

4. Matter 3 – Development Strategy (policies SP1 – SP15)

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref	A0410 – CPRE Shropshire
Matter	3 – Development Strategy
Relevant question nos	2, 4, 9, 14,17, 20 in particular

- 4.1 Although Matter 3 is stated to cover policies SP1 – SP15, policy SP2 is covered more specifically in Matter 4. We have therefore included our comments on that policy, and also on policies SP7 and SP8 under Matter 4. Policy SP3 has already been commented on under Matter 1.

SP1 The Shropshire Test: Question 2

- 4.2 Question 2 asks whether Policy SP1 is *necessary and effective*.
- 4.3 We proposed a Main Modification to SP1, which was:

SP1 The Shropshire Test (and Spatial Vision)

We suggested that the Spatial Vision is incorporated within SP1 and we provided revised text accordingly to better reflect the over-riding importance of the climate emergency.

- 4.4 Shropshire Council’s response in SD014.01, Schedule 2: Page 720 (electronic page 770) to this was:

Noted. The draft Shropshire Local Plan should be read as a whole. It is considered that the draft Shropshire Local Plan identifies an appropriate vision and framework for the future development of Shropshire to 2038 and addresses such issues as enabling adaptation to climate change. This positively responds to the climate emergency declared by Shropshire Council.

With regard to the draft Spatial Vision, it recognises the importance of and identifies the need to move positively towards a zero-carbon economy.

With regard to draft Policy SP1, it recognises the need for development to make settlements more sustainable and addresses the causes and mitigate the impacts of climate change.

- 4.5 It remains difficult to see how SP1 could be applied in a meaningful way at the development management level. It is not specific enough and is therefore ineffective. If the draft Plan is to

be read as a whole then SP1 might be rendered more effective if each of the sub-paragraphs a) to g) were cross-referenced to any more detailed policies backing up their intent.

SP2 Strategic Approach: Question 4

4.6 Question 4 under Matter 3 is:

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

4.7 Matters relevant to this question are largely addressed within our response below to Matter 4.

SP3 Climate Change: Question 9

4.8 Question 9 under Matter 3 is:

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

4.9 Matters relevant to this question have largely been addressed within our response above to Question 15 under Matter 1.

SP7 Managing Housing Development: Question 14

4.10 Question 14 under Matter 3 is:

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?

4.11 This question, particularly the part asking how have the residential guidelines been derived, is dealt with in our responses below to Question 1 under Matter 4.

4.12 However, we did also propose main modifications to policy SP7 Managing Housing Development, namely:

7.8 A policy should be included to enable affordable housing developments to be achieved more easily, where housing needs surveys have indicated a particular need for affordable housing.

7.9 The policy should be amended to take account of the housing needs of the different segments of society, as evidenced in the Shropshire Strategic Housing Market Assessment (SHMA) part 2.

4.13 Shropshire Council's response in SD014.01, Schedule 2: Page 722 (electronic page 772) to this was:

The draft Shropshire Local Plan should be read as a whole.

Shropshire Council considers that draft Policies DP3-DP7 provide an appropriate and effective policy framework for the delivery of appropriate affordable housing.

Shropshire Council also considers that the needs of particular groups within society have been considered and the draft Policies provide an appropriate and effective policy framework that appropriately responds to these needs.

4.14 We accept that policies DP3-DP7 are being introduced in order to help increase the proportion of affordable houses being built, in order to help achieve the current target of 7,700 (25%) affordable dwellings as in SP2. Our concern is that historical delivery has not matched previous targets, as shown in the newly produced Authority Monitoring Report (EV012) up to 31 March 2020 in its Section 3: Policy Performance.

4.15 This AMR 2020 shows total housing completions on page 27 and affordable housing completions on page 40. The percentage of affordable completions seems to have slumped to 14% in both of the last two years shown (2018/19 – 260/1,843; 2020/21 – 223/1,554). The AMR 2020 records on page 40 that Policy CS11 of the original Core Strategy in 2011 proposed 33% local needs affordable housing. That target was never achieved and, by reference to the Shropshire Viability Study of May 2013, affordable housing requirements were reduced to their current regional levels of 10%, 15% and 20%. Those levels are now proposed to be simplified to 10% in the north and 20% in the south, as in Figure DP3.1 of the Draft Plan.

4.16 We simply question whether the affordable housing targets are likely to be delivered and therefore whether they are justified.

4.17 A related concern is that, although Shropshire Council says (see paragraph 4.13 above) that *“the needs of particular groups within society have been considered”*, Section 3: Policy Performance of the AMR continues to give no information as to whether the needs of particular groups within society are actually being met. Policy performance seems to be concerned just with absolute numbers of houses built. There is no information whatsoever on the status of the people who actually come to live in all the new houses being built. Paragraph 5.44 of our Regulation 19 submission hoped that this information might become available in the three years' worth of missing AMR data, but it has not. The lack of evidence

about this, six years into the proposed plan period of 2016 – 2038, means that there is nothing to say whether this aspect of policy is being delivered. That doubt about deliverability is another factor contributing to rendering the plan unsound.

SP12 Shropshire Economic Growth Strategy: Question 17

4.18 Question 17 under Matter 3 is:

Is Policy SP12 justified, effective and consistent with national policy?

4.19 This question is dealt with in our responses below to Question 7 under Matter 4.

4.20 However, we did also propose main modifications to policy SP7 Managing Housing Development, namely:

9.9 The text of the Policy and the Explanation should replace references to “the best” and “maximum” with words indicating optimum consistent with the declared climate emergency and the aim of zero carbon by 2030.

9.10 In paragraph 3.e of the policy wording, remove the words “and the Countryside”.

4.21 Shropshire Council’s response in SD014.01, Schedule 2: Page 724 (electronic page 774) to this was:

The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.

4.22 Paragraph 2.2 of GC4n, the Employment Strategy Topic Paper, repeats the statements about striving to maximise economic potential, and an ambition for growth. This can be characterised as “business as usual” and seems to indicate that Shropshire Council has not yet quite grasped the “emergency” part of declaring a climate emergency.

4.23 As set out in our response to Matter 1 Question 15, we argue that the Draft Plan remains unsound in its approach to Climate Change issues.

SP14 Whole Estate Plans: Question 20

4.24 Question 20 under Matter 3 is about Policy SP15, Whole Estate Plans:

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?

4.25 We proposed a Main Modification to SP15, which was:

10.7 This policy is unnecessary and should be struck out, or else:

- i) the present wording of its clause 1c “It has been subject to meaningful public consultation” should be replaced with the following wording:
It has been subject to the same level of public consultation as is required for Neighbourhood Plans.*
- ii) A definition of what minimum size constitutes an Estate should be included in the text.*

4.26 Shropshire Council’s response in SD014.01, Schedule 2: Page 724 (electronic page 774) to this was:

Noted. It is not considered that a definition of an Estate need to be specifically provided within the draft Shropshire Local Plan. Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.

Meaningful public consultation will depend on the nature, scope and context of the Whole Estate Plan.

4.27 The Council’s response merely repeats the proposed policy without rebutting our arguments. The terms “Estate” and “meaningful consultation”, being undefined, remain so meaningless as to render this policy unjustified.