such allows for a cautious and robust amount of residential development on such sites to contribute towards meeting the proposed housing requirement.
- 21.3. Furthermore, residential development on windfall sites is directly facilitated by the proposed spatial strategy for the level and distribution of residential development, as it establishes a

distribution of development which enables appropriate residential development on windfall sites.

21.4. Windfall residential development is also facilitated by wider strategic and non-strategic policies in the draft Shropshire Local Plan. For instance:

- a. Draft Policy SP7 specifies that there will be positive consideration of sustainable housing development, including on appropriate windfall sites, where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan.
- b. The draft Settlement Policies (S1-S18) identify proposed development strategies for the proposed Strategic, Principal and Key Centres; proposed Community Hubs; and proposed Community Clusters.
 - i. The strategies for proposed Strategic, Principal and Key Centres recognise and allow for appropriate residential development on a variety of forms of windfall site (subject to relevant policy requirements) to contribute towards the achievement of proposed residential development guidelines.
 - ii. The strategies for proposed Community Hubs also recognise and allow for appropriate residential development on a variety of forms of windfall site (subject to relevant policy requirements) to contribute towards the achievement of proposed residential development guidelines. This is also specifically recognised and facilitated within draft Policy SP8.
 - iii. The strategies for proposed Community Clusters recognise and allow for the development of appropriate small-scale windfall sites, subject to policy requirements. This is also specifically recognised and facilitated within draft Policy SP9.
- c. Draft Policy SP10 identifies the forms of residential development appropriate within the 'countryside', which includes a variety of forms of windfall residential development, subject to relevant policy requirements.
- d. Similarly, draft Policy SP11 identifies the more limited forms of residential development appropriate within the Green Belt, which includes forms of windfall residential development, subject to relevant policy requirements.
- e. Affordable housing policies (DP4-DP7) allow for affordable exception, entry level exception, single plot exception and cross-subsidy exception sites to come forward where they comply with relevant draft policies in the draft Shropshire Local Plan. These represent windfall sites.

- 21.5. Shropshire Council considers that the proposed approach to windfall residential development is based on and fully consistent with Paragraph 71 of the National Planning Policy Framework (NPPF). Specifically, it is considered that there is compelling evidence that windfall sites will provide a reliable source of housing land supply and housing delivery over the proposed plan period. This position has been informed by and had due regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 21.6. A comprehensive summary of the compelling evidence that supports the conclusion that windfall sites will provide a reliable source of housing land supply and housing delivery over the proposed plan period is provided within Chapter 6 of the Housing Topic Paper (**GC4i**). In summary:
- 21.7. Shropshire is a large rural county containing the Strategic Centre of Shrewsbury; five Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch); 11 Key Centres (Albrighton, Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem); rural settlements identified as Community Hubs and Community Clusters; hundreds of other rural villages and hamlets; and a significant rural hinterland.
- 21.8. The characteristics of Shropshire are such that there is a constant and significant recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and high uptake of affordable housing exception sites of varying sizes. Development of such sites often represents windfall development.
- 21.9. The Strategic Land Availability Assessment (SLAA) (**EV106.01**) undertaken to inform the draft Shropshire Local Plan Review noted that the adopted Local Plan *"recognises the importance of windfall development in Shropshire and makes allowances for appropriately located windfall sites (where they accord with the policies within the Local Plan) and it is expected that this approach will continue through the Local Plan Review."* It also included an assessment of past completions achieved on small scale windfall sites of less than 5 dwellings and noted that these rates *"supported the conclusions that windfall development does and will continue to represent an important part of the housing land supply."*
- 21.10. It should also be noted that the specific development strategy proposed for each settlement has been informed by careful consideration of the relevant settlements characteristics, constraints, and opportunities. This included consideration of

information available within the SLAA and the wider site assessment process.

- 21.11. Best available data on past completions continues to support the importance of windfall sites as an important and appropriate source of supply for residential development. Specifically, over the five year period from 2016/17 to 2020/21, the average number of dwellings completed on windfall sites equated to some 1,124 dwellings per annum (343 dwellings per annum on small scale windfall sites of less than 5 dwellings and 781 dwellings per annum on medium and large scale windfall sites of 5 or more dwellings).
- 21.12. Existing commitments on sites with Planning Permission or Prior Approval also provide endorsement of the importance of windfall sites in Shropshire. Specifically, as at 31st March 2021, 4,663 dwellings on sites with Planning Permission (consisting of 1,582 dwellings on small scale windfall sites of less than 5 dwellings and 3,051 dwellings on medium and large scale windfall sites of 5 or more dwellings) and 97 dwellings on sites with Prior Approval (consisting of 84 dwellings on small scale windfall sites of less than 5 dwellings and 13 dwellings on medium and large scale windfall sites of 5 or more dwellings) were on windfall sites.
- 21.13. As such, Shropshire Council considers that there is clear and compelling evidence that windfall development has and will continue to represent an important component of the housing land supply and source of housing delivery over the proposed plan period. Therefore, it is considered that the proposed approach to windfall residential development is based on and fully consistent with Paragraph 71 of the NPPF.
- 21.14. As documented above, the proposed spatial strategy for the level and distribution of development within the draft Shropshire Local Plan recognises the contribution that residential development on windfall sites can make to housing supply and delivery and as such allows for a cautious and robust amount of residential development on such sites to contribute towards meeting the proposed housing requirement. It also specifically facilitates residential development on windfall sites through the proposed pattern of development (supplemented by other strategic and non-strategic policies).
- 21.15. Furthermore, the settlement policies (S1-S21) for those settlements with proposed residential development guidelines (the proposed Strategic/Principal/Key Centres and proposed Community Hubs), recognise the contribution that appropriate residential windfall development can make towards achieving the proposed residential development guidelines (subject to relevant policy requirements).

- 21.16. Where appropriate, the explanation to these draft settlement policies includes a cross-reference to Appendix 5 of the draft Shropshire Local Plan. This Appendix identifies the windfall allowance necessary to achieve the proposed residential development guidelines for each of the proposed Strategic/Principal/Key Centres and proposed Community Hubs (as at 31st March 2019). The information within this Appendix will be reviewed annually through the Five Year Housing Land Supply Statement and the Authority Monitoring Report.
- 21.17. It is considered that this approach to windfall residential development is justified, effective and consistent with national policy. It provides certainty about the windfall allowances for specific settlements necessary to achieve proposed residential development guidelines and contributing towards the achievement of the overarching proposed housing requirement for Shropshire, but provides an element of flexibility about the total level of windfall development across Shropshire.
- 21.18. As such, it is not considered necessary for the draft Shropshire Local Plan to identify a specific residential windfall allowance to achieve the proposed housing requirement.

Question 22. Does the Local Plan allocate 10% of the housing requirement on sites no larger than one hectare as set out in paragraph 69 of the Framework or is the Council relying on windfalls and commitments?

Shropshire Council Response:

- 22.1. It is important to note that Paragraph 69 of the National Planning Policy Framework (NPPF) does not require 10% of the housing requirement within a Local Plan to be 'allocated' on small and medium sized sites of 1ha or less. Rather it requires Local Planning Authorities to *"identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare..."*
- 22.2. This is a significant distinction as the housing land supply available and identified through a development plan to achieve a housing requirement will in most instances be wider than proposed allocations.
- 22.3. With regard to the draft Shropshire Local Plan, the supply of sites identified to achieve the proposed housing requirement is diverse. This is perhaps most succinctly summarised within the explanation to draft Policy SP2 of the draft Shropshire Local Plan (within which the proposed spatial strategy for the level and

distribution of development is primarily captured), which includes at Paragraph 3.8:

“The types of site available to achieve the housing requirement in Shropshire are varied and extensive. They include small, medium and large:

- a. Sites with planning permission or prior approval;*
- b. Sites with a ‘resolution to grant’ planning permission;*
- c. Saved SAMDev Plan allocations;*
- d. Local Plan allocations; and*
- e. Windfall opportunities, where sites comply with the requirements of this Local Plan.”*

- 22.4. This is complemented by Paragraph 3.14 of the explanation to the same draft Policy, which explains that *“Appendix 5 of the Local Plan provides information on the residential completions achieved since the start of the Local Plan period and the various commitments (including allocations) available, which will contribute towards achieving the identified housing requirement.”*
- 22.5. Shropshire Council’s approach to small and medium sized residential development sites of up to 1ha in size is comprehensively summarised within Chapter 5 of the Housing Topic Paper (**GC4i**). In summary:
- 22.6. The importance of small and medium sized sites of up to 1ha in size is recognised, embedded within and appropriately facilitated through the proposed spatial strategy and wider policy framework established within the draft Shropshire Local Plan.
- 22.7. The proposed spatial strategy for the level and distribution of development across Shropshire recognises the contribution that small and medium sized sites of up to 1ha can make to housing supply and delivery and as such allows for a cautious and robust amount of residential development on such sites to contribute towards meeting the proposed housing requirement.
- 22.8. Furthermore, the proposed spatial strategy establishes a distribution of development which underpins various draft policies, including those which will facilitate appropriate residential development on small and medium sized sites of up to 1ha.
- 22.9. Draft Policy SP7 specifies that there will be positive consideration of sustainable housing development, this will include on appropriate small and medium sized sites of up to 1ha, where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan.

- 22.10. The draft Settlement Policies (S1-S18) identify proposed development strategies for the proposed Strategic, Principal and Key Centres; proposed Community Hubs; and proposed Community Clusters.
- a. The strategies for proposed Strategic, Principal and Key Centres recognise and allow for appropriate residential development on a variety of forms of small and medium sized windfall sites (subject to relevant policy requirements) to contribute towards the achievement of proposed residential development guidelines.
 - b. The strategies for proposed Community Hubs also recognise and allow for appropriate residential development on a variety of forms of small sized and medium sized windfall site (subject to relevant policy requirements) to contribute towards the achievement of proposed residential development guidelines. This is also specifically recognised and facilitated within draft Policy SP8.
 - c. The strategies for proposed Community Clusters recognise and allow for the development of appropriate small sized windfall sites, subject to policy requirements. This is also specifically recognised and facilitated within draft Policy SP9.
- 22.11. Draft Policy SP10 identifies the forms of residential development appropriate within the 'countryside', which includes a variety of forms of small and medium sized windfall residential development, subject to relevant policy requirements. Similarly, draft Policy SP11 identifies the more limited forms of residential development appropriate within the Green Belt, which includes forms of small and medium sized windfall residential development, subject to relevant policy requirements.
- 22.12. Affordable housing policies (DP4-DP7) allow for affordable exception, entry level exception, single plot exception and cross-subsidy exception sites to come forward where they comply with relevant draft policies in the draft Shropshire Local Plan. These represent small and medium sized windfall sites.
- 22.13. Shropshire Council considers that the identified housing land supply, including the proposed 'saved' allocations in the SAMDev Plan and the proposed allocations within the draft Shropshire Local Plan provide an appropriate range of type and size of site, recognising the nature of the Shropshire market and critically the diverse settlements and communities across Shropshire.
- 22.14. Chapter 5 of the Housing Topic Paper (**GC4i**) also demonstrates that sufficient small and medium sized residential development sites of up to 1ha have been identified through the draft Shropshire Local Plan, to achieve more than 10% of the proposed housing requirement. In summary:

- 22.15. Over the first five years of the proposed plan period (2016/17-2020/21), 3,590 dwellings have been completed on small and medium sized sites of up to 1ha. This exceeds 10% (3,080 dwellings) of the proposed housing requirement of 30,800 within the draft Shropshire Local Plan.
- 22.16. Furthermore, as at 31st March 2021, existing commitments on small and medium sized sites of up to 1ha with Planning Permission or Prior Approval had capacity for around 2,971 dwellings. This equates to around 9.6% of the proposed housing requirement of 30,800 between 2016 and 2038 within the draft Shropshire Local Plan.
- 22.17. Furthermore, with specific regard to the existing allocations within the adopted SAMDev Plan that are proposed to be 'saved' and the proposed allocations within the draft Shropshire Local Plan, there are a number that represent small and medium sized sites of up to 1ha. Specifically:
- a. 10 proposed 'saved' allocations from within the adopted SAMDev Plan are small or medium sized sites of less than 1ha. This equates to around 13% of the 77 proposed 'saved' residential or residential-led mixed use allocations. These sites have capacity for around 84 dwellings.
 - b. There are 9 proposed allocations within the draft Shropshire Local Plan represent small or medium sized sites of less than 1ha. This equates to around 13% of the 70 proposed 'residential' or 'residential-led' mixed use allocations within the draft Shropshire Local Plan. These sites have capacity for around 128 dwellings.
- 22.18. As documented within this response and Chapter 5 of the Housing Topic Paper (**GC4i**), the draft Shropshire Local Plan recognises that existing completions and commitments on small and medium sized sites of up to 1ha in size, alongside other appropriate small and medium sized windfall sites of up to 1ha that emerge (subject to compliance with relevant policy requirements) and the above referenced proposed 'saved' site allocations and newly proposed site allocations will contribute towards the achievement of the proposed housing requirement.
- 22.19. As such, Shropshire Council strongly believes that the draft Shropshire Local Plan is compliant with the requirement in Paragraph 69 of the NPPF to *"identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare..."*.

Question 23. Should the Local Plan include more small and medium size sites to provide greater choice, flexibility, and certainty?

Shropshire Council Response:

- 23.1. Shropshire Council strongly believes that the draft Shropshire Local Plan identifies and facilitates an appropriate and diverse array of housing land, suitable to provide choice, flexibility and significant confidence about the deliverability of the proposed housing requirement. As such, it is not considered necessary for it to include more small and medium sized sites.
- 23.2. This diverse array of housing land is also considered to positively respond to the characteristics, constraints and opportunities identified across the diverse settlements and communities in Shropshire and provides an appropriate range of type and size of site recognising the nature of the Shropshire market.
- 23.3. It is important to recognise that the housing land supply available and identified within the draft Shropshire Local Plan to achieve the proposed housing requirement is not limited to proposed allocations. This is perhaps most succinctly summarised within the explanation to draft Policy SP2 of the draft Shropshire Local Plan (within which the proposed spatial strategy for the level and distribution of development is primarily captured), which includes at Paragraph 3.8:
- “The types of site available to achieve the housing requirement in Shropshire are varied and extensive. They include small, medium and large:*
- a. Sites with planning permission or prior approval;*
 - b. Sites with a ‘resolution to grant’ planning permission;*
 - c. Saved SAMDev Plan allocations;*
 - d. Local Plan allocations; and*
 - e. Windfall opportunities, where sites comply with the requirements of this Local Plan.”*
- 23.4. This is complemented by Paragraph 3.14 of the explanation to the same draft Policy, which explains that *“Appendix 5 of the Local Plan provides information on the residential completions achieved since the start of the Local Plan period and the various commitments (including allocations) available, which will contribute towards achieving the identified housing requirement.”*
- 23.5. Shropshire Council’s approach to small and medium sized residential development sites of up to 1ha in size is comprehensively summarised within Chapter 5 of the Housing Topic Paper (**GC4i**) and is also explained in response to Question 22 of Matter 3.

- 23.6. This information includes details of residential completions achieved in the first five years of the proposed plan period (3,590 dwellings) and residential commitments as at 31st March 2021 (2,971 dwellings) on small and medium sized sites of up to 1ha. These represent significant sources of housing land supply, providing choice and flexibility to the market. They also provide significant confidence about the deliverability of the proposed housing requirement.
- 23.7. These completions and commitments on small and medium sized sites of up to 1ha identified to contribute towards the achievement of the proposed housing requirement are complemented by:
- a. The 10 small and medium sized sites of up to 1ha amongst the proposed 'saved' residential or residential-led mixed use site allocations of the adopted SAMDev Plan. This equates to around 13% of the 77 proposed 'saved' site allocations and these sites have capacity for around 84 dwellings.
 - b. The 9 small and medium sized sites of up to 1ha amongst the proposed allocations within the draft Shropshire Local Plan. This equates to around 13% of the 70 proposed 'residential' or 'residential-led' mixed use allocations and these sites have capacity for around 128 dwellings.
 - c. The positive approach taken to appropriate windfall sites, including appropriate small and medium sized site of up to 1ha, within the draft Shropshire Local Plan (subject to compliance with relevant policy requirements). This is summarised in more detail in the response to Question 21 of Matter 3 and within Chapter 6 of the Housing Topic Paper (**GC4i**).
- 23.8. Furthermore, it is important to recognise that the proposed site allocations within the draft Shropshire Local Plan have been informed by a comprehensive, proportionate and robust site assessment process (as summarised within Appendices B-U reference **SD006.03-SD006.22** of the Sustainability Appraisal undertaken to inform and assess the draft Shropshire Local Plan). It is considered that due to the robustness of this process, there can be significant confidence in the deliverability of the proposed site allocations within the draft Shropshire Local Plan.
- 23.9. As such, Shropshire Council very strongly believes that the diverse array of sites identified are appropriate and provide significant choice, flexibility and confidence in the deliverability of the proposed housing requirement. Shropshire Council also considers that the identified housing land supply provide an appropriate range of type and size of site, recognising the nature of the Shropshire market and critically the diverse settlements and communities across Shropshire.

Question 24. How have the settlement boundaries been decided and were they reviewed when preparing this Local Plan?

Shropshire Council Response:

- 24.1. Shropshire Council can confirm that proposed development boundaries for settlements have been reviewed as part of the process of preparing the draft Shropshire Local Plan. The process of identifying the settlements where it was appropriate to identify development boundaries and the process of identifying an appropriate development boundary for each of these settlements can be summarised as follows:
- 24.2. Within the draft Shropshire Local Plan, the settlements with proposed development boundaries align with and have been informed by the proposed spatial strategy for the level and distribution of development.
- 24.3. Specifically, a core principle of the proposed spatial strategy (which is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan) is 'urban focus', by which the majority of residential development will be directed into identified 'urban' areas. These urban areas are:
- a. Shrewsbury, the proposed Strategic Centre of Shropshire;
 - b. The five proposed Principal Centres and 11 proposed Key Centres of Shropshire;
 - c. The two new proposed Strategic Settlements in Shropshire; and
 - d. The proposed Strategic Site of RAF Cosford in Shropshire.
- 24.4. Aligning with this proposed spatial strategy, the draft Shropshire Local Plan proposes that all locations proposed to be identified as 'urban' would have a development boundary to indicate where the policy requirements within the relevant settlement policies apply and equally where the countryside policy applies.
- 24.5. However, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of our rural communities, the proposed spatial strategy also proposed that development in urban areas will be positively complemented by appropriate new development within the proposed Community Hubs and to a lesser extent Community Clusters⁷. Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification.

⁷ Community Clusters reflect Shropshire Council's positive approach to localism. As communities with aspirations maintain or enhance their sustainability can 'opt-in' to take an appropriate proportion of development, managed through a proposed policy mechanism (draft Policy SP9).

- 24.6. Recognising that proposed Community Hubs are the focus for development within rural areas, it is also proposed that in these settlements would have a development boundary to indicate where the policy requirements within the relevant settlement policies apply and equally where the countryside policy applies.
- 24.7. In the context of settlements proposed to be identified within a Community Cluster, given that the level and nature of development is intended to be more limited, it is considered that development proposals can be effectively managed through a criteria-based policy without the need for development boundaries.
- 24.8. This approach to development boundaries has been informed by and evolved through the iterative Regulation 18 'Plan-Making' Consultations undertaken to inform the draft Shropshire Local Plan. Responses received to each of these consultations were carefully considered and informed subsequent proposals.
- 24.9. It was also consulted upon as part of the Regulation 19 'Pre-Submission' Consultation. Following this consultation representations were carefully considered before full Council approval was sought to submit the draft Shropshire Local Plan for examination.
- 24.10. Furthermore, Sustainability Appraisal, Habitats Regulations Assessment, and Equality and Social Inclusion Impact Assessment work was undertaken to inform the preparation of and appraise the suitability of the draft spatial strategy, draft settlement strategies and draft policies for managing development.
- 24.11. Where it is proposed that a settlement will have a development boundary in the draft Shropshire Local Plan the starting point for identifying an appropriate boundary was generally the existing development boundary within the adopted Local Plan.
- 24.12. These boundaries were then refined through consideration of both the extent of the existing built form and any relevant changes that it would be appropriate to reflect in the context of the proposed development boundary (although generally we sought to exclude exception sites built on the edge of a settlement from the development boundary, reflecting the policy basis upon which such sites were originally granted Planning Permission, unless the extent of the wider built form is such that it becomes sensible for these locations to be incorporated into the built form) and the location of any proposed site allocations. In considering these factors, professional judgement was applied.
- 24.13. This approach applied to the majority of settlements with proposed development boundaries. However, a limited number

of settlements with proposed development boundaries do not have a development boundary within the adopted Local Plan. Where this was the case, the starting point for the proposed development boundary was consideration of the existing built form (again we generally sought to exclude exception sites built on the edge of a settlement from the development boundary, reflecting the policy basis upon which such sites were originally granted Planning Permission, unless the extent of the wider built form is such that it becomes sensible for these locations to be incorporated into the built form) and the location of any proposed site allocations. Again, in considering these factors, professional judgement was applied.

- 24.14. Draft proposed development boundaries were then the subject of Regulation 18 'Plan-Making' Consultation. Specifically:
- a. Development boundaries for the proposed Strategic, Principal and Key Centres and Community Hubs were the subject of consultation within the Preferred Sites and Regulation 18 Pre-Submission Draft Consultations.
 - b. Development boundaries for proposed Strategic Settlements and the proposed Strategic Site were subject to consultation within the Strategic Sites and Regulation 18 Pre-Submission Draft Consultations.
- 24.15. Responses received to each of these consultations were carefully considered and informed subsequent proposals.
- 24.16. The proposed development boundaries were also consulted upon as part of the Regulation 19 'Pre-Submission' Consultation. Following this consultation representations were carefully considered before the decision was made that it was appropriate to seek full Council approval to submit the draft Shropshire Local Plan for examination.
- 24.17. Through this process Shropshire Council has identified settlements where it is considered appropriate for development boundaries to be identified and an appropriate development boundary for each of these settlements has been prepared.