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Dear Inspectors,

Shropshire Council Response to ID28: Inspectors' Interim Findings Following Stage 1 Hearings Sessions

1. Introduction

- 1.1. Thank you for your correspondence of the 15th February 2023 (ID28) in which you set out your Interim Findings on the Stage 1 Hearing Sessions. Within ID28, you posed a series of questions to the Council and identified areas of further work for the Council to undertake before you proceed with the Stage 2 Hearing Sessions.
- 1.2. Within ID28, you also indicated that your questions and identified further areas of work may result in the identification of additional potential Main Modifications to support the soundness of the draft Shropshire Local Plan.
- 1.3. In our initial response (GC20), the Council indicated our intention to respond to ID28 by the 30th June 2023. However, as we subsequently advised, in order to allow for approval of this response by Shropshire Council's Cabinet, these timescales have been subject to a short extension. The Council very much appreciate your understanding on this matter.



- 1.4. We have now taken the opportunity to reflect on ID28 and in particular the conclusions you had reached, the questions you raised and the further areas of work identified.
- 1.5. Our initial response (GC20), this correspondence, and the accompanying documents represent our full response to ID28.
- 1.6. Between the issuing of ID28 and this response, a further hearing occurred regarding minerals and waste. Following the completion of this hearing the Council provided a schedule of proposed main modifications resulting from this hearing. You have subsequently issued a response (with correspondence reference ID34) requesting that the Council give due consideration to the need for main modifications to address a limited number of very specific issues.
- 1.7. The Council has reflected upon these suggestions and is supportive of the identification of proposed main modifications on all the issues identified. As such, a series of proposed main modifications have been prepared.
- 1.8. The documents which accompany this response include an Updated Schedule of Main Modifications and an Updated Schedule of Minor (Additional) Modifications.
- 1.9. These Schedules have been comprehensively reviewed and updated so that they capture all proposed modifications to date. This includes those proposed in response to ID28, those resulting from the recent hearing session on minerals and waste, and those proposed in response to mineral and waste correspondence ID34.
- 1.10. To aid with the consideration of proposed modifications, they have been re-referenced and re-ordered so that they reflect the structure of the draft Shropshire Local Plan.

- 1.11. For convenience, the Council has also prepared a 'track changes' version of the draft Shropshire Local Plan, which captures all of the proposed Main and Minor (Additional) Modifications to the draft Local Plan to this point in the examination.
- 1.12. *Please Note: The Updated Schedules of Main Modifications and Minor (Additional) Modifications utilise policy references as at the submission of the draft Shropshire Local Plan for examination. The 'track changes' version of the draft Shropshire Local Plan includes hyperlinks on policy references to aid navigation, these update to reflect changes resulting from proposed modifications.*
- 1.13. For ease, the Council has structured the remainder of this response to follow the order of ID28 and where appropriate we cross-refer to relevant paragraphs of ID28.

2. Duty to Cooperate (DtC)

- 2.1. Paragraphs 2-3 of ID28 address compliance with the Duty to Cooperate (DtC). Shropshire Council acknowledges and welcomes the conclusions about our engagement with our duty to cooperate partners, as recorded within these paragraphs of ID28.

3. Next Steps

- 3.1. Paragraph 4 of ID28 addresses next steps. This correspondence and the accompanying documents are intended to provide the information necessary to allow the examination of the draft Shropshire Local Plan to proceed to the Stage 2 Hearing Sessions.

4. Plan Period

- 4.1. Paragraph 5 of ID28 addresses the plan period for the draft Shropshire Local Plan. It identifies two questions for the Council:
- a. Whether the start of the plan period (currently proposed to be 2016) should align with the base date for the Local Housing Needs Assessment (which is 2020) submitted as part of the evidence base that informed the preparation of the draft Shropshire Local Plan?
 - b. What are the implications of aligning these two dates, including in relation to the Housing Requirement in draft Policy SP2 and the settlement guidelines / supply of sites in Policies S1-S20?
- 4.2. Shropshire Council has considered these questions and addresses each in turn.

a. Should the start of the plan period be aligned with the base date for the Local Housing Needs Assessment?

- 4.3. The Council acknowledges there may be advantages to aligning the start of the plan period with the base date for the Local Housing Needs Assessment. However, the Council considers that these advantages would be outweighed by the disadvantages and it is also considered unnecessary to change the plan period to ensure the plan is 'sound'.
- 4.4. The disadvantages resulting from such a change to the plan period, include:
- a. Consultations and discussions with communities undertaken during the preparation of the draft Shropshire Local Plan were predicated on a 2016 start date for the plan period. Changing this date now may cause unnecessary confusion.
 - b. Evidence base prepared to inform the draft Shropshire Local Plan is predicated on a 2016 start date for the plan period. Whilst a change



would not invalidate the evidence, it could again cause some unnecessary confusion.

- c. Change would have 'knock-on' implications for settlement housing and employment land guidelines (see below) which could also cause unnecessary confusion.
- d. It could lead to further debate over whether the start of the plan period should be updated again as the examination process continues. This may cause unnecessary delay and confusion.

4.5. Shropshire Council is concerned that unnecessary confusion has the potential to undermine implementation of the draft Shropshire Local Plan.

b. What are the implications of aligning these two dates?

4.6. If the start of the plan period is aligned with the base date for the Local Housing Needs Assessment, the housing and employment land requirements within draft Policy SP2 would need to be reduced to exclude the housing and employment land completed prior to 2020.

4.7. This is because these proposed requirements were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared. The consultation material produced to inform preparation of the draft Shropshire Local Plan documents this.

4.8. Similarly, the housing and employment land guidelines for all settlements within draft Policies S1-S20 would need to be amended to exclude the housing and employment land completed prior to 2020.

4.9. This is again because these proposed guidelines were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared and this



formed the basis for discussions with communities. Again, documented within the consultation material produced to inform preparation of the draft Shropshire Local Plan.

- 4.10. As such, a range of Main Modifications would be required to the draft Shropshire Local Plan in order to reflect this change. This would include:
- a. The introduction to the draft Shropshire Local Plan.
 - b. Draft policies, including SP2, SP7, SP13, DP1, DP2, DP3, DP30 and S1-S20.
 - c. The explanation to a number of draft Policies, including those referenced above.
 - d. Appendices 5 and 6 of the draft Shropshire Local Plan.
- 4.11. Again, it could also lead to further debate over whether the start of the plan period should be updated again as the examination process continues.
- 4.12. As such, upon reflection Shropshire Council's clear preference is for the start of the Plan period to remain 2016, unless you consider that a change to 2020 is required to ensure the draft Shropshire Local Plan is 'sound'.

5. Saved Policies

- 5.1. Paragraph 6 of ID28 addresses the means by which relevant policies within the SAMDev Plan would be 'saved'. It requested that the Council provide further information on how this is intended to be achieved.
- 5.2. Within Appendix 1 of GC20 three initial mechanisms were identified to 'save' the relevant policies within the SAMDev Plan – one of which reflected the approach already proposed in the draft Shropshire Local Plan.



- 5.3. Within your response to GC20 (within correspondence referenced as ID33) you provided the following advice:

"Turning now to appendix 1 of your letter, Mrs Dillon and I have looked at this and given it a great deal of thought. Our view is that whilst you can retain policies in your existing plan you cannot save parts of them by striking through text as there is no mechanism for this. To do this you would have to replicate all of the amended policies in an appendices to the emerging plan. This would make the emerging plan very long and difficult for future users to navigate. Moreover, these policies as you know are not before this examination.

Our advice would be to refer to the policies in appendix 2 of the emerging plan as is the case at present, but then add some wording into emerging Policy SP2 to make it clear that the housing and employment land requirement is made up of sites in the emerging plan and sites in appendix 2. You could also consider adding some wording to the beginning of the Place Plans section of the emerging plan as 'supplementary text' in order to provide further context to the policy situation for allocations within the Place Plan areas."

- 5.4. Firstly, Shropshire Council would like to thank you for reflecting upon the initial mechanisms identified by the Council and providing your views on this matter.
- 5.5. Having considered ID33, Shropshire Council is in agreement that the proposed approach is both effective and appropriate.
- 5.6. The Council has identified two proposed modifications to implement this proposed approach, which are to:
- a. Include additional text in draft Policy SP2 of the draft Shropshire Local Plan to explain that the housing and employment land requirements will be implemented using a land supply that



comprises sites within the draft Shropshire Local Plan and sites already allocated within the SAMDev Plan, as identified within Appendix 2 of the draft Shropshire Local Plan.

- b. Include additional text within the introduction to Section 5 of the draft Shropshire Local Plan explaining that 'saved' allocations and new allocations will contribute towards the achievement of the housing and employment land guidelines for settlements. Thereby providing further context to the settlement policies across the 18 Place Plan areas.

5.7. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.

5.8. Shropshire Council considers that these proposed modifications provide greater clarity about the sites that contribute to the achievement of the proposed housing and employment land requirements within the draft Shropshire Local Plan.

5.9. Shropshire Council also considers that these modifications complement:

- a. The existing references to sites already allocated within the SAMDev Plan (as identified within Appendix 2 of the draft Shropshire Local Plan), in both the explanation to draft Policy SP2 and in the draft settlement policies (S1-S18).
- b. The previously proposed modification to Appendix 2 of the draft Shropshire Local Plan to update the list of proposed 'saved' site allocations to exclude sites that have been built out since 31st March 2019 and include the development guidelines and approximate provision figures from the SAMDev Plan for each 'saved' allocation (the location and extent of these 'saved' allocations are already illustrated on the draft Policies Map).



6. Gypsy and Traveller Transit Site Provision

6.1. Paragraphs 7-9 of ID28 address Gypsy and Traveller transit site provision. They include the following questions:

- a. Can the Council provide copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site on the examination webpage?
- b. Can the Council update 'Table 7.9', the conclusion, and the executive summary of the Gypsy and Traveller Accommodation Assessment (GTAA) 2019 Update, as an addendum to this document?
- c. Can the Council review the supporting text within the draft Shropshire Local Plan in response to the addendum to the GTAA 2019 Update?
- d. Can the Council consider whether they wish to review the Gypsy and Traveller site needs within the GTAA 2019 Update in the light of the judgment *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022?

6.2. Shropshire Council has considered these questions and addresses each in turn.

a. Copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site

6.3. Shropshire Council can confirm that copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site to the north of Shrewsbury have been provided to the Programme Officer and have subsequently been made available on the examination webpage as an Examination Stage Document (reference GC21).

- 6.4. For information, a Planning Application (reference 23/00567/FUL) was submitted for the provision of this new transit site. This was subsequently withdrawn to allow the preparation of further additional technical assessments. It is anticipated that a new Planning Application for this proposal will be submitted shortly.

b. Prepare an Addendum to the GTAA 2019 Update

- 6.5. Shropshire Council has undertaken a review of Table 7.9, the conclusion, and the executive summary of the GTAA 2019 Update. This was informed by professional advice provided by our consultants Arc4.
- 6.6. Following this review an addendum to the GTAA 2019 Update has been prepared. This addendum has been provided alongside this correspondence to be made available on the examination webpage.

c. Review of supporting text within the draft Shropshire Local Plan

- 6.7. Following preparation of the addendum referenced above, Shropshire Council has undertaken a review of the supporting text within the draft Shropshire Local Plan.
- 6.8. As a result of this review, a number of main modifications are proposed to the explanation of draft Policy DP8, to reflect the additional information set out in the GTAA 2019 addendum. These proposed main modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.

d. Implications of the judgment Lisa Smith v SSLUHC [2022] EWCA Civ 1391 of 31st October 2022

- 6.9. Shropshire Council recognises the Court of Appeal's judgment in Lisa Smith v SSLUHC [2022] EWCA Civ 1391 of 31st October 2022 about the



interpretation and application of the Planning Policy for Traveller Sites (2015) (PPTS).

- 6.10. Having reviewed it and considered the implications of this case for the Council's published evidence (including the GTAA 2019 Update), the Council considers that it would not change the Council's approach to assessing the accommodation needs of Gypsies and Travellers for the purposes of the Local Plan review.
- 6.11. The Shropshire GTAA 2019 Update assesses the accommodation needs of all Gypsies and Travellers, with those relating to Travellers meeting the Annex A definition in the PPTS identified as a proportion of the total identified cultural need. Thus, the housing needs of all ethnic Gypsies and Travellers are assessed, including those that may be deemed to have permanently ceased to travel and fall outside the definition of Gypsies and Travellers in the PPTS.
- 6.12. This is succinctly documented within the explanation to draft Policy DP8 of the draft Shropshire Local Plan, which includes a brief summary of the GTAA 2019 Update. This notes that it *"includes ethnic gypsies and travellers who fall outside the definition of Travellers in the PPTS who nonetheless are able to demonstrate a right to culturally appropriate accommodation."*
- 6.13. As such, it is not considered that the GTAA 2019 Update needs to be reviewed in the light of the judgment in *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022. However, the Council has separately addressed the required update of the GTAA requested in relation to Paragraph 8 of ID28.
- 6.14. The Council understands that it has a requirement to assess and meet the accommodation needs of all Gypsy and Travellers, irrespective of their travelling status. The conclusions of the GTAA 2019 Update confirm that all cultural need has been assessed and that for the



purposes of the Local Plan Review, it is expected that supply will be sufficient to meet this need.

- 6.15. Thus, the proposed approach to meeting the housing needs of Gypsies and Travellers within the draft Shropshire Local Plan will meet both the needs of those that comply with the definition of Gypsies and Travellers in the PPTS; and the needs of ethnic Gypsies and Travellers that fall outside the definition of Gypsies and Travellers in the PPTS, who nonetheless can demonstrate a right to culturally appropriate accommodation.

7. Unmet Housing and Employment Land Needs of the Association of Black Country Authorities (ABCA) and Policy SP2

- 7.1. Paragraphs 10-27 of ID28 address a range of issues related to housing and employment land.

Housing and Employment Topic Paper

- 7.2. Paragraphs 10-12 of ID28 address housing and employment land needs and requirements and culminate in a request for a Housing and Employment Topic Paper to address these matters.
- 7.3. Paragraph 22 of ID28 relates to the proposed strategy for achieving the housing and employment land requirement. It culminates in a request for the new Housing and Employment Topic Paper to document the proposed strategy.
- 7.4. Shropshire Council has sought to positively respond to these requests and has prepared a new Housing and Employment Topic Paper. This seeks to explain the Council's position with regard to housing and employment land needs and requirements, including the proposed



strategy for the distribution of development to achieve these proposed requirements.

- 7.5. For the avoidance of doubt, the content of this new Housing and Employment Topic Paper has been directly informed by the wider work undertaken in response to ID28 (particularly the additional Sustainability Appraisal and site assessment work undertaken in responses to paragraphs 17-21 of ID28). The Housing and Employment Topic Paper is enclosed with this response.
- 7.6. In summary, with regard to the housing and employment land requirements and the approach to the strategic distribution of planned development, the Housing and Employment Topic Paper concludes that:
- a. *Over the proposed plan period from 2016 to 2038, **a minimum of 30,800 new dwellings and a minimum of 300 hectares of employment land will be delivered**, of which 1,500 dwellings and 30ha of employment land are to contribute towards the unmet needs forecast to arise within the Black Country. The proposed housing and employment land requirements equate to around 1,400 dwellings and around 14ha of employment land per annum.*
 - b. *To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, **new development will be focused in the 'urban areas'**, which consist of Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements.*
 - c. *Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in 'urban areas' will be **complemented by appropriate new development** within Community Hubs, which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or*



enhance their sustainability. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.

- 7.7. This therefore forms the basis for the proposed spatial strategy for the level and distribution of development across Shropshire.

Housing and Employment Land Need and Proposed Contributions to the Black Country

- 7.8. Paragraph 13 of ID28 specifies that *“The Council’s approach to identifying the housing and employment land needs derived within Shropshire itself is sound.”* It also specifies that *“In principle, the Council’s intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC.”* These conclusions are welcome.
- 7.9. Paragraphs 14-16 continue discussion of the unmet needs forecast to arise within the Black Country and conclude that proposed contributions are *“the starting point as there is agreement to revisit the unmet need with a view to providing further assistance once the local plans for the ABCA councils have been examined and adopted.”*
- 7.10. Shropshire Council acknowledges this conclusion and is committed to continued positive engagement through the duty to cooperate with the Black Country Authorities.

Further Sustainability Appraisal (SA) Assessment Work

- 7.11. Paragraphs 17-20 continue to address the proposed contribution to unmet needs forecast to arise within the Black Country, in the context of Sustainability Appraisal (SA). They raise concern about the

consideration of proposed contributions to the unmet needs forecast to arise within the Black Country when undertaking SA assessments.

7.12. Paragraph 20 concludes that *“Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country.”*

7.13. As such, Shropshire Council has undertaken further Sustainability Appraisal (SA) assessment work regarding the proposed housing and employment land requirements, including consideration of a range of reasonable options for each.

7.14. Consistent with ID28, within the additional SA assessment work an explicit distinction is made between Shropshire need and the proposed contribution to unmet needs forecast to arise within the Black Country.

7.15. The conclusions of this additional SA assessment work have been carefully considered and have informed proposals regarding the housing and employment land requirements for inclusion within the draft Shropshire Local Plan. These proposals and the relationship to need is documented within the new Housing and Employment Topic Paper.

Black Country Contribution

7.16. Paragraph 21 of ID28 explains that if the Council intend to contribute towards the unmet needs forecast to arise within the Black Country, for effectiveness this should be set out in the housing and employment land requirements of the draft Shropshire Local Plan.

7.17. As documented within the further SA assessment work and new Housing and Employment Topic Paper, Shropshire Council continues to consider that the proposed contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise within the



Black Country are appropriate and should be included within the draft Shropshire Local Plan.

- 7.18. The draft Shropshire Local Plan includes explicit reference to these proposed contributions within the explanation to draft Policy SP2. However, in seeking to positively respond to ID28, a main modification is proposed to specify that these contributions constitute part of the proposed housing and employment land requirements within draft Policy SP2 itself.

Sites to Accommodate Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country

- 7.19. Paragraph 21 of ID28 also specifies that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work.
- 7.20. Specifically, it states *"...the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan."*
- 7.21. To ensure the effectiveness of the draft Shropshire Local Plan, Shropshire Council has undertaken additional SA and site assessment work to inform the identification of the site or sites to accommodate the proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country.
- 7.22. This scope and conclusions of this assessment work are explained within the enclosed additional SA and site assessment work.
- 7.23. In conclusion, a series of sites have been identified to accommodate the proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country. These

sites and a brief summary of the reasons for their identification are documented within Table 7.1.

7.24. The additional SA assessment work also considered the sustainability of the proposed contributions and approach / sites to accommodate contributions to unmet needs forecast to arise within the Black Country through the updated SA assessment of draft Policy SP2. Reflecting the outcome of this work, a series of proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.

Table 7.1: Sites Identified to Accommodate the Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country

Site Reference	Site Name	Specific Policy	Total Capacity	Black Country Contribution	Summary
BRD030	Tasley Garden Village, Bridgnorth	S3.1	1,050 dwellings 16ha employment land New local centre 20ha of green infrastructure and a 19ha linear park	600 dwellings	<p>Bridgnorth is located in south-east Shropshire with a functional relationship to the Black Country. It benefits from strong road links to the Black Country via the A454 corridor.</p> <p>Bridgnorth is a principal centre and performs a strategic role in the east of Shropshire.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>
SHF018b & SHF018d	Land east of Shifnal Industrial Estate, Upton Lane, Shifnal	S15.1	39 hectares (15.6ha net development)	30ha of employment land	<p>Shifnal is located in east Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 corridor and Shrewsbury-Wolverhampton railway line.</p> <p>Shifnal is a key centre and a focus for investment, employment, housing and development on the M54/A5 strategic corridor.</p> <p>The site constitutes a proposed strategic employment allocation which due to its size and location has the potential to form both a local and regionally important employment centre.</p> <p>The site can accommodate a sizeable contribution towards the unmet employment land needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints. Whilst the site is located within the Green Belt, it is considered that exceptional circumstances exist to justify the release of this land for employment, as documented within the new Green Belt Topic Paper.</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>

Site Reference	Site Name	Specific Policy	Total Capacity	Black Country Contribution	Summary
SHR060, SHR158 & SHR161	Land between Mytton Oak Road and Hanwood Road, Shrewsbury	S16.1	1,500 dwellings 5ha of employment land	300 dwellings	<p>Shrewsbury is located in central Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 / A5 corridor and Shrewsbury-Wolverhampton railway line. Shrewsbury is the strategic centre of Shropshire and the primary focus for new development in the County.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>
IRN001	Former Ironbridge Power Station	S20	Range of local services and facilities Around 1,000 dwellings Around 6ha of employment land Extensive green infrastructure	600 dwellings	<p>The Former Ironbridge Power Station is located in east Shropshire with a functional relationship to the Black Country. It benefits from road access to the M54 / A5 corridor link to the Black Country via either the A4169 / A5523 or A4169 / A442.</p> <p>The Former Ironbridge Power Station is a part brownfield site that benefits from Outline Planning Permission and will form a new strategic settlement, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>

Green Belt Topic Paper

- 7.25. Paragraph 23 of ID28 addresses the role of proposed Green Belt releases in supporting the housing and employment land supply to meet Shropshire needs and proposed contributions to unmet needs forecast to arise within the Black Country.
- 7.26. It culminates in a request for an updated Green Belt Topic Paper, setting out exceptional circumstances for releasing Green Belt land to meet the needs of Shropshire and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.
- 7.27. In seeking to positively respond to this request, Shropshire Council has prepared an additional Green Belt Topic Paper.
- 7.28. However, it is important to note that a comprehensive Green Belt Exceptional Circumstances Statement (EV051) has already been prepared. Furthermore, a previous Green Belt Topic Paper (GC4g) was also prepared to provide a strategic overview of the role and purpose of proposed Green Belt releases.
- 7.29. Additionally, as documented within Table 7.1, through the additional SA and site assessment work four sites have been identified to accommodate the proposed contribution to the unmet needs of the Black Country. Of these, only one: SHF018b & SHF018d is located within the Green Belt – with the intention that it accommodates 30ha of employment land towards the unmet employment land needs forecast to arise within the Black Country.
- 7.30. As such, the new Green Belt Topic Paper seeks to:
- a. Provide a summary of the purpose of each of the proposed releases of land from the Green Belt to meet current or future needs arising

within Shropshire. This is supported by appropriate cross-references to other relevant material where appropriate.

- b. Provide a more detailed explanation of the purpose and exceptional circumstances for the proposed release of land from the Green Belt to accommodate a proposed contribution to the unmet needs forecast to arise within the Black Country.

Need for Consultation

- 7.31. Paragraph 24 of ID28 explains that it is necessary to address the issues raised in paragraphs 10-23 of ID28 in order for the plan to be found sound. Shropshire Council recognises this conclusion and within this response and the accompanying material has sought to positively respond to the conclusions reached.
- 7.32. Paragraph 24 indicates that following the submission of the full response to ID28, you will determine whether there is a need for further public consultation. Shropshire Council appreciates your consideration of this matter and will of course positively respond to your conclusions.

Local Plan Review Mechanism

- 7.33. Paragraph 25 of ID28 addresses the Local Plan review process. It states that such a review *“could be dealt with by way of an early review trigger built into policy SP2 or by relying on the statutory 5-year review process set out in the Framework”* and requests that the Council provide its formal views on these alternatives.
- 7.34. Shropshire Council very strongly favours the use of the statutory 5-year review process set out in the National Planning Policy Framework (NPPF).



7.35. There are a number of factors which inform this position. In summary, the statutory 5 year review process:

- a. Is the mechanism that Government has introduced for reviewing Local Plans.
- b. Is a cycle with which many within the industry and Shropshire's communities are familiar.
- c. Provides much needed stability and certainty regarding the policy framework in an area for individuals, communities, developers and decision makers. One of the issues with other mechanisms is the considerable uncertainty about whether / when a review will be 'triggered'.
- d. Provides a better opportunity to focus on post adoption implementation and delivery. This implementation process is crucial, as without it the value of the Local Plan is diminished.
- e. Is appropriately aligned with the timescales for the preparation of the Local Plans within the Black Country Authorities in order to support ongoing cross boundary discussions.

Monitoring Indicators

7.36. Paragraph 26 of ID28 addresses monitoring indicators and concludes that there is a need for indicators associated with the delivery of the proposed contributions to the unmet needs forecast to arise within the Black Country.

7.37. Shropshire Council has identified proposed modifications which seek to respond to this conclusion, which are documented within the enclosed Updated Schedule of Proposed Main Modifications.

Main Modifications

- 7.38. Paragraph 27 of ID28 explains that any main modifications resulting from the issues addressed within Paragraphs 10-26 of ID28 need to be appropriately documented and submitted to the examination.
- 7.39. Shropshire Council has identified a series of proposed modifications informed by the additional work undertaken in response to Paragraphs 10-26 of ID28. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications and Updated Schedule of Proposed Minor (Additional) Modifications.

8. Habitat Regulations Assessment

- 8.1. Paragraph 28 of ID28 addresses the Habitat Regulations Assessment (HRA) of the draft Shropshire Local Plan, specifically with regard to the Clun catchment.
- 8.2. It requests that Shropshire Council engages with Natural England and the Environment Agency regarding the Written Ministerial Statement (WMS) entitled 'Statement on improving water quality and tackling nutrient pollution', with a view to updating the prepared Statements of Common Ground (SoCG).
- 8.3. It also asks that following this engagement, the Council should advise on the implications for the latest position in the draft Shropshire Local Plan and whether any outstanding issues might be addressed through further proposed Main Modifications.
- 8.4. Proactive engagement between Shropshire Council and Natural England is currently ongoing with regard to this matter. The Council will provide further updates on this matter in due course.



9. Green Belt – RAF Cosford

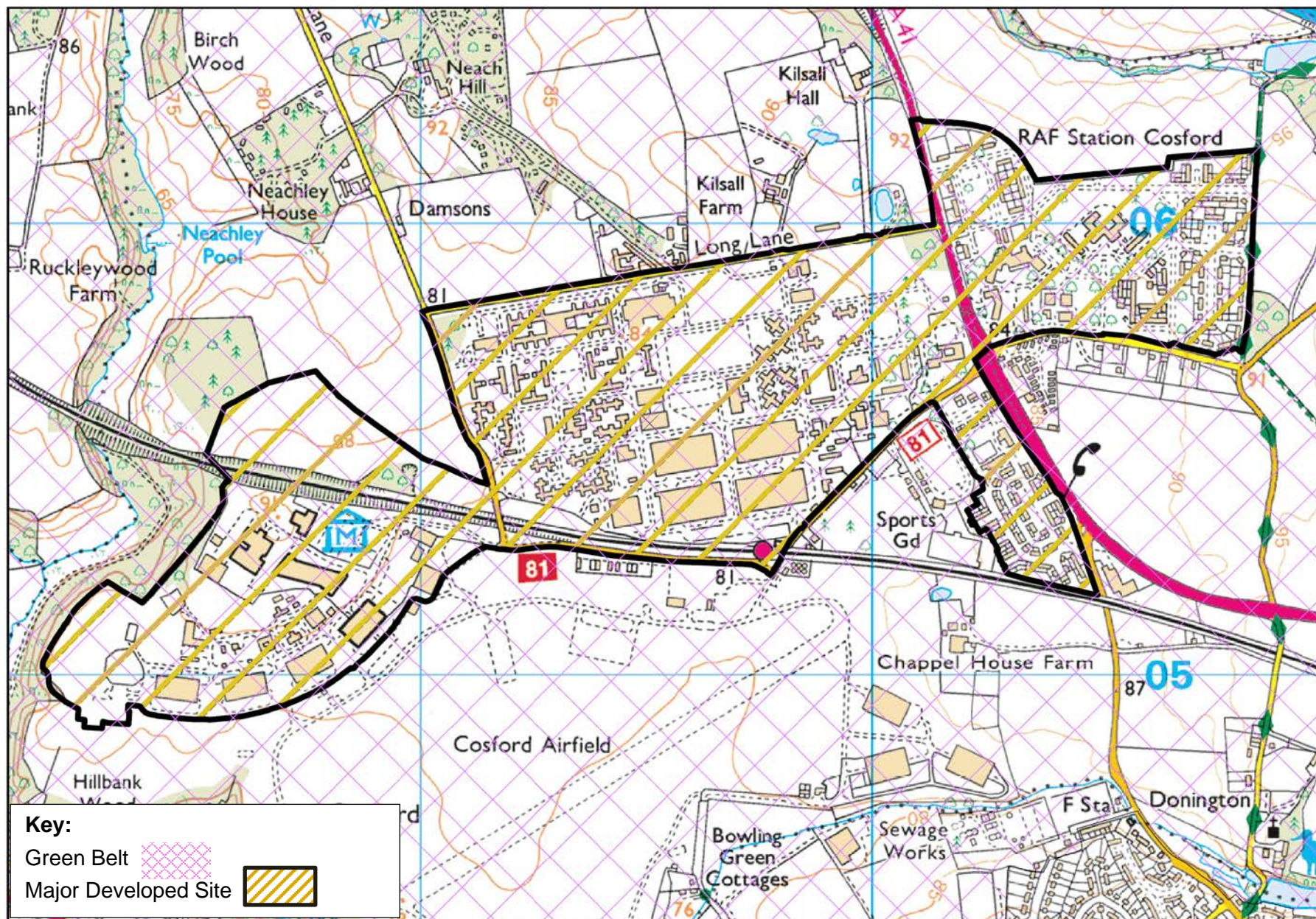
- 9.1. Paragraphs 29-32 of ID28 address RAF Cosford. They explain that you have concluded that RAF Cosford should remain in the Green Belt, because:
- a. There is *“no evidence before us to demonstrate that the site’s Green Belt status has in anyway prevented it being developed in a manner consistent with its use as an RAF base or indeed related activities such as training facilities and domestic accommodation”*.
 - b. *“Paragraph 143(b) of the Framework which advises that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open. However, it seems that the site has large areas of undeveloped land which, if developed, could harm openness of the surrounding Green Belt land.”*
 - c. *“It would also make it more difficult for the Council to control future non-military related development on the site as other general development management policies would apply.”*
- 9.2. Whilst of course disappointed, Shropshire Council accepts the reasoning and conclusions in your Interim Findings. As such, appropriate main modifications are proposed. In summary these proposed modifications involve:
- a. The deletion of draft Policy S21 and its explanation.
 - b. Appropriate amendments to draft Policies SP11 and S1 and their explanations.
 - c. Other necessary amendments for the purpose of consistency.
- 9.3. Given the extensive built form that exists on the RAF Cosford site and the fact that there are known development aspirations / opportunities, Shropshire Council considers it is important to recognise within the

draft Shropshire Local Plan that RAF Cosford is a major developed predominantly brownfield site located within the Green Belt.

- 9.4. It is also important to recognise that this is a consideration when determining whether very special circumstances exist for development within the Green Belt - this position is consistent with that within the adopted Local Plan and is responsive to the conclusions you have reached within your Interim Findings.
- 9.5. As such, it is proposed that this is reflected within the modifications to draft policies SP11 and S1.
- 9.6. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications and Updated Schedule of Proposed Minor (Additional) Modifications.
- 9.7. Modifications will also be required to the draft Policies Map to remove reference to the RAF Cosford Strategic Site and include reference to the RAF Cosford Major Developed Site, this will be undertaken in due course.
- 9.8. For information, the proposed extent of the major developed predominantly brownfield component of the RAF Cosford site, which it is proposed will be reflected on the Policies Map, is identified in Figure 9.1.



Figure 9.1: Extent of the Proposed RAF Cosford Major Developed Site



10. Infrastructure Delivery Plan (IDP) and Strategic Funding Statement (SFS)

- 10.1. Paragraphs 33-34 of ID28 address infrastructure.
- 10.2. Paragraph 33 of ID28 advises the Council to treat the Infrastructure Delivery Plan (known in Shropshire as the Strategic Infrastructure and Investment Plan (GC4t)) as a 'live document' and to continue populating it as further information becomes available.
- 10.3. Shropshire Council recognises the importance of having a robust understanding of the infrastructure required to support development proposals within the draft Shropshire Local Plan. However, the strategic nature of the Local Plan can mean providing detailed assessments will be challenging.
- 10.4. However, Shropshire Council very much recognises the importance of continuing to enhance its understanding of infrastructure requirements across Shropshire, and in particular the infrastructure required to support the development proposals within the draft Shropshire Local Plan.
- 10.5. The Council therefore welcomes the recommendation and strongly embraces the principle of the Strategic Infrastructure and Investment Plan (GC4t) being viewed as a 'live document' that should be continued to be populated as further information becomes available.
- 10.6. Indeed, as documented within the Strategic Infrastructure and Investment Plan (GC4t) itself *"It is important that this Strategic Infrastructure and Investment Plan provides a 'live' framework, enabling the alignment of future planning, prioritisation, and delivery. It can only provide a snapshot in time using the best available data and assumptions from Shropshire's strategic providers. The Plan will be subject to an annual review and agreement via Shropshire's Strategic*

Infrastructure and Investment Network and informed with local intelligence via the annual Place Plan review."

- 10.7. Shropshire Council would note that reflecting the 'live' nature of infrastructure planning in Shropshire, a comprehensive update of the Place Plans (EV067.01-EV067.18) that identify infrastructure needs and priorities is currently ongoing.
- 10.8. Further information regarding the infrastructure needed to support new development and the infrastructure priorities and investment strategies of the main infrastructure providers in Shropshire are also currently being sought through productive discussions with site promoters and the Strategic Infrastructure and Investment Network. This Network includes representatives from several partner organisations, including the NHS, National Highways, Utility Providers and Network Rail, as well as ongoing contributions from the Council's own Education service in assessing school place planning requirements in response to planned development.
- 10.9. This work will in sequence inform future updates of the Strategic Infrastructure and Investment Plan (GC4t).
- 10.10. Paragraph 34 of ID28 requests timescales for the update of the Strategic Funding Statement, known as the Annual Infrastructure Funding Statement in Shropshire.
- 10.11. Shropshire Council can confirm the Annual Infrastructure Funding Statement for Shropshire was last updated for the period 01/04/2021 - 31/03/2022. This was published in December 2022 and a copy is enclosed with this response.
- 10.12. The Annual Infrastructure Funding Statement (2022) presents an infrastructure list (see pages 9-21) which *"sets out the potential infrastructure projects or types of infrastructure which Shropshire*



Council intends to be wholly or partly funded by the Community Infrastructure Levy (CIL)."

- 10.13. It should be noted that this list is subject to a number of caveats, including:

"This report will not dictate how Shropshire Council must spend CIL, but will set out Shropshire Council's intentions."

"The intention is for the infrastructure list to be reviewed regularly. Future iterations of the list will include additional infrastructure projects where they are considered necessary to support new development."

"items not included on this infrastructure list can continue to be CIL funded in advance of being included in any future infrastructure list."

"The list refers only to the use of the CIL local and strategic funds by Shropshire Council." As such, it does not include use of the CIL 'neighbourhood fund' which is distributed to Town and Parish Councils.

- 10.14. The content of the Infrastructure List within the Annual Infrastructure Funding Statement is directly linked to and informed by the Place Plans and Strategic Infrastructure and Investment Plan.
- 10.15. Shropshire Council envisages that the number of projects and level of specificity within the Annual Infrastructure Funding Statement will increase on completion of the Place Plan updates and the ongoing discussions within the Strategic Infrastructure and Investment Network.

11. Five-year Housing Land Supply

- 11.1. Paragraphs 35-36 of ID28 address the five year housing land supply.
- 11.2. Paragraph 35 of ID28 explains your finding that you cannot 'fix' the five year housing land supply in Shropshire. This position and your reasoning is acknowledged by Shropshire Council.



- 11.3. Paragraph 36 of ID28 explains your finding that you might not be able to fully consider our 5-year housing land supply and to come to a conclusion on whether the Council do have a 5-year supply of housing land. This is because the Council are relying on a number of 'saved' site allocated in the SAMDev Plan which are not subject to examination.
- 11.4. The Council would note that the process of determining whether a 5-year housing land supply exists during the examination of a draft Local Plan will inevitably involve the consideration of sites that are not proposed for allocation within the draft Local Plan that is the subject of the examination.
- 11.5. This is because a housing land supply invariably extends beyond sites that are proposed for allocation within a draft Local Plan.
- 11.6. For instance, as summarised within Paragraph 3.8 of the explanation to draft Policy SP2 of the draft Shropshire Local Plan: *"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."*
- 11.7. These sources of housing land supply extend beyond those that are specifically allocated within the draft Shropshire Local Plan. They also extend beyond the proposed 'saved' allocations within the adopted Local Plan.

11.8. This is not considered to be unique to Shropshire or indeed in any way unusual. Ultimately the Council remain keen for the examination to consider the housing land supply identified in Shropshire.

11.9. For information, an updated Five Year Housing Land Supply (2022 base date) based on the housing requirement proposed within the draft Shropshire Local Plan, is enclosed with this document.

12. Housing Requirement

12.1. Paragraph 37 of ID28 addresses the housing and employment land requirements. It explains your finding that the housing and employment land requirements should be expressed as definitive 'minimum' figures for both monitoring purposes and for the effectiveness of the plan.

12.2. Whilst the Council is somewhat surprised by this conclusion, it is accepted. A series of proposed modifications have therefore been identified in order to respond to this conclusion.

12.3. This change to expressing both the housing and employment requirements as minimum figures has been a significant consideration when undertaking the additional work regarding the proposed housing and employment land requirements. The Housing and Employment Topic Paper provides more information on this.

13. Specialist Housing / Older Persons Housing

13.1. Paragraphs 38-41 of ID28 address the requirement to meet the housing needs of older people. In summary, these paragraphs recognise that the Council's evidence indicates a higher proportion of older people residing in the Shropshire Council's administrative area than the national average. Given this, you consider there is clear evidence of a higher-than-average need for specialist housing for older people and

that either the policy should include indicative need figures, or the Plan should contain a specific policy to deal with specialist housing.

- 13.2. Shropshire Council has considered this matter and on reflection has prepared a specific policy to address the housing needs of older people and those with disabilities and special needs, to be included within the draft Shropshire Local Plan. The preparation of this draft Policy has been informed by additional SA assessment work and proactive discussions with colleagues in the Housing and Adult Social Care Teams at Shropshire Council.
- 13.3. It is considered that this policy represents an effective means of ensuring that the housing needs of older people are met in a way that is responsive to both the current Adult Social Care Strategy for Shropshire (2018) and the emerging People's Strategy for Shropshire (currently in development). Crucially, it is also responsive to the geography and characteristics of Shropshire.
- 13.4. This draft policy is appended to this document. Appropriate proposed main modification are also identified within the enclosed Updated Schedule of Proposed Main Modifications.
- 13.5. *Please Note: The version of this draft policy integrated into the track changes version of the draft Shropshire Local Plan includes updated policy cross-references resulting from proposed main modifications. The version within the Appendix of this document and the Updated Schedule of Proposed Main Modifications maintains the policy references as at the submission draft of the Shropshire Local Plan.*

14. Policy SP4 – Sustainable Development

- 14.1. Paragraph 42 of ID28 addresses draft Policy SP4. It notes that during the hearings it was agreed that a Main Modification would be introduced



to delete draft Policy SP4 and instead rely on national policy in the context of the presumption in favour of sustainable development.

14.2. Accordingly, Shropshire Council has identified proposed modifications to the Updated Schedule of Proposed Main Modifications, submitted alongside this correspondence.

14.3. The Updated Schedule of Minor (Additional) Modifications includes proposed amendments to policy titles to reflect this deletion, but the numerous cross references are currently documented as a single entry. However, the 'track changes' version of the draft Shropshire Local Plan includes hyperlinks on policy references to aid navigation, these update to reflect the policy references resulting from the proposed modifications to date.

15. Policy SP5 – High-Quality Design

15.1. Paragraph 43 of ID28 addresses draft Policy SP5. It notes that the Council agreed to consider whether a reference should be included to the National Design Guidance within draft Policy SP5. Shropshire Council considers that it would be appropriate to include a reference to the National Design Guidance within draft Policy SP5.

15.2. The Council also recognises the role of Local Design Codes within the National Design Guidance and the important role that such documents will play in ensuring high-quality design in the future. The Council considers that a specific reference to Local Design Codes within draft Policy SP5 would also be appropriate.

15.3. Shropshire Council has therefore identified appropriate proposed modifications within the Updated Schedule of Main Modifications submitted alongside this correspondence.



16. Policy SP6 – Health and Wellbeing

16.1. Paragraph 44 of ID28 addresses draft Policy SP6. It recognised that the Council had agreed to consider two matters in Policy SP6 and whether to propose any main modifications to the Policy.

16.2. These are:

- a. Should criterion 5a refer to 'improved' health facilities.
- b. What is the expectation of criterion 10 regarding the need for a Health Impact Assessment for all major development proposals and is this appropriate.

16.3. Shropshire Council has considered these questions and addresses each in turn.

a. Criterion 5

16.4. Shropshire Council has reviewed criterion 5a of draft Policy SP6. The intention of this paragraph was to support existing and provision of new health facilities to serve an expanding population.

16.5. On reflection, it is considered that including reference to 'improved' health facilities alongside existing references to 'maintenance' and 'delivery' of health facilities provides greater clarity on this matter. As such, Shropshire Council has identified appropriate proposed modification within the Updated Schedule of Main Modifications submitted alongside this correspondence.

b. Criterion 10

16.6. With regard to the expectations of criterion 10, Shropshire Council has considered three questions:

- a. Is it reasonable to include a policy requirement requiring a Health Impact Assessment (HIA)?



- b. Is the trigger point of 'all major development' being required to undertake a HIA appropriate?
- c. Is the scope of the HIA appropriate – as established within the wider requirements of draft Policy SP6?

16.7. With regard to whether it is reasonable to include a policy requirement to undertake a HIA, The Public Health England Guidance "*Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams*" (October 2020) provides guidance on the use of Health Impact Assessment (HIA) in the planning system.

16.8. It specifies that "*Local authorities are encouraged to adopt policies that require an HIA to be carried out for certain types of developments in their local plan or spatial development processes. Such a requirement may support local health and wellbeing priorities (Annex 2) as well as the local health and wellbeing policy. An HIA policy requirement may also support other health-promoting policies such as those relating to sustainable transport, sport and play, housing, access to healthy and affordable food and green infrastructure.*"

16.9. Furthermore, the National Planning Practice Guidance (NPPG) on Health and Wellbeing (ID53) recognises within paragraph 5 that "*A health impact assessment is a useful tool to use where there are expected to be significant impacts.*"

16.10. As such, it is clear that the principle of requiring a HIA within Local Plan policy is appropriate and consistent with national guidance.

16.11. With specific regard to the 'trigger' for undertaking a HIA, having regard to paragraph 5 of the NPPG (ID53) and the advice provided within the afore-referenced Public Health England Guidance, the trigger in criterion 10 of draft Policy SP6 is also considered to be appropriate.

- 16.12. With regard to the 'scope' of a HIA, having regard to paragraph 5 of the NPPG (ID53), advice provided within the Public Health England Guidance and discussions during the relevant hearing session, it is considered criterion 10 of draft Policy SP6 should be modified to make it clear that the expectation is that major development proposals are required to undertake HIA screening. A full HIA would only be required in circumstances where HIA screening concludes it is necessary.
- 16.13. Shropshire Council has prepared an initial draft template of the HIA screening and associated guidance, which are enclosed with this document.
- 16.14. Reflecting this conclusion, Shropshire Council has identified appropriate proposed modifications to both draft Policy SP6 and its explanation, within the Updated Schedule of Main Modifications submitted alongside this correspondence.

17. Policy SP10 – Managing Development in the Countryside

- 17.1. Paragraph 45 of ID28 addresses draft Policy SP10. Specifically, it addresses the agreed modification to this draft Policy to dis-apply the policy requirements to sites in the countryside that are allocated for development in the draft Shropshire Local Plan or any other adopted Development Plan Document.
- 17.2. Accordingly, Shropshire Council has identified appropriate proposed main modification within the Updated Schedule of Main Modifications submitted alongside this correspondence.



18. Policy SP12 Shropshire Economic Growth Strategy

- 18.1. Paragraph 46 of ID28 addresses draft Policy SP12. Within this paragraph you have expressed concern regarding the effectiveness of this draft policy as *“a great deal of it seems to be more of a vision rather than a strategic policy.”*
- 18.2. Shropshire Council has reflected on this concern and proposed a main modification to delete this policy within the Updated Schedule of Main Modifications submitted alongside this correspondence.
- 18.3. Shropshire Council will regard the Shropshire Economic Growth Strategy as a material consideration in future planning decisions following the deletion of draft Policy SP12.

19. Policy SP13 – Delivering Sustainable Economic Growth and Enterprise

- 19.1. Paragraph 47 of ID28 addresses draft Policy SP13, documenting the agreement to integrate Figure SP13.1 into draft Policy SP13.
- 19.2. Shropshire Council has identified appropriate proposed main modifications within the Updated Schedule of Main Modifications submitted alongside this correspondence.
- 19.3. These proposed main modifications further introduce Figure SP13.1 as a new criterion 8 in Policy SP13. This provides a ‘quality ranking’ of sites within the employment land supply.
- 19.4. The proposed main modifications also include further guidance within the explanation to Policy SP13 on the implications of this ‘quality ranking’ of sites for the implementation of the policy and also that this ‘quality ranking’ of sites will be further explained and monitored annually in the Authority Monitoring Report (AMR).



20. Strategic Settlements and Sites

- 20.1. Paragraphs 48-51 of ID28 address the proposed Strategic Settlements and Strategic Site.
- 20.2. Paragraph 48 confirms that there are no specific comments on draft Policy S20 (Former Ironbridge Power Station) and no further comments on draft Policy S21 (RAF Cosford) already discussed earlier in ID28.
- 20.3. Paragraphs 49 and 50 relate to draft Policy S19 (Clive Barracks, Tern Hill), raising concerns about the viability and deliverability of this proposed allocation and requests further evidence to demonstrate that necessary infrastructure is deliverable.
- 20.4. To respond positively to this request, Shropshire Council has proactively engaged with the site promoter regarding the identified concerns.
- 20.5. Following this engagement both parties have agreed an addendum to the previously submitted Statement of Common Ground (SoCG) between the two parties, which is enclosed with this response.
- 20.6. The SoCG and its addendum demonstrate the site is viable and deliverable and that infrastructure necessary to serve future occupants will be delivered at the appropriate stages in the delivery of this site. This investment will also benefit the surrounding community.
- 20.7. With specific regard to assumptions on delivery timescales, Shropshire Council would note that:
- a. Delivery timescale assumptions are not a result of concerns about site viability or deliverability, but reflect the timing of site disposal (expected in 2029).

b. Delivery timescale assumptions have been informed by and recognise the need to deliver necessary infrastructure at appropriate stages of the development.

c. Delivery timescale assumptions have been discussed and agreed with the site promoter. This is documented within the SoCG which includes *“Subject to the adoption of the Shropshire Local Plan (2016 – 2038), and determination of the future planning application(s) for Clive Barracks, the below delivery schedule should be used to indicate housing delivery at the site. This schedule has been informed by the evidence base and represents an appropriate and deliverable delivery trajectory for the site.”*

20.8. As also documented within the SoCG and its addendum, the promotion of the site and the Indicative Masterplan that has been prepared have been informed by a suite of technical evidence. This technical evidence provides confidence that infrastructure will be delivered at appropriate points within the development project.

20.9. The SoCG and its addendum again records the agreement reached on this matter, stating *“Any phasing of the delivery of the infrastructure requirements will be agreed with SC and the appropriate stakeholders ahead of and during determination of a planning application. These timescales will appropriately reflect the policy requirements within draft Policy S19 and the wider construction of the site.”*

20.10. Shropshire Council would also note that identification of proposed allocations has been informed by a proportionate and robust site assessment process (summarised within the Appendices of the Sustainability Appraisal and Site Assessment Environmental Report of the Draft Shropshire Local (SD006.01)) and a Delivery and Viability Study (2020) (EV115.01).



- 20.11. Shropshire Council considers Clive Barracks, Tern Hill is viable and deliverable and can deliver a policy compliant development.
- 20.12. Paragraph 51 of ID28 relates to concerns regarding the vagueness of policy wording within draft Policy S19. The intention of draft Policy S19 was to provide sufficient certainty about policy requirements, whilst maintaining flexibility. Furthermore, it is important to note that the wider policies within the draft Shropshire Local Plan expand on the policy requirements within draft Policy S19.
- 20.13. However, Shropshire Council has given this concern due consideration and has identified a series of proposed main modifications. These proposed modifications provide greater clarity on the intention of each policy requirement, including through appropriate cross referencing to other relevant policies within the draft Shropshire Local Plan.
- 20.14. These proposed main modifications are identified within the Updated Schedule of Main Modifications submitted alongside this correspondence.

21. Strategic Flood Risk Assessment

- 21.1. Paragraph 52 of ID28 relates to the Council's Strategic Flood Risk Assessment (SFRA) and requests a note of clarification regarding the methodology and data relied upon with regard to hydraulic modelling and fluvial flood risk.
- 21.2. Shropshire Council has engaged with our consultants (JBA Group) that undertook both the Stage 1 and Stage 2 SFRA's to inform the preparation of the draft Shropshire Local Plan and they have prepared the requested note of clarification.
- 21.3. It is understood from this note that:
- a. The SFRA utilised a cautious and robust methodology.



- b. At the time that the SFRA was undertaken, it was based on best available information.
- c. The hydraulic modelling undertaken within the SFRA is considered to be comprehensive and robust.
- d. The approach to climate change modelling undertaken within the SFRA resulted in allowances that were generally comparable to those provided within the more recent guidance.

21.4. Furthermore, it is important to note that the site guidelines for all sites that contain a portion of the site within Flood Zones 2 and/or 3 specifically include a site guideline specifying that development will be excluded from these portions of the site.

21.5. In addition, draft Policy DP21 includes a requirement to undertake site specific flood risk assessments (FRA) for all development proposals that are:

"a. In Flood Zones 2 and 3;

b. In Flood Zone 1 if the site is 1 hectare or above;

c. In Flood Zone 1 where there are critical drainage problems;

d. On land which either the Shropshire SFRA (Levels 1 and 2) shows, or more recent information indicates, is at increased risk of flooding either now or in the future e.g. through the impact of climate change;

e. On land subject to other sources of flooding (surface water, groundwater, infrastructure/sewer failure, reservoir overflow) where development would introduce a more vulnerable use; and

f. On land in those catchments identified in the Shropshire SFRA Level 2 as being at highest risk from the cumulative impacts of development."
(my emphasis).

- 21.6. Draft Policy DP21 then explains the required scope of a FRA, stating
*“The FRA should demonstrate how flood risk, including residual risk, will be managed now and over the development’s lifetime, **taking climate change into account and with regard to the vulnerability of its users**. It should cover all sources of flooding and be proportionate to the scale and nature of the development and the flood risk involved. The FRA should show how the development has been designed to be resilient to both actual and residual flood risk...”* (my emphasis).
- 21.7. As such, these proposed policy requirements ensure that at the time of a development proposal all relevant sites are subject to FRA informed by the most up to date information at the time of the assessment, which ensures that flood risk is appropriately considered and informs these development proposals.
- 21.8. Within Paragraph 52 you also ask the Council to review the Statement of Common Ground (SoCG) with the Environment Agency (EA) and consider whether it needs to be updated in view of this. It is important to note that the EA were on the steering board for the SFRA. Following the completion of the Regulation 19 Consultation, the EA raised concerns that new climate change figures had emerged since the preparation of the SFRA. However, there is no suggestion from the EA that any site allocations are inappropriate as a result.
- 21.9. Shropshire Council has considered the SoCG with the Environment Agency and given the above, does not consider that it needs to be amended at this time.

22. Local Development Scheme

- 22.1. Paragraph 53 of ID28 addresses the Local Development Scheme (LDS) which provides the ‘Project Plan’ for the preparation of planning policy



documents over the next 3-year period. Within paragraph 52 you have requested that the LDS is updated and kept under review.

22.2. Shropshire Council has prepared an updated LDS enclosed with this response. The Council recognises the importance of keeping the LDS under review and will do so throughout the Local Plan examination.

23. Overall Conclusions

23.1. Paragraphs 54-58 of ID28 provide the overall conclusions. Having carefully considered the various matters you have raised within ID28, Shropshire Council has undertaken additional work and where appropriate identified further proposed modifications.

23.2. When you have considered this information, the Council would welcome your views and discussion of our next steps, including any need to consult on the information provided and the further proposed modifications, the need for further discussion of these matters during a mop-up hearing, and the timescales for the Stage 2 Hearings.

23.3. As recognised within your correspondence reference ID33, all parties are keen to progress to the Stage 2 Hearings as soon as possible.

Yours sincerely

Eddie West
Planning Policy and Strategy Manager
Shropshire Council

