

Shropshire Local Plan 2016-2038

Submission Consultation Statement

August 2021

1. Overview of Consultation Process on the Local Plan

- 1.1. This Consultation Statement provides an overview of the consultation process carried out by Shropshire Council during the preparation of the Local Plan Review 2016-2038 at both the Regulation 18 and Regulation 19 stages of plan preparation. Appendices 1-6 provide detailed summaries of the consultation responses received at each stage of consultation. Appendices 6-12 provide information on how the Council, carried out consultation at specific stages.

Background

- 1.2. The Council began preparing the Local Plan review in 2017. At the core of this process is continuous and meaningful community engagement, in line with the Council's Statement of Community Involvement (SCI). However, in addition to this the Council has undertaken five consultation stages as part of the Regulation 18 stage of plan preparation, as well as the statutory consultation at Regulation 19 on the pre-submission version of the Local Plan.
- 1.3. In total therefore, six separate and distinct stages of consultation have been carried out to allow people to comment on emerging proposals which have all informed the submission version of the Local Plan, as well as the proposed schedule of minor modifications. In summary these stages have been:
1. Issues and Strategic Options (January 2017 - March 2017);
 2. Preferred Scale and Distribution of Development (October 2017 - December 2017);
 3. Preferred Sites (November 2018 - February 2019);
 4. Strategic Sites (July 2019 - September 2019);
 5. Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (August 2020 – September 2020).
 6. Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (December 2020-February 2021)
- 1.4. These stages of consultation with the associated documents are available on the Council's website, and each dealt with specific aspects of the plan making process and sought to provide the opportunity for communities and other stakeholders to make comments on emerging proposals. Notably there were:
- a. Around 400 unique respondents to the 8-week Issues and Strategic Options consultation;
 - b. Around 600 unique respondents to the 8-week Preferred Scale and Distribution of Development consultation;
 - c. Around 3,600 unique respondents to the 12-week Preferred Sites consultation;
 - d. Around 2,300 unique respondents to the 10-week Strategic Sites consultation;
 - e. Around 2,500 unique respondents to the 8-week Regulation 18: Pre-Submission Draft of the Shropshire Local Plan consultation; and

- f. 683 respondents – equating to 2,443 individual Representations - to the 10 week Regulation 19: Pre-Submission Draft of the Shropshire Local Plan consultation
- 1.5. At each stage the Council has consulted widely, utilising the Council's Consultee Database as the starting point. Everyone on this database has received an e-mail in each consultation stage with information on the consultation and how to respond. The consultee database is made up of roughly 4,000 consultees, ranging from statutory (specific) organisations; general consultation bodies; and local consultation bodies along with many individual residents.
 - 1.6. At each stage a Consultation Plan has been prepared setting out the methods to be used to ensure a meaningful engagement. These Consultation Plans are outlined in Appendices 6-12 of this Statement. The Consultation Plans show how the Council met and often exceeded the scope and range of consultation envisaged in the Council's adopted Statement of Community Involvement (SCI).
 - 1.7. In line with the Council's SCI, the Council pays great importance to engaging with Parish and Town Councils given their status as the most local form of democratically elected representatives of local communities. The Council has used the Shropshire Association of Local Councils (SALC) as the main conduit to Shropshire's many and varied Parish and Town Councils. The Council has ensured that throughout the Regulation 18 and 19 consultation stages, Parish and Town Councils have had the opportunity, via SALC, to meet and discuss the draft Plan with officers. These discussions principally took place during the Regulation 18 stage of consultation, including through the delivery of 'virtual' meetings during 2020, recognising the restrictions placed upon physically meeting due to the Covid 19 pandemic. Whether physical or virtual, these meetings have at the very least allowed officers to present information on draft proposals directly to representatives from the Parish and Town Councils and have helped to ensure a more informed response to the Plan's development and to ensure meaningful consultations.
 - 1.8. The Council has sought to engage positively with a range of groups throughout the process, and not only at times of consultation. As part of the Duty to Cooperate (DtC), the Council have met on a number of occasions with neighbouring and closely related authorities to discuss and identify any cross boundary issues and how to tackle them. The Council's Duty to Cooperate Statement, submitted alongside the Local Plan for examination, provides more information on this process, including where it has led to a proposed change to the Plan. .
 - 1.9. The Council has also sought to engage constructively with planning agents and developers through the Agent and Developer forums in order to communicate progress on the Plan. In addition, the Council has hosted a Strategic Infrastructure Forum for infrastructure providers and the Council to identify and discuss any capacity shortfall and potential intervention requirements, with the Council's published Strategic Infrastructure and Implementation Plan and Place Plans capturing this information.

2. Specific Consultations Undertaken at Regulation 18

- 2.1. Every comment and representation made as part of the Regulation 18 and 19 consultation stages have been considered in arriving at the Council's Pre-Submission Draft of the Shropshire Local Plan, and has also informed the proposed Schedule of Minor Modifications submitted for consideration to the examination. At each consultation within the Regulation 18 stage, the Council has prepared a detailed summary of the issues raised. These summaries have been made available on the Council's website, and are now included as Appendices 1-5 to this Consultation Statement. Following the Regulation 19 stage of consultation, which ended in February 2021, the Council has considered and summarised each representation made, and has provided a response to each. As noted above, on several occasions this has led to a proposed minor modification to be proposed, which the Council has submitted for consideration at the examination. On this occasion, each representation made has also been published on the Council's webpages...
<http://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/previous-consultations/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

Issues and Options: January – March 2017

- 2.2. The first specific consultation undertaken to support the Local Plan Review was on the Issues and Strategic Options document, published in January 2017. To inform the review, Shropshire Council undertook an eight week consultation on the Issues and Strategic Options document, which started on the 23 January 2017. This consultation sought views from all parties on the key issues and strategic options for the Local Plan Review; it covered the following strategic options: Housing requirement; the Strategic distribution of future growth; Strategies for employment growth; the Delivering development in rural settlements. There were around 400 responses to this consultation and a summary of responses is included in Appendix 1 to this Consultation Statement, whilst details of how the Council consulted at this stage included as Appendix 6 to this Consultation Statement.

Preferred Scale and Distribution of Growth: October –December 2017

- 2.3. The second specific consultation to support the Local Plan Review was on the Preferred Scale and Distribution of Development published in October 2017 for an eight week consultation. This consultation sought views on a number of issues: the preferred scale of housing and employment development in Shropshire 2016-36; the preferred distribution of this growth; the housing and employment growth guidelines for the strategic centre (Shrewsbury) and each principal and key centres; the methodology which Shropshire Council proposes to adopt to identify a settlement hierarchy in Shropshire; using this methodology the settlements which form part of this hierarchy, including those that will, in future, be identified as Community Hubs and those that will be maintained as Community Clusters; draft policies for the management of development within Community Hubs and Community Clusters. There were

around 600 responses to this consultation, and a summary of responses is included as Appendix 2 to this Consultation Statement, with details of how the Council consulted at this stage included as Appendix 7 to this Consultation Statement.

Preferred Site Allocations: November 2018 – January 2019

- 2.4. The third specific consultation to support the Local Plan Review was the Preferred Sites consultation published in November 2018 for a twelve week consultation. This consultation sought views on: the housing policy direction to improve the delivery of local housing needs; Development guidelines and development boundaries for Shrewsbury, the principal and key centres and each proposed community Hub; the preferred sites to deliver the preferred scale and distribution of housing and employment growth during the period 2016 to 2036. During this consultation, more than 3,600 unique respondents commented. These included local residents, businesses, Town and Parish Councils, neighbouring local authorities, statutory consultees and a range of other organisations. The responses will be used to inform further development of the Local Plan Review. A summary of responses to this consultation is included as Appendix 3 to this Consultation Statement, with details of how the Council consulted at this stage included as Appendix 8 to this Consultation Statement.

Strategic Sites: July – September 2019

- 2.5. The fourth specific consultation to support the Local Plan Review was the 'Strategic Sites' consultation published in July 2019 for a ten week consultation. This sought views on a series of preferred strategic development sites at: Clive Barracks, Tern Hill, the Former Ironbridge Power Station; and RAF Cosford. The consultation also identified a further potential strategic site at land north of Junction 3 of the M54, which was subject to ongoing assessment ahead of a decision whether to include it as a strategic site in the Local Plan. During this consultation, more than 2,300 unique respondents commented. These included local residents, businesses, Town and Parish Councils, neighbouring local authorities, statutory consultees and a range of other organisations. A summary of responses to this consultation is included as Appendix 4 to this Consultation Statement, with details of how the Council consulted at this stage included as Appendix 9 to this Consultation Statement.

Pre-Submission Local Plan (Regulation 18): August – September 2020

- 2.6. The fifth specific consultation to support the Local Plan Review was on the Regulation 18: Pre-Submission Draft Local Plan published in August 2020 for an eight week consultation starting on 3 August and concluding on 30 September 2020. The consultation identified a draft vision and draft framework for the future development of Shropshire to 2038. It addressed such issues as needs and opportunities in relation to housing and contained draft strategic policies which set the priorities and framework for the Local Plan; draft 'strategic' implementation policies and more 'detailed' draft policies

for managing development; draft settlement policies which provide draft strategies and guidelines for the settlements of Shropshire, including where appropriate identifying proposed site allocations; draft strategic settlement and strategic site policies which identify these proposed sites and provide strategies and guidelines for their development. During this consultation, around 2,500 unique respondents commented. These included local residents, businesses, Town and Parish Councils, neighbouring local authorities, statutory consultees and a range of other organisations. A summary of responses to this consultation is included as Appendix 5 to this Consultation Statement, with details of how the Council consulted at this stage included as Appendix 10 to this Consultation Statement.

3 Summary of main Issues Raised and how they have been addressed at Regulation 18

- 3.1 Throughout the five separate consultation stages at Regulation 18, a significant level of response has been made to the Plan's development. Consultation on the Local Plan at the Regulation 18 stage has been an iterative process, each stage focussing on a specific set of issues. All comments made to the various consultation stages have been considered by the Council as part of the continued development of the Plan. In undertaking this exercise it is recognised that there will sometimes be local opposition to proposals, and it is necessary to assess the material issues raised to the consultation rather than simply responding to the number of responses on an issue.
- 3.2 Where there have been objection to the Plan (evidenced in the detailed summary of responses contained in Appendices 1-5 of this Consultation Statement) which have not led to a change to the Local Plan, this does not mean the Council has failed to consider responses. It is the role of the Local Plan to balance the material considerations raised as part of the process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what the Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.
- 3.3. By far the most significant level of response to the Local Plan has been in response to the emerging proposed site allocations identified for development. The Council's first iteration of preferred site options was the subject of a twelve week consultation published in November 2018, and which led to responses from around 3,600 unique respondents. The summary of responses is included in Appendix 3 to this Consultation Statement. The consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan in August 2020, also led to a significant level of response to the inclusion of a number of proposed site allocations, and a summary of responses to this consultation are included in Appendix 5 to this Consultation

Statement. In both cases, where it has been proposed to make amendments to the preferred site allocations in response to the consultation process, this has been documented within the Council's site assessment process, with updated assessments provided as part of the consultation material available for consultees to view (these form Appendices of the Sustainability of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan).

- 3.4 There have also been significant levels of response to the Council's approach to the identification of Community Hubs as part of the Council's approach to the Hierarchy of Settlements methodology (included as an Evidence Base document). These consultation responses have led to some changes being proposed to the identification of Community Hubs, principally where the levels of services and facilities in a village has been altered in the assessment as a result of this local information. It is also recognised that the principal of the Council's methodological approach has been challenged through the consultation process, including by several Parish Councils, although having balanced these views against other material considerations, the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan continues to support this approach to the identification of Community Hubs.
- 3.5 The supporting Sustainability Appraisal (SA) and Habitat Regulation Assessment (HRA) processes have also been updated at each stage of the process, and where necessary taken into account responses made to the consultation process, for instance through the inclusion of refined sustainability criteria with which to assess sites.

4. Consultation on the Regulation 19 Pre-Submission Publication

- 4.1 As required by legislation, the Council undertook the statutory Regulation 19 (pre-submission) stage consultation for a period of ten weeks between 18th December 2020 and 25th February 2021. Whilst initially this consultation had been agreed to last for seven weeks, as a result of the third national lockdown on 5th January as a result of rising cases in Covid 19, and in particular the limitations on entering public buildings to view documentation, the Council took the decision to extend this consultation by three weeks in order to allow the public a greater opportunity to respond. On a limited number of cases, where it was considered access to the internet was restricted, the Council provided hard copies of the draft Local Plan to individuals on request.
- 4.2 Unlike earlier consultation stages (made under Regulation 18) the Regulation 19 consultation asked people to comment on the draft Plan's legal compliance, it's 'soundness' and it's compliance with the Duty to Cooperate. The Council received 'duly made' representations from 683 organisations and individuals. As part of this process the Council used a standard response form, and provided guidance notes explaining the process and how to complete the form. In order to be a 'duly made' representation, respondents needed to submit their responses before the close of consultation period, in

this case 25th February 2021. Many of those responding made multiple comments and therefore the total amount of 'duly made' representations received were 2,433.

Summary of Main Issues Raised and how they have been addressed at Regulation 18

- 4.3 The Council has provided a number of summaries of the consultation responses received at the Regulation 19 stage of consultation (see Appendix 12 to this Statement) as well as publishing full versions of the responses on the Council's website <http://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/previous-consultations/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>
- 4.4 Schedule 1 of Appendix 12 provides a comprehensive summary of the main issues raised in each section of the Plan, and how the Council has responded to them. On a number of occasions this has led directly to a minor modification being proposed to the Plan, which will be subject to consideration at the Local Plan examination.
- 4.5 The main issues raised in relation to the Plan's Strategic and Development Management policies are:
- The scale, supply and balance of strategic housing and employment requirements over the Plan period, including the trajectory of housing supply, along with the evidence to support this;
 - The strategic distribution of development, and in particular the proposed 'urban focus' approach;
 - The proposed methodology for identifying Community Hubs in the rural area;
 - The Plan's response to the climate emergency and supporting the transition to a zero-carbon economy;
 - The use of development guidelines to manage residential development appropriately;
 - The proposed approach to managing development in the rural area, within Community Hubs, Community Clusters and the Open Countryside;
 - The application of national Green Belt policy, in particular in relation to the exceptional circumstances proposed in support of the release of some areas of Green Belt;
 - The Council's methodology used to calculate the future aggregate supply and the extent and certainty of mineral windfall site allowances;
 - The Council's approach and justification to its policy on residential mix within new development proposals and on the scale and likely delivery of affordable housing provision;
 - The Plan's approach to managing future development proposals in the Clun Catchment, within the context of its current unfavourable SAC status. Objections have been received from both the Environment Agency and Natural England on this matter; and
 - The identification of infrastructure provision to support new development;

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

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

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

Appendices 1-12: Regulation 18 and 19 - Summary of Consultation Responses and Consultation Plans

Appendix 1: Issues and Strategic Options Consultation Response Summary (July 2017) <http://shropshire.gov.uk/media/7280/local-plan-partial-review-consultation-response-summary.pdf>

Appendix 2: Preferred Scale and Distribution of Growth Consultation Response Summary (April 2018) <http://shropshire.gov.uk/media/9632/preferred-scale-and-distribution-of-development-consultation-response-summary.pdf>

Appendix 3 Preferred Sites Consultation Response Summary plus appendices (November 2018): <http://shropshire.gov.uk/media/12779/preferred-sites-consultation-response-summary.pdf>

Albrighton Place Plan Area - <http://shropshire.gov.uk/media/12777/appendix-b1-albrighton-place-plan-area-consultation-response-summary.pdf>

Bishops Castle Place Pan Area <http://shropshire.gov.uk/media/12778/appendix-b2-bishops-castle-place-plan-area-consultation-response-summary.pdf>

Bridgnorth Place Plan Area <http://shropshire.gov.uk/media/12780/appendix-b3-bridgnorth-place-plan-area-consultation-response-summary.pdf>

Broseley Place Plan Area <http://shropshire.gov.uk/media/12781/appendix-b4-broseley-place-plan-area-consultation-response-summary.pdf>

Church Stretton Place Plan Area <http://shropshire.gov.uk/media/12782/appendix-b5-church-stretton-place-plan-area-consultation-response-summary.pdf>

Cleobury Mortimer Place Plan Area <http://shropshire.gov.uk/media/12776/appendix-b6-cleobury-mortimer-place-plan-area-consultation-response-summary.pdf>

Craven Arms Place Plan Area <http://shropshire.gov.uk/media/12783/appendix-b7-craven-arms-place-plan-area-consultation-response-summary.pdf>

Ellesmere Place Plan Area <http://shropshire.gov.uk/media/12784/appendix-b8-ellesmere-place-plan-area-consultation-response-summary.pdf>

Highley Place Plan Area <http://shropshire.gov.uk/media/12785/appendix-b9-highley-place-plan-area-consultation-response-summary.pdf>

Ludlow Place Plan Area <http://shropshire.gov.uk/media/12786/appendix-b10-ludlow-place-plan-area-consultation-response-summary.pdf>

Market Drayton Place Plan Area <http://shropshire.gov.uk/media/12787/appendix-b11-market-drayton-place-plan-area-consultation-response-summary.pdf>

Minsterley and Pontesbury Place Plan Area

<http://shropshire.gov.uk/media/12788/appendix-b12-minsterley-and-pontesbury-place-plan-area-consultation-response-summary.pdf>

Much Wenlock Place Plan Area <http://shropshire.gov.uk/media/12789/appendix-b13-much-wenlock-place-plan-area-consultation-response-summary.pdf>

Oswestry Place Plan Area <http://shropshire.gov.uk/media/12790/appendix-b14-oswestry-place-plan-area-consultation-response-summary.pdf>

Shifnal Place Plan Area <http://shropshire.gov.uk/media/12791/appendix-b15-shifnal-place-plan-area-consultation-response-summary.pdf>

Shrewsbury Place Plan Area <http://shropshire.gov.uk/media/12792/appendix-b16-shrewsbury-place-plan-area-consultation-response-summary.pdf>

Wem Place Plan Area <http://shropshire.gov.uk/media/12793/appendix-b17-wem-place-plan-area-consultation-response-summary.pdf>

Whitchurch Place Plan Area <http://shropshire.gov.uk/media/12794/appendix-b18-whitchurch-place-plan-area-consultation-response-summary.pdf>

Appendix 4: Strategic Sites Consultation Response Summary (July 2019):

<http://shropshire.gov.uk/media/15559/strategic-sites-consultation-response-summary.pdf>

Appendix 5: Regulation 18 Pre-Submission Draft Local Plan Consultation Response Summary (December 2020):

<http://shropshire.gov.uk/media/16698/summary-of-responses-to-the-consultation-on-the-regulation-18-pre-submission-draft-of-the-shropshire-local-plan.pdf>

Appendix 6: Regulation 19 Pre-Submission Draft Local Plan Consultation

Summary: <http://shropshire.gov.uk/committee-services/documents/s27816/Appendix%20%20Consultation%20Response%20Summary.pdf>

Appendix 7: Issues and Strategic Options Consultation Plan (January 2017):

<http://shropshire.gov.uk/media/3669/issues-and-strategic-options-consultation-plan.pdf>

Appendix 8: Preferred Scale and Distribution of Growth Consultation Plan:

<http://shropshire.gov.uk/media/7637/consultation-plan.pdf>

Appendix 9: Preferred Sites Consultation Plan (November 2018)

<http://shropshire.gov.uk/media/11262/consultation-plan-preferred-sites.pdf>

Appendix 10: Strategic Sites Consultation Plan (July 2019)

<http://shropshire.gov.uk/media/12889/consultation-plan-strategic-sites.pdf>

Appendix 11: Regulation 18 Pre-Submission Draft Local Plan Consultation Plan (August 2020): <http://shropshire.gov.uk/media/15515/consultation-plan-regulation-18-pre-submission-draft-of-the-local-plan.pdf>

Appendix 12: Regulation 19 Pre-Submission Draft Local Plan Consultation Plan (Updated) (January 2021): <http://shropshire.gov.uk/media/17002/updated-consultation-plan.pdf>