



Matthew Giles
Planning Inspectorate Plans team
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3rd September 2021

Dear Matthew,

Shropshire Local Plan 2016-2038 Submission

Please find enclosed the submission documents for the Shropshire Local Plan 2016-2038, the material necessary for the examination and electronic copies of the evidence base. All have been supplied as requested in electronic format via a sharepoint folder which we have provided you access.

The Shropshire Local Plan 2016-2038 has been prepared to replace the existing adopted Core Strategy and Site Allocations and Management of Development (SAMDev) Plan, with the exception of a number of existing adopted site allocations in the SAMDev Plan which are proposed to be 'saved'. The need for an early review of the Shropshire Local Plan was specifically requested by the examining Inspector into the SAMDev Plan within her final report published in 2015. As part of this recommendation, Inspector Sherratt also directed the Council to undertake a detailed review of the Green Belt boundary, which has been progressed positively as part of this Local Plan Review.

The Council began preparing the Local Plan Review in 2017. Between 2017 and 2020 the Local Plan was subject to the following five separate consultations at the Regulation 18 stage:

- Issues and Strategic Options – January 2017 for eight weeks.
- Preferred Scale and Distribution of Growth - October 2017 for eight weeks.
- Preferred Site Allocations – November 2018 for twelve weeks.
- Strategic Sites – 1st July 2019 for ten weeks.
- Pre-Submission Local Plan (Regulation 18) – 3rd August 2021 for eight weeks.

Details of all these previous stages are included in the submitted material, and included within the Consultation Statement.

The submitted Local Plan is supported by a number of 'Prescribed Submission Documents' (Ref SD) and Evidence Base documents (Ref EV). It is proposed these form the basis of the Examination library. As well as those outlined above, the Prescribed Submission Documents include the Draft Shropshire Local Plan (SD002); the Consultation Statement (SD004); the overarching Policies Map and Inset Maps (SD005); the Sustainability Appraisal and Site Assessment Process, plus appendices (SD006); and the Habitat Regulation Assessment (SD008).

An extensive, but proportionate, evidence base has also been submitted in electronic form covering all the references made in Appendix 3 of the submitted Local Plan. This includes 'a 'Duty to Co-operate Statement of Compliance' (EV042), and a Self-Assessment of Soundness and Quality' (EV093), prepared to assist the appointed Inspector.

The draft Plan proposes to deliver around 30,800 dwellings over the plan period from 2016-2038. This equates to around 1,400 dwellings per year. This includes 7,700 affordable houses, equating to around 25% of all dwellings built. To provide sufficient opportunities for new jobs, the draft Plan also proposes to deliver around 300 hectares of employment land over the Plan period. To support a sustainable approach to development and to maximise investment opportunities, the draft Plan proposes an 'urban focus' distribution of development, focussing on Shropshire's network of strategic, principal and key centres. These settlements are considered to be Shropshire's most sustainable areas due to their access to facilities, services and employment opportunities.

The draft Plan is made up of a range of strategic policies (policies SP1 –SP17), development management policies (DP1-DP33), and settlement specific policies (S1-S21). Connected to the settlement specific policies are a schedule of policies maps indicating the proposals for these areas, as well as settlement constraints. The Local Plan has been prepared in a positive and open manner, and one which the Council feels responds to the nature and character of the County, as well as identified needs.

At the Pre-Submission Regulation 19 stage of consultation a total of 2,443 'duly made' formal representations were received from 683 organisations and individuals. The Council also received 2 non-'duly made' representations received following the close of the consultation, which for completeness and transparency have also been submitted. Whilst the Council has not formally considered the non-'duly made' representations, we acknowledged the inspector may have interest in these.

As a result of extensive consultation and engagement at earlier stages we do not consider any of the representations or comments received affect the soundness of the Local Plan Review. However, where appropriate, we have responded to some of the representations made to propose a number of minor amendments to improve the soundness, consistency and clarity of the Local Plan. We are therefore submitting for consideration, a Schedule of Proposed Minor Modifications (SD003) which identifies these amendments alongside corrections, updates and minor editing changes.

The Council acknowledges that despite extensive consultation and refinement during the Regulation 18 stage of Plan preparation, there remains a number of outstanding objections to the Local Plan, expressed through representations to the Regulation 19 stage of consultation. This includes objections on 'soundness' made by several statutory consultees, including the Environment Agency, Natural England and English Heritage to specific parts of the Plan.

Through the updated Consultation Statement the Council has sought to provide a detailed summary of each 'duly made' representation and this is captured in the key issues raised in representations and the Council's response (SD014.01), with copies of the representations received as part of the Regulation 19 consultation also available (SD014.3).

As part of this process, and as Schedule 1 to SD014.01, the Council has also identified what it feels are the main issues raised on each section of the Local Plan, providing a response to each one. As a further distillation of this summary process, and to support the Examination process, the Council considers that in light of the representations received, the main issues raised in relation to the Plan's Strategic and Development Management policies are:

- The scale, supply and balance of strategic housing and employment requirements over the Plan period, including the trajectory of housing supply, along with the evidence to support this (Policies SP2, SP7 and SP13);
- The strategic distribution of development, and in particular the proposed 'urban focus' approach (SP2);
- The proposed methodology for identifying Community Hubs in the rural area (SP2 and SP8);
- The Plan's response to the climate emergency and supporting the transition to a zero-carbon economy (SP3, DP11 and DP26);
- The use of development guidelines to manage residential development appropriately;
- The proposed approach to managing development in the rural area, within Community Hubs, Community Clusters and the Open Countryside (SP8, SP9 and SP10);
- The application of national Green Belt policy, in particular in relation to the exceptional circumstances proposed in support of the release of some areas of Green Belt;
- The Council's methodology used to calculate the future aggregate supply and the extent and certainty of mineral windfall site allowances (SP16 and DP30);
- The Council's approach and justification to its policy on residential mix within new development proposals (DP1) and on the scale and likely delivery of affordable housing provision (DP3);
- The Plan's approach to managing future development proposals in the Clun Catchment (DP13), within the context of its current unfavourable SAC status. Objections have been received from both the Environment Agency and Natural England on this matter; and
- The identification of infrastructure provision to support new development (DP25);

In relation to the Council's Settlement specific policies (S1-S21), it is recognised there are several objections to the soundness of the Local Plan proposals, however it is considered the main issues raised through the pre-submission Regulation 19 consultation are:

- The scale and location of proposed housing and employment requirements in several settlements within the proposed settlement hierarchy;
- The suitability of the site selections process;
- In particular, significant levels of objection to growth proposals in Bridgnorth (Policy S3.1), including the suitability and availability of the proposed Garden Village proposal at Tasley; the existence of exceptional circumstances for the release of Green Belt at land at Stanmore for employment purposes, and the promotion of a potential alternative Garden Village proposal at Stanmore;
- The scale of proposed development, and reliance upon windfall development in Church Stretton (S5.1)
- The scale and location of proposed growth in Much Wenlock, alongside the Local Plan's consideration of the existing Neighbourhood Development Plan for the area (S13.2);
- The scale and distribution of growth at Shifnal (S15.1), including to the proposed release of Green Belt for development to 2038 and potential development beyond the end of the Plan period as safeguarded land;
- The scale and distribution of growth in Shrewsbury (S16.1);
- The scale and distribution of growth in Whitchurch (S18.1)
- The scale and distribution of growth associated with a number of proposed Community Hubs settlements, including Cressage (S13.2); Clive (S17.2); and Trefonen (S14.2)

It should also be acknowledged that throughout much of the Plan preparation process, including at the Regulation 19 stage, the Council has received a number of alternative and/or additional site promotions for consideration, all of which have been subject to site assessment. These omission sites include land north of Junction 3, M54 which has been promoted to the Council as a new Garden Village proposal, and which was subject to consultation as a potential Strategic Site allocation as part of the 'Strategic Sites' consultation in July/August 2019.

Clearly this list of headline issues is not exhaustive, and is intended only as a guide for assistance to the Examination process. It is fully recognised that representations have been received on several other issues which the Inspector may wish to use the examination to consider.

There has been careful consideration to all the representations made throughout the plan preparation process and at the to the pre-submission 'Regulation 19' stage. Whilst recommending a schedule of minor modifications for clarity and consistency, the Council continues to consider the Local Plan as submitted is a 'sound' and legally compliant document. However, it is acknowledged that the appointed Inspector may wish to explore further the potential for main modifications to be made to aspects of the Plan in order to overcome any identified soundness issues through the examination. In this instance, and in line with Section 20(7C) of the PCPA, the Council would like to invite the

Inspector to recommend main modifications if they feel it is necessary to do so to make the draft Local Plan sound and legally compliant.

The Council would also like to draw attention to a recent request by the respondent of the duly made representation ref 358 (Shropshire Homes) to withdraw this representation from further consideration. As this request has come to the Council following agreement to submit the Local Plan, the Council propose to continue to submit this representation and offer the opportunity for the appointed Inspector to consider it if they wish to. The Council can confirm that whilst consideration was given to this representation, this did not lead to a proposed minor modification.

Throughout the plan preparation process there has been positive engagement and 'duty to cooperate' discussions with adjoining and closely related local authorities and with key partners, which have, where appropriate, resulted in changes/proposed changes to some aspects of the Plan. More information on this process is provided in the Duty to Cooperate Statement of Compliance (EV042) and through a series of Statements of Common ground where appropriate. It is worth highlighting that through the Duty-to-Cooperate process, and the positive discussions held with the Black Country Authorities on their emerging Joint Local Plan, Shropshire has agreed to formally accept 1,500 dwellings and 30 hectares of employment land to support the evidenced unmet need in the Black Country area. This position has been formally agreed in a Statement of Common Ground submitted as part of the evidence base material (EV041). The Council are pleased to submit the majority of completed Statements of Common Ground with adjoining authorities. In a small number of cases, final agreement of Statements of Common ground are still outstanding, and it is anticipated these will be submitted as additional documents to the Examination in early September.

Whilst it is acknowledged there remains some level of disagreement on some aspects of the Local Plan from some statutory agencies, this has not prevented positive discussions between the parties to seek resolution wherever possible. This is shown in the agreed separate Statements of Common Ground submitted between the Council and the Environment Agency and Historic England. A further Statement of Common Ground with Natural England is fully advanced, and is awaiting final agreement by Natural England, and will therefore follow shortly. In addition, positive conversation have been had throughout the process with Highways England (now National Highways), with these discussions leading to the production of additional evidence in 2021 assessing the cumulative impact on the local and strategic highway network in Shrewsbury as a result of background and Local Plan growth (EV100). Further discussions will therefore be happening in the coming weeks between the Council and National Highways, and the principle of submitting a Statement of Common Ground to the Examination at the earliest possible time has been agreed.

At the time of submission the Council are awaiting to confirm the Programme Officer, however we are confident that a suitably qualified external candidate will be appointed in the week commencing 6th September, at which point we will confirm details. We understand that until the Programme Officer is confirmed an Inspector cannot be appointed.

Due to the scope and scale of the Local Plan Review it is anticipated that a Pre Hearing Meeting be required. At this stage the Council is assuming that the all hearing sessions will be held in public, rather than virtually, and will be making suitable arrangements to ensure appropriate rooms are booked. However, we are of course open to the potential to hold hearing sessions virtually if this is the preference of the appointed Inspector.

If you have any further questions please do not hesitate to call or e-mail me.

Yours faithfully

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