

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor unique Part A Ref *	A0636
Matter	Matter 3 (Development Strategy) and Matter 7 (Strategic Settlements)
Relevant questions nos	ID2 Paragraph 18, 19 and 20

Stage 1 Hearing Statement

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

1. **ID2 Paragraph 18: According to the SA an ‘Urban Focused’ distribution of development would see Shrewsbury taking around 30% of the housing development, Principal Centres around 24.5%, Key Centres around 18% and Rural Areas around 27.5% along with development at strategic sites such as Ironbridge Power Station and Clive Barracks, and potential new Garden Village settlements in strategic locations. In our last letter we asked that as part of a housing topic paper you set out details of the Council’s spatial strategy and distribution and how it was arrived at. Can you also please confirm that the above is indeed the approach the Council has adopted in the Plan and, if so, where the evidence can be found to demonstrate that the spatial distribution has been followed when selecting all housing and employment sites for allocation, including those ‘saved’ sites.**
 - 1.1 SC have now provided figures which relate to their spatial strategy distribution in GC4 (Council response to ID1 and 2 (Planning Inspector’s initial questions) and in the Employment Strategy Topic Paper. Whilst this is now welcomed, we would like to highlight that the employment land proposed at RAF Cosford has not been included in the overall calculations to assess SC’s need. We would like SC to consider that the existing and future provision included from the RAF Cosford site is included within their figures relating to the scale and distribution of employment land.

- 1.2 It should be acknowledged that there is a plentiful supply of already committed employment land in neighbouring authorities in this corridor. When considering Shifnal, it is an unsustainable assumption that the settlement would attract such strategic employment development to justify the release of such large areas of Green Belt.
- 1.3 Whilst Table 8 of GC4 sets out the proposed Residential Development Guidelines for Settlements in the draft Shropshire Local Plan, it does not provide a robust assessment on how figures for specific settlements in the spatial strategy were arrived at. SC have failed to reasonably answer the second part of ID2 Paragraph 18.
2. **ID2 Paragraph 19: Paragraph 66 of the Framework requires that the local plan's strategic policies set out a housing requirement for each designated neighbourhood planning area and also that the neighbourhood area requirement figures reflect the strategy for the pattern and scale of development and any relevant allocations.**
3. **ID2 Paragraph 20: It is not clear to us that this has been done in Policy SP2. Furthermore, it is unclear if the individual Place Plans contain a specific requirement for each designated neighbourhood area. If there is no apportionment for a given neighbourhood area then this should be explicitly stated for the sake of clarity. It is also unclear whether any Neighbourhood Plans are intended to contain site allocations. Again, this should be made clear in the submitted plan.**
- 3.1 SC have stated in paragraph 213 of GC4 that *"in the case of Much Wenlock and Shifnal, the Neighbourhood Plans cover the period to 2026 (in line with the adopted Local Plan). As such the draft Shropshire Local Plan includes a proposed development strategy for these settlements for the further 12 year period to 2038, which will supersede the existing development strategy for these settlements within the adopted Neighbourhood Plan"*.
- 3.2 It is acknowledged that the plan period for Shifnal's Neighbourhood Development Plan (NDP) only goes to 2026, the principal issues brought forward by the community underpinning the plan are still relevant and should be reflected in the local plan proposals. The proposals set out in the draft plan for Shifnal are clearly a significant departure from those set out in the adopted NDP, and the community and Shifnal Town Council have raised questions as to whether their efforts to produce the NDP were worthwhile. If the level of development proposed were to be progressed this would naturally cause a significant level of local resentment. SC acknowledge both Market Drayton's and Broseley's NDPs, as these settlements do not form part of their wider strategic objectives, and as a result Shifnal's NDP has not been considered relevant.
- 3.3 Whilst SC are dismissing the relevance of Shifnal's NDP, they state in paragraph 254 of GC4 *"whilst the draft Local Plan provides strategic policies to guide the overall scale of development, Neighbourhood Plans are intended to*

provide the strategy for achieving the proposed residential and where relevant employment development guidelines for settlements within them. Where this is the case it is clearly explained within the relevant draft Settlement Policy (S1-S21) of the draft Shropshire Local Plan. However, it is ultimately the role of the Town/Parish Council or Neighbourhood Plan Group (as appropriate) to determine an appropriate strategy for this settlement and whether there is a need for one or more site allocations". In relation to Shifnal this approach has certainly not been applied by SC and throughout the entire review process, SC has failed to engage Shifnal Town Council and the local community and to recognise the Shifnal NDP through a proactive, positive and collaborative approach to the plan's preparation.

- 3.4 Community planning objectives and their expression in the NDP (as part of the adopted development plan) have not been taken into account as required by paragraph 15 and 16c of the NPPF.
- 3.5 As set out in paragraph S15.1. (Development Strategy: Shifnal Town) of GC4o SD014.03 – (Regulation 19 consultation response summary Schedule 1a), SC state that *"the draft submission local plan gives due consideration to the Shifnal Neighbourhood Plan but where the needs of the community and settlement conflict with the community's planning objectives it is necessary for strategic planning"*. These comments are contradictory to previous remarks made by SC and we consider that the level of development proposed at Shifnal is required to meet the wider plan area and the unsatisfied needs of the Black Country. These do not directly link to Shifnal's own requirements, which are set out in Shifnal's NDP (a relevant part of the Development Plan). The draft local plan needs to acknowledge the underlying general consensus of the local community which is set out in the objectives of the NDP and any new development should retain the small market character as a principle attraction to the town.
- 3.6 Furthermore, we would like to express that the proposed residential and employment allocations prescribed by Shifnal need to be reassessed. SC are proposing an unspecified amount of the Black Country's requirement for the housing/employment need at Shifnal, this does not demonstrate a special circumstance to warrant Green Belt release. There are still inconsistencies when sites were scored in the Sustainability Appraisal and the Green Belt Review does not assess alternative sites at Shifnal.
- 3.7 SC also need to have regard to the conservation of the historic character of Shifnal and make available any submitted heritage assessments that were used in the site selection process, these should now be used to illustrate the proposed mitigation to conserve and enhance the historic character of the town. These assessments have been requested throughout our Regulation 18 and 19 representations.
- 3.8 Finally, an assessment demonstrating the implications of traffic generation caused by the proposed developments on Shifnal, needs to be undertaken by SC and not individual developers, if, the plan is found to be viable in the future.

In highway terms the feasibility of proposed site allocations is questionable, and a highways assessment needs to be conducted to assess whether Shifnal's infrastructure can accommodate the proposed severe intensification of residential and employment uses proposed for the area, over this and the next plan period,