

INTRODUCTION

The main purpose of a Sustainability Appraisal is to ensure that sustainable development considerations are dealt with consistently throughout the preparation of the Structure Plan. It enables the sustainable development implications of the Structure Plan to be understood and any negative impacts to be highlighted and re-examined. The Appraisal provides a check on the process of preparing the Structure Plan to ensure consistency with the overall aims and objectives of sustainable development. The appraisal should show how the objectives, policies, proposals and the whole plan process have taken sustainable development issues into account by evaluating their impact on the landscape, environment, population, economy, and culture of Shropshire and Telford & Wrekin.

The Sustainability Appraisal should be an iterative process, that is a continuous process of refinement carried on through the life of the Structure Plan in response to new information, or new legislation. It should ensure that the contents of the Structure Plan from inception to implementation and review should be repeatedly assessed and reviewed. The methodology for undertaking a sustainability appraisal is still being developed and refined but to build it into the development plan process is the cornerstone of its value.

It is also intended that the Sustainability Appraisal is a 'live' document itself. The appraisal is placed on deposit alongside the Structure Plan and any comments received relating to its contents and structure will be considered and alterations will be made if necessary. Similarly if policy changes are to be made to the Structure Plan in the light of consultation and modification then these will be subject to appraisal and the Sustainability Appraisal will be updated accordingly.

The Sustainability Appraisal of policies in the Deposit Joint Structure Plan contains much background and detail about the reasoning behind and the methodology adopted to undertake the appraisal. These have been carried forward into this appraisal of the proposed modifications. If more background information is required then this earlier document "The Shropshire and Telford & Wrekin Joint Structure Plan 1996-2011 Sustainability Appraisal" should be referred to.

APPRAISAL OF MODIFIED POLICIES

At this stage of the Structure Plan process it is necessary to submit the revised policies or proposed modifications to the same rigorous Sustainability Appraisal as those in the Deposit Plan. This is done in order to ensure that the changes or proposed modifications are still promoting sustainable development in Shropshire Telford and Wrekin, or ideally moving more strongly than before towards the goals of sustainable development.

The Appraisal methodology is identical to that carried out for the Deposit Joint Structure Plan where each policy was assessed against thirteen principles derived from the emerging sustainability appraisal of Regional Planning Guidance. The matrix illustrates the results of the appraisal against these principles. There are 5 possible choices to the appraisal

1. > = Policy is moving towards sustainability
2. < = Policy is moving away from sustainability
3. <> = Policy outcome is uncertain
4. o = Policy is neutral
5. - = Policy is not relevant to principle

The analysis describes how the policy performs against the principles and what impact it may have.

Although many of the policies from the Deposit Joint Structure Plan have been clarified or enhanced as part of the proposed modifications it was considered that the majority of changes were not substantial enough to warrant formal re-appraisal. However 21 policies were felt to have been changed sufficiently or completely re-written and therefore justified a re-appraisal whilst 2 new policies were developed (P66 Protection of Waste Management Sites and P70 Flooding) which needed appraisal in their own right.

**SUSTAINABILITY APPRAISAL MATRIX OF
PROPOSED MODIFICATIONS
NOVEMBER 2001**

POLICY ANALYSIS

Policy p1 – Spatial Strategy

By guiding development to the principal growth centres of Telford and Shrewsbury the policy helps make optimum use of land, reduce car dependency, and maximise potential for efficient use and production of energy. The policy also ensures that the ability to access a range of services and facilities to meet people's basic needs is maximised. There is a general move towards sustainability.

Policy p2 – Rural Development

By guiding rural development to key settlements the plan is moving towards sustainable development by helping to minimise car dependency in a rural situation whilst ensuring that the built and natural environment are protected. The policy aims to maximise the accessibility of services and facilities to people living in the rural area by focusing development in those settlements where the services and facilities already exist.

Policy p3 – Scale of Development

By ensuring that the scale of development is appropriate to the role of the town, and its ability to accommodate development the policy will help ensure a move towards sustainability against most criteria.

Policy p4 – Site Selection

The policy places great emphasis on the use of previously developed land ensuring the optimum use of land. The policy also recognises the importance of protecting the built and natural selection.

Policy p5 – Green Belt

Restricting development in the Green Belt will help encourage urban redevelopment although the policy is flexible enough to allow for some development if it helps maintain sustainable communities.

Policy p6 – Development Outside Settlements

By restricting development in the open countryside the optimum use of land is encouraged, the natural environment is protected, whilst allowing for essential development that maintains rural employment. Renewable Energy production is not recognised as an exceptional use in this policy. There is a general move towards sustainability in this policy with the policy being relevant to most of the principles. The move towards sustainability is encouraging as the policy resolves a number of contrasting issues.

Policy p7 – Housing Development in Telford & Wrekin

Development in Telford & Wrekin is to be higher than set out in the Deposit Draft. This reflects Telford's position as the key location in the JSP area in terms of accessibility and the ability to optimise the use of land. The phasing element of the policy will ensure that issues such as the natural environment and the range of house types are considered.

Policy p8 – Employment Land in Telford & Wrekin

There is an increase in employment land provision to ensure that a portfolio of employment land exists in the district. Despite this there is still a requirement to optimise the use of land, as employment land will have to be reallocated to other uses.

Policy p9 – Housing Development in Shropshire

The housing figure for Shropshire is 500 less than in the Deposit Draft. This reflects the spatial strategy which is to maximise accessibility whilst reducing the need to travel. This will also help to protect the natural environment from sporadic development.

Policy p10 – Employment Land in Shropshire

The policy is aimed at making the optimum use of land whilst promoting a balanced modern economy through the minimum allocation process. Cross-reference to policies p1, p2 and p3 will ensure that the natural and built environment is protected and car dependency is reduced. The increase in the rolling programme for Shrewsbury recognises the need for a portfolio of employment in order to promote a balanced modern economy.

Policy p16 – Protecting the Environment

The policy aims for a general move towards sustainability by setting out a number of principles.

Policy p17 – Air Quality

Detailed policy has been updated to reflect the importance of Air Quality Management Plans.

Policy p19 – Conversion of Buildings

The policy will see a general move towards sustainability with making the optimum use of land, protection of natural and built environment all encouraged. The policy notes that preference should be given to proposals that support the local economy.

Policy p21 - Open Space

By placing greater emphasis on the links between open spaces and the countryside in general and the development of networks of open space the policy promotes a stronger move towards sustainable development.

Policy p28 - Town Centre Hierarchy and Strategies

The clarification of the retail hierarchy in this policy will maintain retail facilities in the main towns; this, and the need to broaden the function of Telford town centre, will increase access to facilities and reduce the need to travel. The recognition that town centre strategies are an important element of Local Plans will also help to achieve more sustainable development.

Policy p29 - Supporting Town Centres

This policy still promotes town centre vitality and viability and town centres as a focus for a mix of uses to achieve this aim. In responding to a Panel recommendation however, the policy has been recast to fulfil the need for strategic development control specifically referring to the sequential test and vitality and viability which means that each town can develop in a sustainable fashion.

Policy p41 – Parking

The policy attempts to make the optimum use of land by minimising the amount of parking provision required for new development. This in turn will help reduce dependency on the car.

Policy p43 – Countryside Character

The policy moves towards sustainability by protecting both the natural and built environment of the countryside, particularly biodiversity.

Policy p53 – Agricultural Land

Protection of the best and most versatile agricultural land is given equal priority against the need to protect landscape character, biodiversity and recreational amenity. This change will help ensure a more balanced sustainable approach to agricultural land.

Policy p59 - Environmental Considerations (Minerals)

Recognition of the impact mineral development can have on people and local communities, and areas of designated landscape or conservation value, has made this policy more sustainable.

Policy p66 - Protection of Waste Management Sites.

This new policy works towards sustainable development on a broad scale by making the optimum use of land and locating potential facilities away from residential areas or other conflicting uses. However uncertainty over the type of facility and their location means that against many of the principles the potential outcome could move towards or away from sustainability.

Policy p67 - Environmental Considerations (Waste Management)

Recognition of the impact waste management development can have on people and local communities, and areas of designated landscape or conservation value, has made this policy more sustainable.

Policy p70 - Flooding

This new policy has been included in response to new guidance from government (PPG 25). The recognition at the strategic level of the problems caused by flooding and that new development in the wrong location can exacerbate flood risk, makes the plan more sustainable.

CONCLUSION

In comparison with the results of the appraisal of the policies in the Deposit Joint Structure Plan appraisal of the proposed modifications has revealed that overall the Plan is more sustainable and is moving a little more strongly towards sustainable development than previously. The main areas where this has occurred are the policies relating to the development of housing and employment land, town centres and protecting the environment. Elsewhere the other proposed modifications appraised here have made smaller movements towards sustainability.

The proposed modifications relating to housing and employment land have made the policies more sustainable as a result of the addition of criteria relating to the implementation of the phasing of new development and taking into account such factors as targets for affordable development, access to public transport, maximising densities and the availability of previously used land.

Modifications to policies concerning town centres have enabled the Plan to become more sustainable because, for example, they allow the market towns to satisfy needs arising in their own catchment areas, propose a broader role for Telford town centre, and include the need to prepare town centre strategies, which enable the modified policies to respond more strongly to the principles concerned with access to services and facilities, quality of life and promotion of a modern economy.

In only 2 cases, the policies on Greenbelt (Policy 5) and conversion of buildings (Policy 19), have the proposed modifications resulted in policies which are less sustainable than previously. Greenbelt policy has been modified in response to a recommendation made by the EIP Panel to consider the future of the greenbelt boundary. The uncertain outcome of this process means that it is considered that the greenbelt policy no longer makes optimum use of land, nor does it contribute to the provision of an adequate range of housing. Another Panel recommendation and new guidance from central government relating to the conversion of rural buildings has resulted in this policy becoming less sustainable. More development may now be possible in the open countryside through the conversion of rural buildings for employment, residential, tourism, sport or recreational use.

The iterative nature of the appraisal process has meant that comparison against the principles of sustainable development has been an integral part of the work leading to the production of the proposed modifications. The enhancements and clarifications made to the policies have all been considered against sustainability criteria, most of these however were judged too minor to be part of the formal sustainability appraisal, but their cumulative impact has been to make the emerging Joint Structure Plan more sustainable and drive it more strongly to achieving the goals of sustainable development.

POLICIES		GUIDING PRINCIPLES												
Policy No.	Policy Title	Make optimum use of land	Protect and enhance the quality of the natural environment	Protect and enhance the quality of the built environment	Protect and enhance Air Quality	Protect and enhance the quality of the water resource	Protect and enhance biodiversity and geology	Maximise the efficient use of minerals and waste	Maximise the efficient use and production of energy	Reduce dependency on car travel	Enable the provision of an adequate range of housing	Ensure access to a range of services and facilities to meet people's basic needs	Maintain and improve the Quality of life and community well being for all	Promote a balanced modern economy
P1	Spatial strategy	>	0	0	-	-	-	-	>	>	0	>	<	>
P2	Rural development	<	>	>	<	-	>	-	<	<	0	>	<	-
P3	Scale of development	>	>	>	>	0	>	-	>	>	0	>	>	>
P4	Site Selection	>	>	>	<	>	>	-	<	<	<	>	>	-
P5	Greenbelt	<	>	0	0	-	>	-	0	<	<	<	-	-
P6	Development Outside Settlements	>	>	-	<	<	<	-	0	<	0	0	0	>
P7	Housing Development Telford & Wrekin	>	>	>	>	0	>	-	0	>	>	>	>	-
P8	Employment Development in Telford & Wrekin	>	<	<	<	-	<	<	<	<	-	<	<	>
P9	Housing Development in Shropshire	>	>	>	>	0	>	-	0	>	>	>	>	-
P10	Employment Development in Shropshire	>	>	>	<	<	>	-	<	>	-	>	>	<
P16	Protecting the Environment	>	>	>	>	>	>	-	>	>	-	>	>	0
P17	Air Quality	-	>	>	>	-	0	0	0	>	-	-	>	0
P19	Conversion of Buildings	>	>	>	0	-	>	0	0	<	0	<	<	<
P21	Open Space	<	>	>	>	-	>	-	-	>	-	0	>	-
P28	Town Centre Hierarchy and Strategies	>	>	-	>	-	-	-	-	>	-	>	>	>
P29	Supporting Town Centres	>	>	>	>	-	-	-	>	>	>	>	>	>
P41	Parking	>	-	-	<	-	-	-	-	>	-	0	-	-
P42	Countryside Character	0	>	>	0	0	>	-	-	-	-	-	>	-
P53	Agricultural Land	>	>	0	-	0	>	-	-	-	-	-	-	>
P59	Environmental Considerations (Minerals)	>	>	>	0	>	>	0	-	-	-	-	0	>
P66	Protection of Waste Management Sites	>	<	<	<	<	<	>	<	<	-	-	>	>
P67	Environmental Considerations (Waste Management)	>	>	>	0	>	>	0	-	-	-	-	0	>
P70	Flooding	>	>	>	-	>	>	-	-	-	<	0	>	-