

Reference	Respondent	Part of Document Addressed	Summary of Comments
01	Shropshire Homes	Whole document	<p>1. Very concerned about impact on viability of residential development. Particular areas of concern are:</p> <ul style="list-style-type: none"> -Paragraph 6.7(b) expecting all new dwellings to achieve M4(2) standard. SH strongly object to this requirement as it would significantly increase floor areas (e.g., +140ft² for a 3 bed), raise build costs and sale prices thereby reducing affordability and reduce density and the ability to achieve efficient use of land (as a result of these larger homes). It is recommended that a smaller proportion of homes should be required to achieve the M4(2) standard, similar to Telford & Wrekin’s approach (20% market, 45% affordable). -Paragraph 8.11 expecting dwellings to achieve nationally described space standards. SH have significant concerns about this proposal which would harm the viability of smaller housing, make delivery of small affordable homes very difficult, conflicts with national policy and may be difficult for the Council to justify. It is recommended that this expectation is removed or that a more flexible model is included - for instance requiring 85% of properties to achieve nationally described space standards. -Paragraph 8.26(a) requirement for garden sizes. SH consider that the proposed minimum 70m² garden for all homes is excessive for smaller homes, not a priority for typical buyers of 1–2 bed dwellings and damaging to viability and density. It is recommended that the 70m² garden requirement applies only to 3+ bedroom houses. -Paragraphs 8.48f & 8.45g expectations for garage sizes. SH warn that enlarging garages as proposed would add ~£5,000 per home, not be recoverable in sale prices, impact viability and result in larger garages than elsewhere. It is recommended that smaller, practical garage dimensions are specified (single garage: 3m × 5.1m and double garage: 5.1m × 5.1m). <p>2. Paragraph 6.7(d) and 8.65: it is recommended that the phrase “meaningful provision of other housing” is removed or limited, suggesting it should apply only to dementia friendly requirements.</p>

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01	Shropshire Homes	Whole document	<p>1a. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p> <p>1b. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>1c. The Council considers the principles on garden sizes generally align with good practice but recognises that smaller gardens may be appropriate for smaller units, so appropriate flexibility will be integrated.</p> <p>1d. It is noted that there are many different standards for garages and car ports, however those in the draft SPD directly align with the Council's SMART guidance which have been informed by consultation. It is considered that it remains appropriate to utilise these standards, but it will be clarified that this is in circumstances where the garages are to constitute part of a dwellings car parking provision.</p> <p>2. The Council considers the term 'meaningful proportion' is appropriate. Achievement of HAPPI and Dementia Friendly principles is about effective design, layout, materials and finishes and generally does not have a significant cost associated with its achievement.</p>

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01	Shropshire Homes (continued)	Whole document	<p>3. Paragraph 6.11b: support on-site BNG but note that off-site delivery should remain an option where necessary. It is recommended that wording is added to allow offsite provision “where on site provision is not viable”.</p> <p>4. Paragraph 7.3(b): welcome removal of the “prescriptive mix of house types” from the Local Plan.</p> <p>5. Paragraph 7.6(b): consider there is a conflict between permeability and Secure by Design. Recommend that where conflicts arise, permeability should take precedence.</p> <p>6. Paragraphs 8.13(d) & 8.14: consider small pockets of planting or landscaped areas are undervalued. It is recommended that the term “usable” open space is replaced with “mainly usable” to allow small, dispersed pockets of open space, SUDS, planting, and public art.</p> <p>7. Paragraph 8.18(b): note the SPD contradicts DM guidance that LAPs should be located centrally. It is recommended that the SPD is aligned with DM advice.</p> <p>8. Paragraph 8.36(b): concerned expectations for private gardens of ground floor flats create cluttered, disjointed layouts and contradict preferences of residents who prefer managed communal areas. Recommend this requirement is omitted.</p> <p>9. Paragraphs 8.48, 8.48a and 8.48f: expectations for parking requirements are not suitable in all locations, will encourage car use, will reduce sustainability, will create visual clutter and tarmac dominated layouts, will undermine site efficiency and reduce viability. It is recommended that the standards are amended to 1 bed → 1 space, 2 bed → 1-2 spaces, 3 bed → 2-3 spaces, 4+ bed → 3+ spaces and that the text emphasises that these standards are recommendations rather than fixed rules.</p> <p>10 Paragraph 8.53a: Support adequate cycle parking but consider 2 spaces per apartment excessive. It is recommended that this is reduced to 1 cycle space per apartment. Should also clarify that a house with a garage does not also need external cycle storage. Note that lockable cycle stores add £500 per dwelling, harming viability.</p> <p>11. Support several components of the draft SPD. This includes:</p> <ul style="list-style-type: none"> -The general aspirations on efficient use of a site in paragraph 3.4. -The general aspirations on responding to a sites relationship to the surrounding area in paragraph 3.7. -The general aspirations on character and appearance in paragraph 4.8. -The general aspirations on high-quality design in paragraph 4.10. -The general aspirations on healthy and active lifestyles in paragraph 6.4. -The approach to M4(3) in paragraph 6.7(b). -The approach to specialist housing in paragraph 6.7(c). -Welcome specific requirements for play space in paragraph 8.21. <p>12. Consider the proposals impacting on viability are best considered through a Local Plan review.</p>

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01	Shropshire Homes (continued)	Whole document	<p>3. The existing phraseology specifically allows for off-site provision where on-site is not possible - this would include circumstances where it is either not achievable or not viable.</p> <p>4. Noted.</p> <p>5. The Council does not consider that there is a conflict between achieving permeability and secure by design principles - achievement requires effective design.</p> <p>6. The Council remains of the view that small and fragmented parcels of open space (such as highway verges) are maintenance intensive and have very limited usability and biodiversity value. Therefore, whilst potentially a valued design feature, they are not considered to constitute functional open space. As such, it does not count towards the 30sqm per person requirement.</p> <p>7. The Council does not consider there to be conflict between this guidance and that provided by Development Management.</p> <p>8. The Council remains of the view that to achieve an effective design, flats and apartments (excluding specialist housing) should, wherever possible, include private amenity space that is clearly associated with and accessible from the property. Generally, this should consist of green roof gardens and/or appropriately located and accessible 'green' amenity plots in the property curtilage (with appropriate boundary materials).</p> <p>9. Having reflected on the parking provision guidance, it is considered that they were overly rigid. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p> <p>10. The Council considers guidance regarding cycle parking is entirely appropriate - further it should be noted that the garage sizes within the Council's SMART guidance is to allow for one cycle parking space. There are many alternatives to achieve such provision beyond lockable cycle stores.</p> <p>11 and 12. Noted.</p>

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02	Shropshire Highways	Whole document	<p>1. Paragraph 8.48: Standing advice states a standard single garage is 6m x 3.3m, Manual for Streets states that a minimum of 6m x 3m and SMART guidance (Technical Note 9) recommends 7m x 3m (consistent with the draft SPD) to accommodate bicycle parking. The SMART guidance was subject to consultation and no concerns were raised in relation to the dimensions recommended and published on our website. Suggest amending paragraph 8.48 to clarify that when garages are below the recommended minimum standard (7mx3m) they are not counted in the overall number of parking spaces, which may be more acceptable to developers. The document is striving to achieve good practice so the later garage size would be desirable but not essential.</p> <p>2. Paragraph 3.9(e): seeks enhanced filtered permeability. It is acknowledged that this is a recognised term and therefore appropriate to be used in the context.</p> <p>3. Paragraph 3.9(f): Unclear on the reference to private roads, should this be private drives? Suggest the recommendation is amended to specify private drives are to be avoided, but where they are appropriate alternative pedestrian and cycle routes are provided to ensure pedestrian and cycle permeability throughout a development.</p> <p>4. Paragraph 5.2: Should include the word 'inclusive' given one omission of design is typically not making inclusivity the first requirement over all other design. Alternatively chapters 5 and 6 could be re-ordered.</p> <p>5. Paragraph 5.3(b): Do not require a lot of unnecessary raised tables on well designed residential streets, maintenance and legally traffic calming meaning it has a job to do with cars first not people. As worded can lead to road hump design solutions. Suggest – All crossing points should be fully inclusive whether at carriageway level or raised. Raised solutions need to consider the wider implications of introducing traffic calming to new streets. Also suggest using word 'carriageway' rather than road.</p> <p>6. Paragraph 5.3(c): Consideration could be given to rewording this paragraph to include reference to links into site and within the site, given it is understood this seeks to ensure there is permeability within the site but also to provide connection to infrastructure. Is it worth referring to passenger transport draft guidance for wording?</p> <p>7. Paragraph 5.3(d): Consideration could be given to using wording in Manual for Streets 3 draft, 'an inclusively designed public realm, and through that help achieve social inclusion'. Agree with requirement to ensure public realm takes into account all users. Also emphasis on security in the public realm (reduce risk of terrorism), so an opportunity to expand to incorporate this.</p> <p>8. Paragraph 5.7: Amend to require active travel to engage with top tier facilities if within walking distances of up to 2km and lower tier local facilities within 1km?</p>

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02	Shropshire Highways	Whole document	<p>1. It is noted that there are different standards for garages and that those in the SMART guidance have been informed by consultation. It is considered appropriate to utilise these standards in circumstances where the garages are to constitute part of a dwellings car parking provision. Therefore for clarity, amendments will be made to reflect this.</p> <p>2. Noted.</p> <p>3. The intention of paragraph 3.9(f) was to address private drives, for clarity this will be amended. The caveat on the approach in circumstances where a private drive is appropriate is supported and will be included through an appropriate amendment.</p> <p>4. It is recognised that inclusivity is an important design principle and that its specific reference in paragraph 5.2 ensures a consistent approach through the document. This will be reflected through an appropriate amendment.</p> <p>5. The intention is to achieve inclusivity when seeking to cross carriageways. On reflection, it is considered that the proposed amendment better reflects this intention and as such it will be appropriately integrated.</p> <p>6. Inclusion of reference to public transport links through the site is considered appropriate, reflecting the intention of this guidance. Similarly, reference to achieving consistency with Council guidance on passenger transport is also considered appropriate. Suitable amendments will be integrated.</p> <p>7. It is recognised that the principles in paragraph 5.3(d) are embedded in the highway code. So as to enhance this guidance appropriate amendments will be made to align with the principles of Manual for Streets 3 and the objective of achieving inclusivity. A further amendment will be made to reflect the increased emphasis on security in the public realm.</p> <p>8. An appropriate footnote is proposed to specify that when identifying existing facilities this should consider top-tier facilities within a 2km radius and lower tier facilities within a 1 km radius.</p>

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02	Shropshire Highways (continued)	Whole document	<p>9. Paragraph 6.9(b) does not add beyond the requirements of the NPPF.</p> <p>10. Paragraphs 8.43 & 8.44: The recommendation is not robust enough. It would be more appropriate to state that the design criteria are set within MfS and LTN 1/20.</p> <p>11. Paragraph 8.48(a): Concerned expressing car parking standards as a range could result in developers picking the number that suits them and the top end of ranges are at odds with Active Travel principles. There is also no opportunity for less than 1 car per dwelling. The issues with tandem parking is not referenced. If tandem parking is recognised as being a solution, greater width streets will be required to absorb the additional parking impacts on residential development. Suggest there needs to be reference to access/opportunities for sustainable travel and location of site.</p> <p>12. Paragraph 8.48(d): For safety reasons, all vehicles should be leaving a driveway in a forward gear. However, do agree with the principle of sight lines being provided, particularly an issue with tree lined developments.</p> <p>13. Paragraph 8.51: Unsure what on-street parking exactly is being supported. Such parking will occur where drivers consider appropriate and too little available or utilisable (like tandem) parking is prevalent in a layout.</p> <p>14. Paragraph 8.76: Does not address BS5906 and reference should be made to Shropshire Councils Waste Management guidance.</p> <p>15. Paragraph 8.79(a): Includes reference to emergency vehicles, but they should be addressed in and of themselves.</p> <p>16. Paragraph 8.80: Definition of street furniture and how this can lead to clutter may be advantageous. Suggest using the term 'clutter' rather than 'proliferation'.</p> <p>17. Paragraph 8.80: Opportunity to address sub-station design, location, access – layouts usually suffer when these are introduced.</p>

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02	Shropshire Highways (continued)	Whole document	<p>9. The Council recognises that the guidance in paragraph 5.7 is consistent with the requirements of the NPPF. It is considered advantageous to include within the draft SPD so that these principles are expressed alongside the other guidance to support sustainability and the transition to net zero.</p> <p>10. The importance of complying with the manual for streets and LTN 1/20 is recognised. For clarity, this will be included within paragraph 8.33.</p> <p>11. Having reflected on the parking provision guidance, it is considered that they were overly rigid. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations). The issues with tandem parking are also noted, and an appropriate amendment will be integrated.</p> <p>12. Noted. The safety aspect is recognised and this guideline will be appropriately amended.</p> <p>13. On reflection it is considered that this paragraph does not 'add value' and so will be deleted.</p> <p>14. The guidance in this draft document is considered to comply with BS 5906 and Shropshire Councils Waste Management guidance. However, for clarity specific cross-referencing to these documents will be included in the document.</p> <p>15. It is accepted that access and egress for emergency vehicles is a specific consideration, but these requirements are often comparable to refuse collection vehicles. As such, it is considered appropriate that it is addresses within this element of the guidance.</p> <p>16. It is considered the term street furniture is sufficiently clear and understood, as is the principle of how they can, if not implemented in a coordinated way, can lead to clutter. Agree the term 'clutter' is clearer and more appropriate than 'proliferation' as such an appropriate amendment will be included.</p> <p>17. It is recognised that sub-stations can constitute a significant type of street furniture and for these reason could benefit from specific guidance. As such, an additional guidelines will be incorporated into paragraph 8.80 on this matter.</p>

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02	Shropshire Highways (further continued)	Whole document	<p>18. Paragraph 8.129: Agree with recommendation that lighting strategy should be provided. Street lighting is a legislative requirement for road of 30mph speed limits, which may have an impact on the general design code. For all other speeds (20mph) the legal requirements are the second tier. Consideration should be given to referencing guidance on part night lighting.</p> <p>19. Paragraphs 6.5 and 8.43: Draft Manual for Streets 3 puts a greater emphasis on protected characteristics in the context of street design but also applicable to housing. Section 5.1 could be included.</p> <p>20. Paragraph 8.13: Potential to include reference to the use of the area for drainage purposes.</p> <p>21. Paragraph 8.14: Agree with the principle of highway verges not being part of the POS.</p> <p>22. Paragraph 8.35: Potential to include guidance about trees on highway.</p> <p>23. Paragraph 8.45: Electric Charging strategy is being developed.</p> <p>24. Paragraph 8.74: Updated version of the secured by design document available. As outlined above there is also a greater emphasis on anti terrorism measures with guidance in the NPSA Public Realm Guide for Hostile Vehicle Mitigation (HVM) - Third Edition.</p>
03	Christine Williams	Whole document	<p>1. The location of infrastructure is critical - ensuring there is sufficient infrastructure and is not subject to environmental or flood risk constraints.</p> <p>2 There is a need for more smaller properties such as bungalows and terraced properties for individuals, those down-sizing and first time buyers.</p> <p>3. There is a need to incorporate different materials in design to break-up the appearance of new development.</p> <p>4. Dwellings need to be of high quality design and materials so they achieve acceptable living conditions and support renewable energy generation.</p> <p>5. Room sizes should be of an adequate minimum size.</p> <p>6. Each dwelling should have a garden and suitable spaces for bins, laundry, bikes and buggies.</p>

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02	Shropshire Highways (further continued)	Whole document	<p>18. Noted. It is not considered necessary to reference statutory requirements and the guidance addresses the design considerations in circumstances where street lighting is required. A cross-reference to the Council's guidance on part night lighting would add greater understanding of the Council's approach on this matter and so will be included.</p> <p>19. The intention of the approach to inclusivity is to include those in the Protected Characteristic groupings defined in the Equality Act 2010. For clarity a specific amendments will be made to paragraph 6.7(a).</p> <p>20. The Council considers that this is primarily the role of the wider Green infrastructure network.</p> <p>21. Noted.</p> <p>22. To ensure the guidance on trees is comprehensive, a cross reference to the Council's Trees and Development guide is to be included as an amendment.</p> <p>23. Noted. Unfortunately reference cannot be included to emerging documents.</p> <p>24 Noted. A link to the updated Secure By Design document will be provided. Further reference to the NPSA guidance on hostile vehicle mitigation will also be included in this section and that on safe and secure design.</p>
03	Christine Williams	Whole document	<p>1. It is considered that Section 5 of the SPD provides appropriate guidance on the integration of a development into its setting, including facilitation of access to services, facilities, sports and play.</p> <p>2. It is considered that Section 7 of the document provides appropriate guidance on the function, including provision of an appropriate housing mix.</p> <p>3 and 4. It is considered that Section 4 of the document provides appropriate guidance on the character and appearance of new dwellings, including the design of place and use of materials.</p> <p>5. It is considered that the technical guidance in section 8 of the document appropriately addresses floorspace standards.</p> <p>6. It is considered that the technical guidance in section 8 of the document appropriately addresses private amenity spaces in all forms of housing.</p>

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04	Cllr Andy Boddington	Whole document	<ol style="list-style-type: none"> 1. Paragraph 3.7 should include reference to ensuring routes into and through the development are designed with disability in mind. 2. Paragraph 3.9(a) reference to straight roads may mean development is not responsive to landform. 3. Paragraph 3.9(c) refers to 'grid patterns' which could lead to rectilinear layouts, instead reference should be to efficient densities. 4. Paragraph 3.9(e) should include reference to disability navigation. 5. Paragraph 5.3 should include "For developments of over 50 homes ensure adequate turning space for buses." 6) Paragraphs 5.7 and 6.4 should support first time buyers and working (particularly young) working age people. It is unsustainable if all new housing is to meet the needs of older people. 7. Paragraph 6.c should reference provision of solar panels on all suitable roofs as a minimum. 8. Paragraph 6.11(g) needs to provide positive pressure to protect heritage assets. 9. Paragraph 7.6(d) wording could lead to narrow benches unsuitable for people to sit on while chatting to friends and neighbours. Suggest amending to "Design and locate seating... to reduce risk of anti-social behaviour." 10. Paragraph 8.11 should require "all dwellings" to achieve nationally described space standards. 11. The document should emphasise the need for adequate play areas. However, Paragraph 8.21 would not require two adjacent estates of 50 dwellings to provide a LEAP. This could be CIL funded but space would be required, so possible addition to the first sentence of "taking into account the need to provide space for play given the overall scale of new build in the location." 12. Paragraph 8.23 should replace "can be responsible" with "may be responsible". 13. Paragraph 8.48 garage widths are too small. The width for garages is too small.

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04	Cllr Andy Boddington	Whole document	<p>1. An appropriate addition will be made to the guidance on the relationship and responsiveness to surroundings. Furthermore, an appropriate addition will also be made to the guidance on inclusive design and layout in the section on inclusive and multi-generational communities.</p> <p>2. Noted, the intention was to promote direct routes to support ease of movement, but on reflection it is considered this is achieved without the need to specify roads are 'straight' and it is agreed that removal of this reference ensures the point better aligns with the wider principles of the guidance.</p> <p>3. It is considered that the context to the reference on grid patterns (formal or more relaxed) allows for appropriate flexibility to respond to the characteristics of the site whilst ensuring layouts aid navigation. It is also considered that density is more appropriately addressed in the guidance on character appearance.</p> <p>4. It is considered that the proposed additional guidance in paragraph 3.7 (response to point 1) appropriately responds to this important point.</p> <p>5. This concern is noted, but it is considered that the technical guidance on bin storage in paragraph 8.79 appropriately addresses this issue.</p> <p>6. The importance of providing accommodation appropriate to first time buyers and working age people is noted, but new housing must also be responsive to the demographics of Shropshire. On reflection it is considered that the guidance appropriately balances these considerations.</p> <p>7. Whilst this principle is understood, it is not considered that there is an appropriate policy basis for this in the adopted Development Plan and Government has been clear that energy efficiency standards for dwellings are to be managed through building regulations. However, paragraph 8.86 specifically encourages developers to incorporate low carbon and renewable energy technologies such as solar panels.</p> <p>8. The importance of conserving and enhancing heritage assets is agreed. It is considered that the Development Plan provides appropriate policies on this matter and this guidance appropriately explains the policy approach.</p> <p>9. Noted, the intention of this paragraph was not to reduce the function of seating, which would be contrary to wider guidance. As such, an appropriate amendment is proposed.</p> <p>10. It is considered that the phraseology of the guidance in paragraph 8.11 is consistent with the Development Plan.</p> <p>11. It is agreed that in circumstances where proposals seek to artificially sub-divide a scheme there is a risk that play provision could be under-sized. As such an amendment to refer to the total development is proposed. Where such a circumstance arises through schemes not artificially sub-divided it is considered that this is best addressed through the planning application process.</p> <p>12. Noted. Suggested phraseology is clearer and an appropriate update is proposed.</p>

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05	Ask GB Ltd	Whole document	<p>1. No consideration is given in planning policies to older Shropshire residents who want to downsize from larger family homes. Such properties are well supported by communities however they cannot achieve minimum garden sizes in this guidance. There needs to be an exception or more nuanced approach to the provision of gardens and private amenity space for this sector. In our experience the purchasers want small and manageable external spaces. There is already a larger footprint in building single story accommodation (3.5-5.8 meters in length).</p> <p>-Paragraph 8.26a is overly-restrictive.</p> <p>-Paragraph 8.26b is unclear whether it applies to bungalows (effectively ground floor flats).</p> <p>-Paragraph 8.26e requirement for communal amenity space and open space would restrict higher-density apartment schemes.</p> <p>-Examples of how apartments can be served by private amenity facilities are poorly conceived and unfeasible.</p>
06	Selattyn and Gobowen Parish Council	Whole document	<p>1. Chapter 1 - Paragraph 1.5: Parish Councils should be involved in the Pre-Application process.</p> <p>2. Chapter 2 - Paragraph 2.13: Need to ensure appropriate service availability and infrastructure including mains sewerage, electricity and broadband prior to development.</p> <p>3. Chapter 2 - Paragraph 2.13: More information needed about the source of information relating to 'community needs'.</p> <p>4. Chapter 3 - Paragraph 9: Medium and large scale developments should have more than one point of access to the development site wherever possible.</p> <p>5. Chapter 6 - Paragraph 6.7b/c: All new homes should be made as wheelchair friendly. Also the percentage of specialist housing should be higher and to just to developments over 50 dwellings.</p> <p>6. Chapter 8 - Paragraph 8.91: Flood Risk Assessments should be based on recent evidence and should include the date of the evidence base.</p> <p>7. Chapter 8 - Paragraph 8.65a: Need to define 'meaningful proportion'.</p>
07	Betley Lane Residents Association	Chapter 2, Para 2.3; Chapter 3, Para 3.4, Chapter 4, Para 4.8, Chapter 6, Para, 6.8; Chapter 7, Para 7.4; Chapter 8 Para 8.6	<p>1. The SPD does not provide sufficient safeguards to prevent harm to established communities, local landscape character, visual impact (especially key outward and inward view overlooking National Landscapes and Country Parks) or the cumulative pressures on rural settlements. Should strengthen and clarify the SPD to ensure it better reflects the intent of adopted planning policies - particularly the Shropshire Core Strategy (Policies CS6, CS7, CS9, CS17 and CS18), SAMDev Policy MD2 and the National Planning Policy.</p>
08	Longden Parish Council	Whole document	<p>1. Diagrams of positive design should be included to make the document shorter and more accessible.</p> <p>2. Paragraph 2.6 refers to paragraph 2 of Policy MD2 of the SAMDev Plan. The guidance on density in this paragraph is somewhat contradictory to paragraph 135 of the NPPF.</p>
09	Coal Authority	Whole document	<p>1. No specific comments.</p>
10	Wychavon District Council	Chapter 8, Para 8.103	<p>1. This section should be expanded to emphasise the importance of assessing designated heritage assets, local heritage assets, listed historic buildings and the contribution of their rural and urban setting. This should especially focus on factors which add to the local distinctiveness, examples of vernacular architecture which help to establish a sense of place. This should then be utilised to design a development which emphasises local distinctiveness and avoids simple creating generic schemes.</p>

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05	Ask GB Ltd	Whole document	1. The Council generally considers these standards to constitute good design and are clear. However, it is accepted that where a two storey dwelling consists of an age-restricted dormer bungalow a smaller garden may be appropriate, as such an appropriate amendment is proposed to paragraph 8.26(a).
06	Selattyn and Gobowen Parish Council	Whole document	1. The scope of the pre-application process is beyond the remit of this draft SPD. 2. The importance of ensuring sufficient infrastructure capacity is available to support development is agreed. It is considered that this principle is clear within the Development Plan. 3. It is considered that this further information is provided within section 7 of the document. 4. Paragraph 3.9a promotes 'thinking about multiple points of access' it is considered that this is appropriate guidance. 5. It is considered that the proportions of wheelchair user dwellings and specialist housing specified strike the appropriate balance between the evidenced needs and maintaining the viability of development. 6. The policies of the adopted Development Plan and national policy are clear on the requirements of a flood risk assessment - paragraph 8.92 also specifies that flood risk assessments should be proportionate. 7. It is considered the guidance is clear on the intention of the phrase meaningful proportion, which is a planning judgement based on the characteristics and circumstances of the scheme.
07	Betley Lane Residents Association	Chapter 2, Para 2.3; Chapter 3, Para 3.4, Chapter 4, Para 4.8, Chapter 6, Para, 6.8; Chapter 7, Para 7.4; Chapter 8 Para 8.6	1. The purpose of this SPD is to provide guidance to support the understanding and application of policies in the adopted Development Plan. SPD's cannot introduce new policy.
08	Longden Parish Council	Whole document	1. The value of diagrams in illustrating guidance is recognised and it is considered they are integrated where appropriate in the document. 2. It is considered that paragraph 2 of Policy MD2 of the SAMDev Plan and paragraph 135 of the NPPF are entirely consistent, including with regard to the density of development. Responding appropriately to the existing density of an areas does not preclude innovative higher density development.
09	Coal Authority	Whole document	1. Noted.
10	Wychavon District Council	Chapter 8, Para 8.103	1. The importance of conserving and enhancing heritage assets is agreed. It is considered that the Development Plan provides appropriate policies on this matter and this guidance appropriately explains the policy approach.

Reference	Respondent	Part of Document Addressed	Summary of Comments
11	David Barton - Community Campaigner	Whole Document - particularly chapter 4, paragraphs 6.1- 6.3, paragraph 8.1 and paragraphs 8.41-8.42	<p>1.The submission emphasises that Traditional Vernacular Architecture (TVA) should form the foundation of any Design document adopted by a Local Authority. The author argues that TVA offers economic, environmental, and community benefits while contributing to climate goals and heritage protection.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> -Use Design Codes not Design Guides- Codes should be mandatory, detailed and rooted in TVA to ensure consistent outcomes. -Work with specialist bodies - (e.g. Create Streets, The Kings Foundation) to align codes with proven public preferences and best practice. -Prevent demolition of all pre-1950's historic buildings, incorporating this principle explicitly within the Design Code. -Create and adopt a Local List of valued non-designated heritage buildings (as required by the NPPF) to ensure they influence design coding. -Require faithful restoration, retention and replication of Georgian, Victorian and Edwardian townscape characteristics, preventing stark contrasts with post-1950's housing. -When demolition of newer (post-1950's) buildings does occur replacement development must use historic styles and local materials to ensure coherent character. -Support development of local artisan and heritage skills and encourage volunteer groups to help deliver conservation - aligned projects. -Streamline Planning processes for applications that support authentic restoration or traditional new build. -Ensure Design Codes account for era-appropriate style selection where multiple historic layers exist (e.g. areas blending Georgian, Victorian, Edwardian). <p>2. Overall the Design Code must centre on embedding traditional architecture as the local design language, protecting embodied carbon, preventing loss of historic fabric and ensuring new development reinforces a coherent and heritage-led urban form.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
11	David Barton - Community Campaigner	Whole Document - particularly chapter 4, paragraphs 6.1- 6.3, paragraph 8.1 and paragraphs 8.41-8.42	1 and 2. Noted. It is considered the draft document encourages residential extensions to respond to the character of the existing dwelling - both in form and materials. Furthermore, the document includes specific guidance for extensions in conservation areas, to listed buildings (including those subject to Article 4 directions), and non-designated heritage assets.

Reference	Respondent	Part of Document Addressed	Summary of Comments
12	Shropshire Climate Action	Whole document	<ol style="list-style-type: none"> 1. National Design Guide / National Model Design Code and Guidance advises local planning authorities design guidance should relate to the differing types of area such as town centres; inner suburbs; villages; rural areas. Although the introduction to the Design Guide recognises the different areas and localities of Shropshire, the Technical Guidance does not generally offer different design codes for different areas. The Technical design guidance which has been produced which appears to be mainly suitable for residential developments on the edge of towns rather than historic town centres across the county. 2. Paragraph 6.9 should be more clear on fabric energy efficiency standards. 3. Paragraph 8.48 parking standards encourage the use of private cars. 4. Paragraph 8.86(b) expects development to meet building control requirements for energy efficiency. Suggest this states “Properties are expected to meet or exceed building control requirements.” 5. Paragraphs 8.125-8.128 references MCS 020, which has been superseded by MCS 020(a). The specified noise limit is now 37db at the assessment position. Rather than specifying noise levels (which can be confusing) better to reference the guidance. MCS 020(a) should be adopted as the standard for new dwellings. 6. Object to paragraph 8.126 which implies a lower noise standard for air pumps.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
12	Shropshire Climate Action	Whole document	<p>1. It is considered that the diverse characteristics of Shropshire and our settlements are appropriately reflected in the draft SPD.</p> <p>2 and 4. Government has been clear that energy efficiency standards for dwellings are to be managed through building regulations. Paragraph 6.9 is consistent with this approach, complementing building regulations by encouraging development to maximise energy efficiency.</p> <p>3. Having reflected on the parking provision guidance, it is considered that they were overly high. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p> <p>5. Noted, paragraph 8.125 will be updated accordingly.</p> <p>6. Noted, on reflection references to specific noise standards are to be removed.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
13	Stretton Climate Care	Whole document	<ol style="list-style-type: none"> 1. National Design Guide / National Model Design Code and Guidance advises local planning authorities design guidance should relate to the differing types of area such as town centres; inner suburbs; villages; rural areas. Although the introduction to the Design Guide recognises the different areas and localities of Shropshire, the Technical Guidance does not generally offer different design codes for different areas. The Technical design guidance which has been produced which appears to be mainly suitable for residential developments on the edge of towns rather than historic town centres across the county. 2. Paragraph 6.9 should be more clear on fabric energy efficiency standards. 3. Paragraph 8.48 parking standards encourage the use of private cars. 4. Paragraph 8.86(b) expects development to meet building control requirements for energy efficiency. Suggest this states “Properties are expected to meet or exceed building control requirements.” 5. Paragraphs 8.125-8.128 references MCS 020, which has been superseded by MCS 020(a). The specified noise limit is now 37db at the assessment position. Rather than specifying noise levels (which can be confusing) better to reference the guidance. MCS 020(a) should be adopted as the standard for new dwellings. 6. Object to paragraph 8.126 which implies a lower noise standard for air pumps.
14	Dudley Council	Whole document	1. No specific comments.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
13	Stretton Climate Care	Whole document	<p>1. It is considered that the diverse characteristics of Shropshire and our settlements are appropriately reflected in the draft SPD.</p> <p>2 and 4. Government has been clear that energy efficiency standards for dwellings are to be managed through building regulations. Paragraph 6.9 is consistent with this approach, complementing building regulations by encouraging development to maximise energy efficiency.</p> <p>3. Having reflected on the parking provision guidance, it is considered that they were overly high. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p> <p>5. Noted, paragraph 8.125 will be updated accordingly.</p> <p>6. Noted, on reflection references to specific noise standards are to be removed.</p>
14	Dudley Council	Whole document	1. Noted

Reference	Respondent	Part of Document Addressed	Summary of Comments
15	Lovell Strategic Land	Whole document	<ol style="list-style-type: none"> 1. Proposals to secure housing specifications exceeding adopted policy conflict with national policy, guidance and statute. 2. Guidance is overly-prescriptive and flexibility needs to be inserted to ensure efficient use of land and achievement of high quality places. 3. Adopted policy does not require dwellings to achieve nationally described space standards. As there is no policy basis for this requirement, it should be removed from the draft SPD. 4. Adopted policy does not require dwellings to achieve M4(2) or M4(3) accessibility standards. As there is no policy basis for this requirement, it should be removed from the draft SPD.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
15	Lovell Strategic Land	Whole document	<p>1. The Council recognises that an SPD provides guidance to support understanding and application of policies in the adopted Development Plan rather than itself forming part of the adopted Development Plan. Specific concerns raised by the respondent are addressed in turn below.</p> <p>2. The Council considers the guidance in the draft SPD generally strikes an appropriate balance between providing certainty and allowing flexibility for innovation. Specific concerns raised by the respondent are addressed in turn below.</p> <p>3. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>4. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
15	Lovell Strategic Land	Whole document	<p>5. Adopted policy does not require a proportion of dwellings on sites of 50 or more dwellings to constitute specialist housing for older people. Whilst supportive of providing such housing, as there is no policy basis for this requirement it should be removed from the draft SPD.</p> <p>6. Adopted policy does not require housing to meet the optional Building Regulations 110 litres per person per day. Guidance is clear this can only be set through local policy and whilst the delivery of sustainable development is supported, as there is no policy basis for this requirement it should be removed from the draft SPD.</p> <p>7. Setting car-parking expectations for housing is helpful. However, as this is specified as a range for further clarity it would be helpful for the Council to set out how they would assess what spaces are required within the range.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
15	Lovell Strategic Land	Whole document	<p>5. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that specialist housing for older people will play in meeting the needs of Shropshire's residents. This is further demonstrated within the Council's recent Supported Specialist Housing and Accommodation Needs Assessment. Policy CS11 of the Core Strategy seeks to meet the diverse needs of Shropshire residents, stating that to do so the Council will seek to ensure "that all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities" (our emphasis) and that the Council will support "the provision of housing for vulnerable people and specialist housing provision, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "on sites of five or more dwellings, include a mix and type of housing that has regard to local evidence and community consultation" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people.</p> <p>6. Policy CS18 of the Core Strategy specifies that development will "incorporate water efficiency measures, in accordance with the sustainability checklist in Policy CS6, to meet the water efficiency objectives within the Shropshire Water Cycle Study to protect water resources and reduce pressure on wastewater treatment infrastructure." The referenced checklist forms part of the Sustainable Design SPD which specifies a minimum expectation of 105 litres per day - as such for consistency this SPD will be aligned with this minimum expectation. Notably, Shropshire (Severn Trent Water Limited company area) is now identified as an area under 'serious water stress (water stressed areas 2021 classification).</p> <p>7. Having reflected on the parking provision guidance, it is considered that the provision of a range would create unnecessary uncertainty, further clarity on the considerations when determining appropriate levels of parking would be beneficial and that rates specified were overly rigid. Amendments are therefore to be made to recognise the diversity of dwelling types and our communities and provide guidance on the considerations when determining appropriate levels of parking.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
16	Defence Infrastructure Organisation	Whole document	<ol style="list-style-type: none"> 1. The interface between the high-level and technical guidance is unclear. 2. The SPD should relate to the emerging Local Plan and not the adopted Local Plan. 3. Proposals to secure housing specifications exceeding adopted policy conflict with national policy, guidance and statute. 4. Object to the inclusion of the requirement for Nationally Described Space Standards. This is not required in policy and there is no evidence of their viability. 5. Object to the inclusion of an expectation that larger development includes 10% specialist housing. This is not required in policy and there is no evidence of their viability.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
16	Defence Infrastructure Organisation	Whole document	<p>1. The Council considers the relationship between the high-level and technical guidance is entirely clear. The high-level guidance deals with overarching principles, whilst the technical guidance provide more detailed guidance on those issues upon which such information is considered necessary.</p> <p>2. The intention is that this SPD would provide guidance to support understanding and application of policies in the adopted Development Plan. The next plan-making process under which the next Local Plan will be prepared does not include SPD's.</p> <p>3. The Council recognises that an SPD provides guidance to support understanding and application of policies in the adopted Development Plan rather than itself forming part of the adopted Development Plan. Specific concerns raised by the respondent are addressed in turn below.</p> <p>4. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>5. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that specialist housing for older people will play in meeting the needs of Shropshire's residents. This is further demonstrated within the Council's recent Supported Specialist Housing and Accommodation Needs Assessment. Policy CS11 of the Core Strategy seeks to meet the diverse needs of Shropshire residents, stating that to do so the Council will seek to ensure "that all housing developments are <u>designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities</u>" (our emphasis) and that the Council will support "<u>the provision of housing for vulnerable people and specialist housing provision</u>, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "on sites of five or more dwellings, <u>include a mix and type of housing that has regard to local evidence and community consultation</u>" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
16	Defence Infrastructure Organisation	Whole document	<p>6. Object to the expectation that 100% of housing achieves M4(2) and 5% of housing achieves M4(3) accessibility standards. This is not required in policy and there is no evidence of their viability. Planning Practice Guidance states that LPAs “should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements”. This is not required in policy and there is no evidence of their viability.</p> <p>7. Object to the elements of the SPD which relate to energy and sustainability, as these requirements are not supported by sufficient evidence base and do not supplement existing development plan policies (6.8 – 6.9 and 8.81 – 8.86).</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
16	Defence Infrastructure Organisation	Whole document	<p>6. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p> <p>7. The Council considers the guidance in paragraphs 6.8-6.9 and 8.81-8.86 is entirely appropriate and consistent with the adopted Development Plan. Policy CS6 of the Core Strategy is clear that "to create sustainable places, development will be designed to a high quality using sustainable design principles" including through "requiring proposals likely to generate significant levels of traffic to be located in accessible locations where opportunities for walking, cycling and use of public transport can be maximised and the need for car based travel to be reduced", ensuring development is "designed ... to respond to the challenge of climate change" and "Makes the most effective use of land and safeguards natural resources including high quality agricultural land, geology, minerals, air, soil and water".</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
16	Defence Infrastructure Organisation	Whole document	<p>8. BNG is not considered to be a design matter and should also not be included in the SPD for this reason. Also object to the specification that BNG is achieved on-site or as close to the site as possible. This wording is not compliant with existing legislation which includes no reference to proximity to the site.</p> <p>9. Object to paragraph 8.103 which states “Proposals for residential development with the potential to affect heritage assets or their setting should achieve highest design standards” which is unreasonable and should be more flexible.</p> <p>10. Water conservation and efficiency is not a design matter and should not be included. Further, the 110 litre per day requirement is not within the adopted Development Plan.</p> <p>11. Flood risk is not a design consideration and should be deleted.</p> <p>12. Natural environment assets is not a design consideration and should be deleted.</p> <p>13. Paragraph 4.8(a) is vague on how 'complementary contemporary' design will be assessed. Clearer criteria to reduce ambiguity should be provided.</p> <p>14. Paragraph 4.8(c) appropriate heights, massing, and densities are important but often creates tension with aspirations to increase densities. Clearer support for modest density increases would be welcome.</p> <p>15. Paragraph 5.5(g) need further clarity on acceptable mechanisms for stewardship of green infrastructure (e.g., adoption agreements, management companies) and ensure requirements are proportionate to the scale of development.</p> <p>16. Paragraph 6.7(e) the SPD could allow flexibility for clustering of affordable housing in small groups where this supports effective management and delivery.</p> <p>17. Paragraph 7.6(a) flexibility on active frontages, dual-aspect homes, and perimeter blocks would be beneficial.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
16	Defence Infrastructure Organisation	Whole document	<p>8. The Council considers failure to recognise BNG is a design consideration inevitably leads to either poor quality provision made as an after-thought rather than an integral part of the design of a development, or costly and unnecessary off-site provision. This is the exact reason the Council has included it in this guidance. As recognised by the respondent legislation does not set a requirement for how closely BNG offsetting sites should be located to development sites. Therefore, it is not considered inconsistent with this guidance to indicate the Council's clear preference that if offsetting is to occur off-site it should be as close as possible to the site, to ensure environments and communities receiving development 'attain the gain'. This does not preclude provision being made further afield if necessary, but is a clear indication of the Council's preference.</p> <p>9. The Council accepts the terminology could be more flexible given the potential for other mechanisms (such as mitigation) to offset impacts on heritage assets. An appropriate amendments will therefore be made.</p> <p>10. The Council considers it is entirely appropriate to address design responsive to water efficiency within this design SPD. Policy CS18 of the Core Strategy specifies that development will "<i>incorporate water efficiency measures, in accordance with the sustainability checklist in Policy CS6, to meet the water efficiency objectives within the Shropshire Water Cycle Study to protect water resources and reduce pressure on wastewater treatment infrastructure.</i>" The referenced checklist forms part of the Sustainable Design SPD which specifies a minimum expectation of 105 litres per day - as such for consistency this SPD will be aligned with this minimum expectation.</p> <p>11 and 12. The Council considers it appropriate to address flood risk and natural environment assets and how design can positively respond to these principles within a design SPD.</p> <p>13, 15 and 17. The Council considers the guidance in paragraph 4.8(a), 5.5(g) and 7.6(a) strikes the appropriate balance between clarity and providing sufficient flexibility to respond to the various scales of residential development and characteristics of the communities across Shropshire.</p> <p>14. It is accepted that an appropriate density may not simply be replication of that in the surrounding area. As such, further guidance on this matter will be included.</p> <p>16. It is accepted that there can be benefits in allowing small clusters of affordable housing as part of the pepper-pot principle and that this also provides an opportunity to be more explicit about access expectations. Appropriate amendments are therefore proposed.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
16	Defence Infrastructure Organisation	Whole document	<p>18. Paragraph 8.7 standards on front to front separation distances can affect street design, so consider greater flexibility is required.</p> <p>19. In Paragraph 8.26 consider the private amenity space minimums too rigid.</p> <p>20. Paragraph 8.27 upper stories” is vague and should be clarified.</p> <p>21. Paragraph 8.34(e and h) addresses boundary treatments, but imposing ongoing management duties form is not common practice and may present enforcement challenges.</p> <p>22. Parking standards in paragraph 8.48 are excessive and could compromise good design.</p> <p>23. Paragraph 8.50 is too inflexible regarding rear parking courts.</p>
17	Graham Cowley	Chapter 6, Para 6.11	<p>1. Specific guidance should be provided on creation of permanent habitats for wildlife with the inclusion of swift bricks, bat tiles and bricks.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
16	Defence Infrastructure Organisation	Whole document	<p>18. The Council agree the application of these standards to front elevations is overly prescriptive and an appropriate amendments is therefore proposed.</p> <p>19, 20 and 23. The Council considers the guidance in paragraphs 8.26, 8.27 and 8.50 strikes the appropriate balance between clarity and providing sufficient flexibility to respond to the various scales of residential development and characteristics of the communities across Shropshire.</p> <p>21. Paragraph 8.34(e) relates specifically to boundaries for noise mitigation purposes and the guidance is considered entirely appropriate for this reason. Paragraph 8.34(h) expects retention and future management of boundaries to be clearly established - this is not expected to entail management duties, rather it is about outlining expectations for homeowners. This will be appropriately clarified.</p> <p>22. Having reflected on the parking provision guidance, it is considered that they were overly high. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p>
17	Graham Cowley	Chapter 6, Para 6.11	<p>1. The Council recognise the importance of providing appropriate habitat for wildlife. Whilst this is already reflected in the document, it is considered there is a specific opportunity to promote those mechanisms that can be incorporated into dwellings to 'bolster' at risk wildlife.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
18	Shropshire Council: Health, Wellbeing & Prevention	Whole document	<ol style="list-style-type: none"> 1. Generally supportive of the document. 2. Paragraph 3.1 provides an opportunity to reference the 10 Healthy Street indicators. 3. Paragraph 5.3 further context on the value of street lighting in promoting safety and mental wellbeing, particularly in the winter months, would be welcomed. 4. Paragraph 7.3 should include reference to provision of high-speed broadband infrastructure, enabling the promotion and uptake of both work from home opportunities for those with caring responsibilities or disabilities that limit in-person employment opportunities, and virtual health care/telemedicine supporting individuals to remain in their residence near pre-existing support systems. 5. Paragraph 8.62 should reference the use of data from Joint Strategic Needs Assessments and other demographic data sources to inform the location and types of specialist housing for older people. 6. Paragraph 8.86 could support property designs that are appropriately energy efficient to relevant EPC standards and allow for suitable ventilation to avoid the respiratory/cardiovascular/musculoskeletal health impacts of mould and cold temperatures. Developments should also, as much as is practical, assist in reducing the costs of heating/cooling the home to ease subsequent financial pressures, and support with Local Authority goals/initiatives to reduce fuel poverty.
19	Historic England	Whole document	<ol style="list-style-type: none"> 1. Page 12/13 provides useful context on the Council's aspirations in the context of design. Consider it would be helpful to provide additional text and examples about what is meant in practice and what other documents the applicant can utilise to assist in preparing a design-led scheme. 2. Paragraph 4.8 would benefit from a reference to heritage assets and the need to protect the significance of heritage assets and their setting and the options for enhancement should be sought. 3. Paragraph 4.10 would need to take account of the historic environment and how existing heritage assets/landmarks respond to their surroundings, if new landmarks are being encouraged. 4. Support reference to Heritage Impact Assessment in Paragraph 8.103. However, the table would benefit from additional detail on what information is to be provide - focus on the significance of heritage assets, how the development site contributes to the significance of heritage asset/s and how new design is reflective of local character – either a traditional design or a contemporary design. 5. Recommend a link to relevant documents such as Conservation Area Appraisals and Management Plans, Historic Townscape and Landscape Reports, Historic Environment Record, Local Lists are provided 6. Photographs and examples of what the Council considers to be positive design within the context of this draft SPD should be provided. 7. There is no commentary on the World Heritage Site within this SPD.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
18	Shropshire Council: Health, Wellbeing & Prevention	Whole document	<ol style="list-style-type: none"> 1. Noted. 2. The value of the 10 Healthy Streets indicators are appreciated. A specific reference to their consideration will be integrated into the guidance on safe and convenient movement. 3. The roll of lighting and appropriate surfacing in supporting safety and mental wellbeing, particularly in the winter months is noted. It is considered the guidance is appropriately responsive to this matter. 4. The importance of high-speed internet connectivity to support modern lifestyles cannot be understated. An appropriate amendment will be made to paragraph 7.3 to reflect this. 5. Agree that reference to a source of evidence on the need for specialist housing would provide helpful context. The Council has recently completed a Supported Specialist Housing and Accommodation Needs Assessment which is considered best placed to provide this information - an appropriate amendment will be incorporated. 6. It is considered that the guidance on energy efficiency is appropriate, but there is an opportunity to extend this to address ventilation.
19	Historic England	Whole document	<ol style="list-style-type: none"> 1. The Council considers guidance on character and appearance strikes the appropriate balance between providing certainty of approach and flexibility so as to not stifle innovation. Where further guidance on an issue is considered appropriate, this is addressed in the technical guidance section of the draft SPD. 2. Paragraph 4.8 is clear that design should be responsive to the character of an area - which includes any heritage assets. Furthermore, there are specific sections of guidance on consideration of heritage assets, within sections 6 and 8 of the draft SPD. It is not considered necessary to duplicate this. 3. Paragraph 4.10 is clear that any landmark feature (which is not necessarily a new building) should be of a design that complements its setting. Furthermore, there are specific sections of guidance on consideration of heritage assets, within sections 6 and 8 of the draft SPD. It is not considered necessary to duplicate this. 4. The Council considers the guidance on Heritage Impact Assessment generally strikes an appropriate balance between providing certainty of scope whilst reflecting that the specific approach will be dependent on the scale of proposal and nature of associated heritage asset(s). However, a specific reference to the need to consider the contribution the site makes to the character and significance of heritage asset(s) will be included. 5. Noted, such links are provided on the planning policy webpages from which the document would be accessed. 6. The Council considers that the diverse characteristics of development schemes and our communities mean that providing specific examples / photographs of design guidelines would be unhelpful. 7. The document addresses heritage assets as a collective. There are separate SPD's for each of the two World Heritage Sites in Shropshire, which will be made available alongside this document.

Reference	Respondent	Part of Document Addressed	Summary of Comments
20	Lone Star Land	Chapter 6 and Chapter 8	<p>1. Object to the specific requirements of 100% M4(2) and 5% of housing achieves M4(3) accessibility standards. This is not required in policy, there is insufficient evidence of need and there is no evidence of their viability. Planning Practice Guidance states that LPAs “should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements”. This is not required in policy and there is no evidence of their viability. Flexibility on this guideline should also be provided.</p>
20	Lone Star Land	Chapter 6 and Chapter 8	<p>2. Object to the inclusion of an expectation that larger development includes 10% specialist housing. This is not required in policy and there is no evidence of their viability.</p> <p>3. Object to the inclusion of the requirement for Nationally Described Space Standards. This is not required in policy and there is no evidence of their viability.</p> <p>4. Appropriately sized and located bin storage needs to be defined. Would object if this meant dedicated bin storage on every plot.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
20	Lone Star Land	Chapter 6 and Chapter 8	<p>1. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>
20	Lone Star Land	Chapter 6 and Chapter 8	<p>2. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that specialist housing for older people will play in meeting the needs of Shropshire's residents. This is further demonstrated within the Council's recent Supported Specialist Housing and Accommodation Needs Assessment. Policy CS11 of the Core Strategy seeks to meet the diverse needs of Shropshire residents, stating that to do so the Council will seek to ensure "that all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities" (our emphasis) and that the Council will support "the provision of housing for vulnerable people and specialist housing provision, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "on sites of five or more dwellings, include a mix and type of housing that has regard to local evidence and community consultation" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people.</p> <p>3. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>4. The Council considers the guidance in paragraph 8.79 is clear whilst not restricting innovation.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
21	J3 Buildings Features	Whole document	<ol style="list-style-type: none"> 1. Paragraph 4.7(c) consider it is depressing to name aspects of development after features it eradicates. 2. Paragraph 4.8(a) and 4.10 Support contemporary/complementary design, but consider nothing worse than modern buildings trying to look old. 3. Section 6 guidance on inclusivity and sustainability should reference the spatial potential and perhaps even financial provision for community assets. 4. Section 6 guidance on sustainability / net zero is too passive. 5. Section 7 guidance on amenity should address overly high (2m+) fencing and allowing perforates bases for wildlife movement. 6. Paragraph 7.6(b) guidance is understood but the 'left over spaces' without clear function need to be provided to allow community expansion, or children's creativity, or 'wild' areas. 7. Technical guidance on trees and hedges should set a default position that all are important and should be retained and should specify Arboricultural and Hedge Reports are mandatory. 8. Don't understand why guidance on earth mounding in paragraph 8.41 specifies mounding should have free-flowing, natural contours and not look engineered - there are some incredible land artists and this could be incorporated in the right places. 9. The guidance on embodied carbon needs expanding. 10. Guidance on energy efficiency would benefit from basic diagrams. 11. Paragraph 8.86(b) should specify properties must meet building control requirements on energy efficiency. 12. Paragraph 8.86(c) only encourages integration of renewable energy, this is not good enough. 13. It should be assumed all residential development has the potential to negatively affect natural environment assets, so relevant assessments should be mandatory. 14. Unclear why the guidance on noise is so long, but energy efficiency so short. 15. More guidance on lighting - such as dark skies - required. 16. Guidance on replacement dwellings should recognise that it may be more cost effective/energy efficient to replace.
22	Jill Ashurst	Chapters 2-10	<ol style="list-style-type: none"> 1. Protecting landscape settings and separation of settlements are very important, as are the fringe areas of the countryside which protect the visual impact of green spaces and sensitive sites. 2. Trees and current hedges need to be undisturbed as far as possible as they harbour wild life and plants. 3. There needs to be an infrastructure impact assessment to ensure services such as schools can absorb increased populations. 4. Development above housing targets should be resisted. 5. Surrounding or adjacent residences must be protected with regard to outlook, privacy and access to daylight and the open countryside. Minimum separation distances between building and existing boundaries need to be respected and adhered to. 6. Traffic noise buffers need to be considered in certain areas, cycle ways and safe and healthy pedestrian walkways also, away from busy roads.
23	Jane Shutt	Chapter 6, Para 6.11	<ol style="list-style-type: none"> 1. Guidance should address providing permanent habitats for wildlife with the inclusion of swift bricks, bat tiles and bricks.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
21	J3 Buildings Features	Whole document	<p>1. Shropshire Council considers it entirely appropriate for the names of aspects of a development to be inspired by local features - it is incorrect to suggest such features will be lost through a development.</p> <p>2. Shropshire Council considers the guidance is clear that design should be complementary - there can be a role for development that seeks to 'blend' into existing built form and that which seeks to create an appropriate 'juxtaposition'. The guidance supports these principles.</p> <p>3. Shropshire Council considers section 6 of the document appropriately addresses provision of community space for sport, play, exercise and recreation. Section 5 addresses provision of services and facilities more widely.</p> <p>4, 9, 10, 11, 12 and 14. Shropshire Council considers the guidance in section 6 and wider guidance on carbon management/energy of the document is consistent with policy requirements of the Development Plan and the expectations of national Government that energy efficiency of new dwellings will be managed through the building control regime and not planning.</p> <p>5. The technical guidance section of the document provides guidance on boundary treatments.</p> <p>6. Shropshire Council considers that the guidance on safe and secure design is appropriate - it seeks to avoid left over spaces without clear function, spaces for children to play creatively have a clear function.</p> <p>7. Shropshire Council considers the guidance on trees and hedgerows consistent with the adopted Development Plan and national policy.</p> <p>8. Shropshire Council considers the guidance on earth mounding appropriate.</p> <p>13. Shropshire Council considers the guidance on natural environment assets consistent with the adopted Development Plan and national policy.</p> <p>15. Shropshire Council considers the guidance on lighting appropriate and proportionate.</p> <p>16. Shropshire Council considers the guidance on replacement dwellings appropriate and proportionate.</p>
22	Jill Ashurst	Chapters 2-10	<p>1 and 2. Noted, it is considered that the guidance appropriately addresses these issues.</p> <p>3. Section 5 of the document addresses access to services, facilities, sports and play. This guidance will be complemented by the consideration of any planning application, informed by engagement with infrastructure providers.</p> <p>4. Planning case law has established that housing requirements in Development Plans cannot form 'ceilings' to development. The purpose of this guidance is not about the quantum of development, rather it is about quality.</p> <p>5 and 6. Shropshire Council considers these issues are appropriately reflected within the guidance.</p>
23	Jane Shutt	Chapter 6, Para 6.11	<p>1. The Council recognise the importance of providing appropriate habitat for wildlife. Whilst this is already reflected in the document, it is considered there is a specific opportunity to promote those mechanisms that can be incorporated into dwellings to 'bolster' at risk wildlife.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
24	Julie Cowley	Whole document Chapter 5, Para 5.4 Chapter 6, Para 6.11 Chapters 3, 4, 5 (page 51), paras 3.4 and 8.129	<ol style="list-style-type: none"> 1. Guidance should address providing permanent habitats for wildlife with the inclusion of swift bricks, bat tiles and bricks. 2. Guidance should address providing corridors for hedgehogs. 3. The term green infrastructure is unclear - giving examples such as mixed species hedgerows, native trees, meadow grasses and wildflower verges and spaces in this document will help emphasise the point. 4. The guidance uses the term 'should' consider it should be more enforceable. 5. Sensitive lighting schemes are very important to wildlife. All development should have a lighting scheme strategy.
25	Kate Long	Whole document	<ol style="list-style-type: none"> 1. Wildlife corridors are crucial, consider making the installation of hedgehog fencing and swift nesting bricks compulsory for any housing scheme. Also need to acknowledge legally protected species. 2. Need to carefully manage waste water to avoid polluting streams and rivers. 3. Provide guidance on preserving natural 'sponge' areas that hold excess water during heavy rains, and not building on flood plains.
26	Clive Roberts	General Comments (particularly paras 8.10-8.11)	<ol style="list-style-type: none"> 1. Guidance is very general - they should be made more Shropshire specific. 2. Introduction should explain why the Council believes a new SPD is needed. 3. Need to define what "high quality design" actually means and the consequences of failing to achieve it. 4. The guidance should detail what developers are required to submit to demonstrate high-quality design. 5. The SPD could set out the value of discussions with Council Officers throughout the application process, and how the system might operate. 6. Terms frequently used in the document should be explained - character, high-quality etc. 7. Paragraphs 8.10 and 8.11 address national space standards but not aware of evidence these are appropriate in Shropshire. This guidance should be more flexible.
27	Much Wenlock Refresh Group	Para 8.63	<ol style="list-style-type: none"> 1. Schemes of 50 or more dwellings should include an appropriate housing mix. This includes 10% specialist housing which supports the independent living of older people and those with disabilities and special needs and all should achieve M4 design standards.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
24	Julie Cowley	Whole document Chapter 5, Para 5.4 Chapter 6, Para 6.11 Chapters 3, 4, 5 (page 51), paras 3.4 and 8.129	<p>1 and 2. The Council recognise the importance of providing appropriate habitat for wildlife. Whilst this is already reflected in the document, it is considered there is a specific opportunity to promote those mechanisms that can be incorporated into dwellings to 'bolster' at risk wildlife.</p> <p>3. The guidance addresses green infrastructure in section 5, which the Council considers provides clear guidance on how to make the most of such provision.</p> <p>4. The SPD will be guidance not policy, as such the Council considers the phraseology consistent with its status.</p> <p>5. The importance of appropriate lighting is recognised. For this reason it is addressed within the technical guidance component of the SPD.</p>
25	Kate Long	Whole document	<p>1. The Council recognise the importance of providing appropriate habitat for wildlife. Whilst this is already reflected in the document, it is considered there is a specific opportunity to promote those mechanisms that can be incorporated into dwellings to 'bolster' at risk wildlife.</p> <p>2 and 3. The technical guidance section of the document addresses water conservation, efficiency and flood risk management.</p>
26	Clive Roberts	General Comments (particularly paras 8.10-8.11)	<p>1. The key considerations section of the draft SPD explains the strategic approach taken within the guidance, reflecting the varied scales residential development that occur and the diversity of our communities.</p> <p>2. The introduction of the draft SPD includes a clear and concise summary of the role of the SPD.</p> <p>3. The key design considerations to achieve a high-quality design are the topic of the SPD - it provides the context for what high-quality design means in a Shropshire context.</p> <p>4. The intention of the guidance is not to place additional documentation requirements on developers, rather it provides guidance on the achievement of high-quality design which can be reflected within the material they already produce to inform planning applications.</p> <p>5. The introduction of the draft Sped includes specific guidance on the value of getting advice through proactive engagement with Development Management services.</p> <p>6. Shropshire Council considers the documents provides clear context on the intention of design terms using within it.</p> <p>7. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers - evidence is clear that the nationally described space standards result in housing better able to support immediate and longer term needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p>
27	Much Wenlock Refresh Group	Para 8.63	<p>1. Shropshire Council agrees sites of 50 or more dwellings should include an appropriate housing mix to meet local needs and it is considered this guidance will support this intention. The approach to M4(2) and M4(3) housing has been amended in response to wider consultation responses and changes nationally, but it is considered this continues to reflect the wider principle of meeting local needs.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
28	Local Developer Consortium (Shingler Homes Ltd, Shropshire Homes Ltd, Pickstock Homes Ltd and SJ Roberts Construction Ltd)	Whole document	<p>1. Very concerned about impact on viability of residential development. Particular areas of concern are:</p> <ul style="list-style-type: none"> -S106 contributions are increasingly required of smaller developments with the justification often arbitrary and requests made at a late stage which means they cannot be reflected in land prices and raise viability concerns. -CIL rates have increased significantly through indexation (78.57%) they should be reviewed. -There is increasing difficulty in securing RSL's to purchase S106 affordable housing units, particularly on smaller sites. Furthermore, concerned that the Council intends to review affordable housing rates and would seek assurances that this is informed by viability assessment. -BNG, Building Safety Levy and other national regulatory burdens are affecting viability. -Most sites incur abnormal costs. <p>2. The proposed increase in M4(2) dwellings will increase the size of smaller houses and therefore the costs. It is very unlikely that this can be recovered in sale prices.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
28	Local Developer Consortium (Shingler Homes Ltd, Shropshire Homes Ltd, Pickstock Homes Ltd and SJ Roberts Construction Ltd)	Whole document	<p>1. Shropshire Council recognises the need to achieve an appropriate balance between ensuring development remains viable whilst also achieving design expectations and funding its fair share of infrastructure improvements. It is considered that the guidance in this document will support these principles. With regard to S106 contributions, the national tests define where these are appropriate. Ultimately development can only occur where it is supported by necessary supporting infrastructure. With regard to CIL rates, the Council has issued its intention to review its CIL Charging Schedule alongside preparation of the next Shropshire Local Plan. This is the only mechanism available to review these rates. With regard to affordable housing take-up, this is beyond the scope of this SPD, however the Council will of course support developers if they assistance in securing RSL's to purchase S106 affordable housing units at appropriate values. With regard to the wider factors that influence development viability, these are recognised by the Council and they have and will continue to be given due consideration when preparing policy documents and determining planning applications. With regard to the potential for abnormal costs, this is also recognised by the Council and there are mechanisms in the adopted Development Plan which respond where such circumstances arise and have significant implications for the viability of development. Further specific comments on identified issues follow.</p> <p>2. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
28	Local Developer Consortium (Shingler Homes Ltd, Shropshire Homes Ltd, Pickstock Homes Ltd and SJ Roberts Construction Ltd) (continued)	Whole document	<p>3. National Space standards will increase costs but will not generally produce a proportionate increase in selling prices.</p> <p>4. Garage sizes, garden sizes, cycle storage and open space requirements incur development costs that are not generally recoverable in sale prices and will further undermine viability.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
28	Local Developer Consortium (Shingler Homes Ltd, Shropshire Homes Ltd, Pickstock Homes Ltd and SJ Roberts Construction Ltd) (continued)	Whole document	<p>3. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>4. With regard to garage and car port sizes, it is noted that there are many different standards, however those in the draft SPD directly align with the Council's SMART guidance which have been informed by consultation. It is considered that it remains appropriate to utilise these standards, but it will be clarified that this is in circumstances where the garages are to constitute part of a dwellings car parking provision. With regard to cycle parking the guidance is considered entirely appropriate - further it should be noted that the garage sizes within the Council's SMART guidance is to allow for one cycle parking space. With regard to garden sizes, the Council considers these principles generally align with good practice but recognises that smaller gardens may be appropriate for smaller units, so appropriate flexibility will be integrated. With regard to open space requirements, these standards are well established, with the guidance supporting effective achievement of standards.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
29	Bonigale Developments	Whole document	<p>1. The SPD seeks to introduce new policy, impose new technical standards, and present requirements beyond national policy and statutory regulation. It cannot legally be given any weight in decision making. Paragraph 1.1 states the Sped includes design expectation and para 1.2 that it will be used in determining planning applications. Wider language and content with the use of tick-box standards, quantitative thresholds and prescriptive “should” statements which, in practice, are likely to be treated as mandatory requirements by decision makers and statutory consultees go far beyond the scope of an SPD.</p> <p>2. Paragraphs 6.7(b) and 8.58, state all new dwellings must achieve M4(2) accessible and adaptable standards, and on sites of five or more dwellings 5% must achieve M4(3) wheelchair user standards. These are optional Building Regulations standards, which national policy and guidance explicitly stage may only be applied where a local planning authority has demonstrated need and viability and has adopted those standards through Local Plan policy. This should not be introduced through SPD.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
29	Boningle Developments	Whole document	<p>1. The Council recognises that an SPD provides guidance to support understanding and application of policies in the adopted Development Plan, rather than itself providing policies or forming part of the adopted Development Plan. The guidance within the draft SPD achieves this principle, supporting understanding and application of policies in the adopted Development Plan, with the appendices of the draft SPD assisting in understanding this relationship. However, it is accepted that the introduction could be clearer and as such appropriate amendments are proposed. With regard to wider language, the use of 'should' is considered entirely appropriate and standard practice in guidance - Development Management officers are experienced in the application of guidance expressed in such a way; guidance on quantitative thresholds are to support understanding of the requirements of policies in the adopted Development Plan - reflecting the role of SPD's in providing such guidance to support understanding and application of Development Plan policy; and the purpose of the tick box graphics are to support identification of key guidance rather than forming a checklist with such a mechanism not forming part of the draft SPD.</p> <p>2. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
29	Bonigale Developments (continued)	Whole document	<p>3. Paragraph 6.7(c) and 8.63 require schemes of 50 or more dwellings provide 10% specialist housing. This strays beyond design guidance constituting strategic housing policy intervention with potential implications for land value, scheme viability and delivery. This should not be introduced through SPD.</p> <p>4. Paragraphs 8.6–8.9 specify fixed quantitative standards on separation distances. These standards will directly impact density and site capacity and are therefore policy in substance. They should not be introduced through SPD.</p> <p>5. Paragraph 8.26(a) mandates minimum garden sizes that go beyond the requirements set out in SAMDev Policy MD2. Such an approach conflicts directly with the purpose of an SPD.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
29	Boningale Developments (continued)	Whole document	<p>3. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that specialist housing for older people will play in meeting the needs of Shropshire's residents. This is further demonstrated within the Council's recent Supported Specialist Housing and Accommodation Needs Assessment. Policy CS11 of the Core Strategy seeks to meet the diverse needs of Shropshire residents, stating that to do so the Council will seek to ensure "that all housing developments are <u>designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities</u>" (our emphasis) and that the Council will support "the <u>provision of housing for vulnerable people and specialist housing provision</u>, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "on sites of five or more dwellings, <u>include a mix and type of housing that has regard to local evidence and community consultation</u>" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people.</p> <p>4. The guidance on separation standards specifically supports application of policies in the adopted Development Plan. In particular, this guidance supports understanding of expectations within Policy CS6 on the enhancement of local distinctiveness, achievement of <u>appropriate scale, density, pattern and design that reflects local context</u>; and <u>compliance with local design guidance</u> (which itself represents). Furthermore, this guidance supports the understanding of expectations in Policy MD2, including those on respecting local character, <u>responding to form and layout of existing development (including scale, density and plot sizes)</u>, and supports consideration of <u>design of landscaping and open space holistically</u>.</p> <p>5. The guidance on garden sizes specifically supports application of policies in the adopted Development Plan. In particular, the guidance supports understanding of expectations within Policy CS6 on being <u>adaptable to changing lifestyle needs</u>, <u>achievement of appropriate scale, density, pattern and design that reflects local context</u>; <u>safeguarding community health and wellbeing</u> and <u>compliance with local design guidance</u> (which itself represents). Furthermore, this guidance supports the understanding of expectations in Policy MD2, including those on respecting local character, responding to form and layout of existing development (including scale, density and plot sizes), and supports consideration of <u>design of landscaping and open space holistically</u>.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
29	Boningle Developments (further continued)	Whole document	<p>6. Paragraphs 6.9 and 8.42 onwards promote fabric-first energy efficiency, carbon offsetting, embodied carbon assessment and renewable energy generation. These matters are already comprehensively regulated by Building Regulations and national policy. There is no justification for the SPD to address these matters.</p> <p>7. It is not lawful to introduce nationally described space standards through an SPD.</p> <p>8. The approach to parking provision, shared surfaces and “pedestrian first” principles are applied in a uniform and unrealistic way which fails to reflect the fundamentally rural character of much of Shropshire and the reality of how communities’ function.</p> <p>9. The SPD relies on dated evidence.</p> <p>10. Design, density, parking provision, use of shared surfaces, provision of cycleways, are all areas that should be determined on a site-by-site basis. What is appropriate in Shrewsbury will not be appropriate in Much Wenlock for example.</p> <p>11. Viability implications of the guidance are profound. Mandatory M4(2) compliance, mandatory M4(3) provision, 10% specialist housing, fixed separation distances, minimum open space standards, minimum garden sizes, enhanced sustainability measures, increased dwelling and garage sizes and carbon expectations, all sit alongside existing policy burdens such as affordable housing, biodiversity net gain, nutrient neutrality mitigation and infrastructure contributions. It will materially reduce developable capacity, increase build costs and undermine deliverability. The SPD therefore risks directly undermining the Government’s objective to significantly boost housing supply.</p> <p>12. If the Council seeks to use this SPD to refuse applications based on standards that exceed national policy, exceed Building Regulations, and are not embedded in adopted Development Plan policies, we would be concerned that refusals based on the SPD would be overturned at appeal.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
29	Boningle Developments (further continued)	Whole document	<p>6. The Council is aware that Government intends to regulate energy efficiency through Building Regulations. The guidance in the draft SPD is entirely consistent with and complementary to this approach - it does not seek to exceed Building Regulation standards, rather it provides guidance on the expectations in policy CS6 regarding design that mitigates and adapts to climate change and safeguards natural resources.</p> <p>7. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers - evidence is clear that the nationally described space standards result in housing better able to support immediate and longer term needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>8. Shropshire Council considers the guidance on these matters generally appropriate. However, having reflected on the parking provision guidance, it is considered that they were overly high. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p> <p>9. The purpose of this SPD is to provide guidance to support understanding and application of policies in the adopted Development Plan. The guidance is responsive to the characteristics and demographics of Shropshire informed by latest information. It is also considered consistent with current national policy/legislation.</p> <p>10. Shropshire Council agrees with this principle, which is reflected within the guidance of this draft SPD.</p> <p>11 and 12. Shropshire Council considers the guidance in this SPD appropriate. It support understanding and application of existing policies in the adopted Development Plan.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
30	Shrewsbury Town Council	Whole document	<ol style="list-style-type: none"> 1. Support the five high-level design principles, emphasis on sustainability, and acknowledgement the SPD provides detailed guidance to support policy understanding and application. 2. Whilst county-wide, consider the SPD should expressly recognise the special historic character of towns such as Shrewsbury. 3. Guidance on layout, function and amenity space should emphasise that site context (urban vs rural vs edge-of-town) will determine appropriate scale and density. The term “one size fits all” must be avoided. 4. Given Shrewsbury's riverside location (River Severn) and history of flooding, suggest the SPD include a clearer reference to flood risk, flood resilience, and adaptation measures (e.g., raised finished floor levels, resilient materials, drainage integrated with open space). While broader sustainability is addressed, flood-risk deserves explicit mention. 5. Guidance for infill, back-land or brownfield sites needs to recognise challenges around constrained sites, existing built context, servicing and amenity. The SPD should provide specific commentary (or an annex) for such constrained urban sites. 6. Support high design standards, but urge the SPD to recognise that increased design/technical requirements may potentially increase development costs and affect viability – especially for affordable housing. Suggest the SPD includes language about balancing design ambitions with viability and enabling flexible approaches where affordable housing delivery is affected. 7. Would welcome a commitment to monitor and review how the SPD is used in practice – e.g., examples of planning applications where guidance has been applied, feedback on outcomes, and how any unintended consequences (e.g., slower delivery/lower viability) are addressed. 8. Request Shropshire Council works closely with Shrewsbury Town Council (and relevant stakeholders) in delivering the SPD and any associated design review or pre-application processes within Shrewsbury. We also suggest that the SPD is accompanied by practical toolkits or worked examples, including for town-centre, edge of-town and rural contexts.
31	Natural Resources Wales	No specific comments	<ol style="list-style-type: none"> 1. No specific comments.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
30	Shrewsbury Town Council	Whole document	<ol style="list-style-type: none"> 1. Noted. 2. Shropshire Council recognises that Shropshire is a diverse county, with a varied landscape and hundreds of settlements - each with its own character and identity - this has specifically informed the approach to provision of guidance in this draft SPD. Unfortunately this does mean that it can be challenging to specifically recognise individual characteristics within specific settlements - however the guidance is considered sufficiently flexible to respond to this diversity. 3. Agreed, the Council considers this is achieved within the guidance of this draft SPD. 4. Noted, the draft SPD provides guidance on flood risk management within the technical guidance section. On balance this is considered proportionate given the wider available guidance on this matter. 5. The draft SPD includes guidance on backland, rear garden development and sub-division of dwelling plots within the technical guidance section. The principles of design for brownfield sites are a 'thread' throughout the draft SPD. 6. Noted, the Council considers the policies of the adopted Development Plan strike an appropriate balance between maximising design quality and maintaining development viability - the guidance in this draft SPD reflects this balance. 7. Shropshire Council has issued an intention to commence preparation of the next Local Plan, this provides the ideal mechanism to review this SPD. 8. Noted, the Council values the input of Shrewsbury Town Council and other stakeholders in both plan-making and decision-making. However, this specific issues is beyond the scope of this SPD.
31	Natural Resources Wales	No specific comments	<ol style="list-style-type: none"> 1. Noted

Reference	Respondent	Part of Document Addressed	Summary of Comments
32	MossCo Architects	Whole document	<ol style="list-style-type: none"> 1. Does guidance in section 2 apply to conversions (i.e. town centre properties to apartments)? 2. Para 3.9c - Designing new housing estates with simple street patterns can make developments feel unnatural and artificial. Some complexity in the layout of streets can help development feel more natural. 3. Para 8.13d - Does the minimum of 30m² per person open space apply to apartment block developments? Would developments of apartment blocks be expected to provide this area of open space? This could make many developments financially unviable. 4. Para 8.48 - There is no guidance on the provision of parking spaces for converted buildings (e.g. commercial to residential in a town centre situation) It is not always possible to provide parking for converted properties due to the nature of their location and surroundings (i.e. a town centre) 5. No consideration has been given to surface water drainage and how landscaping might be used to mitigate flood risk.
33	National Highways	Whole document	<ol style="list-style-type: none"> 1. Support those chapters which support integration and inclusivity and sustainability. The design of new developments to promote active and sustainable transport as the primary mode of transport, thereby encouraging modal shift, aligns with the objectives of both the NPPF and the Circular in reducing the need to travel by private vehicle.
34	Natural England	No specific comments	<ol style="list-style-type: none"> 1. No specific comments.
35	Network Rail	Whole document	<ol style="list-style-type: none"> 1. Design of extensions should factor in the railway as consideration for mitigation from impacts of development and construction works.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
32	MossCo Architects	Whole document	<p>1. The guidance in section 2 applies to all new dwellings. However the para 2.15 is clear that <i>"Although it is recognised that due to scale and context of a site some key design considerations (related to 'layout', inclusivity and sustainability' and 'integration' themes) are less applicable to replacement and small scale residential development."</i></p> <p>2. Shropshire Council considers that a clear street hierarchy can achieve an attractive layout whilst ensuring development is easily navigable.</p> <p>3. Open space requirements are established in Policy MD2 of the SAMDev Plan and apply to all forms of residential development.</p> <p>4. Having reflected on the parking provision guidance, it is considered that they were overly high. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p> <p>5. Section 6 of the draft SPD specifically addresses the potential for open space and public realm to achieve multiple functions, including flood management.</p>
33	National Highways	Whole document	1. Noted
34	Natural England	No specific comments	1. Noted
35	Network Rail	Whole document	1. Noted. Advice on this matter will be incorporated into the document.

Reference	Respondent	Part of Document Addressed	Summary of Comments
36	Bowsall Developments Ltd	Whole document	<p>1. The SPD introduces expectations that go beyond existing Development Plan policy and should be removed (e.g. inclusive design requirements at para. 6, separation distances at paras 8.7-8.8 and specialist housing requirements at para 8.63). This should be reserved for the Local Plan.</p>
36	Bowsall Developments Ltd (continued)	Whole document	<p>2. Paragraph 8.93 should be reworded to reflect latest guidance on Flood Risk Sequential Tests (PPG Paragraph 027 Reference ID: - 7-027-20220825).</p> <p>3. Once adopted, the Council should allow a reasonable transition period. It is suggested that the SPD would not apply to any planning application that has been submitted at the time of adoption and would not apply to any scheme submitted within 6 months of the adoption date of the SPD.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
36	Bowsall Developments Ltd	Whole document	<p>1. Shropshire Council considers that the guidance within this draft SPD is generally appropriate - supporting the understanding and application of policies in the adopted Development Plan.</p> <p>With regard to guidance on accessible housing and specialist housing, Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing and specialist housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest evidence. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. Policy CS11 also specifies that the Council will support "the provision of housing for vulnerable people and specialist housing provision, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "on sites of five or more dwellings, include a mix and type of housing that has regard to local evidence and community consultation" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards and the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>
36	Bowsall Developments Ltd (continued)	Whole document	<p>1 (continued). The guidance on separation standards specifically supports application of policies in the adopted Development Plan. In particular, this guidance supports understanding of expectations within Policy CS6 on the enhancement of local distinctiveness, achievement of appropriate scale, density, pattern and design that reflects local context; and compliance with local design guidance (which itself represents). Furthermore, this guidance supports the understanding of expectations in Policy MD2, including those on respecting local character, responding to form and layout of existing development (including scale, density and plot sizes), and supports consideration of design of landscaping and open space holistically.</p> <p>2. Shropshire Council considers the guidance in paragraph 8.93 is consistent with national policy and guidance.</p> <p>3. As this is a guidance document, supporting the understanding and application of policy in the adopted Development Plan, it is not considered that a transitional period is necessary.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
37	Anwyl Homes	Whole document	<ol style="list-style-type: none"> 1. SPD's should build upon existing policies and cannot introduce new requirements over and above those set out in the Development Plan, which will have been tested for soundness and financial viability. Introducing requirements through an SPD is contrary to national policy and guidance. 2. SPDs must avoid terms such as 'must' and should not specify 'minimum and maximum requirements' unless they are set out in an adopted Development Plan Document) doing so undermines Development Plan policy and adds to the financial burdens for developers. 3. Paragraph 3.3 is overly prescriptive and should be reworded to clarify it is not mandatory. 4. Paragraph 3.4 uses the word "should" alongside tick marks which may result in a requirement to meet every criterion, regardless of site context. This is inappropriate for SPD guidance, so should be clarified by a clear statement that not all criteria will be applicable to every site and that compliance should be assessed holistically and proportionately. 5. Paragraph 3.4(a-g) fail to acknowledge viability and other constraints. Wording should be added to confirm criteria only apply where feasible and viable. 6. Paragraph 3.7(a) sensitive transition is ambiguous and should be clarified to confirm it will be assessed on a case by case basis. 7. Paragraph 3.7(c) expects developments to extend pedestrian and cyclist links beyond the site boundary but does not acknowledge that land outside the application site is often in third-party ownership and therefore beyond the control of the developer. This risks creating an unreasonable expectation that off-site connections can always be delivered. 8. Paragraph 3.7(d) addresses ecological connectivity, these expectations may exceed adopted Development Plan policy requirements and should be limited to these requirements. 9. Paragraph 3.7(f) needs to clarify that Agent of Change principles apply only where relevant, in accordance with Local Plan policy and national guidance. 10. Paragraph 3.9(a) addresses multiple access points, this may be inappropriate in some cases so should be amended to where appropriate and feasible. 11. Paragraph 3.9(b) expectation to safeguard future connectivity may exceed site control so should be clarified that this is where reasonable and within the applicant's control, and where it does not prejudice deliverability or viability. 12. Paragraph 3.9(c) preference for grid patterns may conflict with local character, this should be reworded to recognise it is one approach and the layouts must respond to local character, topography and context.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
37	Anwyl Homes	Whole document	<p>1, 2, 15, 28 and 47. The Council recognises that an SPD provides guidance to support understanding and application of policies in the adopted Development Plan, rather than itself providing policies or forming part of the adopted Development Plan. The guidance within the draft SPD achieves this principle, supporting understanding and application of policies in the adopted Development Plan, with the appendices of the draft SPD assisting in understanding this relationship. With regard to wider language, the use of 'must' is limited to references to policies and general descriptions of what constitutes high-quality design; the use of 'minimums and maximums' is considered entirely compatible with the role of guidance - supporting understanding and application of policies in the adopted Development Plan.</p> <p>3. The Council does not intend paragraph 3.3 to represent a mandatory process, but rather an explanation of best practice. Minor amendments will be incorporated to clarify this.</p> <p>4. The Council disagrees use of "should" alongside tick marks in paragraph 3.4 constitutes an inappropriate requirement. Rather, it provides clear guidance on the factors that should be considered when designing a site so as to achieve efficient use of the site - consistent with the requirements of Policy CS6 of the Core Strategy.</p> <p>5. The Council considers the guidance in paragraph 3.4(a-g) entirely appropriate, supporting understanding and application of Policy CS6 of the Core Strategy and MD2 of the SAMDev Plan.</p> <p>6. The Council considers the term sensitive transition is appropriate and suitably responsive to the differing contexts of development in Shropshire.</p> <p>7. The Council is cognisant of this issue and intended the guidance in paragraph 3.7(c) to reflect it through reference to 'opportunities'. However, to avoid ambiguity on this matter, an amendment will be incorporated.</p> <p>8. The Council considers this guidance is entirely consistent with Policy CS17 of the Core Strategy and MD12 of the SAMDev Plan which outline the expectation that development will identify, protect, enhance, expand and connect Shropshire's environmental assets, to create a multifunctional network of natural and historic resources.</p> <p>9. Whilst the Council considers it should be apparent that the agent of change principle should only be applied in relevant circumstances, an appropriate amendment will be incorporated to ensure this is clear.</p> <p>10 and 11. The Council considers the guidance in paragraphs 3.9(a) and (b) appropriately flexible to respond to the diverse development that arises in Shropshire.</p> <p>12. It is considered that the context to the reference on grid patterns (formal or more relaxed) allows for appropriate flexibility to respond to the characteristics of the site whilst ensuring layouts aid navigation. It is also considered that density is more appropriately addressed in the guidance on character appearance.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
37	Anwyl Homes (continued)	Whole document	<p>13. Paragraph 3.9(e) filtered permeability may conflict with amenity or management considerations. Amend wording to confirm that filtered permeability should be provided where it enhances safety, legibility and amenity, and does not create management or security issues.</p> <p>14. Paragraph 3.9(f) blanket discouragement of private roads risks undermining deliverability, this should be reworded to state they should be minimised where appropriate.</p> <p>15. Paragraph 4.7 risks forming a rigid checklist. This is inappropriate for SPD guidance, so should be clarified by a clear statement that not all criteria will be applicable to every site and that compliance should be assessed holistically and proportionately.</p> <p>16. Paragraph 4.7(b) expectation for “character streets” may conflict with context. It should be clarified that character streets and spaces should be provided where appropriate to the scale and nature of the development.</p> <p>17. Paragraph 4.7(c) should be reworded to state that locally inspired naming may be encouraged, but is not a planning requirement.</p> <p>18. Paragraph 4.8(b) should be clarified to specify that responding to urban grain should not preclude appropriate changes in density or form where supported by policy.</p> <p>19. Paragraph 4.8(c) includes subjective terminology that risk inconsistent application. Need to confirm these matters will be assessed case-by-case, informed by Local Plan policies and site context.</p> <p>20. Paragraph 4.8(d) visual considerations may exceed relevance on some sites. Should be clarified it only applies where feasible and deliverable based on land ownership.</p> <p>21. Paragraph 5.3(b) priority for active travel routes may be overly restrictive, wording should be amended to specify this prioritisation is where appropriate and achievable, having regard to site context and travel patterns.</p> <p>22. Paragraph 5.3(b) design requirements may conflict with site constraints, this should be reworded to confirm that route characteristics should be achieved where feasible, taking account of topography, safety and environmental constraints.</p> <p>23. Paragraph 5.3(b) approach to PROW's needs to clarify that they should be retained where possible, or appropriately diverted in accordance with statutory procedures.</p> <p>24. Paragraph 5.3(b) expectation on level crossings may exceed technical standards. This should be clarified that such provision is where feasible and agreed with the highway authority.</p> <p>25. Paragraph 5.3(c) requires clarification on what is meant by "schemes involving several dwellings" as public transport expectations may be unrealistic. It should state that such integration should be considered where viable and appropriate to the scale of development and location.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
37	Anwyl Homes (continued)	Whole document	<p>13. The Council considers the principles of filtered permeability entirely consistent with amenity and management considerations.</p> <p>14. This Council considers the guidance on private drives entirely appropriate and would note that it includes a recognition that there may circumstances where they are appropriate.</p> <p>16. The Council considers the guidance in paragraphs 4.7(b) on character streets appropriately flexible to respond to the diverse development that arises in Shropshire.</p> <p>17 and 19. The Council considers this guidance on locally inspired names and building form generally appropriate, but will incorporate appropriate clarification amendments.</p> <p>18. The Council considers the guidance on responding to urban grain is appropriately flexible and that it would not conflict with achieving appropriate densities.</p> <p>20. The Council considers the guidance appropriate on design and layout responding to landmark features - there is no need to own landmark features to positively respond to them.</p> <p>21 and 22. The Council accepts there may be some circumstances where this is not possible but development remains appropriate. As such, an appropriate amendment will be incorporated.</p> <p>23. The Council considers the guidance already reflects these principles.</p> <p>24. The Council is proposing appropriate amendments to this guidance, reflecting comments from the highway authority.</p> <p>25. The Council agrees that providing more clarity on what constitutes a scheme involving several dwellings would add value to the draft SPD. Informed by discussions with the highway authority, it is considered that an appropriate scale for this guideline is 50 or more dwellings. As such, an appropriate amendment will be made to reflect this.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
37	Anwyl Homes (further continued)	Whole document	<p>26. Paragraph 5.5(b) expectation for uninterrupted boundary-to-boundary connectivity may be unrealistic. Amend wording to state green infrastructure connectivity should be achieved where feasible, and may be integrated alongside infrastructure where necessary.</p> <p>27. Paragraph 5.5(e) innovative green infrastructure may not suit all development types, so should be clarified to consider where appropriate and viable.</p> <p>28. Paragraph 5.7 risks forming a rigid checklist. This is inappropriate for SPD guidance, so should be clarified by a clear statement that not all criteria will be applicable to every site and that compliance should be assessed holistically and proportionately.</p> <p>29. Paragraph 5.7(b) is overly vague and should be re-worded to provide clarity.</p> <p>30. Detailed requirements of section 6 go beyond the scope of an SPD, which does not set numeric/prescriptive requirements for them. This is contrary to national policy and guidance and have not been informed by viability assessment:</p> <ul style="list-style-type: none"> a. Requirements for inclusive design - M4(2)/M4(3) accessibility. b. Specialist housing. c. HAPPI/Dementia Friendly principles. d. affordable housing distribution. e. outdoor community interaction

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
37	Anwyl Homes (further continued)	Whole document	<p>26. Shropshire Council considers this guidance appropriate.</p> <p>27 and 29. The Council considers the guidance in paragraphs 5.5(e) and 5.7(b) clear and appropriately flexible to respond to the diverse development that arises in Shropshire.</p> <p>30. The Council considers the guidance within the draft SPD appropriately supports the understanding and application of policies in the adopted Development Plan. The appendices of the draft SPD assist in understanding the relationship between this guidance and policies in the adopted Development Plan.</p> <p>30a, 30c, 41 and 42. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
37	Anwyl Homes (further continued 2)	Whole document	<p>31. Paragraph 6.11(g) is not consistent with the NPPF, which for non-designated heritage assets in paragraph 216 requires a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.</p> <p>32. Paragraph 7.3(b) and 8.63 should be reworded to say specialist housing is encouraged rather than set a specific minimum requirement. This places a burden on applicants beyond the adopted Local Plan policies mentioned above and is not a matter for the SPD. Specific requirements need to be viability tested and are a matter for the new Local Plan.</p> <p>33. Paragraph 7.4(c) needs to clarify what is meant by “appropriate and strong”.</p> <p>34. Paragraph 7.6(b) reference to “left over spaces” is undefined and unclear, creating ambiguity. This needs to be clarified.</p> <p>35. Paragraphs 8.7-8.8 set rigid numerical separation distances between new and existing dwellings. This is overly prescriptive and inflexible to site specific circumstances, so should be amended.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
37	Anwyl Homes (further continued 2)	Whole document	<p>30b and 32. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that specialist housing for older people will play in meeting the needs of Shropshire's residents. This is further demonstrated within the Council's recent Supported Specialist Housing and Accommodation Needs Assessment. Policy CS11 of the Core Strategy seeks to meet the diverse needs of Shropshire residents, stating that to do so the Council will seek to ensure "<i>that all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities</i>" (our emphasis) and that the Council will support "<i>the provision of housing for vulnerable people and specialist housing provision, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need</i>" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "<i>on sites of five or more dwellings, include a mix and type of housing that has regard to local evidence and community consultation</i>" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people.</p> <p>30d. The Council considers guidance on the distribution of affordable housing within a development is entirely consistent with and supports understanding and application of Policy CS6 of the Core Strategy which seeks to "<i>create mixed, balanced and inclusive communities, an integrated and balanced approach will be taken with regard to existing and new housing, including type, size, tenure and affordability</i>".</p> <p>30e. The Council considers guidance on outdoor community interaction is entirely consistent with and supports understanding and application of Policy MD2 of the SAMDev Plan which expects the consideration of the "<i>design of landscaping and open space holistically as part of the whole development to provide safe, useable and well-connected outdoor spaces which respond to and reinforce the character and context within which it is set</i>".</p> <p>31. Shropshire Council considers this guidance is entirely consistent with Policy MD13 of the SAMDev Plan and the NPPF.</p> <p>33. Shropshire Council considers that this guidance achieves an appropriate balance between clarity and flexibility.</p> <p>34. The Council considers para 7.6(b) is clear that left over spaces are those areas without clear function.</p> <p>35. The Council considers guidance on separation standards is appropriate.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
37	Anwyl Homes (further continued 3)	Whole document	<p>36. Introducing Nationally Described Space Standards (NDSS) requirements in paragraph 8.11 goes beyond the scope of an SPD. This should be removed.</p> <p>37. Paragraph 8.13 requirement for all open space to be usable excludes areas for ecological, landscape and visual amenity value. Useable should be clarified as where appropriate.</p> <p>38. Paragraph 8.15 guidance on over-provision of open space where development may adversely affect the integrity of an internationally or nationally designated wildlife site due to recreational impacts is more prescriptive than policy MD2. This should be amended to align with Policy MD2.</p> <p>39. Paragraph 8.26 sets specific numerical and spatial standards for private amenity space including guidance on flats, specialist housing, orientation, and boundaries. these requirements go beyond the scope of Local Plan policies, which promote amenity and high-quality layouts without prescribing rigid dimensions.</p> <p>40. Paragraph 8.35 requirement to retain all important trees should be clarified as where possible.</p> <p>41. Paragraph 8.58 requirements for inclusive design - M4(2)/M4(3) accessibility is inappropriate as it goes beyond policy and has viability implications.</p> <p>42. Paragraphs 8.65&8.71 requirement for HAPPI principles and Dementia-Friendly principles within the mix goes beyond the Local Plan Polices. This should be clarified to encouraged.</p> <p>43. Paragraph 8.88 water efficiency requirements are overly prescriptive and goes beyond the requirements of the adopted Local Plan, which does not mandate specific water efficiency standards. This should be removed.</p> <p>44. Paragraph 8.93 needs to reflect the latest guidance on Sequential Tests in the PPG.</p> <p>45. Paragraph 8.103 is not consistent with local or national policy and goes beyond the scope of a SPD.</p> <p>46. Once adopted, the Council should allow for a reasonable transition period, during which the SPD would not apply to schemes already in preparation, subject to ongoing pre-application discussions, or live planning applications.</p> <p>47. The SPD should be updated where necessary to ensure full alignment with the latest published version of the NPPF once the consultation has concluded and the final version is published. Consequently, the Council may need to hold a further consultation period on a revised SPD taking into account changes to national planning policy later in 2026.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
37	Anwyl Homes (further continued 3)	Whole document	<p>36. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>37. The Council considers this guidance entirely appropriate and consistent with the expectations of policy MD2.</p> <p>38. The Council intended this paragraph to align with the requirement of Policy MD2 and so for clarity an amendment is proposed.</p> <p>39. Shropshire Council considers this guidance is entirely appropriate, supporting the understanding and application of policies in the adopted Development Plan. However, appropriate amendments will be included to provide greater discretion between smaller and larger dwellings.</p> <p>43. Policy CS18 of the Core Strategy specifies that development will "incorporate water efficiency measures, in accordance with the sustainability checklist in Policy CS6, to meet the water efficiency objectives within the Shropshire Water Cycle Study to protect water resources and reduce pressure on wastewater treatment infrastructure." The referenced checklist forms part of the Sustainable Design SPD which specifies a minimum expectation of 105 litres per day - as such for consistency this SPD will be aligned with this minimum expectation. Notably, Shropshire (Severn Trent Water Limited company area) is now identified as an area under 'serious water stress (water stressed areas 2021 classification).</p> <p>44. Appropriate amendments are proposed informed by guidance from the Environment Agency.</p> <p>45. Appropriate amendments are proposed addressing development contributing to the conservation and enhancement of assets.</p> <p>46. As this is a guidance document, supporting the understanding and application of policy in the adopted Development Plan, it is not considered that a transitional period is necessary.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
38	Pickstock Homes	Whole document	<ol style="list-style-type: none"> 1. Concerned that some proposed guidelines will adversely impact on development viability, thereby delaying or halting development. As such, some of the measures may be better through the Local Plan Review. 2. Paragraph 6.7(b) requirement for all new dwellings to achieve M4(2) standards will result increases construction costs, adversely impacting on viability and pricing out first time buyers. 3. Paragraph 8.11 requirement to meet Nationally Described Space Standards will have adverse effects on the viability of smaller house types. 4. Paragraph 8.26(a) minimum 70sq.m. of garden space is a significant increase over existing standards. Many homeowners (particularly in smaller single storey properties) do not prioritise garden size with smaller being preferable. This will also effect density and scheme viability. Suggest it only applies to detached 3 bed properties. 5. Paragraph 7.3(b) - agree with the proposals to omit a prescriptive mix of house types. 6. Paragraph 8.53(a) addresses cycle parking, whilst supportive in principle providing two spaces in a communal cycle store is too much and will impact on scheme viability. Also important to specify that where a house has a garage, no additional cycle storage is required.
39	Bridgnorth Town Council	Chapter 8, paragraphs 8.47-8.51	<ol style="list-style-type: none"> 1. Concerned that there are no recommendations for the sizing of car parking spaces.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
38	Pickstock Homes	Whole document	<p>1.</p> <p>2. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p> <p>3. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>4. The Council considers the principles on garden sizes generally align with good practice but recognises that smaller gardens may be appropriate for smaller units, so appropriate flexibility will be integrated.</p> <p>5. Noted.</p> <p>6. It is considered that the guidance in the draft SPD is appropriately flexible on this matter, specifying provision is to be made wherever possible. However, an appropriate amendment will be made to provide clarity on the role of garages in meeting cycle parking provision.</p>
39	Bridgnorth Town Council	Chapter 8, paragraphs 8.47-8.51	<p>1. Paragraph 8.48 of the draft SPD addresses the size of car parking spaces.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
40	Pontesbury Parish Council	Chapters 3, 4, 7 and 8. Paragraphs 2, 3.7(e), 8.102, 8.80(c). 8.35 and 6.4(e).	<ol style="list-style-type: none"> 1. Support five key design considerations. 2. Consider specific reference should be included to Neighbourhood Plans and local design codes as key sources of information on local character. 3. This document should not become a progressive tick list but be a flexible enough to accommodate well justified design. 4. Chapter 3 - In rural areas important to maintain vistas. 5. Chapter 6 - Good links within and beyond a site will encourage active travel and social contact. 6. Chapter 7 - Design of open spaces to encourage sociability as well as recreation, e.g. seats, planting. 7. Chapter 8 - Gardens to have some hedge boundaries where it fits local character. 8. Chapter 8 - Signage to be kept to a minimum. 9. Chapter 8 - Strongly support the aspiration for design to be the highest quality in the Shropshire Hills National Landscape.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
40	Pontesbury Parish Council	<p>Chapters 3, 4, 7 and 8. Paragraphs 2, 3.7(e), 8.102, 8.80(c), 8.35 and 6.4(e).</p>	<ol style="list-style-type: none"> 1. Noted. 2. The importance of Neighbourhood Plans is well appreciated, as they form part of the adopted Development Plan for Shropshire. However, it is appreciated that the SPD could inclusion specific reference, an amendment to the introduction of the SPD is therefore proposed. 3. The Council agrees that the guidance provided within this SPD must be sufficiently flexible to respond to the diverse characteristics of our settlements and the forms of development that arise. It is considered that this flexibility is achieved. 4. The Council agrees that consideration of views and vistas should form part of the design process. It considers appropriate reference to the consideration of views and vistas is made in the guidance in paragraph 3.7(e). 5. The Council agrees that good design encourages use of active modes of travel. It considers the guidance in paragraphs 3.7(b) (integrating development into its surroundings) and paragraph 6.4(e) (promotion and prioritised of active travel) suitably address this issue. 6. The Council agrees that the design of open space can promote social recreation. It considers the guidance in paragraphs 7.4 and 8.13 appropriately reflects this. 7. Shropshire Council considers the guidance on boundary treatments in section 8 of the document is appropriate. 8. Shropshire Council considers the guidance on signage in section 8 of the document is appropriate. 9. Noted.

Reference	Respondent	Part of Document Addressed	Summary of Comments
41	Nigel Ingham	Whole document	<ol style="list-style-type: none"> 1. Document could be shorter but provides useful guidance which will support preparation of Neighbourhood Plans. 2. Paragraphs 2.6 and 2.10 useful in stating how new dwellings should fit in with existing properties so as to avoid altering the character of a village. 3. Paragraph 2.13 - very useful design considerations on layout, integration, inclusivity & sustainability and function. 4. Paragraph 3.4 - very useful comments on landform, features and ground conditions. Particularly relevant in terms of sites on slopes. Useful points on solar gain and flow of water. 5. Paragraph 3.6 - Several good points including connectivity. 6. Paragraph 4.1-4.10 - Character and appearance. Very useful points mentioning issues such as type, texture and materials. Imperative that new dwellings do not alter the character of a village. 7. Paragraph 5.3b. Important travel routes are safe. This means that excessive speeds need to be tackled in villages, for existing residents and for any future residents. Traffic calming should be included in these situations so that road crossing is safe. 8. Section 6 – excellent points that include affordable homes and housing for elderly or disabled. It is particularly important that these dwellings should be indistinguishable to other housing. Many youngsters cannot afford to move into villages they grew up in, so any affordable housing should be targeted at local people first. Similarly it is important that any future developments are not solely affordable housing, as this could alter the dynamics of the village. 9. Paragraph 6.9 – Need to avoid excessive car journeys. In terms of the actual properties Part L Building Regulations will force developers/builders to look at LZC technology such as heat pumps (rather than boilers) for heating, and also solar panels for the generation of electricity. 10. Paragraph 6.11 – In the past development has often harmed biodiversity so the inclusion of Biodiversity Net Gain BNG is important. This is likely to affect sizes and therefore reduce development density. 11. Section 8 - Whilst this section is extensive it is useful to demonstrate examples of good and bad practice (e.g. diagrams on P25). 12. Specialist housing - This section looks at age restriction general market housing. Many olde people cannot downsize easily or do not want to, as often they have been in their home of many years. There is also the trauma of moving. Many elderly residents may prefer to access care packages in their homes. There is a general lack of new build single storey housing such as bungalows, these would be more useful to elderly residents and those with limited mobility. The reference to HAPPI principles is useful. 13. Sections on Secure by Design/ adequate bin storage / street furniture – many of these points could be necessary criteria that builders need to satisfy prior to getting planning approval. 14. Appendices are useful.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
41	Nigel Ingham	Whole document	<p>1. The Council considers the length of the SPD appropriate given the breath of issues addressed. It welcomes the view that the SPD will support preparation of Neighbourhood Plans. 2-5, 9-14. Noted.</p> <p>6. The Council considers the guidance and the policies of the adopted Development Plan is appropriately responsive to the diverse characteristics of Shropshire.</p> <p>7. The Council considers the guidance in section 5 appropriately addresses the design of roads.</p> <p>8. Noted, it is considered the guidance on affordable and specialist housing is appropriate. It is considered that the specific allocation of affordable housing extends beyond the remit of this design guidance.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
42	Cameron Homes	Whole document - particularly para's 6.7, 6.9 and 8.11	<p>1. Government is phasing out SPD's and adopted will be superseded when the Council adopts its next Local Plan - meaning any emerging SPD would now be short lived. As such, consider progression of this SPD is contrary to Government approach.</p> <p>2. Significant concern the draft SPD is seeking to introduce additional policy and burdens, beyond that within the adopted Development Plan. It is also increasing development costs. These principles are contrary to national policy and guidance.</p> <p>3. Paragraph 6.7 - Government intends to make M4(2) mandatory nationally, so local SPD requirements are unnecessary. Accessibility standards should be set through building regulations, not local guidance. This would also increase the cost of development, which is contrary to national expectations.</p>
42	Cameron Homes (continued)		<p>4. Paragraph 6.9 - supportive of the Council's aim to transition to net zero, however it considers that standards relating to energy efficiency are best led by national building control regulations.</p> <p>5. Paragraph 6.11 - through this paragraph Shropshire Council is seeking to introduce additional policy burdens on development. Government has made clear that these standards are optional and can only be mandated through a Local Plan policy, not an SPD. Evidence of local need (e.g., SHMA 2020) is insufficient and out of date and viability evidence is also over 5 years old and cannot justify new requirements.</p>
43	Paul Carter	Whole document	<p>1. Diagrams of positive design should be included to make the document shorter and more accessible.</p> <p>2. Particularly support paragraphs 2.6, 2.13, 3.4, 4.1-4.4, 6.9 and security by design guidance.</p>
44	Paul Gurnett	Whole document	<p>1. The Council should not be providing guidance on these matters.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
42	Cameron Homes	Whole document - particularly para's 6.7, 6.9 and 8.11	<p>1. The Council considers it entirely appropriate to produce further guidance to support the understanding and application of policies in the adopted Development Plan - this aligns with the guidance from Government which includes specific timescales within which SPD's can be adopted. It is understood that this guidance will be in place until such time as the next Local Plan is adopted - however it is considered the guidance will be of value for this period.</p> <p>2. The Council recognises that an SPD provides guidance to support understanding and application of policies in the adopted Development Plan, rather than itself providing policies or forming part of the adopted Development Plan. The guidance within the draft SPD achieves this principle, supporting understanding and application of policies in the adopted Development Plan, with the appendices of the draft SPD assisting in understanding this relationship.</p> <p>3. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>
42	Cameron Homes (continued)		<p>4. The Council is aware that Government intends to regulate energy efficiency through Building Regulations. The guidance in the draft SPD is entirely consistent with and complementary to this approach - it does not seek to exceed Building Regulation standards, rather it provides guidance on the expectations in policy CS6 regarding design that mitigates and adapts to climate change and safeguards natural resources.</p> <p>5. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers - evidence is clear that the nationally described space standards result in housing better able to support immediate and longer term needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p>
43	Paul Carter	Whole document	<p>1. The value of diagrams in illustrating guidance is recognised and it is considered they are integrated where appropriate in the document.</p> <p>2. Noted.</p>
44	Paul Gurnett	Whole document	<p>1. Shropshire Council considers it entirely appropriate to produce guidance on design to support the understanding and application of relevant policies in the adopted Development Plan.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
45	Shropshire Swifts	Chapter 6 and 6 Para 5.5 and 6.11	<ol style="list-style-type: none"> 1. Strong support for the inclusion of swift bricks, hedgehog corridors, bat bricks/ tiles. 2. Greater emphasis on supporting biodiversity at all scales. 3. Sections 8.6, 8.7, 8.8 and 8.26 all imply very dense building of properties with very little space for nature in ever smaller gardens. Aspirations for nature should be included even at the smaller scale.
46	Bloor Homes and Taylor Wimpey	Chapters 3, 5, 6 & 8. Paragraphs 3.7, 5.5, 6.7, 8.8, 8.11, 8.48, 8.58, 8.63, 8.86.	<ol style="list-style-type: none"> 1. Generally support the aims and objectives of Section 3 Layout, and the requirement for development proposals to make efficient use of land, in line with National Planning Policy. 2. Paragraph 3.7(c) - Agree opportunities to improve active travel routes beyond development sites should be encouraged, but this requirement needs to recognise this is only possible where land ownership and other constraints allow. 3. Generally support the aims and objectives of section 5 Integration and the requirement for development proposals to ensure connectivity to and through the site, providing green infrastructure and wildlife corridors and access to services, facilities, and sports and play provision. 4. Paragraph 5.5(b) concerned this requirement is too ambiguous and likely to interrupt development parcels, thereby undermining the ability to make efficient use of land. Furthermore, making wildlife corridors 'weave' through a site may not be the most appropriate form of connection and could increase travel distances for wildlife. 5. Paragraphs 6.7b and 8.58 seek to introduce a requirement for new dwellings to achieve M4(2) and M4(3) standards. This is inappropriate, unviable and unlawful. It is inappropriate as M4(3) standards would require either an identified end user, or a restriction placed upon who can purchase those properties built to M4(3) standards - properties cannot be left empty until these conditions are met. A more appropriate alternative would be a financial contribution to provide grants for works to properties where individuals require them. It is unviable as this requirement has not been tested to consider its impact on residential developments within Shropshire - it represents a marked change to current policy requirements impacting both site density and delivery costs and latest viability assessment evidence is out of date. Lack of viability assessment and the fact that this is tantamount to new policy makes this unlawful. This paragraph should be deleted.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
45	Shropshire Swifts	Chapter 6 and 6 Para 5.5 and 6.11	<p>1 and 2. The Council recognise the importance of providing appropriate habitat for wildlife. Whilst this is already reflected in the document, it is considered there is a specific opportunity to promote those mechanisms that can be incorporated into dwellings to 'bolster' at risk wildlife.</p> <p>3. The draft SPD provides guidance on garden sizes.</p>
46	Bloor Homes and Taylor Wimpey	<p>Chapters 3, 5, 6 & 8. Paragraphs 3.7, 5.5, 6.7, 8.8, 8.11, 8.48, 8.58, 8.63, 8.86.</p>	<p>1 and 3. Noted.</p> <p>2. The Council is cognisant of this issue and intended the guidance in paragraph 3.7(c) to reflect it through reference to 'opportunities'. However, to avoid ambiguity on this matter, an amendment will be incorporated.</p> <p>4. The Council's intention is to ensure green infrastructure and wildlife corridors are interconnected and fully integrated (weaved) into a site, rather than a disjointed afterthought. However, it accepts that there is potential for the phrase 'weaved' to be misunderstood, as such an appropriate amended will be incorporated.</p> <p>5. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
46	Bloor Homes and Taylor Wimpey (continued)	<p>Chapters 3, 5, 6 & 8.</p> <p>Paragraphs 3.7, 5.5, 6.7, 8.8, 8.11, 8.48, 8.58, 8.63, 8.86.</p>	<p>6. Paragraphs 6.7(c) and 8.63 seek to introduce a requirement for development of 50 or more dwellings to include 10% specialist housing. This is unevidenced, unviable and unlawful. There is no evidence of need or how such specialist homes have been delivered within Shropshire to date (experience suggests this is mainly through windfall). It is unviable as this requirement has not been tested to consider its impact on residential developments within Shropshire - impacting both site density and delivery costs and latest viability assessment evidence is out of date. Lack of viability assessment and the fact that this is tantamount to new policy makes this unlawful. This paragraph should be deleted.</p> <p>7. Significant concerns paragraph 8.8 would impact the ability to achieve appropriate densities due to the effect on the location of car parking between detached properties.</p> <p>8. Paragraph 8.11 introduces a general expectation that all dwellings achieve national described space standards. The inclusion of such a requirement in the SPD does not accord with the guidance contained in the Planning Practice Guidance.</p> <p>9. Paragraph 8.48(a) - no evidence is presented as to how recommendations have been reached and therefore there is no justification for the suggested approach. It is considered unnecessary to require 3 bedroom properties to require such a high number of car parking spaces and such a requirement is likely to impact on the density that can be achieved and increase the dominance of car parking.</p> <p>10. Paragraph 8.48(f&g) - the requirement for garages to be 7m in length should only apply where it is to be used for cycle parking as part of the cycle parking requirements set out in paragraph 8.53. If cycle parking is to be provided separately then the size requirement for garages should be reduced to 6m in length.</p> <p>11. Paragraph 8.86 - Whilst generally we have no concerns regarding the approach, it is clear that the orientation of properties does have to respond to site specific factors and good urban design principles. As such, dwellings cannot always be orientated to support such an approach within conflicting with other elements of the draft SPD.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
46	Bloor Homes and Taylor Wimpey (continued)	<p>Chapters 3, 5, 6 & 8. Paragraphs 3.7, 5.5, 6.7, 8.8, 8.11, 8.48, 8.58, 8.63, 8.86.</p>	<p>6. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that specialist housing for older people will play in meeting the needs of Shropshire's residents. This is further demonstrated within the Council's recent Supported Specialist Housing and Accommodation Needs Assessment. Policy CS11 of the Core Strategy seeks to meet the diverse needs of Shropshire residents, stating that to do so the Council will seek to ensure "that all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities" (our emphasis) and that the Council will support "the provision of housing for vulnerable people and specialist housing provision, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "on sites of five or more dwellings, include a mix and type of housing that has regard to local evidence and community consultation" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people.</p> <p>7. The Council considers guidance on a 1m separation between a detached / end semi/terraced property and its curtilage entirely appropriate. It is understood from the response there is concern this would constitute unused/undeveloped land, but this is unlikely to be the case. The 1m 'buffer' could consist of garden space, driveway or other appropriate use of land. The intention of this guidance is to support the layout of dwellings avoiding an overbearing terracing effect and to support future access for maintenance purposes.</p> <p>8. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>9. Having reflected on the parking provision guidance, it is considered that they were overly rigid. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p> <p>10. It is noted that there are different standards for garages and that those in the SMART guidance (which have been informed by consultation) include an allowance for cycle parking. It is considered appropriate to utilise these standards in circumstances where the garages are to constitute part of a dwellings car parking provision but reference will also be made to their role in providing cycle parking. For clarity, amendments will be made to reflect these principles.</p> <p>11. It is accepted that there are other factors that inform the orientation of dwellings, so an appropriate amendment will be incorporated.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
46	Bloor Homes and Taylor Wimpey (further continued)	<p>Chapters 3, 5, 6 & 8.</p> <p>Paragraphs 3.7, 5.5, 6.7, 8.8, 8.11, 8.48, 8.58, 8.63, 8.86.</p>	<p>10. Paragraph 8.48(f&g) - the requirement for garages to be 7m in length should only apply where it is to be used for cycle parking as part of the cycle parking requirements set out in paragraph 8.53. If cycle parking is to be provided separately then the size requirement for garages should be reduced to 6m in length.</p> <p>11. Paragraph 8.86 - Whilst generally we have no concerns regarding the approach, it is clear that the orientation of properties does have to respond to site specific factors and good urban design principles. As such, dwellings cannot always be orientated to support such an approach within conflicting with other elements of the draft SPD.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
46	Bloor Homes and Taylor Wimpey (further continued)	<p>Chapters 3, 5, 6 & 8. Paragraphs 3.7, 5.5, 6.7, 8.8, 8.11, 8.48, 8.58, 8.63, 8.86.</p>	<p>10. It is noted that there are different standards for garages and that those in the SMART guidance (which have been informed by consultation) include an allowance for cycle parking. It is considered appropriate to utilise these standards in circumstances where the garages are to constitute part of a dwellings car parking provision but reference will also be made to their role in providing cycle parking. For clarity, amendments will be made to reflect these principles. 11. It is accepted that there are other factors that inform the orientation of dwellings, so an appropriate amendment will be incorporated.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
47	The Canal and River Trust	Whole document	<ol style="list-style-type: none"> 1. Canal and river waterways should be recognised as significant blue/green infrastructure. 2. Welcome text in paragraph 4.4.8. 3. Section 8 should identify situations where Landscape & Visual Impact Assessments are likely required. This could reflect the requirements in the Local Validation List and the expectation that such assessments will be provided for larger developments and particularly sensitive areas. 4. Paragraphs 6.11 and 8.103 - welcome text clarifying the need addressing heritage and the need for Heritage Impact Assessments. However, additional text addressing Conservation Areas would be of benefit. 5. Paragraph 8.129 - draft text recognises the impact of lighting on wildlife and that it may be beneficial to prepare a lighting strategy for larger development proposals but should clarify that where detrimental impacts on biodiversity could arise as a result of development a Lighting Assessment will be required. 6. The draft SPD refers to sustainable drainage in various sections. Inappropriate SuDS can affect water quality and structural integrity of canals and rivers. However, where appropriate our canals can provide opportunities for the controlled discharge of surface water to a water body. Providing a cross reference to the LPA's adopted SPD on Sustainable drainage would assist developers understanding the wider requirements related to SuDS. 7. Welcome identification of Policy CS7 recognising the benefits that the canal and river network provides and the promotion of an awareness of it.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
47	The Canal and River Trust	Whole document	<ol style="list-style-type: none"> 1. Noted. The Council agrees that the draft SPD would benefit from provision of guidance on considering canals and waterways where sites are in proximity to this infrastructure. An appropriate amendment will be identified. 2. Noted. 3. Noted. A footnote will be added to paragraph 3.4, explaining the role of landscape and visual sensitivity assessment in informing proposals - consistent with SAMDev Plan Policy MD12. 4. The Council considers sufficient guidance is provided to support those policies related to heritage assets, including conservation areas. 5. The Council agrees that reference to the role of a Lighting Assessment where the strategy identifies harm would be of value. 6. The Council agrees that a cross-reference to guidance on the design of SUD's features would be of value. This will be incorporated as a footnote to paragraph 5.5. 7. Noted.

Reference	Respondent	Part of Document Addressed	Summary of Comments
48	Vistry Group	<p>Chapters 3, 5 and 6.</p> <p>Paragraphs 3.1, 3.9.b, 5.1, 5.5.c, 5.5.d, 5.5.e, 6.7, 6.7.b, 6.7.c, 6.11.b, 6.11.c and 6.11.g.</p>	<ol style="list-style-type: none"> 1. Request for greater flexibility in SPD wording on avoiding ‘ransom strips’, as multiple landownerships often make this difficult in practice. Suggest amending paragraph 3.9(b) to recognise that avoiding ransom strips may require agreement between landowners, not solely developer control. 2. In paragraph 5.5(c) Natural England’s Green Infrastructure Principles are voluntary, not policy. SPD should reflect this by stating developers should align “where possible”. 3. The Shropshire Local Nature Recovery Strategy is a non mandatory and not intended to restrict development. The SPD wording should be more flexible and avoid implying LNRS requirements are binding in paragraphs 5.5(c) and 5.5(d). 4. Paragraph 5.5(e) - green roofs/walls may be unsuitable for many residential schemes, especially where roof space is needed for PV panels required under the Future Homes Standard; SPD should reflect suitability and viability constraints.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
48	Vistry Group	<p>Chapters 3, 5 and 6.</p> <p>Paragraphs 3.1, 3.9.b, 5.1, 5.5.c, 5.5.d, 5.5.e, 6.7, 6.7.b, 6.7.c, 6.11.b, 6.11.c and 6.11.g.</p>	<p>1. The Council considers that the guidance on avoiding ransom strips appropriate and sufficiently flexible to respond to the different circumstances experienced across development sites.</p> <p>2. On reflection, the Council considers that reference to Natural England's Green Infrastructure Principles is best provided within the context element of this section of guidance. As such, an appropriate amendment is proposed.</p> <p>3. The Council considers the LNRS an essential sources of evidence on the opportunities to conserve, enhance and restore Shropshire's natural environment. Guidance on the alignment of green infrastructure and wildlife corridor provision with the LNRS objectives is therefore considered consistent with and supportive of the understanding and application of the expectations of Policy CS17 of the Core Strategy and Policy MD12 of the SAMDev Plan. With regard to paragraph 5.5(c) it is recognised that dependent on site it may not always be possible to align provision with the objectives of the LNRS and as such an appropriate amendment will be incorporated. With regard to paragraph 5.5(d) the Council considers it appropriate to specify the can provide guidance to support identification and achievement of appropriate nature actions.</p> <p>4. The Council considers this guidance entirely appropriate, it suggests consideration of innovative ways to provide green infrastructure, rather than requiring its provision.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
48	Vistry Group (continued)	<p>Chapters 3, 5 and 6.</p> <p>Paragraphs 3.1, 3.9.b, 5.1, 5.5.c, 5.5.d, 5.5.e, 6.7, 6.7.b, 6.7.c, 6.11.b, 6.11.c and 6.11.g.</p>	<p>5. It is considered that paragraph 6.7(b) fails to have regard to the viability and deliverability of sites and extends beyond national policy (introducing an optional building standard). There is no justification for this proposal provided. As such, the requirement for 5% of homes as M4(3) standards on sites of 5 or more dwellings should therefore be considered on an individual basis and properly evidenced.</p> <p>6. The definition of 'specialist housing' in paragraph 6.7(c) is unclear and it is requested that further clarity is provided on this. Further, the requirement for 10% specialist housing on sites of 50 or more dwellings is too high and will likely impact the viability of sites and delay them from bringing forward new homes to meet identified needs. It is therefore requested that paragraph 6.7(c) is updated to 5% and the wording is amended to be more flexible and have regard to sites on an individual basis.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
48	Vistry Group (continued)	Chapters 3, 5 and 6. Paragraphs 3.1, 3.9.b, 5.1, 5.5.c, 5.5.d, 5.5.e, 6.7, 6.7.b, 6.7.c, 6.11.b, 6.11.c and 6.11.g.	<p>5. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be "designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11" (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure "all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard" (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p> <p>6. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that specialist housing for older people will play in meeting the needs of Shropshire's residents. This is further demonstrated within the Council's recent Supported Specialist Housing and Accommodation Needs Assessment. Policy CS11 of the Core Strategy seeks to meet the diverse needs of Shropshire residents, stating that to do so the Council will seek to ensure "that all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities" (our emphasis) and that the Council will support "the provision of housing for vulnerable people and specialist housing provision, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need" (our emphasis). Furthermore, Policy MD3 of the SAMDev Plan specifies residential development should "on sites of five or more dwellings, include a mix and type of housing that has regard to local evidence and community consultation" (our emphasis). Local evidence is clear on the importance of specialist housing in meeting the needs of older people within our communities. As such, it is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to the proportion of housing on larger sites of 50 or more dwellings consisting of specialist housing for older people. The definition of specialist housing is provided in section 8 of the document.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
48	Vistry Group (further continued)	<p>Chapters 3, 5 and 6.</p> <p>Paragraphs 3.1, 3.9.b, 5.1, 5.5.c, 5.5.d, 5.5.e, 6.7, 6.7.b, 6.7.c, 6.11.b, 6.11.c and 6.11.g.</p>	<p>7. SPD wording of “at least 10% BNG” should be amended to 10% to align precisely with Environment Act requirements (not above).</p> <p>8. Note that residential development often already delivers significant ecological enhancements; SPD should reflect this positive relationship with BNG outcomes.</p> <p>9. Support SPD wording generally, but stress the NPPF requirement that any heritage harm must be weighed against public benefits, particularly relevant given Shropshire’s current housing land supply shortfall. 10.</p> <p>Overall Themes</p> <p>a. SPD should avoid turning voluntary frameworks (GI Principles, LNRS) into implied policy requirements.</p> <p>b. Need for clearer definitions, particularly around specialist housing.</p> <p>c. Key policies should be viability tested, flexible, and consistent with national policy to support housing delivery.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
48	Vistry Group (further continued)	<p>Chapters 3, 5 and 6. Paragraphs 3.1, 3.9.b, 5.1, 5.5.c, 5.5.d, 5.5.e, 6.7, 6.7.b, 6.7.c, 6.11.b, 6.11.c and 6.11.g.</p>	<p>7. The Council considers the wording of the SPD aligns with the Environment Act. It does not require more than 10% BNG. 8. This is readily acknowledged by the Council and it is considered that this is reflected in the draft SPD. 9. Noted. 10. See wider response.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
49	Shrewsbury Civic Society	Whole document	<ol style="list-style-type: none"> 1. Highly recommend guidance aligns with Homes England: Healthy, Homes Standard, published Autumn 2025, which is much more coherent/progressive on many aspects of what constitutes good design. 2. Consider parking guidance inappropriate. The council should be reducing reliance on private cars by promoting sustainable transport options and aspiring to car-free developments in highly accessible urban areas .
50	Shropshire Wildlife Trust	Whole document Particularly Chapters 5, 6 and 8; and paragraphs 5.5, 6.4 and 8.5.	<ol style="list-style-type: none"> 1. Should include guidance regarding avoidance of pipe to basin type SuDS features and promote sumpless gully pots, road underpasses and badger corridors where appropriate. 2. Reference to the Local Nature Recovery Strategy (LNRS) should provide the documents full name. 3. Paragraph 5.5(d) should include guidance regarding the role of the LNRS in supporting the identification and achievement of appropriate nature actions. 4. Sites may not be within the mapped network identified in the LNRS but unmapped actions identified by the LNRS may be relevant. 5. Paragraph 6.4(b) should refer to the benefits of 'well designed' green spaces on mental health. 6. Paragraph 6.11(e) refers to non-disturbed spaces and then 'low' disturbance in those spaces. In reality low disturbance is difficult to achieve. The writing needs to be really clear on the expectation here. 7. Designing onsite BNG should take into account long term sustainability of the habitats being provided - ensuring they can be maintained. 8. Paragraph 8.34 boundary fences should include hedgehog holes where ever possible to make development permeable to wildlife.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
49	Shrewsbury Civic Society	Whole document	<ol style="list-style-type: none"> 1. It is considered that the guidance in the draft SPD appropriately reflects best practice on design, whilst reflecting the intended role of an SPD - supporting the understanding and application of policies in the adopted Development Plan. 2. Having reflected on the parking provision guidance, it is considered that they were overly high. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).
50	Shropshire Wildlife Trust	Whole document Particularly Chapters 5, 6 and 8; and paragraphs 5.5, 6.4 and 8.5.	<ol style="list-style-type: none"> 1. A footnote will be added to paragraph 5.5, highlighting the Council's detailed guidance on Sustainable Drainage. 2. To avoid confusion a specific link to the LNRS will be incorporated into the SPD where the document is first referenced. 3. The Council considers the guidance in para 5.5 appropriately highlights the opportunities of aligning green infrastructure/wildlife provision with the LNRS. 4. Noted, the Council considers the guidance which refers to the LNRS is not limited to the mapped opportunities. 5. Noted, this is a reasonable clarification and will be integrated. 6. Noted, the Council will ensure that the guidance refers consistently to low-disturbance. 7. The Council considers the legislative requirements sufficiently address the long-term maintenance of BNG. 8. The Council recognise the importance of providing appropriate habitat for wildlife. Whilst this is already reflected in the document, it is considered there is a specific opportunity to promote those mechanisms that can be incorporated into dwellings to 'bolster' at risk wildlife.

Reference	Respondent	Part of Document Addressed	Summary of Comments
51	Berry's	Whole document	<ol style="list-style-type: none"> 1. Paragraph 2.13 - will there be minimum plot sizes, allowing potential for extension in the future whilst maintaining separation boundaries? 2. Paragraph 3.9(c) - Desire has previously been expressed for more organic road layouts and developments with less hierarchy on development, this is contradicted in the reference to a 'grid pattern' which potentially scuppers designing to work with landform. 3. Paragraph 3.9(f) – concern over inhibition of site navigation through exclusion of private roads, which allow for more efficient layouts on constrained sites. Furthermore, are the Council suggesting they want to adopt every road? 4. Paragraph 4.5 – strongly agree with this point and advocate this forming part of the new design code – just because there is poor design nearby, does not mean poor design should be acceptable in general. 5. Paragraph 4.10(c) – concern this may stifle future innovation and or restrict the natural evolution of design and development regarding materials and the like. 6. Paragraph 5.2/5.3 – agree and already incorporate most of the points within our designs. 7. Paragraph 5.5(e) – Council has not previously been receptive to this, but welcome and advocate for the promotion of green infrastructure. 8. Paragraph 6.7(b,c,d) – agree with principle of futureproofing all dwellings where possible. However, achieving M4(3) units is very prescriptive and difficult to apply this as a blanket percentage to all new developments. Also, do the percentages overlap or are these distinguishable per development?

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
51	Berry's	Whole document	<p>1. The Council does not consider that guidance on minimum plot sizes is required, as the draft SPD includes guidance on garden sizes and separation standards.</p> <p>2. The Council does not consider guidance in paragraph 3.9(c) to be overly restrictive, it references the potential for formal or more relaxed grid patterns, thereby supporting designs that are responsive to the sites landform whilst supporting navigation.</p> <p>3. The Council has very significant concerns about the implications of private drives and their negative implications for site navigation. This guidance is considered entirely appropriate.</p> <p>4, 6 and 7. Noted.</p> <p>5. The Council does not consider this guidance to be overly prescriptible. It does not suggest materials should 'copy' those that already exist, but rather that they should 'complement'.</p> <p>8. Shropshire's demographics demonstrate both our age profile and the speed at which the profile is ageing are higher than the national average - this demonstrates the important role that accessible and adaptable housing will play in meeting the needs of Shropshire's residents, as emphasised in the Council's latest SHMA. Furthermore, a key component of the Council's adult social care strategy is to support older people to remain independent in their own homes for as long as possible. Core Strategy Policy CS6 specifically requires all development to be <i>"designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11"</i> (our emphasis). Core Strategy Policy CS11 continues stating that to meet the diverse needs of Shropshire residents the Council will seek to ensure <i>"all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard"</i> (our emphasis) - notably lifetime home standards are now incorporated into Part M of the Buildings Regulations. It is considered entirely appropriate that in providing guidance on the achievement of these policy principles, reference is made to dwellings achieving M4(2) and M4(3) accessibility standards. However, the 100% M4(2) guideline had been linked to the expectation that Government was to mandate this, which it is now understood is no longer to be the case and it is appreciate the certainty over the interplay between M4(2) and M4(3) standards is of value. Therefore, reflecting the demographics of Shropshire and emerging national policy it is considered appropriate to amend this guideline to specify that 40% of dwellings on sites of 5 or more dwellings achieve M4(2) standards and a further 5% achieve the M4(3) standard.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
51	Berry's (continued)	Whole document	<p>9. Paragraph 6.7e – it is traditionally difficult to make affordable units indistinguishable as normally limited to a specific size.</p> <p>10. Paragraph 6.9a – modern methods of construction for energy efficiency (think Passivhaus as exemplary standard) utilise overhangs for solar shading, and different materials and profiles. This is potentially contradictory to the character and appearance section – will there be a hierarchy here?</p> <p>11. Paragraph 8.11 – advocate for this as a bare minimum standard and also push for enforcement of these rules – volume housebuilders should not be immune to this.</p> <p>12. Paragraph 8.48 parking provision – does this not directly contradict the active travel element that you are looking to promote? Further to this, we feel that tandem parking on new developments creates issues with cars parking on the roadside rather than in tandem on the allocated drive. It should be preferential to have parallel / side by side parking drives where possible to avoid the on street parking scenario.</p> <p>13. Paragraph 8.86b – meet building control requirements for energy efficiency. This should be the bare minimum, and we should be pushing for much better than the minimal needed to pass. Homes should be aiming to utilise passive principles and aim for Passivhaus standard. This would truly ensure energy efficiency and negate any future retrofit needs.</p> <p>14. Section 8 water conservation and efficiency – this is the council’s chance to be at the forefront of change and push for grey water recycling and or rain water harvesting technology where possible, reducing the use of potable water for toilets and irrigation.</p>
52	Much Wenlock Town Council	Whole document	<p>1. It is essential that the guidance includes reference to the role of Neighbourhood Plans - suggest section 8.</p>

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
51	Berry's (continued)	Whole document	<p>9. It is considered that through location, architecture, and landscaping affordable housing can be made indistinguishable from market housing. The Council would also note that consistent with Policy MD3 of the SAMDev Plan, smaller market housing has an important role in meeting the needs of our communities.</p> <p>10. The Council consider the guidance on fabric energy efficiency and character & appearance is entirely consistent. It should be noted that the guidance on character and appearance does not expect development to copy existing character, but to be complementary and also recognises the role for contemporary (but complementary) design.</p> <p>11. The Council is passionate about ensuring future housing provides appropriate internal floorspace to meet the needs of occupiers. However, it is recognised that the phraseology of the draft SPD may have been overly restrictive, as such the Council is proposing appropriate amendments to reflect this is an aspiration.</p> <p>12. Having reflected on the parking provision guidance, it is considered that they were overly rigid. Amendments therefore to be made to recognise the diversity of dwelling types and our communities (including that zero car parking schemes may be appropriate in our most accessible locations).</p> <p>13. The Council is aware that Government intends to regulate energy efficiency through Building Regulations. The guidance in the draft SPD is entirely consistent with and complementary to this approach.</p> <p>14. Policy CS18 of the Core Strategy specifies that development will "incorporate water efficiency measures, in accordance with the sustainability checklist in Policy CS6, to meet the water efficiency objectives within the Shropshire Water Cycle Study to protect water resources and reduce pressure on wastewater treatment infrastructure." The referenced checklist forms part of the Sustainable Design SPD which specifies a minimum expectation of 105 litres per day - as such for consistency this SPD will be aligned with this minimum expectation. Notably, Shropshire (Severn Trent Water Limited company area) is now identified as an area under 'serious water stress (water stressed areas 2021 classification).</p>
52	Much Wenlock Town Council	Whole document	<p>2. The importance of Neighbourhood Plans is well appreciated, as they form part of the adopted Development Plan for Shropshire. However, it is appreciated that the SPD could include specific reference, an amendment to the introduction of the SPD is therefore proposed.</p>

Reference	Respondent	Part of Document Addressed	Summary of Comments
53	Environment Agency	Whole document	<ol style="list-style-type: none"> 1. Paragraph 8.87 refers to the Shropshire Water Cycle Study (2020), however this needs updating. Shropshire (Severn Trent Water Limited company area) is now identified as an area under 'serious water stress (water stressed areas 2021 classification). 2. The proposed water efficiency standards in paragraph 8.88 do not align with those set out in Shropshire Council's Sustainability Checklist as required by Policy CS6 of the existing Core Strategy. This sets a minimum requirement of 105l/p/d but indicates 90l/p/d would be good and 80l/p/d would be best. Given the 'stressed' classification these tighter standards remain justified. Recommend tighter water efficiency standards should be adopted for new homes which go beyond the minimum standards set out in Building Regulations. 3. With regard to paragraph 8.89 implementing tighter water efficiency standards is generally not costly or challenging and is viable for developments that should be seen as a positive outcome. The Design Guide could include requirements for grey water recycling and rainwater harvesting for new development (designed at an appropriate scale) to help create places resilient to climate change, contribute toward achieving net zero emissions and reduce the demand for water. 4. Paragraph 8.90 should specify that flood risk assessments should be site specific and provide reference to the Flood Risk Assessment (FRA) Guidance Note (West Midlands Area). It should also provide minimum expectations for the flood risk assessment. 5. In paragraph 8.93, recommend the guidance highlights the need to apply a sequential approach to the siting of development to ensure: the site layout places new development within those areas at lowest risk of flooding; and management of any flood flows within the site. 6. Technical guidance on flooding could encourage development to maintain an 8m easement along watercourses, work with natural processes (natural flood management), restore and enhance watercourses where opportunities exist and make reference to the SFRA or any update (including cumulative impacts). 7. Recommend the section on Green Infrastructure includes reference to blue infrastructure. 8. Opportunity to expand on the agent of change principle in paragraph 3.7(f). 9. The design guidance could set an expectation for new development to be connected to the foul mains drainage network, include reference to the drainage hierarchy as set out in the NPPG.

Reference	Respondent	Part of Document Addressed	Shropshire Council Response / Action
53	Environment Agency	Whole document	<ol style="list-style-type: none"> 1. The Council intends to update the Water Cycle Study as part of the process of preparing the next Shropshire Local Plan, however it is considered appropriate to reference the currently available evidence. The guidance in this draft SPD addresses water efficiency, reflecting the 'water stress' concern. 2. Noted, for consistency this SPD will be aligned with the minimum expectation of the Sustainable Design SPD. 3. The Council agrees with the view that achieving increased water efficiency is generally inexpensive and a positive outcome for development, this is reflected in paragraph 8.89. The Council also agrees that the draft SPD provides an opportunity to promote consideration of grey water recycling and rainwater harvesting. 4. The Council agrees that specifying that where required flood risk assessments should be site specific adds further certainty on their scope. The Council also agrees referencing appropriate guidance will support those undertaking flood risk assessment, as such a link to the EA guidance on flood risk for developers will be incorporated. However inclusion of specific expectations is considered unnecessary given this new link to relevant guidance. 5. Noted. An appropriate amendment will be made. 6. Noted, the guidance will be expanded to encourage developers to consider opportunities to minimise flood risk. 7. The term green infrastructure is generally well understood and incorporate blue infrastructure. As such, the Council do not consider it is necessary to specifically include it within the text. 8. The Council considers the draft SPD guidance on the agent of change principle is sufficient. 9 and 10. The Council considers expecting new development to be connected to the foul mains drainage network, separate foul and storm drainage, restrict surface water connections etc would be overly prescriptive.