

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
General / Overarching Comments	<ol style="list-style-type: none"> 1. Draft Policies are inconsistent/contradictory and/or proposed allocations do not comply with draft Policies. 2. Draft policies are not sufficiently flexible. 3. Concerns about legibility of the draft Shropshire Local Plan. 4. Concerns about use of Supplementary Planning Documents (SPDs). 5. The evidence base is either out-of-date, not sufficiently robust, or incomplete (with key evidence documents missing). Reference also made to evidence from the Black Country Authorities regarding their unmet need. 6. Key documents (including national policy/guidance) not sufficiently referenced throughout the draft Shropshire Local Plan. 6. Evidence of compliance with Duty to Cooperate/Statements of Common Ground not available. 7. Consultation undertaken to inform the draft Shropshire Local Plan does not comply with the Statement of Community Involvement and/or legislation/legal requirements (Gunning Principles often referenced). 8. Responses to various stages of consultation have not been conscientiously considered. 9. Little consideration of climate change/declared climate emergency/achieving net zero carbon. All draft Policies should be re-written to contain explicit links to the way they assist in achieving net zero carbon. 10. Concerns about the viability of the draft Shropshire Local Plan. 11. Wider representations on policies/sites. 12. Support on components/draft policies of the draft Shropshire Local Plan were also expressed, but not necessarily included within the summary of comments on the relevant draft Policy. 13. Include reference to other documents. 	<p>1, 2 and 3. The draft Shropshire Local Plan should be read as a whole. It is considered that it provides a positive vision for the future of Shropshire; an appropriate framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings. Draft policies are considered succinct, clearly written, complementary and effective (with appropriate flexibility offered where suitable). They are considered positive and aspirational but deliverable. They have been prepared with the objective of achieving sustainable development. They avoid unnecessary duplication and provide certainty to decision makers, communities, and the development industry.</p> <p>2, 3 and 4. Supplementary documents are proposed/referenced where considered appropriate to add further detail to the policies in the draft Shropshire Local Plan. This approach also avoids unnecessary duplication.</p> <p>5. Shropshire Council considers that a proportionate and robust evidence base has been assembled to inform the draft Shropshire Local Plan.</p> <p>6. Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>7 and 8. Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.</p> <p>7 and 8. Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>7 and 8. It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation 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 Shropshire 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.</p> <p>9. Shropshire Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation and does not propose any changes.</p> <p>10. A Whole Plan Viability Assessment has been undertaken to inform the draft Shropshire Local Plan. Shropshire Council considers that the Whole Plan Viability Assessment undertaken to inform the draft Shropshire Local Plan is proportionate and robust.</p> <p>11 and 12. Wider representations on policies/sites are dealt with under the relevant draft Policy.</p> <p>13. Where appropriate and relevant to the planning process other documents and evidence have been reflected in Plan policies. Other matters and evidence can be material considerations in decision making on applications.</p>
Spatial Vision and Objectives	<ol style="list-style-type: none"> 1. Due to the Ecological and Climate Emergency should be moving towards a zero carbon economy now, with the Spatial Vision seeking to complete this transition. 2. Request the draft Spatial Vision informs decision making or is incorporated into draft Policy SP1. 3. Concern the draft Policies will not achieve the draft Spatial Vision. 	<p>1, 2 and 3. The draft Shropshire Local Plan should be read as a whole. The draft Spatial Vision would be implemented through the draft Policies proposed within the draft Shropshire Local Plan, which are considered to provide an appropriate framework for managing future development proposals.</p> <p>1. The draft Spatial Vision recognises the importance of and identifies the need to move positively towards a zero-carbon economy. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the draft Shropshire Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p>

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SP1. The Shropshire Test	<ol style="list-style-type: none"> 1. Conflicts with other draft policies/proposals in the draft Shropshire Local Plan, particularly proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth). 2. Supports allocation of specific sites/development in specific settlements. 3. Should seek radical carbon reduction (in line with a trajectory of achieving zero carbon by 2030) and reference the climate emergency declared by Shropshire Council. 4. Not justified as a sound basis for the development of more detailed policies in the draft Shropshire Local Plan and too open to interpretation. 5. Suggestions on extension of the draft Policy to address issues such as level of development, distribution of development, infrastructure etc. 6. Identified issues are addressed in other policies and there is a risk of duplication. 7. Concerned about references to the Big Town Plan and inconsistencies between this document and the draft Shropshire Local Plan. 8. Include reference to other documents, particularly those relating to climate change / environment. 	<p>1, 3, 4, 5, 6 and 8. The Draft Shropshire Local Plan should be read as a whole. Draft Policy SP1 is a 'gateway' policy that supplements the proposed vision and sets the context for the wider development framework within the draft Shropshire Local Plan. It is considered that the proposed vision, draft Policy DP1 and the wider development framework appropriately address such issues as enabling adaptation to climate change and positively responds to the climate emergency declared by Shropshire Council.</p> <p>1, 3, 4, 5, 6 and 8. It is also considered appropriate to include a 'gateway' policy in order to clearly establish the strategic issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner and ensure all proposals have consideration of them as a starting point. The remaining proposed strategic and development management policies of the draft Shropshire Local Plan then expand on these issues. As such it is considered that draft Policy SP1 is consistent with and complementary to other policies within the draft Shropshire Local Plan.</p> <p>1, 2 and 3. It is considered that the proposed strategic approach to the level and distribution of development across Shropshire and the proposed strategies for specific settlements (including existing commitments (including existing allocations), proposed allocations and proposed windfall allowances) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Representations on other sites/settlements will be addressed under relevant draft Policies.</p> <p>7. Shropshire Council considers that draft Policy SP1 and the objectives of the Big Town Plan and its associated masterplan documents are consistent. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.</p>

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<p>SP2. Strategic Approach</p>	<ol style="list-style-type: none"> 1. The proposed distribution of development in inappropriate - including because of a need for a greater urban focus. 2. Need for consideration of climate change in establishing the distribution and levels of development. 3. Representations on specific settlements - the level of development directed towards them should be either higher or lower. Some representations also suggested the need for settlement specific assessments of local housing need. 4. Representations on the merits of including specific sites to contribute towards achieving the proposed housing and/or employment requirements. Representations also promote sites to contribute towards unmet need arising within the Black Country. 5. The proposed housing requirement is not based on robust evidence and/or disregards responses to previous stages of consultation. 6. The proposed housing requirement should be expressed as a minimum. It is either too high or too low - views expressed either way and various suggestions provided on how it might be amended (for instance reduced the housing requirement to align with the calculation of Local Housing Need using Government's standard methodology or increase the housing requirement to reflect the 2018-based sub-national household projections). 7. The housing land supply is not robust and/or sufficient (including concerns regarding reliance on windfall development, amount of land proposed to be allocated for development and lack of reserve sites) and/or sufficiently flexible, and there is no detailed trajectory for housing delivery. 8. The proposed affordable housing requirement is not based on robust evidence. 9. The proposed affordable housing requirement is inappropriate. 10. A proposed older person housing requirement should be identified and an appropriate strategy for their delivery included. 	<p>1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 17, 19, 20 and 21. Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. 1, 3, 4, and 19. The pattern of development proposed seeks to direct the majority of development towards urban areas, but recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, this growth in urban areas will be complemented by appropriate new development within Community Hubs (considered significant rural service centres); and to a lesser extent Community Clusters (settlements with aspirations to maintain or enhance their sustainability).</p> <p>2. Shropshire Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p> <p>5 and 6. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>7. Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p> <p>7. Specifically with regard to windfall allowances, given the nature of Shropshire, it is not surprising that windfall development represents a component of the housing land supply in both urban and rural areas. Shropshire is a large rural County containing the town of Shrewsbury, 17 other smaller settlements identified as Principal/Key Centres, and hundreds of other villages and hamlets. Consequently there is a constant and significant recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and significant delivery of affordable exception sites (which will be supplemented by the more diverse mechanisms proposed for such housing within the draft Shropshire Local Plan). The housing land supply will be kept under review through the annual five Year Housing Land Supply Assessment.</p> <p>7. With regard to a housing trajectory, as outlined within the proposed explanation for draft Policy SP2 "the expected rate of housing delivery over the Local Plan period is around 1,400 dwelling per annum, which is consistent with the annual housing requirement. Whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery." This is considered a reasonable and precautionary approach to preparing a housing trajectory. This trajectory of future housing delivery will be annually reviewed within Shropshire Council's Authority Monitoring Report (AMR).</p> <p>8 and 9. In Shropshire delivery of affordable housing is a key priority, as such it is considered appropriate to seek to deliver around 7,700 affordable dwellings (equating to around 25% of the total housing requirement) during the proposed Plan period. This is considered positive and aspirational, but deliverable. Past trends on affordable housing delivery, summarised within the Strategic Housing Market Assessment (SHMA), indicate that over the last 5 years, affordable housing completions averaged around 21% of total housing completions, based on generally comparable affordable housing requirements from market housing schemes. It should be noted that affordable housing contributions from open market schemes represent only one mechanism for securing affordable housing. Other such mechanisms, as identified within the draft Policies of the draft Shropshire Local Plan, include exceptions schemes, entry-level exceptions sites, single plot exceptions sites and cross-subsidy exception schemes.</p> <p>10. It is considered that the draft policies within the draft Shropshire Local Plan, set a clear approach for addressing housing need in Shropshire. This includes the needs of specific groups within the community, including older people. As such, it is not considered necessary (nor is it considered a requirement of national policy), to identify specific targets for the provision of older persons accommodation within draft Policy SP2.</p>

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<p>SP2. Strategic Approach continued</p>	<p>11. The proposed employment land requirement is not based on robust evidence and/or disregards responses to previous stages of consultation. 12. The proposed employment land requirement is either too high or too low - views expressed either way and various suggestions on how it might be amended. 13. The extent of the employment land supply exceeds the proposed employment land requirement. 14. There is not an appropriate balance between the proposed housing and proposed employment land requirements.</p>	<p>11 and 12. The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. 11 and 12. With regard to this evidence, we would note that calculations of the employment land requirement are based on the national assumption that employment land when developed, delivers 40% net floorspace from the gross land area, and that new employment is generated on that basis. However, available evidence suggests that employment land when developed, delivers on average 25% net floorspace in Shropshire. This has been given careful consideration when determining an appropriate employment land requirement. Furthermore, we would also note that the proposed employment land requirement actually represents a reduction to that within the adopted Local Plan (whilst the housing requirement has actually increased). 13. In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. 13. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location, and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. 14. It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the proportion of an employment site that results in net employment floorspace); the need to off-set the re-use of existing employment land for other purposes; and the wider range of employment uses now being accepted in the draft Shropshire Local Plan. 11, 12 and 14. The proposed employment land requirement also incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas.</p>

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<p>SP2. Strategic Approach continued</p>	<p>15. Detailed trajectories are required for proposed allocations. 16. Need for Statements of Common Ground. 17. The proposed contribution to unmet cross-boundary need (housing and/or employment) is either too high or too low - views expressed either way and various suggestions provided on how it might be amended. 18. Include an early review mechanism for circumstances where there is a shortfall of land in neighbouring areas that could be accommodated within the Plan area. 19. The proposed methodology (Hierarchy of Settlements Assessment) for identifying Community Hubs is either inappropriate and/or has not been applied consistently. Specific settlements identified for removal or addition to the list of proposed Community Hubs. 20. There is a need to recognise that each settlement is distinct. 21. Definition of 'Strategic Corridors' and merits of the various 'Strategic Corridors' proposed in Shropshire.</p>	<p>5, 11 and 16. Shropshire Council considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. 15. A cautious high level trajectory for proposed allocations is provided within Appendix 7 of the draft Shropshire Local Plan, based on proactive discussions with site promoters. If ultimately adopted, trajectories for sites will be kept under review as part of the Five Year Housing Land Supply Statement. 16 and 17. Shropshire Council has proactively engaged in duty to cooperate discussions with relevant bodies, including relevant Local Authorities, throughout the Local Plan Review process. Statements of Common Ground will be prepared with these bodies, informed by the content of the draft Shropshire Local Plan subject to Regulation 19 consultation. 16, 17 and 18. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs. 18. There is a legal requirement to review Local Plans every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). Furthermore, para 33 of the National Planning Policy Framework (NPPF) states "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." This requirement is also specifically recognised within para 2.16 of the introduction to the draft Shropshire Local Plan. We would also note that proposed changes to the plan making process within the Planning for the Future White Paper, if ultimately introduced, could also require a review of the Local Plan. As such, it is considered unnecessary to include a specific early review mechanism within the draft Shropshire Local Plan. 19 and 20. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment, used to identify proposed Community Hubs, is appropriate and has been applied consistently across Shropshire. The list of proposed Community Hubs is also considered appropriate. 19 and 20. It is recognised that the settlements across Shropshire are diverse, including where they perform a similar function within the settlement Hierarchy. As such the specific development strategy proposed for each settlement has been informed by consideration of the settlements characteristics, constraints, and opportunities. Shropshire Council considers that the proposed development strategies for each settlement are appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations and where relevant safeguarded land has been informed by a proportionate and robust site assessment process. 21. Draft Policy SP14 and the associated Shropshire Economic Growth Strategy explain that 'Strategic Corridors' are the principal rail and strategic road routes through the County. These corridors are identified within the Shropshire Economic Growth Strategy and subsequently within the explanation of draft Policies SP2 and SP14 of the draft Shropshire Local Plan. The definition of and proposed 'Strategic Corridors' are considered appropriate and reflect the varied pattern of strategic corridors through Shropshire.</p>

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SP3. Climate Change	<ol style="list-style-type: none"> The policy needs to be more strongly worded to make the necessary reduction in carbon emissions and combat the climate emergency. The policy should be amended to require electric charging infrastructure in all development, increase opportunities for walking and cycling and reduce car transport The policy should reference other documents such as Shropshire Council's Climate Change Strategy and the government's 25 year Environment Plan. 	<ol style="list-style-type: none"> The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation and does not propose any changes. The provision of electric vehicle infrastructure is covered by Building Regulations rather than the planning system. The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan. There is an emphasis on the location of new development in existing urban centres, the wording of many policies supports pedestrian and cycling options and the Sustainability Appraisal and site assessment process contain criteria aimed at minimising car-based travel and encouraging walking and cycling. Therefore, the Council does not consider any changes are necessary. The Council's Climate Change Strategy covers issues which are primarily delivered by mechanisms other than the planning process - although the Council considers Local Plan does reflect the Strategy's priorities when they accord with national planning policy and guidance. The government's 25 year Environment Plan covers a wide range of issues and where its provisions affect the planning process, they have also been reflected in Plan policies. Accordingly, the Council does not consider it necessary to include references to either of the documents mentioned.
SP4. Sustainable Development	<ol style="list-style-type: none"> Draft Policy SP4 does not provide a robust definition of sustainable development. The draft Shropshire Local Plan does not balance the three aspects of sustainability - social, environmental, and economic. The draft Policy represents unnecessary duplication of national policy. Some also suggested it should specify how the presumption in favour of sustainable development is to be applied locally. The proposed employment land requirement is too high. Representations on specific settlements - the level of development directed towards them should be lower. Representations on specific sites. 	<ol style="list-style-type: none"> 1, and 2. The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed." 2. The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process. 1, 2 and 3. Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire. 1, 2 and 3. Shropshire Council considers draft Policy SP4 is appropriate and consistent with national policy. It is complemented by the wider draft Policies within the draft Shropshire Local Plan. 2, 4, 5 and 6. Shropshire Council also considers that the proposed strategic approach to the level and distribution of development and the proposed development strategies for settlements is appropriate, effective, sustainable and deliverable and that the proposed development strategies for each settlement are appropriate, effective, sustainable and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations and where relevant safeguarded land has been informed by a proportionate and robust site assessment process.
SP5. High-Quality Design	<ol style="list-style-type: none"> High quality design should not compromise sustainability, ensure appropriate space for people and wildlife, incorporate extensive sustainable design features, and reduce carbon/water emissions (beyond solar). No reference to climate change in para 5 of the draft Policy and para 3.40 of the proposed explanation to draft Policy SP5. Include greater promotion of community engagement. More flexibility should be provided with regard to compliance with para 2 of the draft Policy. Varying representations that the design principles in the West Midlands Design Charter should be either applied more flexibly, deleted (not intended to represent local design policy and not compliant with national policy and guidance) or replaced with more Shropshire specific design requirements. Para 5 of the draft Policy should be positively worded. No reference to Neighbourhood Plans or other community led plans in the draft Policy and references in the proposed explanation exclude Village Design Statements. Specific sites comply with the principles of this draft Policy. 	<ol style="list-style-type: none"> 1, 2, 3, 4, 5, 6 and 8. Shropshire Council considers that draft Policy SP5 is fully justified and consistent with national policy and guidance. 1 and 2. Draft Policy SP5 states "Design and layout positively responds to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan". Furthermore the draft Shropshire Local Plan should be read as a whole and wider draft policies also address these issues - Para 3.40 recognises that planning applications should set out how they comply with... "design requirements of the other policies contained in this Local Plan", this includes design requirements of draft Policy DP11. 6. It is considered appropriate to clearly state that planning permission will be refused for development of poor design and that fails to take the opportunities available for improving the character and quality of an area, the way it functions where it would adversely affect the well-being of others and where inadequate information has been submitted to demonstrate how new development will ensure the quality of design. 4 and 5. Shropshire Council has adopted the West Midlands Design Charter as a material consideration to inform planning decisions and to inform policy development, notably the review of the Local Plan. The West Midlands Design Charter is not intended to set local design policies but seeks to provide a clear and consistent understanding of the West Midlands' place-making expectations, create a level playing field for developers across the region, to define 'good design quality' and indicate what is expected from developers when planning applications are submitted. As such it is considered appropriate to expect all planning applications for new development to set out how they comply with Policy SP5, the principles of the West Midlands Design Charter and comply how they comply with the design requirements of the other policies contained in this Local Plan. 3 and 7. Community Led Plans are considered to be appropriately referenced within the proposed explanation of draft Policy SP5 and other draft policies/proposed explanations to draft policies. Village Design Statements are considered a form of community-led plan. However, for clarity a minor modification is proposed to the explanation to draft Policy SP5.
SP6. Health and Wellbeing	No key issues were raised.	N/A

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<p>SP7. Managing Housing Development</p>	<ol style="list-style-type: none"> 1. Proposed residential development guidelines should not be 'significant' policy considerations. This is not consistent with national policy. 2. Concern regarding potential conflict between draft Policy SP7 and draft Policy DP1. Some suggested para 3 of draft Policy SP7 should be expanded to specifically include reference to achieving the residential mix proposed in draft Policy DP1 and consider viability of development. 3. A non-delivery assumption should be applied in the context of determining whether a proposed development guideline is to be exceeded. 4. The draft Policy needs to take account of meeting the housing needs of different groups in the community (particular reference to affordable housing). 5. Development of brownfield land outside development boundaries should be identified as an appropriate form of development. 6. The scale of appropriate development (including affordable housing) should be considered. 7. Concern about delivery of proposed allocations and/or flexibility/ability to maintain a housing land supply. 8. Reserved sites/safeguarded land should be addressed. 9. Promotion of specific sites/development in specific settlements. 10. Support expressed for draft Policy SP7. 	<p>1, 2, 3, 4, 5, 6, 7, 9 and 10. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations. However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings than the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline. As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. Shropshire Council also considers that the existing criteria within paras 3 and 4 of draft Policy SP7 are appropriate.</p> <p>2, 4, 5 and 6. The draft Shropshire Local Plan should be read as a whole. As such, it is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities. Draft Policy DP18 specifically addresses the re-use of previously developed (brownfield) land and stipulates the circumstances within which such development will be supported.</p> <p>7 and 8. Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p> <p>7 and 8. Draft Policy SP4 deals with circumstances where there are no policies relevant to a planning application or the policies which are most important to determining the application are out of date at the time of making the decision.</p> <p>7. A cautious high level trajectory for proposed allocations is provided within Appendix 7 of the draft Shropshire Local Plan, based on proactive discussions with site promoters. If ultimately adopted, trajectories for sites will be kept under review as part of the Five Year Housing Land Supply Statement.</p> <p>8. With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p> <p>4. Shropshire Council considers that the needs of particular groups within society have been considered and the draft Policies provide an appropriate and effective policy framework that appropriately responds to these needs (with specific regard to affordable housing, draft Policies DP3-DP7 provide an appropriate and effective policy framework for their delivery).</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
SP8. Managing Development in Community Hubs	<ol style="list-style-type: none"> 1. Community Hub residential development guidelines should be removed and/or cross-reference to draft Policy SP7 deleted (regarding considerations in circumstances where the development guidelines are exceeded). 2. Concerns about delivering proposed residential development guidelines. 3. Development should be allowed on the edge of proposed Community Hubs. 4. The proposed methodology (Hierarchy of Settlements Assessment) for identifying Community Hubs is either inappropriate and/or has not been applied consistently. Specific settlements identified for removal or addition to the list of proposed Community Hubs. 5. Representations on proposed strategies for specific settlements. 6. Representations on specific sites (including proposed allocations considered to contradict draft Policy SP8). 	<p>1, 3 and 6. Draft Policy SP8 reflects the draft Shropshire Local Plan’s urban development focus and strategy of focusing growth in strategically agreed locations (set out in Draft Policy SP2) whilst supporting rural communities by enabling some controlled development to maintain local sustainability.</p> <p>1, 2, 3 and 6. The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines for proposed Community Hubs have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations. Draft Policy SP8 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such where these residential development guidelines are to be exceeded it cross-references draft Policy SP7. Draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement’s residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>1, 3. Providing a framework for the sustainable development of Shropshire is also achieved, in part, by identifying appropriate types and locations for open market residential development, including through identification of development boundaries where it is considered appropriate to do so.</p> <p>2, 4, 5 and 6. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. The list of proposed Community Hubs is also considered appropriate. However, it is recognised that the proposed Community Hubs are diverse. As such the specific development strategy proposed for each settlement has been informed by consideration of the settlements characteristics, constraints, and opportunities. Shropshire Council considers that the proposed development strategies for each settlement are appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations has been informed by a proportionate and robust site assessment process.</p>
SP9. Managing Development in Community Clusters	<ol style="list-style-type: none"> 1. New Community Clusters should be identified through Whole Estate Plans. 2. The definition of infill plots should be amended - some expressed concern about implications for the design of development. 3. The proposed methodology (Hierarchy of Settlements Assessment) for identifying Community Hubs is either inappropriate and/or has not been applied consistently. Specific settlements identified for removal or addition to the list of proposed Community Hubs and proposed Community Clusters. 4. Provision should be made for redevelopment of brownfield sites. 5. Representations on specific sites (including proposed allocations considered to contradict draft Policy SP8). 	<p>1. Shropshire Council considers that if new Community Clusters are to be brought forward, this should be through the Neighbourhood Plan process, rather than a Whole Estate Plan or other such mechanism. Formal Neighbourhood Plans, once made, form part of the Development Plan.</p> <p>2, 3 and 5. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. The list of proposed Community Clusters and the approach to managing development within them identified within draft Policy SP9 and other relevant draft Policies is also considered appropriate.</p> <p>2 and 5. It is considered that the definition of infill plots provided within draft Policy SP9 is appropriate. It provides a level of certainty to local communities and the development industry about the types of sites that are suitable for such development - in terms of location, size and capacity; ensures an effective use of land; but also allows for flexibility to density, design and layout, as the referenced site size (0.1ha or less) and capacity (maximum 3 dwellings) are maximums. As such it recognises the diverse nature of Community Clusters and the settlements within them. It should also be noted that whilst draft Policy SP9 provides the starting point for decisions on infill development within Community Clusters, the draft Shropshire Local Plan should be read as a whole. As such draft Policies SP1 and SP5 apply to such sites and there will inevitably be instances where a 0.1ha site is appropriate for 3 dwellings and others where it perhaps is not.</p> <p>4. Shropshire Council also considers draft Policy SP9 gives appropriate consideration to brownfield land. Specifically they types of sites upon which it is proposed that residential development can occur include "conversion of existing buildings within or immediately adjoining the built form of the settlement"; and "suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings"; and "By affordable exception sites, cross-subsidy exception sites and entry level exception sites meeting evidenced need and the other requirements of Local Plan Policies." Each of these categories can of course include appropriate brownfield land. Furthermore employment development which is of a type and scale appropriate to the settlement and other non-residential development that benefits the rural community by providing required community facilities and infrastructure will be supported where it can be achieved through the reuse of existing buildings or on suitable sites within or immediately adjoining the built form of the settlement and meets other requirements of Local Plan Policy. Again, this includes appropriate brownfield land.</p> <p>4. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP18 specifically addresses the re-use of previously developed (brownfield) land and stipulates the circumstances within which such development will be supported.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
SP10. Managing Development in the Countryside	<ol style="list-style-type: none"> 1. Insufficient flexibility to meet the needs of businesses and support their long-term future, particularly in light of increased demand due to pandemic impacts. Clarification needed regarding provisions in relation to tourism. 2. The Draft policy (section 3a) is unjustified and inconsistent with national policy in restricting new economic development types and scale. 3. Policy wording (para 3) is too restrictive and will prevent necessary rural change and innovation and not support changing land use and employment needs. 4. Approach to re-use of buildings with heritage significance too restrictive and inflexible and provides insufficient scope for viable renovation and re-use. 5. A number of responses identify conflict between role of countryside policy, including restricting economic development, and the proposal to allocate employment sites STC002 and P58a in countryside at Stanmore. They seek that the allocations are deleted and the countryside (and country park) at this location continues to be protected. 6. The policy fails to refer to Whole Estate Plans. Policy should endorse appropriate development that comes forward as part of a Whole Estate Plan. 7. The use of settlement boundaries, where they preclude otherwise sustainable development from coming forward, conflicts with NPPF objectives to boost the supply of housing. A criterion-based approach that considers additional residential schemes adjoining settlement boundaries of Shrewsbury and Principal Centres would address this. 8. Draft Plan approach does not meet identified need or achieve sufficient delivery of required specialist housing to meet the needs of older people and other groups or self-build / custom-build housing. SP10 should allow for their provision in the countryside adjoining settlements. Alternatively, to meet need draft Policy SP10 should be amended to include specialist housing, as form of housing which will be positively considered where there is a shortage of provision. 9. Policy allows developers to bring forward multiple, unsustainable affordable housing exception sites which may impact on local character and result in reliance on private vehicles for access to needed range of services and facilities. 10. Insufficient detail regarding renewable energy 11. The policy does not adequately address the impact of large intensive livestock units or set out appropriately detailed planning considerations, particularly in the AONB. 	<ol style="list-style-type: none"> 1. The draft Shropshire Local Plan is intended to be read as a whole and draft Policy DP10 provides the detailed policy context in respect of tourism. Draft SP10 recognises the countryside as a ‘living-working’ environment and provides for appropriate development to facilitate its various functions and support the sustainability of rural communities. When considering development proposals, the need to support rural vitality and the viability of countryside as an economic, as well as an environmental, resource will be a significant consideration. It is therefore considered that the draft Shropshire Local Plan includes an appropriate draft strategy and draft policies relating to tourism development. 2 & 3 Draft Policy SP10 reflects the Draft Plan’s urban development focus and strategy of focusing growth in strategically agreed locations (set out in Draft Policy SP2) whilst supporting rural communities by enabling some controlled development to maintain local sustainability. However, part 3 of draft Policy SP10 is positively phrased and thus allows for the consideration of other development which is not listed on its sustainability merits. As such it is considered that the broadening of the criteria by removing reference to small-scale is unnecessary and would undermine the proposed strategic approach within the draft Shropshire Local Plan and the plan led approach to managing development in Shropshire. 3. The draft policy is sufficiently flexible and appropriate to include consideration of maintenance or enhancement of countryside vitality and character in the context of proposals for sustainable employment, tourism, leisure, other business and community development proposals in the countryside. 4. Part 4d of the Draft Policy reflects local and national policy aims in respect of heritage assets. It also seeks to more broadly safeguard the character of buildings and the countryside. The draft policy does not necessarily preclude sympathetic alterations and extensions but expects that individual proposals would be considered on their merits as clarified by the draft policy explanatory text. 5. Comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than soundness of draft Policy SP10 itself. Comments are provided separately in the relevant settlement section on the appropriateness of the development strategy and proposed allocations for Bridgnorth. 6. Draft Policy SP15 specifically relates to Whole Estate Plans, referencing their role as non-statutory plans produced by Estates. Whilst not specifically referenced in Draft Policy SP10, the draft Shropshire Local Plan is intended to be read as a whole, and the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications 7. The Policy reflects the Draft Plan strategy of achieving a sustainable and appropriate pattern of development through new development focused in the urban areas. Accordingly, a wide range of allocations and other opportunities are provided by the Draft Plan for all types of housing within settlements. In line with the Plan’s strategy SP10 seeks to strictly control new market housing outside development boundaries. This reflects the approach set out in national policy which seeks to direct new housing development away from isolated rural locations to places where it will support the role of existing settlements and their communities. 8. Affordable housing exception schemes in appropriate locations are enabled by a range of policies in the draft Plan as sustainable housing solutions to meet recognised local housing needs which can include specialist affordable housing and affordable self-build dwellings. DP1 makes provision for specialist older person accommodation in settlements in a way which is integrated with broader market provision in communities, recognising the benefits of access to services and facilities, including healthcare, which may be less accessible in countryside locations. Allowing open market dwellings or older person accommodation in the countryside is unnecessary and would undermine the proposed strategic approach and the plan led approach to managing development in Shropshire. 9. SP10 facilitates exception schemes but does not set out the detailed approach. Issues raised are therefore more appropriately considered in relation to the wording and operation of exception policies DP3, DP4, DP5, DP6 & DP7 . 10. The draft Shropshire Local Plan is intended to be read as a whole and it is considered that the approach taken to renewable energy in policy DP26 Strategic Infrastructure, as well to climate change and reducing carbon emissions more generally throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation 11. Requirements are identified for large scale new development, with separate criteria for agricultural developments and other policies, including Draft AONB Policy DP24, signposted. The draft Shropshire Local Plan is intended to be read as a whole. Therefore, in addition to the criteria set out in Draft Strategic Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications, along with other material considerations which can include other plans such as the AONB Management Plan which is directly referenced in draft Policy DP24.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
SP11. Green Belt and Safeguarded Land	<ol style="list-style-type: none"> 1. A number of responses identify conflict between role of Green Belt policy and the proposal to allocate employment sites STC002 and P58a in Green Belt at Stanmore. Seek that the allocations are deleted, and Green Belt continues to be protected. 2. A number of responses identify conflict between role of Green Belt policy and proposals to release Green Belt land for safeguarding and allocating at Shifnal. 3. Concern about harm to and loss of Green Belt, unacceptable where removal for allocation or safeguarding would cause a moderate or above risk of harm and that the draft Policy should be amended to reflect this, and relevant site allocations deleted 4. Exceptional circumstances are not/not adequately demonstrated for proposed release of Green Belt. 5. Green Belt land release not justified as all reasonable options for development have not been assessed. Alternative non-Green Belt sites are available 6. Development strategy not appropriate. Specific reference to strategic approach and sites needed to contribute to cross-boundary need. 7. More appropriate and sustainable sites are available for allocation, site selection not appropriate or justified. Additional/alternative site allocations and/or safeguarded land proposed - suggestions these are more suitable and sustainable than those proposed 8. Identification of safeguarded land not justified in the evidence base. 9. Approach to Green Belt release is over-cautious. More land should be safeguarded/allocated to meet needs. 10. Inclusion of specified site as an allocation is appropriate and justified. 11. Consideration of compensatory improvements to remaining Green Belt when undertaking the site assessment and identification process has been insufficient. 12. Land removed from the Green Belt should follow biodiversity net gain principles. 13. Very special circumstances should require demonstration of impact of lost food production and carbon absorption and biodiversity loss 14. Draft Policy does not facilitate the strategic approach proposed, including increased housing and employment requirements to accommodate unmet needs arising in the Greater Birmingham and Black Country Housing Market Area. Therefore, does not address relevant cross-boundary strategic matters. 15. Green Belt Study methodology defective & needs revising. Evidence results in inappropriate outcomes and flawed conclusions regarding site harm assessment. Alternative methodology would support allocation of other locations. 16. Insufficient reference to safeguarded land. Approach inconsistent with NPPF, which requires policies to reflect changes in demand for land. A mechanism should be included in draft Policy SP11 which allows safeguarded sites to be bought forward in the Plan period. 17. Draft Policy SP11 needs to be amended to comply with the NPPF & allow reuse of previously developed land within the Green Belt for open market housing. Also, NPPF allows for up to substantial harm in the Green Belt where affordable homes are being provided in an area of affordable housing need. 	<p>1 & 2. Noted. These representations primarily relate to specific proposals for Green Belt release and/or the proposed settlement development strategies for settlements, including Albrighton, Bridgnorth, RAF Cosford & Shifnal, rather than the content of draft Policy SP11.</p> <p>1,2,3, 6 , 7 & 9 The proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. It is also considered that the proposed development strategies and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable, and deliverable. In identifying proposed site allocations, a robust and comprehensive site assessment process has been undertaken, which included consideration of any harm that would result from releasing a site from the Green Belt. No specific sites are identified to meet cross boundary need.</p> <p>1,2,3,4,5, 8,9 & 11 Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances and compensatory improvements to the remaining Green Belt are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement is available on the Shropshire Council Evidence Base page.</p> <p>3. Harm of release is a significant consideration, but other factors must also be taken into account as described in the Policy explanatory text.</p> <p>10. Noted</p> <p>12. Achieving biodiversity net gain is provided for in draft Policy DP12</p> <p>13. The approach to establishing whether 'very special circumstances' exist outlined within draft Policy SP11 and the National Planning Policy Framework (NPPF) is appropriate.</p> <p>14. It is considered that the Draft Policy appropriately reflects national policy and the Draft Plan strategy of achieving a sustainable and appropriate pattern of development. A wide range of allocations and other opportunities are provided by the Draft Plan to bring forward appropriate new development . With regard to the proposed contribution to the cross-boundary need arising within the Black Country, as a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>15. The methodology used within the Green Belt Assessment and Review undertaken to inform the Local Plan Review is considered appropriate, proportionate and robust.</p> <p>16. The Policy is consistent with the NPPF, planning permission for the permanent development of safeguarded land should only be given following an update to a plan which proposes its development.</p> <p>17. Draft Policy SP11 identifies circumstances when development may be acceptable in line with National Policy, whilst also providing appropriate additional clarification in the Shropshire context. Para 5 of the draft Policy seeks to enable appropriate reuse of previously developed land to meet identified local affordable housing need, 'where it can be demonstrated not to cause substantial harm to the openness of the Green Belt'. This proposed policy requirement is consistent with the proposed strategic approach to development(within draft Policy SP2) which states that outside identified settlements, 'new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification' and the proposed Policy approach for countryside within draft Policy SP10. This proposed approach is consistent with that within the adopted Local Plan.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP12. Shropshire Economic Growth Strategy</p>	<ol style="list-style-type: none"> 1. Comments that there should be an allowance for sites to come forward which are not windfall, provided they relate to sustainable development, climate change and any relevant land status. Employment land requirement should be decreased and align employment levels with the housing. 2. Comments that allocations in Stanmore should be removed as they are in Green Belt land 3. Comments on the lack of justification of the selection of sites over those which are not allocations in the Local Plan. 4. Comments on the deletion of the policy and removal of RAF Cosford as a Strategic Site. 5. Comments requesting the inclusion of addressing business carbon emissions, as well as requesting wording changes in relation to the carbon emergency 6. Alternative/additional sites should be allocated for employment 7. A cross reference to Whole Estate Plans (Policy SP15) , and their role in facilitating such development, should be made within Policy SP12, to ensure clarity in future decision making. 8. It is important that the draft policy considers recent amendments to the use class order, and that employment generation isn't restricted to just the old B uses. A number of different commercial uses such as care homes and nurseries, for example, can employ a greater number of employees that some traditional B uses. 	<ol style="list-style-type: none"> 1. Shropshire Council considers that the proposed strategy for supporting economic growth, development, and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable, and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible, and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraphs 10 and 11 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period. 2. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). 3. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town. 4. Shropshire Council considers that the proposed strategy for supporting economic growth, development, and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable, and deliverable. 5. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. 6. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town. 7. The Local Plan should be read as a whole, and any planning application made would need to adhere to all of the relevant policies 8. The draft Shropshire Local Plan should be read as a whole. It is considered that draft Policies SP12 and other relevant policies such as draft Policy SP13 and SP14 appropriately consider and provide a framework for consideration of employment generating uses. Policy SP13 refers to the correct use classes as defined in the amendments of Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP13. Delivering Sustainable Economic Growth and Enterprise</p>	<ol style="list-style-type: none"> 1. Policy SP13 is supported for the employment land requirement provided it is delivered in a flexible manner particularly with regard to Community Hubs (including site HWK014) and the regard for the impacts of employment development on the historic environment and the identification of clear economic growth aspirations. SP13 should provide greater flexibility to redevelop existing employment sites for alternative uses including site SHR203 in Shrewsbury. 2. Policy SP13 is considered to be unsound because the employment land requirement is not justified and should be significantly reduced (to 165 - 196ha) and the policy advocates employment allocations that are not appropriate including RAF Cosford, STC002 and P58a at Bridgnorth where the key issues for delivering sustainable economic growth should be identified. 3. Land at Junction 3 is considered to be necessary for inclusion in the strategic supply of employment land to provide choice and competition in the market and meet an identified need in the logistics and manufacturing sector and to support the Economic Growth Strategy and the growth aspirations of the wider area. 4. Draft policies relating to economic development must be sufficiently flexible to allow businesses to respond to the changing economic circumstances in Shropshire and the national economy. 5. Update requested for the use classes referenced in the Policy to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. 6. Clarification / amendment requested for the Policy at criteria 3(b) and 7 and the Explanation at paragraph 3.134 to provide greater flexibility for the re-use of existing employment floorspace. 7. A general economic development policy is requested to replace SP13 to state any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land. 	<ol style="list-style-type: none"> 1. 4. & 7. The economic strategy in the draft Shropshire Local Plan seeks to balance new economic development and employment generation with the delivery of new housing, focused within the strategic and principal urban centres of Shrewsbury, the Market Towns and Key Centres of the County. This balance between the two principal aims of the draft Local Plan seeks to ensure that key economic objectives of the strategic approach in Policy SP2 will be met: providing for the delivery of a growing and diverse labour force; and in turn, supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy. This balancing approach in the spatial strategy for new economic development and employment generation targets new economic development opportunities principally into Shrewsbury and the principal centres with an increase in provision in the east of the County. This will improve the economic potential of the County particularly within significant commuting locations with higher concentrations of resident labour and with higher levels of skills and academic attainment. 2. & 6. The increased urban focus in the economic strategy of the draft Local Plan seeks to capture the greater opportunity in urban markets to achieve more efficient development of employment land. This is expected to deliver higher proportions of developed floorspace and employment from the land that is developed in the County. This urban focused strategy will also locate a greater proportion of the new employment development into those urban centres located along the strategic corridors through the County, helping to improve the accessibility and sustainability of Shropshire's key employment locations over the plan period to 2038. This is expected to assist in retaining more of the County's resident labour force, to help improve the productivity of the Shropshire economy and in retaining and bringing about the refurbishment and improvement of existing employment floorspace and the built fabric of existing employment areas. 3. & 2. The increased concentration of new economic development and employment generation in the centre and east of the County will also enable Shropshire to increase its profile and investment offer beyond the County boundary. This will be achieved by providing a broader range and choice of both housing and economic development opportunities that are accessible to other key economic and employment markets. This will include locations in the sub-regional area, in need of additional support to meet their own economic needs and demands, which will further help to improve the economic growth potential of the County. 5. Policy SP13 refers to the correct use classes as defined in the amendments of Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. This will facilitate a much broader range of employment generating uses by providing access for new Class E uses to existing employment areas where the proposed land use makes an appropriate use of the building, is suitable located within the employment area and will not affect the amenity and operation of neighbouring uses.
<p>SP14. Strategic Corridors</p>	<ol style="list-style-type: none"> 1. Policy SP14 is supported as a 'strategic' policy, for identifying the A41 and A458 as 'strategic corridors', recognising the economic role and function of Oswestry, Bridgnorth, Ludlow and Craven Arms and for recognising the impacts of employment development on the historic environment. 2. SP14 should state an explicit preference for development sites that have rail connectivity. 3. SP14 states that development in the 'strategic corridors through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy which conflicts with the allocation of employment land in the Green Belt at Shifnal because exceptional circumstances to justify the Green Belt release in this area has not been provided throughout the review process. 4. Evidence for the function of M54 as a strategic corridor is considered to advocate the role of M54 Junction 3, RAF Cosford, additional housing in Albrighton and the release of site SHF032 from the Green Belt for housing development in Shifnal. 5. Development in the A5 corridor around Shrewsbury should not be permitted to affect the Oxon Hall caravan park. 6. Much Wenlock should not be considered as a settlement in the strategic corridor through the eastern belt of Shropshire as this conflicts with the Neighbourhood Plan for Much Wenlock. 7. Clarification / amendment requested for the Policy in criteria 2, 3, 4 and 4a and the Explanation at paragraphs 3.142, 3.144 and 3.145. 8. A general economic development policy is requested to replace SP14 to state any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land. 	<ol style="list-style-type: none"> 1. & 2. Shropshire Council considers that Policy SP14 and the employment development strategy for Shropshire is appropriate, effective, sustainable, and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. 4. & 8. The policies recognise the need for flexibility arising from the presumption in paragraphs 10 and 11 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. In relation to the release of additional greenfield sites through the Local Plan, it is considered that sufficient flexibility has been accorded to the release of such sites along the strategic corridors. 3. 5. 6. & 7. In articulating the strategic approach for the Local Plan, Policy SP14 recognises that the County has significant areas within the Green Belt and the Shropshire AONB, and a high quality environment with a rich biodiversity, landscape and historical heritage that must be afforded appropriate protection. Consequently, further development in the 'Strategic Corridors' beyond those sites already committed or proposed to be allocated for development will be determined through a sequential preference for principal settlements, strategic sites (and strategic settlements see Minor Modifications) and brownfield redevelopment opportunities with greenfield land releases to be considered only in exceptional circumstances where the benefits of the proposal will clearly justify the development of greenfield land.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
SP15. Whole Estate Plans	<ol style="list-style-type: none"> 1. There is no evidence/justification to support recognising Whole Estate Plans as material planning considerations (no Whole Estate Plans are provided as evidence for this draft Policy). 2. Objections to recognising Whole Estate Plans as material planning considerations. 3. Need for clarity on the relationship of draft Policy SP15/Whole Estate Plans with the other policies in the draft Shropshire Local Plan - concern expressed about Whole Estate Plans being subject to less public consultation and/or sustainability appraisal and used to circumvent wider policy requirements. 4. Define estate or specify minimum size for an estate. 5. Requirement for Whole Estate Plans to complement and be consistent with the objectives and policies of the Local Plan should be removed or amended to require general conformity/conformity with strategic objectives. 6. Whole Estate Plans should be significant material considerations, rather than simply material considerations within the Planning process. 7. Unclear what meaningful consultation entails/this should be agreed with Shropshire Council. 8. The draft Policy should specify specific considerations for Whole Estate Plans. 	<p>1, 2. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets.</p> <p>1, 3. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>1, 2, 3, 5, 6. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p> <p>1, 2, 3, 5, 6. Shropshire Council considers that it is appropriate for Whole Estate Plans to be endorsed by the Council and used as a material consideration in decision making to:</p> <ul style="list-style-type: none"> -Have objectives, policies and land use proposals that complement and are consistent with the objectives and policies of the Local Plan. -Have been subject to meaningful public consultation. <p>7. Meaningful public consultation will depend on the nature, scope and context of the Whole Estate Plan.</p> <p>6. The amount of weight that can be applied to Whole Estate Plans that represent material considerations within the Planning process will be determined by the decision taker as it depends on the nature, scope and context of the Whole Estate Plan.</p> <p>8. It is not considered appropriate to include specific considerations for Whole Estate Plans, as this list could be very extensive and the documents themselves will inevitably be diverse and varied.</p> <p>4. It is not considered that a definition of an Estate need to be specifically provided within the draft Shropshire Local Plan.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
SP16. Strategic Planning for Minerals	<ol style="list-style-type: none"> 1. Minerals arising in Shropshire are used beyond the Local Authority area. 2. Duplication within draft Policy SP16 and draft Policy DP30. 3. Level of provision of aggregates should be based on the 10 years sales average of 0.68 million tonnes (consistent with national policy). Any adjustment based on "other relevant local information" should subsequently be explained. 4. Potential conflict between para 4 of draft Policy SP16 and para 3.158 of the proposed explanation to draft Policy SP16 regarding windfall sites coming forward to meet demand. 5. Potential conflict between sand and gravel windfall allowance and strict policy controls within draft Policy SP16 - explanation required. 6. Reference to broad locations should state saved allocations. 7. Site restoration should follow principles of Biodiversity Net Gain and consider opportunities for habitat creation and flood water storage. 8. Concerns about impact of mineral working on the water environment. 9. Where both a Planning Application and Environmental Permit Application for mineral sites with waste recovery/landfilling are required, twin-tracking should be encouraged. 10. Specified proposed allocations should be removed from mineral safeguarding areas. 	<p>1, 7 and 8. Shropshire Council considers that the draft Mineral Policies provide an effective framework for ensuring a sufficient supply of minerals and to manage mineral development proposals.</p> <p>2 and 6. Draft Policies SP16 and DP30 are intended to be complementary. As such a minor modification is proposed to para 4 of draft Policy SP16 to clarify this.</p> <p>1 and 3. Consider the approach proposed to the level of aggregate provision is sound in that it reflects local circumstances and well-rehearsed industry concerns that planning on the basis of a 10 year average does not properly reflect local circumstances in the West Midlands. The rationale for the proposed approach is clearly identified as part of the LAA / Minerals Technical Background report (Para 17) and paragraph 3.157 of the explanation to draft Policy SP16.</p> <p>For the purpose of clarity a minor modification is proposed to the proposed explanation to draft Policy SP16 to cross-reference the appropriate section of the Minerals Technical Background Paper. A minor modification is also proposed regarding reference to broad locations, which should reference saved SAMDev Plan mineral allocations.</p> <p>4 and 5. With regard to para 4 of draft Policy SP16, we would note that draft Policy DP30 clarifies that mineral working falling outside allocated areas will also be permitted where developers can demonstrate that the proposal would meet an unmet need/prevent sterilisation of resources; and not prejudice development of allocated sites/result in significant environmental benefits as a result of the exchange or surrender of existing permissions or the site might be significantly more acceptable overall than the allocated sites, and would offer significant environmental benefits. Shropshire Council is confident the scale of windfall development proposed will be delivered since this largely comprises extensions to existing sites. Reinforcing this, a new site for 1.9mt at Ironbridge / Buildwas has recently benefitted from a resolution to grant planning consent.</p> <p>7 and 8. The draft Shropshire Local Plan should be read as a whole. Para 4.274 of the proposed explanation to draft Policy DP31 recognises that restoration and aftercare of mineral sites provides positive opportunities to deliver environmental or community benefits. It also recognises that we therefore need to establish policies to support mineral working which helps to secure locally sensitive design and to ensure that high quality restoration and aftercare of mineral sites takes place at the earliest opportunity and, wherever possible, helps to secure green infrastructure or environmental and community benefits identified in the relevant local Place Plan. Draft Policy DP12 addresses biodiversity net gain, it includes "Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22." Site-specific proposals/opportunities are most appropriately addressed as part of the Planning Application process. Protection of the water environment is addressed within para 4.272 of the explanation to draft Policy DP31. It recognises that mineral working must not have an unacceptable adverse impact on the natural and historic environment or human health. It also includes specific requirements with regard to the water environment including the need for early consideration, a hydro-geological risk assessment, groundwater level monitoring well in advance of any Planning Application, a water features survey and long-term monitoring programme for the water environment.</p> <p>9. The minor modification proposed to para 4.280 of the explanation to draft Policy DP32 addresses opportunities for twin-tracking with waste permitting.</p> <p>10. Proposed allocations, have been informed through a proportionate and robust site assessment process, which included consideration of mineral safeguarding. Para 4.264 of draft Policy DP29 (to which draft Policy SP16 cross-references in the context of mineral safeguarding) states "Non-mineral development which is exempt from the requirements of this Policy comprises:... Applications that are in accordance with the development plan and site allocations where the assessment of site options took account of potential mineral sterilisation and determined that prior extraction was not required".</p>
SP17. Waste Management Infrastructure	<ol style="list-style-type: none"> 1. Policies should reflect the waste hierarchy. 2. Where both a Planning Application and Environmental Permit Application for waste management facilities are required, twin-tracking should be encouraged. 	<ol style="list-style-type: none"> 1. Where evidence indicates that waste production will increase draft policies are required to ensure that there is sufficient capacity to manage this additional waste, as recognised within para 3.164 of the Explanation to draft Policy SP17. Waste Management Infrastructure. 2. See response to draft Policy DP32 with regard to twin-tracking Planning Application and Environmental Permit Application for waste management facilities.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP1. Residential Mix	<p>1. Evidence is insufficient (including in relation to need and viability) or fixed in time so does not support aspects of draft Policy DP1, including the proposed residential mix for sites of 5 or more dwellings, requirements for affordable housing to achieve nationally described space standards, requirements relating to M4(2) accessible and adaptable dwellings/M4(3) wheelchair user dwellings, and requirements for provision of specialist housing for the elderly/disabled on sites of 50 or more dwellings.</p> <p>2. Elements of the draft Policy are inconsistent with national policy, including the proposed residential mix for sites of 5 or more dwellings, requirements for affordable housing to achieve nationally described space standards, requirements relating to M4(2) accessible and adaptable dwellings/M4(3) wheelchair user dwellings, and requirements for provision of specialist housing for the elderly/disabled on sites of 50 or more dwellings.</p> <p>3. The draft Policy is overly prescriptive and there is a need for greater flexibility within it, particularly with regard to the proposed residential mix for sites of 5 or more dwellings.</p> <p>4. References to Right Homes Right Place surveys (or equivalent) is inappropriate as these are snapshots in time, the methodology is not sufficiently robust and they are not subject to consultation.</p> <p>5. The approach to provision of older peoples housing is either unnecessary, inappropriate, unclear, or insufficient (including failure to identify a specific total requirement for older peoples housing).</p> <p>6. Concerned about conflict between this draft Policy and others within the draft Shropshire Local Plan, particularly with regard to the proposed residential mix for sites of 5 or more dwellings.</p>	<p>1, 2, 3, 4 and 6. Shropshire Council considers the proposed requirements of draft Policy DP1 positively respond to and are justified by the evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Housing Market Assessment (SHMA), Whole Plan Viability Assessment, the Shropshire HomePoint Housing Waiting List and the 'Right Home Right Place' Local Housing Need Surveys. The evidence base is considered proportionate and robust. It is also considered that these proposed requirements are consistent with national policy and consistent with and complement the wider draft Policies within the draft Shropshire Local Plan, which should be read as a whole.</p> <p>1, 2, 3 and 6. With regard to the proposed residential mix for sites of 5 or more dwellings, it is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring new development includes an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) and also allowing flexibility for innovation within development. Specifically, flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand.</p> <p>1, 2, 3 and 4. The approach proposed within para 2a of draft Policy DP1 allows for the residential mix on a site to positively respond to the most recent information on local housing need for communities, where in the last 5 years a Local Housing Need Survey has been undertaken under either the Right Home Right Place Council-led initiative or an equivalent survey endorsed by Shropshire Council.</p> <p>1, 2 and 3. The mix proposed within para 2b of draft Policy DP1 is informed by the SHMA, which indicates a significant proportion of new dwellings required during the proposed Plan period will be 1, 2 and 3 bedrooms in size. Specifically, the SHMA indicates around 32.7% of the dwellings needed will be 1 or 2 bedrooms in size and a further 43.5% will be 3 bedrooms in size. This demand for 1, 2 and 3 bedroom dwellings also reflects the view often expressed by local communities when discussing their local housing needs.</p> <p>1 and 2. The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the SHMA and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date.</p> <p>1 and 2. The requirements relating to M4(2) accessible and adaptable dwellings/M4(3) wheelchair user dwellings within paras 4 and 5 of draft Policy DP1, the SHMA identifies that growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers the SHMA justifies requirements for all housing specifically designed for the elderly to achieve M4(3) standard and the proposed thresholds for M4(2) and M4(3) standard dwellings on sites of 5 or more dwellings.</p> <p>1, 2 and 5. The requirements relating to provision of specialist housing for the elderly and those with disabilities/special needs on sites of 50 or more dwellings in para 6 of draft Policy DP1 is also considered appropriate. The National Planning Policy Framework (NPPF) specifies housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people and those with disabilities. The SHMA indicates growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the proposed Plan period. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met, it is considered appropriate to require larger sites of 50 or more dwellings to include an appropriate range of specialist housing designed to meet the diverse needs of older people as this will ensure inclusive and sustainable communities. However, it is recognised that sites of 50 or more dwellings will be diverse in nature and it is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p> <p>1, 2 and 5. It is also considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically:</p> <ul style="list-style-type: none"> -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>DP2. Self-Build and Custom-Build Housing</p>	<ol style="list-style-type: none"> 1. No justification for requirement to provide 10% of plots on residential schemes of 5 or more dwellings (or 0.5ha in size) as serviced plots for self-builders or custom-builders. 2. Requirements of the draft Policy are unclear. 3. There is no demand for self-build or custom-build plots on larger development sites and such provision could be inappropriate, impacting on viability, delivery timescales/site management, and future residents of other plots. 4. Access requirements for self-build and custom-build plots could be problematic. 5. Timescales for marketing of self-build and custom-build lots should be reduced (with many referencing 36 months as the current requirement). 6. To meet need, the draft Policy should allow for self-build and custom-build sites within the countryside (adjoining settlement development boundaries) and/or allocate sites specifically for self-build and custom-build development. 7. Do not consider the self-build register is a robust evidence to inform need for self-build and custom-build plots. Need should be considered on a settlement rather than County basis. 	<p>1, 2, 3, 4, 5, 6 and 7. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position whilst also providing appropriate flexibility regarding provision on large development sites. The proposed requirements for where such provision is made are also considered appropriate, including the timescales for marketing of self-build and custom-build plots, access requirements and phasing of these plots within a development.</p> <p>3 and 6. It is considered that the proposed approach within draft Policy DP2, alongside other relevant policies relating to residential development in the draft Shropshire Local Plan, will effectively meet the diverse need for self-build and custom-build development. It is important to note that open market self-build and custom-build development is a form of open market residential development. It is also important to note that Shropshire is already delivering significant volumes of self-build plots, using a policy approach which is generally consistent in relation to small sites, whilst the proposed approach in relation to large sites creates an opportunity to complement this provision both in terms of numbers and types of plots, again to effectively meet the diverse need for self-build and custom-build development.</p> <p>1 and 7. The Self-Build Register is considered a robust source of information for determining self-build housing need and is referenced as such within National Planning Practice Guidance (NPPG).</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP3. Affordable Housing Provision	<ol style="list-style-type: none"> 1. The proposed housing requirement should be increased to deliver more affordable housing. 2. There is no definition of affordable housing and no affordable housing delivery target (or sub-target for affordable rent). 3. The affordable housing rates should be either increased or reduced. Specific references for reductions made to development in the north, all/larger sites in the south and specialist accommodation for older people. 4. Detailed requirements of the draft Policy are inflexible. They are better addressed through a Supplementary Planning Document and/or discussions at the Planning Application stage/S106 Legal Agreements. 5. The proposed affordable housing tenure mix contradicts national policy. 6. Requirement for transferring affordables to Registered Providers should be more graduated. 7. Reference to exceptional circumstances for off-site and/or financial contributions contradicts national policy. 8. Referencing to pepper-potting should be amended to allow for groups of affordable dwellings. 9. Reference to Shropshire Council's Allocation Policy should be removed. 10. Reference to affordable dwellings being in perpetuity and caps on staircasing/rents should be removed. 11. Need to reference use of Open-Book Viability Assessment for Specific Sites to determine appropriate contributions. 12. Need to include greater recognition of importance of accessible natural green space for occupiers of affordable housing. 13. No dwelling mix is provided for affordable housing. 14. Viability of specific settlements/sites. 	<p>1, 2 and 3. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Draft Policy SP2 provides an affordable housing delivery target (this does not distinguish between the different types/tenures of affordable housing as it is not considered appropriate or necessary to do so). It is considered that the proposed affordable housing delivery target effectively responds to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. The draft Shropshire Local Plan also introduces a range of mechanisms to support the delivery of affordable housing.</p> <p>1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14. Shropshire Council also considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. We would note that para 2 of draft Policy DP3 states "The provision of reduced rates of affordable housing due to viability concerns on otherwise sustainable schemes will be considered in exceptional circumstances where evidence is clearly presented and agreed by the Council. In these circumstances an overage clause will be sought in order to secure the potential for future contributions towards affordable housing." The detailed requirements identified within draft Policy DP3 are also considered appropriate and provide certainty to all including the decision maker, development industry and local communities. With regard to specific requirements:</p> <ul style="list-style-type: none"> -The proposed affordable housing tenure split effectively responds to evidence on affordable housing needs, as summarised within para 4.52 of the explanation to draft Policy DP3. It also provides flexibility for alternative tenure splits where local need would support this. It is evidenced that there is significant need for affordable housing for rent in Shropshire, the delivery of which would be prejudiced by the application of a standard 10% affordable home ownership requirement. The draft policy approach to tenure thus complies with NPPF (para 64) which expects at least 10% of the homes to be available for affordable home ownership, "unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs". -The requirement to demonstrate exceptional circumstances to justify off-site or financial contributions in lieu of on-site contributions is consistent with national policy (reflects Para 62 of the National Planning Policy Framework requirement which expect on site provision unless a financial contribution in lieu can be robustly justified or that "the agreed approach contributes to the objective of creating mixed and balanced communities"). -The requirement for affordable dwellings to be transferred to a Registered Provider as soon as possible, and no later than at completion of 50% of the consented market housing" reflects the current established approach, is appropriate, provides certainty to all parties (including the community, development industry and decision maker) and ensures the timely delivery of affordable housing. Implementation is able to reflect the phased development of larger sites. -It is considered appropriate to specify that affordable housing provided on-site will be allocated in accordance with Shropshire Councils Allocations Policy. -It is considered appropriate to require affordable housing to be appropriately pepper-potted through a site. -Requirements for affordability in perpetuity and limitations on staircasing reflect that significant need and established approaches, securing a range of affordable housing which is meeting continuing need beyond that of initial occupants. <p>2, 3, 4, 6, 7, 8, 9, 10 and 11. A Housing Supplementary Planning Document will support housing policies and provide further guidance.</p> <p>12. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP15 provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace.</p> <p>2, 5 and 13. Draft Policy DP3 specifies the tenure mix expected from affordable housing provision as part of market housing development. Draft Policies DP4, DP5 and DP7 indicate that the type, size, and tenure of affordable housing should meet local housing needs evidenced in housing need surveys. Whilst Draft Policy DP6 is a mechanism for delivering affordable dwellings for the specific applicant and such dwellings are expected to be designed to meet the current and future households needs (within a maximum dwelling size).</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>DP4. Affordable Housing Exception Schemes</p>	<p>1. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services & facilities and more extensive sustainable travel opportunities should be required.</p> <p>2. Policy allows developers to bring forward multiple sites which may have significant cumulative impacts. Policy needs safeguards against this.</p> <p>3. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required.</p> <p>4. Policy lacks clear and specific criteria and terms used are open to interpretation. Ineffective for controlling development and lack clarity for decision making. A particular concern raised is lack of definition of scale of development in the Policy. Size of sites should be limited by the Policy to 25, a reasonable maximum, with larger sites allocated.</p> <p>5. To reflect national guidance, requirements for retaining affordable housing in perpetuity, other than for rural exception sites, should be removed.</p>	<p>1, 2, 3, 4 and 5. It is considered that the Policy is effective. The terminology used within policies is generally consistent with that used in national policy. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP4 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations .</p> <p>1, 2, 3 and 4. Settlements across Shropshire with an identified affordable housing need are diverse. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 (High Quality Design), and, where relevant, SP10 which expects that development proposals in the countryside ‘do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity.</p> <p>1 and 3. Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. Draft Policy DP4. Affordable Housing Exceptions Schemes states such schemes will be positively considered where they meet all of a series of policy requirements, including "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport"</p> <p>2. Draft Policy DP4, identifies the primary factor that determines the size threshold for affordable housing exception sites is local need, which for most rural settlements is likely to be less than 25 dwellings. It is considered appropriate to include the general expectation of the maximum size of exception sites within the proposed explanation to draft Policy DP4. It is also considered appropriate to recognise that exceptional circumstances will exist that justify larger sites within the proposed explanation to draft Policy DP4.</p> <p>1, 2, 4 and 5. An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations.</p> <p>5. Requirements for affordability in perpetuity reflect significant need for affordable housing and established approaches, securing a range of affordable housing which is meeting continuing need beyond that of initial occupants. Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward.</p>
<p>DP5. Entry Level Exception Sites</p>	<p>1. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services & facilities and more extensive sustainable travel opportunities should be required.</p> <p>2. Policy allows developers to bring forward multiple sites which may have significant cumulative impacts. Policy needs safeguards against this.</p> <p>3. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required.</p> <p>4. Policy lacks clear and specific criteria and terms used in policies are inconsistent and open to interpretation. Ineffective for controlling development and lack clarity for consistent decision making.</p>	<p>1, 2, 3 and 4. It is considered that the Policy is effective. The terminology used within policies is generally consistent with that used in national policy . The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP5 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations</p> <p>1, 2, 3 and 4. Settlements across Shropshire with an identified affordable housing need are diverse and draft Policies DP4 - DP7 need to appropriately reflect this diversity. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 (High Quality Design), and, where relevant, SP10 which expects that development proposals in the countryside 'do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity.</p> <p>2. Policy SP7 'Managing housing development' requires consideration be given to cumulative impacts for settlements identified in Policies S1-S20. Where development facilitated by Policy DP5 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs & SP9 (part f) for Community Clusters is relevant. Residential development outside identified settlements, in the countryside, is strictly controlled in accordance with Policy SP10 which further requires that development proposals do not lead to an adverse cumulative impact on the character of communities.</p> <p>1 and 2. Draft Policy DP5 states entry level schemes will be positively considered where they meet all of a series of policy requirements, including that "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport".</p> <p>3. Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP6. Single Plot Exception Sites	<ol style="list-style-type: none"> 1. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services & facilities and more extensive sustainable travel opportunities should be required. 2. Policy allows developers to bring forward multiple sites which may have cumulative impacts. Policy needs safeguards against this. 3. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required. 4. Policy lacks clear and specific criteria and terms used in policies are inconsistent and open to interpretation. Ineffective for controlling development and lack clarity for consistent decision making. 5. Policy too restrictive and should be amended to include greater flexibility to allow sites to be assessed against the spatial pattern of each individual settlement. 	<p>1, 2, 3, 4 and 5. It is considered that the Policy is effective. The terminology used within policies is generally consistent with that used in national policy and there is also significant case law available to define such terms as an 'isolated dwelling'. Shropshire Council consider the criteria and requirements identified within draft Policy DP6 are appropriate and set out a clear approach to single plot exception sites. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP6 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance and clarity.</p> <p>1, 2, 3, 4 and 5. Settlements across Shropshire with an identified affordable housing need are diverse and draft Policies DP4 - DP7 need to appropriately reflect this diversity. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 (High Quality Design) and SP10 which expects that development proposals in the countryside 'do not lead to an adverse cumulative impact on the character of communities.' Where development facilitated by Policy DP6 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs & SP9 (part f) for Community Clusters is relevant.</p> <p>1 and 3. Draft Policy DP6 states schemes will be considered where they meet all of a series of policy requirements, including that "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport". Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace.</p>
DP7. Cross-Subsidy Exception Schemes	<ol style="list-style-type: none"> 1. Cross subsidy schemes not suitable for village/rural locations should be focused on larger centres. 2. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services & facilities and more extensive sustainable travel opportunities should be required. 3. Policy allows developers to bring forward multiple sites which may have significant cumulative impacts. Policy needs safeguards against this. 4. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required. 5. Policy lacks clear and specific criteria. 6. Unevidenced, inflexible approach not compliant with national policy. Inappropriate requirement to demonstrate exception schemes unviable. Percentage requirement for affordable element too high to secure delivery. 7. Could prejudice delivery of 100% Affordable Exception schemes. Percentage requirements should reflect open market site affordable housing requirements. 8. Insufficient consultation on the policy. 	<p>1, 2, 3, 4, 5, 6 and 7. Shropshire Council considers that draft Policy DP7 is consistent with the National Planning Policy Framework (NPPF) and provides beneficial supplementary local policy on Cross-Subsidy Schemes. The criteria and requirements identified within draft Policy DP7 are appropriate and set out a clear approach to cross subsidy sites. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP6 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance and clarity.</p> <p>1, 2 and 3. It is considered appropriate to allow for cross-subsidy exception sites within/immediately adjoining the built form of a settlement with a school or the ability to access a school by public transport, where such proposals meet the wider requirements of draft Policy DP4, including that there is a proven local affordable housing need and it is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport; and the wider draft Policies of the draft Shropshire Local Plan (including draft Policy DP25 regarding infrastructure provision).</p> <p>1, 2, 3, 4, 5, 6 and 7. Settlements across Shropshire with an identified affordable housing need are diverse and draft Policies DP4 - DP7 need to appropriately reflect this diversity. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 (High Quality Design), and, where relevant, SP10 which expects that development proposals in the countryside 'do not lead to an adverse cumulative impact on the character of communities' and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity.</p> <p>5. Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward.</p> <p>6 and 7. The cross-subsidy exception scheme draft policy is primarily intended as a delivery mechanism for affordable housing and not the provision of open market dwellings. This is reflected in the need to deliver at least 70% affordable housing tenures and directly reflect the needs outlined in a housing need survey based on tenure and size of dwellings. Requirements respond to the significant affordable housing need identified in Shropshire and reflect the expectation that affordable exception schemes are the first delivery mechanism considered.</p> <p>6 and 7. The proposed minimum amount of affordable housing on Cross-Subsidy Schemes is reflective and responsive to development viability which will be determined through open book appraisal at the Planning Application stage.</p> <p>8. A version of draft Policy DP7 was consulted upon within the Regulation 18: Pre-Submission Draft Consultation.</p>

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DP8. Gypsy and Traveller Accommodation	<p>1. Policy requirements direct gypsy sites towards existing developed settings. Potential preference for less developed locations should be acknowledged in the draft Policy and guidance provided for both 'developed' and undeveloped locations.</p> <p>2. Unclear how the specific suitability of any site will be assessed. Policy needs to set out how the effect of a gypsy site on amenity, the environment and on existing or proposed residential, commercial and leisure facilities will be taken into consideration in planning applications.</p> <p>3. Need for both the development and the particular site must be demonstrated, in the same way rural workers dwellings must.</p> <p>Policy should make clear how the Council will deal with proposals for development when assessed need has been met.</p>	<p>1. Draft Policy DP8 reflects national policy in respect of Traveller sites, including locational and other expectations for sustainable development. National policy expects that, local planning authorities should 'very strictly limit new traveller site development in open countryside' and sets out relevant considerations.</p> <p>2. The draft Shropshire Local Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP8, the relevant considerations, including those relating to amenity and environment, of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations.</p> <p>3. GTAA evidence indicates that there is no strategic identified need and therefore no specific need for allocations. The GTAA does however recognise that some need for small sites will nevertheless arise where available supply does not meet need a specific requirement. National policy requires that where there is no identified need, criteria-based policies be included to provide a basis for decisions on any planning applications which are submitted. Draft Policy DP8 provides such a criteria-based policy. Since need must be considered on a planning application specific basis and matters such as alternative accommodation availability and the personal circumstances of applicants are relevant considerations, it would not be appropriate to impose limits on provision. The final section of the policy provides for monitoring and review.</p>
DP9. Managing and Supporting Town Centres	<p>1. Comments on where the policy should explicitly identify how it will assist in achieving net zero carbon, and that it should be revised to allow for significant progress towards achieving net zero carbon over the plan period.</p> <p>2. Comments suggesting that planned local centres should be included at proposed strategic sites within the retail hierarchy.</p>	<p>1. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p> <p>2. If the Local Centres are under 300sqm then no RIA will be required. Locally the issue of protecting Town Centres is important and the current approach is consistent with how the Retail Hierarchy has been applied to Local Centres as part of SUEs.</p>
DP10. Tourism, Culture and Leisure	<p>1. Comments on where the policy should require developers to contribute to aspects such as environmental and natural asset upkeep and retention.</p> <p>2. Further detail should be provided in relation to caravans and scale and capacity.</p> <p>3. Comments on where the policy should explicitly identify how it will assist in achieving net zero carbon, and that it should be revised to allow for significant progress towards achieving net zero carbon over the plan period</p> <p>4. Wording in the policy should mirror the guidance in the NPPF with the encouragement to engage with appropriate bodies.</p> <p>5. Some of the detail is too restrictive in relation to holiday accommodation.</p>	<p>1. These types of aspects are covered under DP10 1c and 1f, as well as other relevant policies that an application would have to comply with.</p> <p>2. This would be relevant on a case-by-case basis, as there may be sites of much larger caravans or log cabins etc and others with smaller ones, or sites with numerous caravans or log cabins and other sites with very few. Therefore, such a matter would be dealt with at the planning application stage.</p> <p>3. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p> <p>4. Aspects which are already expressed in the NPPF are unnecessary to be repeated in the Local Plan (i.e. para 40 in this case).</p> <p>5. Shropshire Council considers that the existing wording is appropriate as the tourism enterprise should be established and viable rather than just one of those two. To revised to "and/or" (or equivalent) here may result in unviable tourism which will ultimately lead to a backdoor entrance for inappropriate residential dwellings in the countryside.</p>

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DP11. Minimising Carbon Emissions	<ol style="list-style-type: none"> 1. The policy needs does not go far enough and should be strengthened 2. The policy is not compliant with national planning policy or guidance and its requirements cannot be justified. 3. The requirements of the policy would make development unviable 	<p>1. The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation</p> <p>2. Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for ‘a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development’, provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard.</p> <p>Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for ‘development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations’ - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government’s 2015 Productivity Plan subsequently stated that ‘the government does not intend to proceed withthe proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.’ Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus, the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy’s requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented.</p> <p>3. Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP11 has been subject to due consideration within this assessment.</p> <p>Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for ‘a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development’, provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard.</p> <p>Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for ‘development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations’ - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government’s 2015 Productivity Plan subsequently stated that ‘the government does not intend to proceed withthe proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.’ Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus, the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy’s requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented.</p> <p>Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP11 has been subject to due consideration within this assessment. No change proposed.</p>

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DP12. The Natural Environment	<ol style="list-style-type: none"> 1. The level of biodiversity net gain should be higher than 10%. 2. Additional natural assets should be protected, or other strategies should be referred to within the policy or its explanation. 3. The policy should not require biodiversity net gain as although this is a provision of the Environment Bill, that bill has not yet been carried forward into law. 4. The policy's requirements would make development unviable. 	<ol style="list-style-type: none"> 1. The requirement for a 10% net gain for biodiversity reflects the provisions of the Environment Bill and the Council thus considers it to be appropriate 2. The Council considers that the requirements of the policy are consistent with national planning policy and guidance and that none of the proposed amendments are necessary. 3. The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities, and the decision maker on requirements. 4. A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP12 has been subject to due consideration within this assessment.
DP13. Development in the River Clun Catchment	<ol style="list-style-type: none"> 1. Objections on the legal compliance and deliverability of the policy have been received from the Environment Agency and Natural England. 2. Current Council guidance on development within the River Clun Catchment references the production of a revised nutrient management plan as the key to unlocking development. This should be produced as soon as possible. 	<ol style="list-style-type: none"> 1. A series of minor modifications to address the objections from the Environment Agency and Natural England are set out in the respective Statements of Common Ground and are included in the Schedule of Minor Modifications. 2. The Council has proposed minor modifications to Policy DP13 in response to comments received from the Environment Agency and Natural England. These modifications address the production of a River Clun SAC Restoration Plan.
DP14. Green Infrastructure	<ol style="list-style-type: none"> 1. Green Infrastructure should be mapped for Hubs and Clusters 2. Sport England sought clarification that the policy was not intended to cover playing fields. 3. Various amendments were suggested to: require GI to be maintained for the lifetime of the development; provide additional detail on when GI assessments would be required and to recognise that both quantity and quality of GI are important. 4. There was a good level of support for the policy. 	<ol style="list-style-type: none"> 1. The Council considers the approach taken to the mapping of Green Infrastructure is proportionate and appropriate and does not preclude work being carried out in the future for Community Hubs and Community Clusters. 2. A minor modification to paragraph 4.138 to clarify that playing fields are covered by Policy DP15 is proposed 3. The Council considers that the policy and explanation provide an appropriate level of detail, are proportionate and are consistent with national planning policy and guidance. 4. The support is welcomed.
DP15. Open Space and Recreation	<ol style="list-style-type: none"> 1. A 'design-led' approach to the amount of open space provided would be better than a prescribed standard. 2. The standard of 30m2 open space per person is not supported by an evidence base. 	<ol style="list-style-type: none"> 1. Draft Policy DP15 is also considered to provide appropriate flexibility in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. 2. The Shropshire Open Space Needs Assessment (2018) undertaken to inform the draft Shropshire Local Plan identifies the need for 30sq.m per person, which is reflected within draft Policy DP15. This requirement is also consistent with the adopted Local Plan.
DP16. Landscaping of New Development	No key issues were raised.	N/A
DP17. Landscape and Visual Amenity	<ol style="list-style-type: none"> 1. Policy DP17 has not been correctly applied in the site selection process. 	<ol style="list-style-type: none"> 1. Policy DP17 requires development proposals to assess their impact on landscape and visual amenity and will apply to all planning applications on allocated sites. The principles behind policy DP17 have been applied through the Sustainability Appraisal and Site Assessment process which considered the landscape and visual sensitivity of all SHLAA sites based on the Council's Landscape and Visual Sensitivity Study.
DP18. Pollution and Public Amenity	<ol style="list-style-type: none"> 1. Biodiversity features should be protected by this policy. 2. The Ministry of Defence was concerned that noise sensitive developments close to areas where defence activities create noise could lead to complaints. 3. General support for the policy. 	<ol style="list-style-type: none"> 1. Other policies in the plan protect biodiversity 2. A series of minor amendments are proposed to the policy and explanation to clarify the need for development proposals to take military activities into account. 3. The support is welcomed
DP19. Water Resources and Water Quality	<ol style="list-style-type: none"> 1. Assurances should be sought from the appropriate utilities that the infrastructure will be sufficient to support any developments 2. The protection for groundwater Source Protection Zones should be strengthened 3. A series of textual and technical amendments were suggested by the Environment Agency to clarify legal requirements and conserve and enhance water quality. 4. The Policy should contain an explicit link to achieving net zero carbon. 	<ol style="list-style-type: none"> 1. The Council's Statements of Common Ground with Severn Trent Water and Dwr Cymru Welsh Water show that the water infrastructure requirements identified in the Councils Water Cycle Study can be delivered. 2. The Council considers that the Policy provides appropriate and adequate protection for groundwater Source Protection Zones. No changes are proposed. 3. Minor modifications are proposed to the wording of the policy relating to the Water Framework Directive and to clarify requirements to protect private potable water supplies. The other suggested amendments have not been accepted because the Council considers that they would either duplicate existing regulatory regimes or are not reasonable/not necessary. 4. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.
DP20. Water Efficiency	<ol style="list-style-type: none"> 1. The requirement for the higher water efficiency standard is unsound because it is unjustified and inconsistent with national policy. 	<ol style="list-style-type: none"> 1. The government has introduced an optional new Building Regulation standard that can be required through a Local Plan policy if it addresses a clearly evidenced need and its impact on viability has been considered. The Shropshire Water Cycle Study provides the evidence for a standard of 110 litres per day per person and this has been assessed through the Shropshire Viability Study. No change proposed.
DP21. Flood Risk	<ol style="list-style-type: none"> 1. The sequential and exception tests for the proposed site allocations do not correctly identify all flood related issues. 2. An amendment to paragraph 2a of the policy so that it makes sense is suggested. 	<ol style="list-style-type: none"> 1. The application of the Sequential and Exception Tests to all proposed site allocations is based on the information contained in the Council's Strategic Flood Risk Assessments (Levels 1 and 2) and follows national planning policy and guidance. As such the Council considers it is accurate and appropriate. 2. A minor modification is proposed to include text omitted in error.

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DP22. Sustainable Drainage Systems	<ol style="list-style-type: none"> Clarity should be provided by reference to the specific part of the Lead Local Flood Authorities guidance on the allowance for urban creep. The Environment Agency suggested amendments to include technical details of when SuDS would be acceptable with reference to groundwater levels, clarification of text on climate change allowances and reference to other guidance documents. 	<ol style="list-style-type: none"> The Council considers it appropriate to reference LLFA guidance rather than a specific part of it a document as this allows updates to the guidance to be made during the lifetime of the Local Plan which keep it current. Minor modifications are proposed to clarify the text on climate change allowances, but the Council does not feel it would be appropriate to include more technical information in the policy or to reference additional guidance as the documents currently referenced in the policy cover these issues
DP23. Conserving and Enhancing the Historic Environment	<ol style="list-style-type: none"> The policy should seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings whilst safeguarding the special characteristics of these heritage assets for the future. The policy does not align with NPPF. 	<ol style="list-style-type: none"> Proposals for the retrofitting of energy efficiency measures and for the installation of renewable energy systems on or affecting heritage assets would be assessed against this policy as and when they come forward. The Council does not consider it necessary to encourage such proposals and as such does not propose any changes to the policy. The Council considers that the requirements of this policy are consistent with national planning policy and guidance.
DP24. Shropshire Hills Area of Outstanding Natural Beauty	<ol style="list-style-type: none"> The Council should prepare a separate DPD for the AONB. The definition of 'major development' should be amended to allow smaller scale proposals to be included. The policy should refer to the 'setting' of the AONB. 	<ol style="list-style-type: none"> The Council considers that the Shropshire Local Plan is the most appropriate mechanism for safeguarding the Shropshire Hills AONB and does not propose to prepare a separate DPD. The Council considers it appropriate to use the definition of major development set out in the NPPF. This provides certainty and consistency for developers on the Council's approach to development in the AONB. The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that the policy thus makes appropriate provision for the effect of development outside the AONB on the designated area.
DP25. Infrastructure Provision	<ol style="list-style-type: none"> The Infrastructure policy should improve the provision of public transport, walking and cycling. Shifnal's infrastructure needs should be met and provided for in advance of development. West Mercia Police requested that emergency services infrastructure be included in the explanation to the Policy. Concern was expressed that developer contributions to NHS Trusts' critical infrastructure requirements have not been considered and that the Council has not engaged with the Clinical Commissioning Group to ensure that the development impacts have been considered for cross-boundary services. 	<ol style="list-style-type: none"> Local and strategic highway improvements may of course include infrastructure associated with walking, cycling and public transport. The prioritisation of infrastructure is undertaken through the Strategic Infrastructure Implementation Plan and Place Plan process. The infrastructure needs of Shifnal will be taken into account through the Strategic Infrastructure Implementation Plan and Place Plan process. A minor modification is proposed to para 4.224 of the explanation for draft Policy DP25 to include reference to emergency services infrastructure. Draft Policy DP25 specifies that "For new development where the Community Infrastructure Levy (CIL) applies, priority will be given to using CIL funds to support any critical or statutory infrastructure requirements resulting from the development." The explanation to draft Policy DP25 specifically includes reference to health care infrastructure as a form of critical infrastructure. Furthermore, draft Policy DP25 states that "On proposals where it is considered CIL funds will not be sufficient to meet the specific infrastructure needs of development, consideration will be given to applying additional Section 106 contributions for specific infrastructure items where this meets national requirements for planning obligations." Additionally, Shropshire Council welcomes positive engagement with the NHS Trusts and would encourage them to join the strategic infrastructure forum established for Shropshire. We would also encourage engagement in the Place Plan process to identify critical statutory healthcare infrastructure requirements alongside all potential funding mechanisms (including national funding) available. Additionally, Shropshire Council has engaged with strategic infrastructure providers, including the Clinical Commissioning Group, through the Place Plan process (the Place Plans have informed the Strategic Infrastructure Implementation Plan and together these documents for part of the evidence base for the draft Shropshire Local Plan).
DP26. Strategic, Renewable and Low Carbon Infrastructure	<ol style="list-style-type: none"> The Environment Agency requested that additional assessments be required for hydropower and biomass proposals The policy does not go far enough to provide for the scale of renewable energy needed for decarbonisation and seems designed to prevent renewable energy proposals being permitted. The policy does not provide sufficient guidance to protect the special qualities of the Shropshire Hills AONB. 	<ol style="list-style-type: none"> Minor modifications are proposed to accommodate some of the issues raised by the Environment Agency. The Council considers that the requirements of this policy are consistent with national planning policy and guidance. Any development proposals for renewable energy will be assessed against policy DP24 The Shropshire Hills AONB. The Council considers that the latter provides sufficient clarity and guidance on the protection of the special qualities of the designated area. No change proposed.
DP27. Broadband and Mobile Communications Infrastructure	<ol style="list-style-type: none"> Respondents to the Local Plan welcome the move towards more sustainable practices to reduce the need to travel. Respondents to the Local Plan wish to see an explicit link in Policy DP27 to the ways in which the Local Plan will assist in achieving a net zero carbon economy and lifestyles. Respondents welcome the aspirations to improve Broadband capacity in Shropshire but object to part 3 of draft Policy DP27 which hard for developers to deliver. Requirements have to be delivered by infrastructure providers. Therefore, Policy DP27 should not impose new electronic communications requirements beyond those set out in statutory Building Regulations. Respondents to the Local Plan object to part 5 criterion (a) through to criterion (d) of the draft Policy DP27 which places an onerous requirement on residential and commercial developers to provide and maintain communications networks which is the responsibility of communications infrastructure companies. 	<ol style="list-style-type: none"> Shropshire Council welcomes the support for Policy DP27 as evidence of the soundness of the Draft Local Plan. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. This is especially promoted through Policy DP27 and the key objectives of the policy to deliver high quality, digital infrastructure that meets the needs of businesses and communities as an essential utility to support their quality of life, to facilitate social inclusion and reduce the need to travel to access work, services and leisure opportunities particularly to support how they choose to work, live and seek to lower the 'carbon footprint' of their business operation or lifestyle. 3 and 4. Shropshire Council is working to improve broadband connectivity across the County through its Connecting Shropshire programme to attract commercial superfast broadband infrastructure investment and to bring faster broadband to areas where it is not economically viable for commercial operators to provide these services. The purpose of these objectives for connecting Shropshire to the best electronic communications infrastructure into their business premises and homes is to ensure businesses, employees and residents can embrace and optimise the use of broadband in their everyday lives. Unless the development market embraces these objectives in their development design schemes and build specifications through the provision of network infrastructure and 'fibre to premises' technologies then the roll out of digital connectivity will not be achieved and Shropshire will struggle in its programme to move towards and achieve the broader objective of achieving a zero carbon economy and personal lifestyles in the County.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP28. Communications and Transport	<p>1. Respondents to the Local Plan welcome the positive response to the climate problems, but feel the focus on unsustainable transport should be reconsidered. For example, DP28(3d, e and g) still promotes road and other unsuitable transport links, i.e. HS2 and the focus on these unsustainable modes of transport should be reduced in the Plan.</p> <p>2. Respondents to the Local Plan consider that the explicit support for the NWRR in Policy DP28(3)(e) and the Explanation at paragraph 4.257 should be removed from the Plan as this is considered to compromise any attempt at sustainability or to address the climate or ecological emergency.</p> <p>3. Respondents to the Local Plan consider that the canal network between Shrewsbury, Uffington, Upton Magna and Withington should be restored and Policy DP28(3)(b) and the Explanation at paragraph 4.253 should be amended to include the objective "To undertake the complete restoration of the Shrewsbury Canal to its original terminus at the Butter Market."</p>	<p>1. Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations, and businesses. Policy DP28 structures the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well-connected places. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options, in advocating the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment.</p> <p>2. Shropshire Council has set out in Policy DP28 the summary explanation for the North West Relief Road from the Outline Business Case for the construction of this new road. The primary purpose of the road is to link the urban highway network in both the north and the west of the town together to remove the need for local and through traffic to circumnavigate the east, south and west quadrants of the town or to travel through the town centre as opposed to simply traversing the north-west quadrant of the town. This strategic infrastructure proposal has been included in Policy DP28 to recognise a fundamental principle of the Hierarchy of Sustainable Transport which is the continuing need for private motor transport particularly with the national programme to move to vehicles with electronic power cells and other non-fossil fuel energy sources. This continuing need for private transport brings with it a need for essential improvements or new construction on the highway networks to support its use in order to properly serve the needs of the economy and the communities in Shropshire, the West Midlands and England. Shropshire Council considers that the principles and objectives of the Hierarchy of Sustainable Transport and the NWRR are mutually inclusive and contribute to the strengths and opportunities provided by a broad based, balanced, and ambitious Local Plan. The Council considers that these two principles and objectives for the Hierarchy of Sustainable Transport and the provision of the NWRR are consistent with the strategy of the Local Plan. The policy framework is also internally consistent with the inclusion of the NWRR in Policy DP28 when the plan is read as a whole.</p> <p>3. Policies and proposals in Local Plans should be appropriate, realistic and deliverable within the spatial strategy and the timeframe for the Plan. It is considered that an objective to deliver the complete restoration of the Shrewsbury Canal would fail these tests of soundness. The broad objective of working towards the conservation and partial restoration of the canal network where it is possible to achieve these objectives is recognised in Policies DP23, DP28 and several settlement policies. This objective of helping to restore the canal network has been and continues to be achieved where canals fall within areas for conservation of the natural and built environment, within key areas of green infrastructure being improved or extended or in proposed development sites of a sufficient scale or degree of viability. Policies of the Plan seek to sustain these achievements by ensuring that canal restoration is an appropriate objective that is realistic and deliverable.</p>
DP29. Mineral Safeguarding	<p>1. None of the exemptions to the requirements to assess sterilising of mineral resources within Mineral Safeguarding Areas apply to proposals on site allocations.</p>	<p>1. Paragraph 4.264 of the Explanation of draft Policy DP29 states 4. Non-mineral development which is exempt from the requirements of this Policy comprises: "...Applications that are in accordance with the development plan and site allocations where the assessment of site options took account of potential mineral sterilisation and determined that prior extraction was not required". The assessment process for all proposed saved SAMDev Plan allocations and all proposed allocations within the draft Shropshire Local Plan took account of potential mineral sterilisation and determined that prior extraction was not required (unless otherwise specified). As such they are included within the specified list of exemptions (unless otherwise specified).</p>
DP30. Sites for Sand and Gravel Working	<p>1. Draft Policy DP30 provides a spatial strategy for provision of sand and gravel which should be included in draft Policy SP16.</p> <p>2. There are inconsistencies between permitted reserves specified within Table DP30.1 of the proposed explanation to draft Policy DP30 (13.5Mt) and the Minerals Technical Background Paper (10.93Mt).</p> <p>3. The windfall allowance to maintain an adequate and steady supply of sand and gravel is high. It is also unclear whether windfall sites would accord with the draft Shropshire Local Plan.</p> <p>4. Minerals arising in Shropshire are used beyond the Local Authority area.</p> <p>5. Similar information to that available for sand and gravel should be provided for other mineral resources.</p> <p>6. Figure SP16.1 is incorrectly referenced within this draft Policy.</p>	<p>1, 3 and 4. Shropshire Council considers that the draft Mineral Policies provide an effective framework for ensuring a sufficient supply of minerals and to manage mineral development proposals.</p> <p>1. Draft Policies SP16 and DP30 are intended to be complementary. As such a minor modification is proposed to para 4 of draft Policy SP16 to clarify this.</p> <p>2 and 3. 13.5mt specified in Table DP30.1 of the explanation to draft Policy DP30 is correct and based on returns to AM2018. Draft returns for AM2019 suggest an improvement on the previous year's reserves and production performance. Whilst it is acknowledged that the windfall allowance is high, it is based on the planned extension of existing sites (which accord with the existing and draft Local Plan), with the exception of a single site which is subject to a current planning application (recommended for approval).</p> <p>5 and 6. For clarity a minor modification is proposed to the proposed explanation of draft Policy SP16 to provide further information in relation to crushed rock and cross-reference the Minerals Technical Background report. A minor modification is proposed to correct references to Figures DP16.1.</p>

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DP31. Managing Development and Operation of Mineral Sites	<ol style="list-style-type: none"> 1. Minerals arising in Shropshire are used beyond the Local Authority area. 2. There is no justification for winning and working coal. 3. Concerns about impact of mineral working on the water environment. 4. Site restoration should follow principles of Biodiversity Net Gain and consider opportunities for habitat creation and flood water storage. 5. To protect defence interests, the need to mitigate bird hazard should extend throughout development/operation of a mineral site. 	<p>1, 3 and 4. Shropshire Council considers that the draft Mineral Policies provide an effective framework for ensuring a sufficient supply of minerals and to manage mineral development proposals.</p> <p>2. Any Planning Application for the winning and working of coal will be determined in accordance with the NPPF. Para 4 of draft Policy DP31 establishes a policy requirement for any such application to also include proposals for the separation and stockpiling of fireclay so that its value as a mineral resource can be captured.</p> <p>3 and 4. Para 4.274 of the proposed explanation to draft Policy DP31 recognises that restoration and aftercare of mineral sites provides positive opportunities to deliver environmental or community benefits. It also recognises that we therefore need to establish policies to support mineral working which helps to secure locally sensitive design and to ensure that high quality restoration and aftercare of mineral sites takes place at the earliest opportunity and, wherever possible, helps to secure green infrastructure or environmental and community benefits identified in the relevant local Place Plan. Draft Policy DP12 addresses biodiversity net gain, it includes "Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22." Site-specific proposals/opportunities are most appropriately addressed as part of the Planning Application process.</p> <p>3. Protection of the water environment is addressed within para 4.272 of the explanation to draft Policy DP31. It recognises that mineral working must not have an unacceptable adverse impact on the natural and historic environment or human health. It also includes specific requirements with regard to the water environment including the need for early consideration, a hydro-geological risk assessment, groundwater level monitoring well in advance of any Planning Application, a water features survey and long-term monitoring programme for the water environment.</p> <p>5. For the sake of clarity a minor modification is proposed to ensure consideration of bird hazard as part of mineral working and subsequent site restoration.</p>
DP32. Waste Management Facilities	<ol style="list-style-type: none"> 1. Waste facilities in Shropshire provide for waste arising outside of the Local Authority area. 2. Require all potential adverse impacts of waste management facilities to be avoided. 3. The impact of odour, dust and bio-aerosols associated with waste management facilities should be considered. 4. Where both a Planning Application and Environmental Permit Application for waste management facilities are required, twin-tracking should be encouraged. 	<p>1, 2 and 3. Shropshire Council considers that the draft Waste Policies provide an effective framework for ensuring sufficient capacity within waste management facilities and for managing waste management development proposals.</p> <p>2. A requirement for all potential adverse impacts of waste management facilities is unrealistic and would be inconsistent with national policy for waste and would impose an unreasonable constraint on this type of essential business and community infrastructure in circumstances where impacts can be satisfactorily controlled, as is required by the draft Policy.</p> <p>3. It is acknowledged that the impact of odour, dust and bio-aerosols associated with waste management facilities should be considered and as such an appropriate minor modification is proposed for the purpose of clarity.</p> <p>4. It is also acknowledged that, where both are required, promoting opportunities for twin-tracking of an Environmental Permit Application and Planning Application for a site would provide a greater degree of certainty to the applicant, although this is not a policy consideration. As such an appropriate minor modification is proposed to the explanation of draft Policy DP32.</p>
DP33. Landfill and Landraising Sites	<ol style="list-style-type: none"> 1. Waste facilities in Shropshire provide for waste arising outside of the Local Authority area. 2. Landfill/landraising sites should not be located in Source Protection Zones. 3. Sites below the water table in sensitive groundwater settings should be refused. 4. The draft Policy should recommend parallel tracking of any Landfill Permit Application (with associated hydrogeological risk assessment) and the Planning Application. 	<p>1, 2 and 3. Shropshire Council considers that the draft Waste Policies provide an effective framework for ensuring sufficient capacity within waste management facilities and for managing waste management development proposals.</p> <p>2 and 3. It is considered that para 2a of draft Policy DP33 provides appropriate reference to the need for compliance with water management and water resource protection policy requirements. Furthermore, the draft Shropshire Local Plan should be read as a whole and draft Policy DP19 specifically addresses water resources and water quality. However, for clarity a minor modification is proposed to cross reference draft Policy DP19 within para 2a of draft Policy DP33.</p> <p>4. The need to consider opportunities for parallel tracking is recognised. As such a minor modification is proposed to para 4.280 of the explanation to draft Policy DP32.</p>
S1. Albrighton Place Plan Area	See S1.1	See S1.1

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S1.1. Development Strategy: Albrighton Key Centre</p>	<p>Albrighton Development Strategy</p> <p>1. The level of development proposed for Albrighton within the proposed development strategy is insufficient. It limits potential to deliver additional growth in Albrighton, to support the wider draft Shropshire Local Plan growth agenda, tackle local infrastructure priorities and address chronic under-delivery since 2006 (2006 to 2019 Albrighton's had lowest delivery of any Principal/Key Centre, reflecting constraints of the Green Belt). Previous suppressed housing growth in Albrighton has led to an ageing population, rising housing prices outstripping the Shropshire average, and an inability for first-time buyers to access the housing market.</p> <p>2. The proposed housing guideline for Albrighton does not represent an appropriate strategy and is not justified. It should be increased as it fails to reflect M54 corridor potential or the proposed strategic approach in draft Policy SP2 (which prioritises growth zones, including M54 corridor, to respond the Shropshire Economic Growth Strategy). The housing guideline does not respond to Albrighton's location on the M54 strategic corridor and its relationship to RAF Cosford (including planned job growth) ; Albrighton's high sustainability (clearly evidenced in Hierarchy of Settlement Paper) and accessibility ;housing need and unmet cross-boundary need arising in the Black Country despite close relationship and railway links. Inconsistency in the Draft Plan which directs the same level of new housing to Craven Arms, which is much further from employment opportunities and has a significantly lower provision of services and amenities compared with Albrighton.</p> <p>3. Overall strategic approach, and specifically the artificial suppression of residential growth in Albrighton as one of the county's most sustainable settlements does not align with intent of Policy DP28, which seeks to deliver a sustainable pattern of growth and development.</p> <p>4. A respondent highlighted that despite an increase to the overall housing requirement from earlier stages of the Local Plan Review, allocations in Albrighton have reduced by 15 dwellings. Another respondent identified that proposed 500 dwellings was not increased from earlier drafts of the document which had a 20 year rather than 22 year proposed Plan period, a proportionate increase would be 50 dwellings. However, given the strategic location, connectivity, range of services and employment opportunities and strong market demand, a higher guideline of some 700 dwellings would be deliverable, reflect evidence and be an appropriate strategy.</p> <p>Development Boundary</p> <p>5. Objection to the proposed development boundary for Albrighton, which is considered too restrictive (and excludes various referenced sites including ALB023, ALB014). The proposed development boundary should be amended to identify more sites in order to allow flexibility and respond to rapid change as required by NPPF paragraph 11a .</p> <p>Windfall Allowance</p> <p>6. Deliverability of proposed windfall allowances queried. The proposed contribution of windfall sites towards achieving the proposed residential guideline for Albrighton should be reduced. Approach to windfall development is unjustified/not sound and does not meet NPPF paragraph 70 requirements. The windfall assessment in the Strategic Land Availability Assessment (SLAA), looks at past trends borough-wide, but has not analysed distribution of past windfalls in settlements. This is important as proposals for windfall for each settlement are simply the residual of the headline allocation required minus the capacity of proposed allocations. To be credible and in line with the NPPF, any settlement windfall allowance should be based on an assessment of likely future supply at the settlement-level. The supply of windfall sites in Albrighton since 2006 has been limited compared to other non-Green Belt settlements. Sites which do not undermine the purposes of the Green Belt should be allocated, before any allowance is made for windfalls. Windfalls will then represent a 'buffer' that can help ensure the required growth at Albrighton is achieved. This would be more consistent with a plan-led approach to meeting housing needs, rather than relying on windfall sites without sufficient justification.</p> <p>Green Belt & Safeguarded Land</p> <p>7. Broad agreement with the Council on exceptional circumstances statement in that there are 'strategic level' exceptional circumstances to justify release of Green Belt at Albrighton. However, consider increasing need to address the identified housing shortfall from the Black Country constitutes 'strategic exceptional circumstances', in addition to those identified, which also provides clear justification for increasing the amount of land to be released from the Green Belt at Albrighton for development.</p> <p>8. The robustness and conclusions of the Green Belt Assessment and Green Belt Review undertaken to inform the draft Shropshire Local Plan is queried. Specific disagreement with the conclusions relating to proposed safeguarded land and ALB023 and ALB014 (as set out below in relation to the sites).</p>	<p>Albrighton Development Strategy</p> <p>1, 2, 3 and 4. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable and that there is no conflict between strategic approach and Policy DP28 which is mainly an implementation policy.</p> <p>Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to settlements characteristics, constraints and opportunities that exist.</p> <p>Development Boundary</p> <p>5. Shropshire Council considers the proposed development boundary for the settlement to be appropriate and reflects the extent of Green Belt and built form. Development boundary alterations to provide development sites require Green Belt release and before proposing the release of land within the Green Belt for development, Shropshire Council must demonstrate that it has examined fully all other reasonable options, including existing safeguarded land, for meeting its identified need for development. Proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, informed by a proportionate and robust Green Belt Review.</p> <p>Windfall Allowance</p> <p>6. Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable.</p> <p>Green Belt & Safeguarded Land</p> <p>7. Whilst the draft Shropshire Local Plan, is proposing to accommodate part of the 'unmet' housing and employment needs forecast to arise in the Black Country Authorities no specific sites are to be identified to accommodate these contributions which it is proposed will be integrated into the wider housing and employment land requirements for Shropshire and be delivered in accordance with the proposed spatial strategy for the level and distribution of development in the draft Shropshire Local Plan. Shropshire Council considers that the proposed amendments to Green Belt facilitate a proposed strategic approach to the level and distribution of development across Shropshire which is appropriate, effective, sustainable and deliverable.</p> <p>8. Shropshire Council considers that the Green Belt Assessment and Green Belt Review undertaken to inform the draft Shropshire Local Plan are appropriate and robust assessments.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S1.1. Development Strategy: Albrighton Key Centre continued</p>	<p>Green Belt & Safeguarded Land continued</p> <p>9. Additional safeguarded land should be proposed. Objection to both amount and locations of proposed safeguarded land with suggestions parts are not suitable/available (detailed below). This leads to resulting concern about the likely permeance of proposed Green Belt boundaries. A more proportionate amount of safeguarded land should be proposed at Albrighton due to its inherent sustainability. Additional/alternative land proposed for removal from Green Belt suggestions these are more suitable and sustainable than those proposed (detailed in relation to Alternative Promoted Sites).</p> <p>10. Concern regarding the availability and suitability of the sites proposed for safeguarding at Albrighton. The proposed safeguarded site at land bounded by Kingswood Road, High House Lane and the By-Pass (P35) will significantly alter the form and character of Albrighton. The site is on the periphery of the village and any development will materially change gateway views, impacting upon the setting of the Albrighton Conservation Area, within which part of the site is located. The SA scoring for the site is also incorrect in relation to distances to facilities (Primary School, GP Surgery and Library). This site is not a suitable site for future housing development and should remain in the Green Belt. Released from the Green Belt as safeguarded land is not justified, it will render the plan unsound Saved allocation ALB003</p> <p>11. Deliverability of existing Plan allocation queried; allocation should be reconsidered.</p> <p>ALB017 and ALB021</p> <p>12. Site ALB017 is viable and deliverable in line with Draft Local Plan Appendix 7 delivery timescales Early delivery demonstrated by the Pre-Application enquiry that has already been undertaken (no objections from highways, affordable housing, drainage, conservation, archaeology, ecology, trees, contaminated land and public rights of way were received). Technical documents, including a draft Masterplan, prepared in support of development proposals for ALB017 form appendices to the representation. Intention to submit Outline Planning Application at the earliest opportunity.</p> <p>13. Disagree with draft guidelines for proposed allocation ALB017. Do not reflect evidence and therefore do not meet the 'justified' or 'effective' tests of soundness and should be amended. Specifically:</p> <p>a) Proposed requirement for a roundabout access not reflected by Highways Officer advice on a Pre-Application Enquiry. A roundabout would result in loss of significantly more mature trees with greater impact on the character of the area. Guideline should be amended to require an appropriate access.</p> <p>b) Requirements for vehicular, cyclist and pedestrian links into the adjacent site saved SAMDev Plan Allocation ALB002 are unreasonable. Such a link can be provided into the northern part of ALB002, but a vehicular connection to the site boundary for the southern part of ALB002 was not required as part of its planning application. Northern link, which will link Kingswood Road to Shaw Lane is sufficient. Guideline should be amended so that it seeks to provide a connection into the saved SAMDev Allocation ALB002 rather than specific requirement.</p> <p>c) Seeking on-site public car parking facilities to alleviate pressure on existing facilities is not justified or effective. Location is 500m from the doctors or railway station. The requirement should be deleted.</p> <p>d) Green Infrastructure providing public open space that links to the wider area and an ecological corridor along the railway line are very different and combining the two will result in difficulty to effectively deliver either or to achieve a satisfactory layout. The requirement to retain trees and hedges is sufficient to ensure that the railway corridor remains undisturbed. The guideline requiring an 'associated green infrastructure corridor' along the railway line conflicts with 'secured by design' guidelines and will result in public open space being located in sub-optimal locations. The requirement for green infrastructure to include an appropriate green buffer of the railway line should be deleted.</p> <p>14. Support proposed requirement for comprehensive master planning and access from ALB017 into ALB021 in site guideline wording. This makes it clear that access from ALB017 into ALB021 must be ensured through a comprehensive masterplan and that the developers of ALB017 cannot 'ransom' or otherwise impede the development of ALB021, which is in separate land ownership. The landowners for ALB021 are also supportive of the principle of a pro-rata arrangement for developer contributions across the site. An indicative site plan for ALB021 supplied.</p>	<p>Green Belt & Safeguarded Land continued</p> <p>9 and 10. Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). The Local Plan review, in considering the Green Belt, has taken into account both at Shropshire's current Plan development requirements and the need to safeguard land to accommodate future development needs beyond 2038.</p> <p>Shropshire Council has undertaken a proportionate and robust site assessment process which has taken account of a range of considerations (including visual amenity) to inform identification of proposed allocations and proposed safeguarded land. This was informed by a proportionate and robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified is available. Shropshire Council considers that the Green Belt Assessment and Green Belt Review undertaken to inform the draft Shropshire Local Plan are appropriate and robust assessments.</p> <p>Saved allocation ALB003</p> <p>11. Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable).</p> <p>ALB017 and ALB021</p> <p>12. Noted.</p> <p>13. Shropshire Council considers that the proposed site guidelines for ALB017 are appropriate and sound.</p> <p>a) With regard to vehicular, cyclist and pedestrian connections into the adjoining SAMDev Plan allocation ALB002, the concerns raised are noted, but in order to ensure that access to services and facilities in the town and integrated communities are achieved, links between the two sites are considered essential. However, it is considered appropriate to propose a minor modification to proposed site guidelines to recognise the design and layout approved on the southern element of SAMDev Plan allocation ALB002.</p> <p>b) With regard to the proposed guideline for an appropriately designed roundabout at the point of access into the site, Shropshire Council continues to believe a roundabout remains the most appropriate means of access to the site and initial highway comments on the pre-application referenced in this representation are not considered to contradict this position. Indeed, they note that "any future planning application should provide any and all details necessary to assist with the appropriate determination from a Highways and Transport perspective. This should include vehicular and pedestrian/cycle access and junction details with associated visibility splays, sustainable travel facilities, Transport Assessment and Travel Plans." It is also noted that this access point will also serve the ALB021 element of the proposed allocation and will connect to essential linkages through to the adjoining saved allocation ALB002.</p> <p>c) It is considered appropriate to include a guideline regarding consideration of the potential to provide on-site public car-parking, as it is noted that this is a matter of significant local interest.</p> <p>d) It is considered appropriate to require a green infrastructure buffer along the railway line/green infrastructure corridor, as such provision responds to ecology comments that this corridor forms an environmental network and as such should be buffered. It is also considered that such provision, alongside the wider design and layout of the development, will effectively respond to any issues of noise associated with the railway line, an issue raised within the public protection assessment of the site.</p> <p>14. Noted.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S1.1. Development Strategy: Albrighton Key Centre continued</p>	<p>ALB017 and ALB021 continued 15. Objection to proposed allocations and the site assessment/Sustainability Appraisal (SA) undertaken to identify the sites. Whilst SA states that it seeks to make sure the plan proposals are the most appropriate (given reasonable alternatives) the preference for proposed allocations ALB017 and ALB021 contradicts this and has not been adequately justified by the SA results (Stage 2a - ALB017 performs fair and ALB021 performs poor (assessed together they perform fair). ALB017 and ALB021 were identified as not currently suitable but are still proposed for allocation. Assessment of ALB017/021 shows an element of bias choosing a site which needs mitigation to address SA concerns, nor is it justified why they are proposed for allocation ahead of more appropriate alternatives, including ALB014. The proposed allocations score significantly worse than site ALB014 (and many other sites assessed) in sustainability terms and so should have been discounted at the screening stage (2b). Consider these sites have been preferred simply because they were safeguarded land and so have been treated differently to other SLAA sites. This raises concern as to fairness and transparency in the site selection process.</p> <p>Alternative promoted site ALB014 16. ALB014 is a deliverable 7ha site which has well defined site boundaries and is in a highly sustainable location with access to a good range of services and facilities (including the adjacent primary school) and excellent accessibility to the strategic road (A41/M54) and rail network. Masterplanning shows the site could accommodate around 160 dwellings/d 1.7ha of open space. Its development would deliver significant social, economic and environmental benefits.</p> <p>17. ALB014 offers an appropriate location for development in the context of Policy S21. This Policy recognises the need to maintain the Green Belt/strategic gap between Albrighton and RAF Cosford (reflecting the Green Belt Assessment) which thus limits the potential for future growth to the north-west of Albrighton, and requiring that growth should be directed away from this location. In this context Green Belt land should be released for allocation of ALB014 rather than safeguarding in addition to the proposed allocation. This would be wholly in line with Albrighton's expected strategic role, respond to chronic past under-delivery, be consistent with the wider housing and economic agenda in Shropshire, as well as providing further flexibility, range of sites and boosting the supply of housing in line with national policy.</p> <p>18. Agree with the Council that 'site-specific' exceptional circumstances justify removal of ALB014 from the Green Belt, however, disagree with the decision to not release the site, or any site, from the Green Belt for development when Council evidence shows the site is capable of delivering sustainable development</p> <p>19. Error in the assessment of ALB014 for proximity to a primary school (should be ++) and would make it the highest scoring site in Albrighton. Disagree with stage 2b site screening conclusion that the site is not suitable as the identified site-specific factors can be resolved and the site made suitable. Consider ALB014 is more sustainable than the proposed allocations and the most sustainable of the assessment sites with no evidence preventing its allocation). This provides clear justification for allocation.</p> <p>20. The site provides an opportunity to deliver new development in a sustainable location that does not undermine the purposes of the Green Belt. ALB014 makes a low-moderate rather than moderate contribution to the Green Belt as set out in Shropshire Council's Green Belt assessment but agrees with Site Assessment conclusion that it should be removed from the Green Belt.</p> <p>Alternative promoted site ALB015 21. Land east of Newport Road, Albrighton (ALB015), should be allocated for around 218 dwellings as an alternative to safeguarded land. This is related to concern that proposed safeguarded site P35 is not a suitable site for future housing development and should remain in the Green Belt.</p> <p>Alternative promoted site ALB023 22. ALB023 should be taken out of the Green Belt and allocated for development to contribute to achieving the proposed development guideline for Albrighton (complementary to or instead of ALB003). The site is more suitable and sustainable than proposed safeguarded land to the east, benefits from good access to services, several potential access points and would 'round off the settlement'. Whilst located within a conservation area, it can be sensitively designed to enhance character and appearance. Disagree with the conclusions of the 2018 Green Belt Review regarding the contribution ALB023 makes to Green Belt purposes, rather consider it makes no/weak contributions.</p>	<p>ALB017 and ALB021 continued 15. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development as required by national guidance. This includes consideration of existing safeguarded land, (which had been removed from the Green Belt by a previous Local Plan) in order to meet any future sustainable development needs. Proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, informed by a proportionate and robust Green Belt Review.</p> <p>Alternative promoted site ALB014 16, 17, 18, 19 and 20. Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). This proposed development strategy has given due consideration to the settlement's characteristics, constraints and opportunities that exist. Safeguarded land has been identified in order to meet any future sustainable development needs beyond the current proposed plan period with exceptional circumstances for Green Belt release fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Alternative promoted site ALB015 21. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a proportionate and robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified is available. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Alternative promoted site ALB023 22. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a proportionate and robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified is available. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S1.2. Community Hubs: Albrighton Place Plan Area	See S21.	See S21.
S1.3. Community Clusters: Albrighton Place Plan Area	N/A	N/A
S1.4. Wider Rural Area: Albrighton Place Plan Area	N/A	N/A
S2. Bishop's Castle Place Plan Area	See S2.1-S2.4	N/A
S2.1. Development Strategy: Bishop's Castle Key Centre	Bishop's Castle Town Council are preparing a Neighbourhood Plan. Shropshire Council did not receive any responses to the Draft Shropshire Local Plan Regulation 19 consultation in respect of Bishop's Castle.	N/A
S2.2. Community Hubs: Bishop's Castle Place Plan Area	<p>General issues Bucknell</p> <p>1. The Right Homes Right Place survey showed only 14 respondents looking to move in the next 5 years, so don't agree that Bucknell needs 110 new houses. It is unsound to encourage so much development in Bucknell which will change the character of the settlement. Other, larger nearby settlements are providing many houses along with employment opportunities already.</p> <p>2. The views of local residents are being ignored.</p> <p>3. The explanatory text undervalues Bucknell's railway connection in para 5.35. The geographic extent of the AONB's relationship to Bucknell is incorrect in para 5.36 – an eastwards extension of development would not move it away from the AONB.</p> <p>Saved allocation BUCK001</p> <p>4. Support the allocation of this brownfield site. This is the community's preferred site and would bring many benefits such as respecting historic character, replacing redundant buildings, no impact on AONB due to screening of established trees and hedges and there is room for expansion if more numbers are required. Development should be ring-fenced to this site. It complies with draft policy S2.2. Recent planning applications remain undetermined due to the issue of impact on the River Clun SAC. There is a clear demand for development. Draft policy DP13 proposes only nutrient neutral development but there is no information on how this can be achieved. Definitive and measurable actions are needed. The Council should be making every effort to resolve the River Clun SAC issue – the Local Plan is not sound unless this happens.</p> <p>Site BKLO08a</p> <p>5 The brownfield site in Bucknell should be developed rather than this greenfield site. Development should not be at the expense of important agricultural land, especially close to the AONB.</p> <p>6. The draft guidelines in respect of contribution to historic character, enhancement of AONB and the countryside setting to the east are unachievable.</p> <p>7. The allocation is unsound as there has been no duty to co-operate discussions with Bucknell residents</p> <p>8. Support for the allocation. The site is highly deliverable, an option agreement has been agreed and development can be delivered in a short time period.</p> <p>9. The site is outside the village envelope. Development would harm visual and residential amenity.</p> <p>10. The site may not be deliverable as the land may be needed for restoration measures for the River Clun SAC and the proposed allocation may not be compatible with the Dutch Nitrogen Judgement.</p>	<p>General issues Bucknell</p> <p>1. Shropshire Council considers that the proposed strategic approach and development strategy for Bucknell is compliant with the NPPF and appropriate, effective, sustainable, and deliverable.</p> <p>2. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation.</p> <p>3. Noted. Modifications are proposed to address both points.</p> <p>Saved allocation BUCK001</p> <p>4. Support welcomed. The delivery of BUCK001 and BKLO08a is currently affected by the protection of the River Clun Special Area of Conservation (SAC) due to the water quality in the river. Site BKLO08a could be delivered quickly as a smaller, greenfield allocation to refresh the housing market when the issues connected with the protection of the SAC are resolved but currently these issues will defer the delivery of new housing in Bucknell.</p> <p>Site BKLO08a</p> <p>5. Proposed site allocations have been informed by a proportionate and robust site assessment process which has taken account of agricultural land quality and visual amenity.</p> <p>6. The Council considers the development guidelines to be deliverable.</p> <p>7. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation.</p> <p>8. Support welcomed.</p> <p>9. Proposed site allocations have been informed by a proportionate and robust site assessment process which has taken account of visual amenity.</p> <p>10. This issue is covered in the Statement of Common Ground with Natural England and the Environment Agency.</p>
S2.2. Community Hubs: Bishop's Castle Place Plan Area continued	<p>Saved allocation CLUN002</p> <p>11. Confidence expressed that issues with the current planning application with respect to nitrogen enrichment on this site can be addressed through continuing discussion with the Council.</p> <p>Site CLU005</p> <p>12 Support the recognition of Clun as historically significant and welcome the requirements in the development guidelines for this site to safeguard heritage assets. This site combined with saved allocation CLUN002 would make a significant contribution to the housing guideline for Clun.</p> <p>13. The site may not be deliverable as the land may be needed for restoration measures for the River Clun SAC and the proposed allocation may not be compatible with the Dutch Nitrogen Judgement.</p>	<p>Saved allocation CLUN002</p> <p>11. Noted</p> <p>Site CLU005</p> <p>12. Support welcomed</p> <p>13. This issue is covered in the Statement of Common Ground with Natural England and the Environment Agency.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S2.2. Community Hubs: Bishop's Castle Place Plan Area continued	<p>General issues Worthen and Brockton</p> <p>14. The Hierarchy of Settlements points scoring is flawed – the ‘one size fits all’ approach is not appropriate. Parish wide public consultation events showed overwhelming support for all parish settlements to be countryside not Clusters. This is based on large volume of recent permissions (which have exceeded SAMDev guidelines) for properties which do not meet local need (not affordable) and due to older demographic of purchasers, threaten local schools and existing services. Loss of local services would increase driving which is not environmentally friendly and would cause air pollution. There is a need for 2 and 3 bedroomed properties for families and young people to keep local services going.</p> <p>15. The proposed level of development is too high and will permanently change the rural character, put pressure on services (sewerage already at capacity) and cause additional flooding – this already restricts access to village at times.</p> <p>16. Safety concerns are expressed about excessive speed, uplift in usage and types of vehicles using B4386. The pavement to school is too narrow for mobility scooters and parents with buggies so people drive and parking by the school then causes issues. There is a need for safe pedestrian crossing and access - there has been a recent fatality.</p> <p>17. Allocating the sites WBR007, WBR008 and WBR010 would have a negative impact on views from the AONB and the Glover Report should be taken into consideration.</p> <p>18. The combined impact of WBR007, WBR008 and WBR010 has not been considered. Together these represent approx. a 50% increase in houses in Worthen. Question whether this is sustainable development.</p> <p>Site WBR007 & WBR008</p> <p>19. Both sites scored Poor in the SA due to not being in walking distance of services and facilities. A Transport Assessment is needed to determine safe and appropriate measures for local services and traffic calming (speeding is a concern) as the Parish Council has already advised that the proposed access route is not safe.</p> <p>20. The road adjacent to this site floods regularly and becomes impassable by car.</p> <p>21. Concern expressed that the identified capacity of the site (25) would be exceeded in light of the Government White Paper. An increase to 55 houses (the size of the site would allow this) increases the housing stock/size of the village (currently less than 150 dwellings) by an alarming 38%.</p> <p>Site WBR010</p> <p>22. There is no safe pedestrian access to this site and the footpath on the opposite side is not regulation width (narrower than 0.5m). Speeding and poor visibility are a safety concern. The Road Safety Camera Van visits regularly. There would be safety issues for pedestrians and vehicles emerging from this site onto the main road and a lack of space for a pavement means pedestrians would have to cross immediately to access the school and other facilities.</p> <p>23. Planning permission for this site was refused at appeal in 2004 due to (amongst other things) urbanisation of countryside which was harmful to its intrinsic character and beauty and harm to attractive landscape setting of the village and views from the AONB. These issues are still present and the current site assessment is incomplete.</p> <p>24. Concern was expressed that the identified capacity of the site (20) could actually become 50 in light of the Government White Paper.</p> <p>25. The site is highly deliverable and will provide a much needed pedestrian footway along the road frontage. There is already strong interest from developers to deliver the appropriate housing for the community quickly</p>	<p>General issues Worthen and Brockton</p> <p>14. The Council considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Worthen and Brockton. Consequently, it is considered appropriate that Worthen and Brockton are identified as a proposed Community Hub.</p> <p>15, 17, and 18. Flood risk and the effect of development on the Shropshire Hills AONB have been taken into account in the site assessment process. The Water Cycle Study and Statement of Common Ground with Severn Trent Water show that there is sufficient water infrastructure to support development. The Council also considers that the proposed strategic approach and development strategy for Worthen and Brockton is compliant with the NPPF and appropriate, effective, sustainable, and deliverable.</p> <p>16. Proposed site allocations have been informed by a proportionate and robust site assessment process which has been informed by comments from the Council's Highways Officers. These recommended that a Transport Assessment be carried out at the planning application stage for proposed site WBR007 & WBR008 to determine appropriate measures for improving safe pedestrian and cycle access to local services and amenities. This now forms part of the requirements in this site's guidelines. Similarly, recommendations about the provision of a substantial pedestrian footway, safe access, traffic calming and an appropriate crossing of the B4386 have been incorporated in the guidelines for proposed site WBR010.</p> <p>Site WBR007 & WBR008</p> <p>19. Proposed site allocations have been informed by a proportionate and robust site assessment process which has been informed by comments from the Council's Highways Officers. Their recommendations have been incorporated into this site's guidelines (see 16 above).</p> <p>20. Proposed site allocations have been informed by a proportionate and robust site assessment process which has taken account of flood risk.</p> <p>21. The identified capacity has been informed by a consideration of the site's constraints, opportunities, and countryside character as well as the rural nature of Worthen itself, and is deemed to be appropriate</p> <p>Site WBR010</p> <p>22. Proposed site allocations have been informed by a proportionate and robust site assessment process which has been informed by comments from the Council's Highways Officers. Their recommendations have been incorporated into this site's guidelines (see 16 above).</p> <p>23. The Local Plan is a separate process to the determination of planning applications. Proposed site allocations have been informed by a proportionate and robust site assessment process which has taken account of landscape character and the AONB</p> <p>24. The identified capacity has been informed by a consideration of the site's constraints, opportunities, and character as well as the rural nature of Worthen itself and is deemed to be appropriate.</p> <p>25. Support welcomed</p>
S2.3. Community Clusters: Bishop's Castle Place Plan Area	N/A	N/A
S2.4. Wider Rural Area: Bishop's Castle Place Plan Area	N/A	N/A
S3. Bridgnorth Place Plan Area	See S3.1-S3.4	See S3.1-S3.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre</p>	<p>General issues Bridgnorth</p> <ol style="list-style-type: none"> 1. Need to justify why the proposed housing requirement for Shropshire exceeds housing need. 2. There is a need for more housing in Shropshire (particularly affordable housing for younger people). 3. Disagree that Bridgnorth is the second largest Principal Centre in Shropshire. 4. Agree that Bridgnorth is a Principal Centre. As the only such settlement in east Shropshire, it performs an important role meeting the needs of its residents and the surrounding hinterland. There is also a significant need for open market and affordable housing in the town, given limited levels of delivery over recent years. 5. Development should be directed to other settlements (Telford and the Black Country often referenced). 6. The draft Shropshire Local Plan responds to the Shropshire Economic Growth Strategy. However, this seeks to direct growth to strategic corridors and Bridgnorth is not on such a corridor. 7. Shropshire needs more employment opportunities (modern facilities) to retain and draw in employers. Bridgnorth provides a rare opportunity to retain major regional employers given the established employment base at Stanmore Industrial Estate and proximity to Telford and the West Midlands conurbation, which offers opportunities to attract investment into Shropshire. 8. The proposed strategy for Bridgnorth, including the proposed housing and employment guidelines, is unsound (particular reference to effective and justified tests), unsustainable, and undeliverable. Specific concerns varied, but included: lack of justification (particular reference to justification for proposed allocations), lack of consideration of alternatives including alternative site allocations (specific reference to BRD032 and STC003), and lack of robust evidence to support proposals. 8a. Specific objections to the level of residential development proposed for Bridgnorth. Reasoning for objections varied, but included: the level of development is too high; lack of evidence to support proposals (some representations also suggested the need for settlement specific assessments of local housing need); lack of need/demand and market capacity/interest – (some identified a need to consider implications of Brexit and Covid 19); level of increase above the existing population; level of increase above past delivery rates (need evidence to justify); addressing past under-delivery; the level of development beyond existing development boundaries; infrastructure capacity and constraints (particularly highways); lack of regard to responses to previous stages of consultation; and conflict with conclusions reached within the Bridgnorth Plan. 8b. Specific objections to the level of employment development proposed for Bridgnorth. Reasoning for objections varied, but included: the level of development is too high, lack of evidence to support proposals (some representations also suggested the need for evidence such as a local economic assessment of the Bridgnorth Place Plan Area); lack of need/demand and market capacity/interest – (some linked this to the connectivity of the town, the fact the town is not on a strategic corridor, and a need to consider implications of Brexit and Covid 19); concerns about viability and deliverability (The viability study undertaken to inform the draft Shropshire Local Plan concludes office and industrial development is generally unviable and larger industrial development only marginally viable on greenfield site. Development occurring is for the operation of existing businesses rather than investment reasons); level of increase above past delivery rates (need evidence to justify); past trends show loss of employment not gain; addressing past under-delivery; existing available land/vacant units; infrastructure capacity and constraints (particularly highways); lack of regard to responses to previous stages of consultation; and conflict with conclusions reached within the Bridgnorth Plan. 9. Concerns relating to the capacity of infrastructure; the availability of infrastructure to support development proposals; the need for investment in infrastructure; and the lack of funding/clarity about sources of funding for necessary infrastructure improvements (including reference to electricity, high-speed broadband, mobile signals, and transport. Concern was also expressed about the failure to take a whole town approach to planning for infrastructure, services and facilities (reference made to the need for infrastructure and transport/highway plans – the brief for the transport assessment for Bridgnorth is not appropriate). 10. With specific regard to transport infrastructure, it was noted that Bridgnorth does not benefit from a main-line railway station. Concerns were also raised regarding the implications of increased use of roads on congestion, pollution, road safety (particularly given large agricultural vehicles use the roads), quality of life, and climate change. Furthermore, improvements to roads are constrained by topography, landscape, and various pinch points and road improvements will require traffic modelling and costs are unknown. 	<p>General issues Bridgnorth</p> <ol style="list-style-type: none"> 1 and 2. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need identified for Shropshire using Government's standard methodology, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. 3, 4, 5 and 6. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. 7, 8, 8a and 8b. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. <p>Shropshire Council also considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. This includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review. A Strategic Transport Assessment for Bridgnorth is also being undertaken to inform infrastructure requirements in association with development proposals for the town.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Furthermore, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site. Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the Gunning Principles. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <ol style="list-style-type: none"> 9 and 10. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Furthermore, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site. Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre continued</p>	<p>General issues Bridgnorth continued</p> <p>11. Proposed allocations are small-scale and do not benefit from access to the strategic road network. As such, they will meet local rather than strategic and cross-boundary need.</p> <p>12. There is significant in- and out-commuting from Bridgnorth which exacerbate congestion. No evidence/there is a need for evidence that proposals will increase self-containment.</p> <p>13. The Local Transport Plan for Shropshire should have been updated to inform the draft Shropshire Local Plan. Information on roads and highways is fundamental to the Local Plan decision making process.</p> <p>14. Support for the overall aims of the draft Policy. This will help to address affordability issues and boost economic growth.</p> <p>15. Consultation has been inconsistent, inappropriate, failed to comply with the Gunning Principles and Statement of Community Involvement, views expressed during them have not been considered, the summary of responses does not provide a response to these views and there is a lack of explanation for changes to levels and balance of housing and employment development proposed for different settlements.</p> <p>16. The level of employment land proposed varies through the document and the locations where provision will be made is unclear.</p> <p>17. Concern about impact of proposals on the tourist industry.</p> <p>18. Cross-boundary matters, including lack of statements of common ground with adjoining Local Planning Authorities and concern about decision to accept unmet cross-boundary housing need from the Association of Black Country Authorities (ABCA) which do not adjoin Shropshire.</p>	<p>General issues Bridgnorth continued</p> <p>11 and 12. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt.</p> <p>13. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review. A Strategic Transport Assessment for Bridgnorth is also being undertaken to inform infrastructure requirements in association with development proposals for the town.</p> <p>14. Noted.</p> <p>15. The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the Gunning Principles. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>16. The proposed strategic approach provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>17. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>18. Duty to Cooperate Discussions with relevant parties have occurred throughout the Local Plan Review process and Statements of Common Ground will be informed by the content of the draft Shropshire Local Plan subject to Regulation 19 consultation.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre continued</p>	<p>Proposed allocation BRD030 19. Objections to proposed mixed-use allocation BRD030 which is unsound. Reasoning for objections varied, but included: -Alternative sites/approaches (some referenced the approach in the Bridgnorth Plan, BRD032 and STC003) more appropriate. There has been a lack of consideration of alternatives. -The site is unsustainable, unavailable (in multiple ownerships none of which is the developer and there are risks and viability implications associated with land acquisition), undeliverable and unviable. -The site performs poorly within the Sustainability Appraisal of the draft Shropshire Local Plan. -The site is too large and the preference for a single garden village inappropriate. Development should be of a scale compatible and sensitive to the historic town of Bridgnorth. Smaller sites can meet need, impact on infrastructure would be reduced and necessary infrastructure would be deliverable. -The site promoters consultation on the site was inappropriate and responses not considered by Shropshire Council. -Lack of technical assessments to inform the proposed allocation, particularly given that some assessments are required by draft policies/draft site guidelines in the draft Shropshire Local Plan. Particular assessments referenced included landscape and visual sensitivity, air quality, agricultural land, noise and odour. -Insufficient consideration of the climate emergency and impact on carbon emissions. -Cumulative impact with saved SAMDev Plan allocations and wider development proposals across Shropshire (including impact on infrastructure). -It would result in a monopoly in the town. -It is outside the development boundary and would form a separate 'bolted-on' community rather than part of Bridgnorth and impact on the character of Bridgnorth and key gateways into the town. -It would not represent a self-contained development or a garden village (fails to demonstrate that it achieves requirements for a garden village). -Lack of need/demand and market capacity (reference Brexit and Covid 19). -Impact on the proposed relocation of the livestock market - which was required to allow for the current residential allocation. -Impact on adjacent land uses/land users. -Unexplained changes and conflict with proposals in previous stages of consultation. -Significant local opposition. -Affordable housing concerns including that it will not be affordable. -The site should be identified as Green Belt. -Infrastructure constraints, concern about the deliverability of infrastructure improvements, and the need to identify how/where infrastructure is to be delivered. Specific infrastructure referenced included: drainage, high-speed broadband, public transport, pedestrian and cyclist links (particular reference to the pedestrian footbridge over the A548 and the danger of an at level crossing of the A458), roads (particular reference to access onto the A458 and the wider network), welfare and community facilities (including schools, shops, leisure areas and the viability/timescales for delivery of on-site provision), on-site parking, and the park and ride service. -Lack of demand for employment (including competition from other locations like Shrewsbury, Telford and Wolverhampton), lack of existing employment provision to expand upon (which has viability implications and conflicts with the justification/opportunities for additional employment – attracting inward investment and supporting existing businesses) and lack of existing large employers. -Distance to the town centre, existing employment in the town, and other key employment centres (including Telford, Wolverhampton and Stourbridge) and associated implications for congestion, pollution, road safety, quality of life, and climate change. -Site constraints such as: flood risk, access concerns (pedestrians and cyclists – with a particular reference to the footbridge over the A458, and vehicles - with particular reference to the lack of an A road frontage and concerns about the capacity of Ludlow Road); separation from existing built form caused by the A458 and associated lack of pedestrian and cyclist connections/ability to provide pedestrian and cyclist connections into Bridgnorth, landscape/visual impact (appears to be deep countryside rather than urban fringe and is in the foreground of the AONB), loss of high-quality agricultural land/open space – often included reference to implications of Brexit and Covid respectively, heritage impact, ecology impact, public protection issues such as noise and odour (including associated with the proposed relocation of the livestock market, proposed poultry units on the site - status of which is unclear, existing/proposed mineral working, existing/proposed commercial activities and roads), and mineral sterilisation.</p>	<p>Proposed allocation BRD030 19. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. Draft site guidelines for the proposed mixed-use allocation BRD030 provide a framework for any future masterplanning and development of the site. They address such issues as compliance with the principles of a garden village; infrastructure provision; and key design/layout considerations. Furthermore, they also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document (SPD), this process will allow for more detailed consideration of any future development. As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Furthermore, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site. Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so. The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the Gunning Principles. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre continued</p>	<p>Proposed allocation BRD030 continued</p> <p>20. With specific regard to viability, no evidence of viability is provided. The viability study undertaken to inform the draft Shropshire Local Plan includes only a best estimate of costings for BRD030 so has low evidential value and does not specifically assess the viability of the employment element, but concludes office and industrial development is generally unviable and larger industrial development only marginally viable on greenfield site. Covid 19 may impact further on viability of office development.</p> <p>21. Support proposed allocation of BRD030 – would represent sustainable development and create a highly sustainable community, providing housing, employment, community facilities and open space, which will reduce the need to travel and. The site is available, suitable and deliverable. It represents the best location to deliver a mixed use allocation to meet the needs of Bridgnorth and its surrounding hinterland.</p> <ul style="list-style-type: none"> -The site is sustainably located with good access to services and facilities and would delivery high quality pedestrian and cycle connections to and through the site. It benefits from a direct access onto an ‘A’ road, highway assessments indicate the local highway network is capable of accommodating the level of traffic associated with the site and improvements are deliverable, and work undertaken by the site promoter indicates a pedestrian footbridge over the A458 is achievable within the public highway. -The site is not located in the Green Belt and as such would protect the Green Belt from development. -Consistent with national policy, large numbers of new homes can often be best delivered through a large scale development. -The site is not subject to technical or environmental constraints and is supported by a robust evidence base and initial masterplanning. -Development of the site can be effectively masterplanned to be sensitively integrated and respect and enhance the surrounding landscape, avoid areas of flood risk and mitigate public protection concerns. -Fully support provision of policy compliant affordable housing on the site and all necessary requirements relating to energy efficiency. -BRD030 would build on existing employment allocations and provide a concentration of employment floorspace well related to the strategic road network and resident population, such provision could complement that at Stanmore Industrial Estate. <p>22. With regard to the livestock market relocation site, note this allocation itself includes substantial landscaping.</p> <p>23. Concern about air quality and impact on the Air Quality Management Area in Bridgnorth.</p> <p>24. The Sustainability Appraisal for BRD030 is incorrect as it omits a (-) for Criteria 15 (high landscape sensitivity for residential).</p>	<p>Proposed allocation BRD030 continued</p> <p>20. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt.</p> <p>The Shropshire Viability Study is based on cautious assumptions regarding infrastructure requirements and contributions associated with potential development sites. However inevitably until the detailed Planning Application stage, the full infrastructure requirements and contributions for a potential development cannot be finalised, as not all necessary information will be available until this stage. Nevertheless, Shropshire Council considers the Shropshire Viability Study is a robust assessment of viability based on the information available at the strategic plan making stage.</p> <p>21 and 22. Noted.</p> <p>23. Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as a requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment.</p> <p>24. The landscape and visual sensitivity scoring within the Sustainability Appraisal (SA) is based on the Landscape and Visual Sensitivity Assessment undertaken to inform the Shropshire Local Plan Review.</p> <p>This Assessment concludes that the parcel which covers the majority of BRD030 has medium landscape and visual sensitivity to residential development and medium-high landscape and visual sensitivity to employment - a portion of the site was beyond the area assessed. As such it is correctly scored within both the residential and employment SA.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre continued</p>	<p>Proposed site guidelines for proposed allocation BRD030</p> <p>25. Support proposed vision, design code and masterplan Supplementary Planning Document (SPD) for the site.</p> <p>26. Greater clarity is required regarding the link between preparation of the SPD and submission of a Planning Application on the site. The first phases of development should be allowed alongside preparation of the SPD.</p> <p>27. Endorse requirement for employment development to be an intrinsic part of the development and will address the current balance between housing and employment and attract new businesses and industries into Bridgnorth. Agree employment land should be in a gateway location on the A458. General support for employment being targeted towards offices and research and development which will complement wider provision. However, it is important that guidelines are flexible to changes including related to Covid 19.</p> <p>28. Support provision of a local centre. Consider the proposed local centre should be a designated centre within the retail hierarchy to assist its delivery. Guideline specifies delivery of the local centre should be linked to the first phase of development, this is better addressed through the SPD as it depends where it is located on the site (central location would not allow delivery as part of the first phase).</p> <p>29. Guidelines relating to development being appropriately designed to accommodate pedestrians, cyclists and motorists; creating a development which promotes sustainable modes of transport is a key priority for the site promoter and the design of BRD030. Also endorse provision of links to current allocations.</p> <p>30. The site can deliver good quantity/quality open space. It can achieve the specified open space requirements, including new playing fields, associated facilities, green infrastructure and a new linear park.</p> <p>31. Concern about feasibility of a pedestrian footbridge and the ability to achieve pedestrian links along desire lines.</p> <p>32. Concern about the effectiveness of the condition regarding closure of poultry units.</p> <p>33. Guideline relating to closure of poultry units is unnecessary and duplicates policy elsewhere. Early phases of BRD030 are some distance from the proposed poultry units. This could be considered/dealt with through technical assessment and consideration against draft Policy DP18.</p> <p>34. Support provision of renewable energy, but the amount to be provided on the site should be dealt with as part of the SPD rather than a site guideline.</p> <p>35. Support use of buffers, effective design and materials will be used to mitigate noise, dust or odour issue.</p> <p>36. Welcome requirement for the site's design and layout to reflect and respect the site's heritage and heritage assets within the wider area and for non-designated historic farm buildings to be retained.</p> <p>37. Satisfied impact on heritage assets can be mitigated, but recommend any Planning Application is accompanied by a heritage statement and archaeological assessment.</p> <p>38. Support retention of designated heritage, but consider retention of non-designated historic farm buildings is not justified and the guideline is too imprecise (what is historic).</p> <p>39. Green infrastructure should 'safeguard' rather than 'create' settings for historic assets.</p> <p>40. Support provision of new playing fields and associated facilities on BRD030. However, guidelines should require the developer to demonstrate how facilities will be managed and maintained. Furthermore, need is likely to be met on- and off-site, which should be reflected within the site guidelines.</p>	<p>Proposed site guidelines for proposed allocation BRD030</p> <p>25. Noted.</p> <p>26. Shropshire Council considers the requirement for development of BRD030 to be in accordance with a vision, design code and masterplan adopted as a Supplementary Planning Document (SPD) important, given the scale and nature of development proposed on the site. Furthermore, assumptions regarding timescales and rates of delivery for proposed allocation BRD030, and its contribution to the strategy for Bridgnorth and Shropshire, have included consideration of likely timescales for preparing and adopting such a SPD. As such the proposed guideline is considered appropriate.</p> <p>However, for clarification a minor modification is proposed to recognise that it is the positive determination, rather than submission, of a Planning Application that is linked to the adoption of the SPD. Shropshire Council, as the Planning Authority, of course cannot control when a Planning Application is submitted for any site.</p> <p>27. The proposed site guideline relating to the types of employment uses targeted on the proposed employment land within proposed allocation BRD030 is considered appropriate, in that it recognises that office and research and development uses would complement wider employment opportunities in Bridgnorth and contribute to the objectives of the Shropshire Economic Growth Strategy. The guidelines are also considered sufficiently flexible to, where appropriate, allow for other suitable employment uses, where they conform with wider draft Policies including SP12.</p> <p>28. The proposed site guideline regarding linking provision of retail and community facilities to the first phase of residential development is considered appropriate as it recognises the importance of providing services and facilities early within a development of this scale. It is considered that the SPD can be used to determine the most appropriate means of achieving this proposed requirement.</p> <p>29 and 30. Noted.</p> <p>31. Shropshire Council considers that the proposed site guidelines for BRD030 are appropriate and achievable.</p> <p>32 and 33. The proposed site guideline regarding cessation of poultry units operating on the proposed allocation or associated potential future direction of growth before occupation of the first dwelling is considered appropriate, necessary and justified as it provides certainty that this matter is of relevance to this site and importantly the specific phasing of development of BRD030 is unknown, to be established through the SPD. Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p> <p>34. Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development' provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. Shropshire Council considers the proposed site guideline for on-site renewable and low-carbon energy generation to be consistent with the proposed requirement in draft Policy DP11, and for this draft policy to be reasonable. This requirement in draft Policy DP11 has been subject to due consideration within the Viability Assessment undertaken to inform the draft Shropshire Local Plan.</p> <p>35 and 36. Noted.</p> <p>37. To provide clarity a minor modification is proposed to the draft site guidelines confirming the need for a heritage assessment including an archaeological assessment to inform the Planning Application process.</p> <p>38. It is considered appropriate, consistent with the conclusions of the site assessment process and consistent with wider draft Policies in the draft Shropshire Local Plan to include a proposed site guideline relating to retention of non-designated heritage assets on the site. Those buildings which do and do not constitute non-designated heritage assets on the site will be determined during any future Planning Application process, informed by appropriate technical assessments and comments from relevant statutory consultees. However, for clarity a minor modification is proposed to amend reference from non-designated historic farm buildings to non-designated heritage asset.</p> <p>39. For the sake of clarity, a minor modification is proposed to amend reference from 'create' to 'safeguard' the setting within the site guidelines for BRD030.</p> <p>40. For the sake of clarity, it is proposed that a minor modification relating to provision and maintenance of playing pitches is made to the 13th paragraph of the guidelines for site BRD030.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre continued</p>	<p>Proposed allocations STC002 and P58a 41. Reference to Stanmore Industrial Estate should be updated to Stanmore Business Park. 42. Objections to proposed employment allocations STC002 and P58a. Reasoning for objections included: -Lack of need/demand for employment land and lack of certainty that if allocated it would be developed. -Existing/proposed alternative employment sites available that are not in the Green Belt (some suggested inclusion of STC002 and P58a may undermine their viability, including the employment proposed at BRD030, others suggested capacity remained within the existing Stanmore Industrial Estate so STC002 and P58a are not needed). -Changes to the wider strategy for Bridgnorth, resulting in no residential development in the Stanmore area, have not been consistently reflected in relation to these sites. -The separation from Bridgnorth and the rural location of these sites, its expansion will exacerbate existing issues; -Impact on Green Belt (the Green Belt Assessment and Review under-estimate the contribution these sites make to the Green Belt) and open countryside. Conflict with associated policies. -Lack of evidence and exceptional circumstances to justify the release of the sites from the Green Belt (no reference is made to existing demand, capacity and occupancy rates at Stanmore Industrial Estate). -Site constraints such as loss of agricultural land (which has not been sufficiently assessed). 43. Concern raised about the potential for waste management facilities on proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth). 44. Support for proposed allocations STC002 and P58a. These are necessary extensions to Stanmore Industrial Estate and can capitalise on its existing employment provision. There are clear exceptional circumstances for removing the site from the Green Belt, and the site promoter has provided evidence of the success of the existing site (it is running at capacity), the need for existing businesses on the site to grow and availability of land elsewhere.</p> <p>Proposed site guidelines for proposed allocations STC003 and P58a 45. Site guidelines regarding types of future employment uses need to be updated to add in business use class E(g)(i) offices, (ii) research and development, and (iii) light industrial. These are essential allow the site to reach its potential and provide flexibility (particularly important given Covid 19). Furthermore, these uses are already represented on Stanmore Industrial Estate and complement advanced manufacturing uses. 46. Sites are located on a principal aquifer and in source protection zone 3. Contaminated land and surface water management will need to be considered. 47. Welcome site guideline specifying that employment development should be targeted towards the engineering and advanced manufacturing sectors, to complement the employment offer on the existing Industrial Estate.</p> <p>Potential future direction of growth 48. Objection to the proposed potential future direction of growth which is not justified or effective given the proposed allocation of BRD030 has not been informed by consideration of alternative sites. 49. Support the identification of the proposed potential future direction of growth. This is necessary to demonstrate that the Green Belt will endure beyond the proposed plan period. 50. Suggest an alteration to the future direction of growth to allow delivery of infrastructure and open space and allow for flexibility associated with BRD030 as the masterplan evolves – current boundary informed by initial masterplanning.</p>	<p>Proposed allocations STC002 and P58a 41. For consistency the site will continue to be referenced as Stanmore Industrial Estate. 42. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. With regard to proposed employment allocations STC002 and P58a, they are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Draft site guidelines provide a framework for any future development of these sites. Draft site guidelines for the site address such issues as key design/layout considerations. 43. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. 44. Noted.</p> <p>Proposed site guidelines for proposed allocations STC003 and P58a 45. For clarity, a minor modification is proposed to the draft site guidelines for these sites regarding the types of employment uses appropriate. 46. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality. 47. Noted.</p> <p>Potential future direction of growth 48. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. The potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town. 49. Noted. 50. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. Draft site guidelines for the proposed mixed-use allocation BRD030 provide a framework for any future masterplanning and development of the site. They address such issues as compliance with the principles of a garden village; infrastructure provision; and key design/layout considerations.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre continued</p>	<p>Saved allocation W039 51. Need to undertake landscape and visual assessment for the site (referenced as BRD026). 52. The site should be included on the brownfield land register.</p> <p>Alternative sites 53. BRD032 (Stanmore Garden Village) would represent sustainable development providing a genuine garden community with great design and a balanced mix of housing, employment, community facilities, local centre and open space. The site is also designed to promote self-containment and sustainable modes of transport. It is supported by an initial masterplan, numerous technical assessments and extensive consultation. It was previously identified as a preferred option. It is immediately available and primarily in the ownership of two landowners who intend to deliver the site themselves. The site can support the economic growth of Bridgnorth, support the cluster of activities and key sectors at Bridgnorth and would reflect the justification for additional employment provision - attracting inward investment and supporting existing businesses (supported by socio-economic study undertaken for the town). Development of the site would balance past development focused to the west of the town. The site has zero-carbon objectives and will over provide (30%) affordable housing. The site provides opportunities for enhancement of the significance of the Hermitage scheduled monument, Stanmore Country Park and the sustainability of Stanmore and The Hobbins. Whilst in the Green Belt, this is a policy tool intended to restrict sprawl of the West Midlands conurbation rather than supressing the economies/ability to meet needs of towns around it. Consider that exceptional circumstances exist to support the development of BRD032. 54. Comparing BRD032 to BRD030: BRD032 is more sustainable than BRD030; BRD032 performs better than BRD030 within the Sustainability Appraisal of the draft Shropshire Local Plan; BRD032 is deliverable, unlike BRD030; BRD032 is all in the ownership of a single landowner/developer, unlike BRD030; BRD032 benefits from direct access onto an 'A' road, which is not the case for the residential element of BRD030; BRD032 has better connectivity to existing employment (particular reference to Stanmore Industrial Estate) and wider employment centres than BRD030, reducing implications for congestion, pollution and CO2 emissions (linked to climate change); due to its location and existing provision in the area, employment land would be more attractive to businesses on BRD032 than at BRD030; BRD032 will have a lower impact on services and facilities than BRD030; there is more community support for BRD032 than BRD030; the promoters of BRD032 have committed to zero-carbon housing, which is not the case on BRD030; BRD032 has a lower heritage, ecological and landscape impact than BRD030; BRD032 represents lower quality agricultural land than BRD030 (and its development will not undermine the wider holding); BRD032 is sequentially preferable in terms of flood risk to BRD030; and BRD032 is less exposed to sources of noise and odour than BRD030 (particular reference to the site for the relocation of the livestock market and mineral workings). 55. Comparing BRD030 to the alternative site BRD032: BRD030 is not located within the Green Belt, whilst BRD032 is (the Green Belt Assessment and Review under-estimate the contribution the site makes to the Green Belt); BRD030 benefits from good access to services and facilities, whilst BRD032 is inaccessible with existing routes not appropriate or reasonable due to topography and width and proposals for improved routes through the ancient woodland contrary to national policy; placing greater reliance of private vehicles; BRD030 will have less than substantial harm on heritage assets, whilst BRD032 would have substantial harm on heritage assets; BRD030 has a lower heritage and ecological impact; BRD030 and BRD032 are neutral with regard to landscape sensitivity; unclear whether affordable housing proposals on BRD032 meet the definition of affordable housing and are viable, but can confirm policy compliant provision on BRD030 is viable; 56. STC003 (Land at Grove Farm, Stourbridge Road) which could deliver a sustainable community of around 200 affordable and low carbon/zero-carbon dwellings. It benefits from a location adjoining an existing employment site/proposed employment allocations; development to the east of Bridgnorth will balance past growth to the west and offers better connectivity to the conurbation; and it could come forward alongside BRD032, increasing overall sustainability. Exceptional circumstances for Green Belt release at Stanmore already acknowledged (with regard to STC002 and P58a).</p>	<p>Saved allocation W039 51. This site is an existing allocation within the adopted Local Plan. 52. This site is an existing employment allocation. The purpose of Brownfield Land Registers is to identify sites suitable for residential development.</p> <p>Alternative sites 53, 54, 55 and 56. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.2. Community Hubs: Bridgnorth Place Plan Area</p>	<p>General issues Alveley</p> <ol style="list-style-type: none"> 1. Acceptance and support for Alveley Community Hub status. 2. Support proposed changes to Green Belt boundaries. 3. Alveley is a sustainable location on the A442 corridor, with strong demand for housing. It has a good range of services and facilities, public transport links, local employment, and access to employment centres in Worcestershire/wider West Midlands. 4. A recent local housing need survey identified need for affordable houses/bungalows and some open market dwellings. 5. Additional housing is not required due to the significant delivery that has occurred and remaining commitments. Time should be allowed for the community to absorb this growth. The proposed residential guideline for Alveley and policies map should reflect these recent completions and commitments (Central Garage Site specifically referenced) and sites already removed from the Green Belt. 6. The proposed residential guideline for Alveley is the minimum necessary and justifies the release of land from the Green Belt. 7. Evidence inadequate to support appropriate approach to development. 8. Recent approval for 100 park homes on the Butts Caravan site in Alveley will create additional problems for local services, particularly any development on ALV009, which must be considered. 9. Post office provision in Alveley is limited, but there is no weighting for this within the Hierarchy of Settlements. 10. Infrastructure and service improvements required, including to support development. 11. Provide explanation of how greater access to the Green Belt can be achieved for the community to off-set proposed development. 12. Views of the local community/consultation responses not properly considered. 13. Consider existing policy mechanisms have worked well and the adopted Development Plan needs to be considered. 14. Green Belt/site assessment process inconsistent (including site referencing), fragmented and not appropriate. <p>Proposed allocation ALV006 and ALV007</p> <ol style="list-style-type: none"> 15. Query whether decisions on allocations (ALV006 and ALV007 specifically referenced) can be rescinded if community benefits considered within the sites selection are no longer valid. <p>Proposed allocation ALV009</p> <ol style="list-style-type: none"> 16. Proposed allocation ALV009 should be removed from the Plan. There is sufficient alternative supply of sites so this site is not needed. The site is also in the Green Belt, has been rejected by the Parish Council, and is subject to site specific constraints (reference to ecological and hydrological issues) which have not been adequately considered. 17. Support allocation ALV009. The site can deliver high-quality design and a range of features include public open space. The site makes only a limited contribution to the Green Belt and has the lowest landscape and visual sensitivity. 18. ALV009 is adjacent to groundwater springs/issues, so groundwater is likely to be shallow. Contaminated land, foundation dewatering and surface water management aspects will need consideration. <p>Proposed site guidelines for ALV009</p> <ol style="list-style-type: none"> 19. The requirement for a footway along the A442 should be specifically on adopted highway land. 20. Guidelines should recognise that the site's access will necessitate puncturing through the tree belt fronting the A442. <p>Proposed safeguarded land</p> <ol style="list-style-type: none"> 21. Safeguarded land is not required, identified areas should be retained as Green Belt. 	<p>General issues Alveley</p> <ol style="list-style-type: none"> 1, 2 and 3. Noted. 4, 5, 6, 7 and 8. The Draft Shropshire Local Plan spatial strategy has focused development in principal and key centres, but Green Belt release, to provide for allocations, are identified for Alveley to support its continuing role as a Community Hub as detailed within the exceptional circumstances statement. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable, and deliverable. Existing commitments and development in Alveley during the Plan period (2016-2038) are taken into account and contribute to the housing guideline figure. Whilst some development may be approved within the Green Belt, no land has been released from the Green Belt for a considerable period of time. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Assessment and Review. The methodology used within the Green Belt Assessment and Review undertaken to inform the Local Plan Review and other evidence is considered appropriate, proportionate, and robust. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP2 addresses residential mix, whilst draft Policies DP3-DP7 address the various affordable housing delivery mechanisms, including within open market development schemes. 9. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. 10. It is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. 11. Provision of compensatory improvements to the Green Belt is a specific requirement of the sites guidelines for ALV006 and ALV007, and ALV009. The exceptional circumstances statement details potential compensatory improvements to the Green Belt, including opportunities for improving access. 12. Complaints submitted about the approval process for planning applications are required to be dealt with through a separate process to the examination of a Local Plan. All representations received in response to Local Plan consultations are considered. 13. Local Plans must be regularly reviewed and an the early review of the adopted Plan (SAMDev DPD) was required. The Draft Local Plan does not need to replicate the adopted plan but does needs to be in line national policy. As part of the review process housing and employment land requirements over the whole Plan period and beyond in the case of Green Belt review, must be considered. Alveley as a Community Hub is a sustainable location and focus for development in the rural area. 14. The methodology used within the Green Belt Assessment and Review undertaken to inform the Local Plan Review and other evidence is considered appropriate, proportionate, and robust. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Assessment and Review. <p>Proposed allocation ALV006 and ALV007</p> <ol style="list-style-type: none"> 15. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. Site guidelines provide 'structure' for the future development of proposed allocations. <p>National Policy relating to Green Belt has been taken into account and exceptional circumstances are identified for Green Belt boundary changes to support identified options for delivering sustainable development.</p> <p>Proposed allocation ALV009</p> <ol style="list-style-type: none"> 16. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. Allocation of sites in different parts of the village provides alternative delivery options. <p>National Policy relating to Green Belt has been taken into account and exceptional circumstances are identified for Green Belt boundary changes to support identified options for delivering sustainable development.</p> <ol style="list-style-type: none"> 17. Noted. 18. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality. <p>Proposed site guidelines for ALV009</p> <ol style="list-style-type: none"> 19 and 20. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed site guidelines for ALV009 are appropriate. <p>Proposed safeguarded land</p> <ol style="list-style-type: none"> 21. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S3.3. Community Clusters: Bridgnorth Place Plan Area	N/A	N/A
S3.4. Wider Rural Area: Bridgnorth Place Plan Area	N/A	N/A
S4. Broseley Place Plan Area	See S4.1-S4.4	See S4.1-S4.4
S4.1. Development Strategy: Broseley Key Centre	<p>General issues Broseley 1. Objection to the lack of proposed allocations to achieve the proposed development strategy for Broseley. Alternative sites 2. Promotion of site JKD004VAR (east of Ironbridge Road) for allocation for residential development at Broseley. This is a brownfield site and benefits from good road access and proximity to employment opportunities.</p>	<p>General issues Broseley 1. A Neighbourhood Plan is being progressed for the Broseley Town Council area. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the Key Centre of Broseley. Alternative sites 2. A Neighbourhood Plan is being progressed for the Broseley Town Council area. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the Key Centre of Broseley.</p>
S4.2. Community Hubs: Broseley Place Plan Area	N/A	N/A
S4.3. Community Clusters: Broseley Place Plan Area	N/A	N/A
S4.4. Wider Rural Area: Broseley Place Plan Area	N/A	N/A
S5. Church Stretton Plan Area	See S5.1-S5.4	See S5.1-S5.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S5.1. Development Strategy: Church Stretton Key Centre</p>	<p>General issues</p> <ol style="list-style-type: none"> 1. The town has experienced significant amounts of garden infill in recent years. Inappropriate development of residential gardens should be resisted in line with para 70 of NPPF. 2. Caer Caradoc Hillfort Scheduled Monument should be mentioned in paragraph 5.85 of the proposed explanation. 3. Question whether there is compelling evidence that cross subsidy and exception sites will continue at the same rate into the future, particularly in the context of a landscape sensitive settlement such as Church Stretton where speculative or redevelopment opportunities become increasingly scarce as previous sites are built out. 4. The scope for meeting Church Stretton’s housing needs outside the AONB is limited as the town is remote from other settlements of a reasonable size. 5. The Council should have identified Community Hubs and Clusters in the Church Stretton Place Plan area. Strong community opposition means that places such as All Stretton will not come forward voluntarily. <p>Lack of site allocations</p> <ol style="list-style-type: none"> 6. The necessary balance between housing needs and the protection of the AONB is best achieved by allocating a site large enough to deliver landscape enhancements. 7. The plan will fail to meet the housing needs of the settlement as no new site allocations are proposed. Instead development relies on a saved site from SAMDev (CSTR019) which has not come forward in the last 8 years. The other SAMDev site (CSTR018) is not saved. The last significant planning permission granted in this Key Centre was in 2008, renewed in 2011. All other housing has been through windfall and consents prior to SAMDev. Given that the plan period is to 2038 that means there will have been no housing allocations for more than 28 years. 8. The proposals in the Local Plan do not deliver the strategy and are unsound because they make no provision for any new housing sites and only include two sites which failed to deliver any housing in the last plan period. <p>Housing guideline</p> <ol style="list-style-type: none"> 9. The proposed housing guideline is too low and fails the positively prepared, justified and effective soundness tests. Church Stretton is the 3rd highest ranking Key Centre in the Hierarchy of Settlements with a very good range of services and facilities and a population of 4,000. The 2018 household projections for Shropshire forecast a 26.9% growth- this translates to 534 dwellings in Church Stretton. The town has the highest viability of all the settlements in the Viability Study and is subject to greater housing demand than the Shropshire average. Low levels of development will put pressure on house prices and reduce affordability, undermining social and economic sustainability. Church Stretton has a housing affordability problem. The Local Plan Delivery and Viability Study confirms that 23 of the 25 typologies are viable, meaning that the Local Plan needs more allocations in the South Higher area. 10. The justification for housing guideline is limited and relies on the provision/retention of services when the SA indicates these will be lost in the long term. The housing guideline should be landscape led, respond to clear local need, demonstrate that great weight has been given to the local environment, that national policy is not breached, and that the exceptional circumstances tests have been met. This has not been done. 11. The figure of 200 should be fully justified by proportionate evidence and should not breach national policy. This has not been done and the plan is unsound. 12. There has been no assessment of affordable housing need which could contribute to meeting the guideline. 13. Consider that brownfield sites are unlikely to contribute to affordable housing so exception sites should be considered. 14. There is no calculation of local housing need for Church Stretton, implying that the guideline is intended to meet wider growth objectives, contrary to national policy and guidance. 15. A residential guideline in the AONB is unsatisfactory if it relies on major development. Meeting the guideline relies on possible exception sites which are likely to be major development in the AONB and will need to demonstrate exceptional circumstances. 16. The capacity for development in the town should be limited in line with the AONB Management Plan and NPPF. 	<p>General issues</p> <ol style="list-style-type: none"> 1. The Draft Shropshire Local Plan does not propose residential development of gardens. 2. The explanation to the policy mentions environmental constraints adjacent, or close to the town’s development boundary. Caer Caradoc Scheduled Monument is not in this category. 3 and 4. The Council considers that the proposed development strategy for Church Stretton and the proposed windfall allowance identified to contribute towards achieving this strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). 5. None of the settlements in the Church Stretton Place Plan Area met the criteria for Community Hub status in the Council’s Hierarchy of Settlements methodology and no communities came forward to be considered as Community Clusters. <p>Lack of site allocations</p> <p>6, 7 and 8. The Council considers that the proposed development strategy for Church Stretton is appropriate, effective, sustainable and deliverable.</p> <p>Housing guideline</p> <p>9, 10, 11, 12, 13, 14, 15 and 16. The Council considers that the housing guideline for Church Stretton is justified, is in line with the evidence base for the Draft Shropshire Local Plan, and complies with national policy and guidance.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S5.1. Development Strategy: Church Stretton Key Centre continued</p>	<p>The Shropshire Hills AONB 17. The choice to use the Annex 2 definition of major development is contrary to footnotes 55 and 70 of NPPF 17. The Council’s target driven approach to settlement numbers is likely to mean major development in the AONB, which is wrong. 18. Para 2 of draft policy S5.1 states that the 200 dwellings contribute to the strategic growth objectives in the south of the County. This is inconsistent with NPPF paras 11 and 172 and NPPG on the protection of the AONB. The Council has not applied NPPF planning obligations for the AONB in the preparation of its strategy for Church Stretton. 19. No assessment of AONB/Church Stretton housing need has occurred, the SA fails to specifically include the AONB, smaller sites were screened out in favour of major development and a (weak) assessment of exceptional circumstances wasn’t published until August 2020.</p> <p>Windfall allowance 20. The draft Shropshire Local Plan relies on windfall, but previous high demand means most windfall sites have already been developed and the remainder will struggle to comply with environmental policies. 21. The allowance exceeds the capacity of small scale brownfield sites within the development boundary 22. Question whether there is compelling evidence that past windfall delivery rates will continue at the same rate into the future, particularly in the context of a landscape sensitive settlement such as Church Stretton where speculative or redevelopment opportunities become increasingly scarce as previous sites are built out. No evidence (such as known constraints) is provided to support either the windfall allowance or its deliverability. 23. The windfall allowance is arbitrary. It is the second highest amount of the 11 key centres. 24. The allowance is not sound, given that the Council has 6.42 years of housing land supply. 25. Adding the 70 houses previously proposed for an allocated site to the windfall allowance is contrary to previous approaches where that number was deleted from the guideline. 26. The emphasis should be on planned development, subject to evidence of need and there should not be reliance on unknown/unplanned sites.</p> <p>Alternative sites 27. Site CST019VAR promoted for residential development. It has development on 3 sides and the railway line to the fourth side. Access can be established from Lawley Close to the south, the site is in the area of lowest landscape sensitivity in the town, flood risk can be accommodated, access to the saved employment land could be provided and the site scores Good in the SA. Site is considered viable and deliverable. 28. Site CST020 promoted for residential development. Access to this site has been amended to avoid damaging the avenue of lime trees which are covered by TPOs. The house types suggested are smaller affordable and open market units. 29. Site CST021 promoted for residential development. Re-introduce the allocation of land at Snatchfield Farm (CST021) for up to 70 dwellings. 30. CST021 was unexpectedly removed from the Plan after the Regulation 18 Preferred Sites consultation. The new (current) strategy for the town will not meet its needs and is not supported by evidence to demonstrate the deliverability of the sources suggested (windfall, cross subsidy). Windfall is only likely to deliver 48 dwellings, leaving a shortfall of 71. New housing is needed if Church Stretton is to maintain its role as a Key Centre and this site is the only logical unconstrained location outside the development boundary. We respectfully consider that other sites suggested by the local community are constrained and not deliverable. 31. Consider that CST021 is deliverable. Reasons for not allocating are vague. All other non-allocated sites have site-specific constraints, but apart from some technical issues (ecology, heritage and tree matters) the Stage 3 site assessment does not set out any unassailable constraints for this site. Insufficient reasoning has thus been given for its rejection and it should be allocated to provide a meaningful contribution towards the area’s market and affordable housing needs. 32. Site CST033/34 promoted for residential development. The loss of CST021 from the Local Plan creates a shortfall which these sites (Watling Street North eastern field and southern field can meet. They are well located, fully deliverable, have access to the A49 (which would require improvement) and adjoin other recently developed land. 33. Site CST035 promoted for residential development. This site can accommodate 20 dwellings. It has a good SA score and concerns raised by the Council over flooding and ecological impacts have been addressed in an outline planning application (18/01258/OUT), approved in February 2021.</p>	<p>The Shropshire Hills AONB 17. The Council considers it appropriate to use the NPPF Annex 2 definition of major development. 18. The Council considers the development strategy for Church Stretton to be consistent with national policy requirements. 19. The impact of this strategy on the Shropshire Hills AONB has been assessed through the Sustainability Appraisal (criteria cover landscape, biodiversity, flora, fauna, soil, water, cultural heritage which includes architectural and archaeological heritage and landscape). No major development is being proposed through allocated sites, so the exceptional circumstances test is not needed. Rather individual applications will need to meet the requirements of draft policy DP25. This includes the exceptional circumstances test.</p> <p>Windfall allowance 20, 21, 22, 23, 24, 25 and 26. The Council considers that the proposed windfall allowance for Church Stretton is appropriate, effective, sustainable and deliverable.</p> <p>Alternative sites CST019VAR, CST020, CST021, CST033/34 and CST035 27, 28, 29, 30, 31, 32 and 33. The Council’s considers that the residential guideline for Church Stretton can be achieved through a combination of windfall sites within the development boundary, including on brownfield land, and through the likely delivery of exception and cross subsidy affordable housing sites. Given these sources of supply are sufficient to achieve the settlements’ residential guideline it is considered that there is insufficient justification to warrant the allocation of major housing development in Church Stretton, given its location within the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and the need, documented within the NPPF, to demonstrate that exceptional circumstances exist for such major development within an AONB.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S5.1. Development Strategy: Church Stretton Key Centre continued	<p>Saved allocation ELR078</p> <p>34. This site has access issues and without changes is undeliverable, thus failing the effective test of soundness.</p> <p>Policies map</p> <p>35. Recent developments are not included such as planning consent 18/01258/OUT which is north and south of site CST019VAR. Nor does it include the existing employment allocation. These are serious omissions and should be corrected.</p>	<p>Saved allocation ELR078</p> <p>34. This is a proposed saved employment allocation. The Council considers this to be an appropriate, effective, sustainable and deliverable approach.</p> <p>Policies map</p> <p>35. The Council considers the policies map accurately reflects the current situation in Church Stretton.</p>
S5.2. Community Hubs: Church Stretton Place Plan Area	<p>Designation of Community Hubs</p> <p>1. Disagree with the Council's approach to which does not identify any Community Hubs in the Church Stretton Place Plan. The Council should rely on a professional assessment of sustainability and suitability of All Stretton to determine its status.</p>	<p>Designation of Community Hubs</p> <p>1. The Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such the list of proposed Community Hubs is considered appropriate.</p>
S5.3. Community Clusters: Church Stretton Place Plan Area	<p>Designation of Community Clusters</p> <p>1. Disagree with the Council's approach to which does not identify any Community Clusters in the Church Stretton Place Plan. It is highly unlikely that All Stretton Parish Council will put the settlement forward as a Cluster. The Council should rely on a professional assessment of sustainability and suitability of All Stretton to determine its status. If All Stretton were to become a Cluster, this would enable our clients land at Starr Lane to come forward and we ask the Inspector to consider this.</p>	<p>Designation of Community Clusters</p> <p>1. The Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability.</p>
S5.4. Wider Rural Area: Church Stretton Place Plan Area	N/A	N/A
S6. Cleobury Mortimer Plan Area	See S6.1-S6.4	See S6.1-S6.4
S6.1. Development Strategy: Cleobury Mortimer Key Centre	<p>Cleobury Mortimer Town Council are preparing a Neighbourhood Plan. Shropshire Council did not receive any responses to the Draft Shropshire Local Plan Regulation 19 consultation in respect of Cleobury Mortimer.</p>	N/A
S6.2. Community Hubs: Cleobury Mortimer Place Plan Area	N/A	N/A
S6.3. Community Clusters: Cleobury Mortimer Place Plan Area	N/A	N/A
S6.4. Wider Rural Area: Cleobury Mortimer Place Plan Area	N/A	N/A
S7. Craven Arms Place Plan Area	See S7.1-S7.4	See S7.1-S7.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S7.1. Development Strategy: Craven Arms Town	<p>Craven Arms</p> <p>1. Support Policy S7.1, the strategy for Craven Arms including the enablement of significant transport infrastructure improvements to the settlement, the inset policies map, and saved employment land allocations ELR055 and LS2005_00002 and the identification of a 14ha employment guideline to meet the future employment needs of the town and its rural hinterland as a primary growth point and focus for development in south Shropshire.</p> <p>2. Object to Policy S7.1 and recommend the allocation of additional housing sites CRA023, CRA024 and CRA025 to be included within the development boundary of Craven Arms for the following reasons:</p> <ul style="list-style-type: none"> -To meet the soundness tests for the plan to be justified and effective which will require more small greenfield sites to ensure the housing sites are viable and deliverable. -To meet a growing demand for housing in Shropshire evidenced by more recent household projections and increasing demand from the Covid-19 pandemic there is a need for more housing sites and this will satisfy the ‘justified’ and ‘positively prepared’ soundness tests. -Craven Arms role and function as a Key Centre on the A49 strategic corridor means the town is a focus for growth and the housing guideline should be increased by 25% to 625 dwellings to provide sufficient flexibility to meet the growing demand. -The development of the existing SAMDev allocations show larger greenfield sites are not as viable and deliverable as smaller greenfield sites as shown by the delayed delivery of sites CRAV003 & CRAV009 indicating a need for additional housing allocations. <p>3. Recommend the allocation of proposed site CRA15 (0.87ha) for housing use to contribute towards the housing guideline of 500 dwellings utilising its location on Watling Street, its situation between existing and already proposed development land to the north and south and the flat topography and absence of flood risk across the site.</p>	<p>Craven Arms</p> <p>1. Support for Policy S7.1 and the strategy for Craven Arms is welcomed.</p> <p>2 and 3. The SAMDev Plan (2015) currently identifies a comprehensive mixed-use strategy to deliver 500 dwellings and 14 hectares of employment land for Craven Arms in the period to 2026. It is proposed that this strategy should continue through the draft Local Plan for the period from 2016 to 2038 subject to the duty to keep spatial development strategies under review.</p> <p>At the meeting of Craven Arms Town Council on 28th August 2018, Shropshire Council recommended that this strategy remained sufficiently robust to continue to meet the needs of the community of Craven Arms as part of the Local Plan review for the period 2016 to 2036 (now 2038) and the housing and employment guideline figures should be sustained over this revised plan period. Existing employment commitments and allocations in Craven Arms will fulfil the employment guideline figure and existing housing commitments and allocations leave a residual requirement for 91 dwellings. Craven Arms Town Council resolved to continue to pursue this strategy and to accept the residual requirement for 91 dwellings as an allowance for further, unidentified (windfall) housing sites to come forward over the revised plan period to 2036 (now 2038). There is no intention to make any further housing or employment allocations in Craven Arms. Consequently, sites CRA015, CRA023, CRA024 and CRA025 are not considered to be necessary nor sustainable additions to the spatial development strategy for Craven Arms. These sites would affect the setting of the settlements and heritage assets in the adjoining Sibdon Carwood Parish in a location previously only considered for development to deliver exceptional affordable housing referenced by the respondent in proposing site CRA015. Shropshire Council therefore considers the strategy for Craven Arms to be appropriate, effective, sustainable and deliverable without further allocations including sites CRA015, CRA023, CRA024 and CRA025.</p> <p>The adopted Local Plan in the Site Allocations and Management of Development Plan (SAMDev Plan, 2015) set out an ambitious development strategy for Craven Arms. This strategy will be ‘saved’ in the draft Shropshire Local Plan with the addition of a windfall allowance for 91 dwellings for further small sale housing development within the town in the period to 2038. This ambitious strategy will strengthen the role and function of Craven Arms as a Key Centre and a principal ‘service’ settlement for the adjoining rural areas particularly within the Shropshire Hills Area of Outstanding Natural Beauty along the Clun/Kemp valley (west) and Corvedale (east). The strategy reflects the location of Craven Arms on the strategic corridor of the A49 Trunk Road through south Shropshire and the proposed function of the town as a key growth point supporting the historic Market Town of Ludlow (south) and the historic Key Centre of Church Stretton (north). The disposition of proposed uses in Craven Arms with housing to the west, employment to the north and commercial uses to the east reflects the more commercial history and character of the central and eastern areas of the town. This also reflects the history of Craven Arms as an important station stop on the Shrewsbury – Cardiff rail line at the junction with the Heart of Wales line serving mid-Wales. The town is the business location for a key local employer (Euro Quality Lambs) looking to locate and expand from the centre of the town to a new bespoke site in the north of the town to create the proposed Newington Food Park. This proposed development is expected to drive the development of further employment sites allocated in the north of the town including the Phase 2 expansion of the successful Craven Arms Business Park. Shropshire Council and its partners, including Craven Arms Town Council, consider the proposed strategic approach to the level and distribution of development to be appropriate, effective, sustainable and deliverable including the allocations saved from the currently adopted SAMDev Plan. These saved allocations are almost entirely greenfield sites for which there is expected to be a ready market following the commencement of the key commercial and infrastructure proposals principally for the relocation of Euro-Quality Lambs into the north of the town. It is recognised that the more commercial character of Craven Arms means the housing market may not be as strong and resilient as the other historic towns of Ludlow and Church Stretton also located on the A49 Trunk Road through south Shropshire. Nevertheless, the provision of new employment is expected to provide a stimulus for further housing development in Craven Arms. For the time being, the Brexit decision and the Covid-19 downturn have affected the delivery of the Craven Arms strategy. This strategy is also affected by further infrastructure requirements to deliver a new strategic highway junction on the A49, a strategic highway link between the north and the west of the town, a bridge over the Shrewsbury-Cardiff rail line to serve the employment allocations to the north and the housing allocations in the west and the widening of Watling Street as the urban boundary between the town to the east and the open countryside and AONB to the west. The delivery of this strategic infrastructure will facilitate the closure of a key level crossing (at Long Lane) on the Shrewsbury – Cardiff rail line. This closure will avoid the proposed automation of this crossing, expected to cause traffic delays and queues onto the A49 and affecting the safe operation of this strategic Trunk Road that also serves north – south movements through Wales. Shropshire Council is supporting a partnership of landowners and developers to deliver this strategic infrastructure in Craven Arms to help trigger the delivery of the development strategy for the town in the draft Shropshire Local Plan. Shropshire Council with Craven Arms Town Council have considered whether to make further land allocations in the draft Local plan to help deliver the strategy. This has considered the proposals to enhance the viability of the overall scheme as suggested in the proposed Craven Arms Development Brief submitted by a respondent to the draft Local Plan. The preferred strategy agreed with Craven Arms Town Council is to make a small windfall allowance available for smaller developers to balance the larger development opportunities and to help broaden the range, choice and affordability of new housing up to 2038. It is also recognised that Watling Street forms a strong and defensible boundary to the western areas of the town and effectively separates the urban areas from the countryside and from the AONB enclosing the north and west of Craven Arms. Watling Street also encloses and maintains the rural isolation and tranquillity of the largely agricultural, estate hamlets of the adjoining Sibdon Carwood Parish area. Shropshire Council with the support of Craven Arms Town Council have therefore not chosen to implement the proposals in the Craven Arms Development Brief in the draft Shropshire Local Plan.</p>
S7.2. Community Hubs: Craven Arms Place Plan Area	N/A	N/A

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S7.3. Community Clusters: Craven Arms Place Plan Area	N/A	N/A
S7.4. Wider Rural Area: Craven Arms Place Plan Area	N/A	N/A
S8. Ellesmere Plan Area	See S8.1-S8.4	See S8.1-S8.4
S8.1. Development Strategy: Ellesmere Key Centre	<p>General comments Ellesmere</p> <p>1. The proposed development strategy for Ellesmere fails the 'effective' test of soundness. This is because reliance on windfall development is too high (the development boundary is too restrictive and the approach to affordable exception sites more restrictive); the capacity of the proposed allocation is less than the 170 dwellings proposed; allocations are concentrated in the south-west of Ellesmere, where development is historically slow and is reducing choice and competition.</p> <p>2. Ellesmere is underlain by a complex geology with highly variable groundwater depth. Design of development should positively respond to this.</p> <p>3. Reference should be made to the future sustainable use of Ellesmere Yard (located outside the proposed development boundary) and its improved connectivity to the town. This site contains historically significant buildings no longer appropriate for their existing uses.</p> <p>4. The development boundary on the draft policies map for Ellesmere should be amended to include existing development sites. Specific reference to 14/00822/OUT / 15/05415/REM.</p> <p>Proposed allocation ELL005, ELL008 and ELL033</p> <p>5. Proposed allocation ELL005 and ELL008 has the support of the local community and will be a positive benefit to the town.</p> <p>6. Proposed allocation ELL008 and ELL033 are supported. They are available, viable and deliverable, represent a highly sustainable location and sit comfortably within the existing pattern of development. They were also considered within technical assessments undertaken as part of Planning Application 14/04047/OUT.</p> <p>7. The capacity of the proposed allocation is less than the 170 dwellings proposed and allocations are concentrated in the south-west of Ellesmere, where development is historically slow and is reducing choice and competition.</p> <p>Saved allocations ELL003a and ELL003b</p> <p>8. The draft Shropshire Local Plan relies too heavily on saved mixed-use allocations ELL003a and ELL003b, which have been slow to deliver much needed housing. Given this, further residential allocations should be identified.</p> <p>Alternative sites</p> <p>9. Promotion of all or part of site ELL026 (Land off Elson Road) as either a residential allocation or reserve site for residential development should a shortfall in delivery occur. This land has the potential to contribute towards a strategic link road.</p> <p>10. Promotion of site ELL007 (Land off Cherry Drive) as a residential allocation. The site could be delivered quickly and delivery multiple benefits. There are technical solutions to the access constraint (located in flood zones 2/3) as accepted on ELL003a.</p>	<p>General comments Ellesmere</p> <p>1. Shropshire Council considers that the proposed development strategy for Ellesmere and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken.</p> <p>2. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.</p> <p>3. Given the location and nature of the Ellesmere Yard site, it is considered appropriate that the site remains outside the proposed development boundary for Ellesmere and as such 'countryside' for planning policy purposes. It is considered that draft Policy SP10 which is the starting point for managing development in the countryside provide an appropriate framework for managing sites such as the Ellesmere Yard.</p> <p>4. It is not proposed that development boundaries will reflect the extent of all extant Planning Permissions around a town. Rather, the purpose of a development boundary is to define a logical area, based on the built form of a settlement and any proposed allocations, within which certain policies apply. With regard to Planning Permission 14/00822/OUT / 15/05415/REM, when defining the development boundary for Ellesmere it was considered that significant progress had been made on the northern element of the scheme to the extent that it was considered to constitute part of the built form of the settlement, this was not the case for the southern element of the site. This of course does not impact on the ability to implement Planning Permission 14/00822/OUT / 15/05415/REM. Shropshire Council considers that the proposed development boundary for Ellesmere is appropriate.</p> <p>Proposed allocation ELL005 and ELL008</p> <p>5 and 6. Noted.</p> <p>7. Shropshire Council considers that the proposed development strategy for Ellesmere and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken.</p> <p>Saved allocations ELL003a and ELL003b</p> <p>8. Shropshire Council considers that the proposed development strategy for Ellesmere and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken.</p> <p>Alternative sites</p> <p>9 and 10. Shropshire Council considers that the proposed development strategy for Ellesmere and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S8.2. Community Hubs: Ellesmere Place Plan Area</p>	<p>General comments Dudleston Heath 1. Need to ensure adequate foul drainage, water supply and protection of existing private supplies and groundwater in Dudleston Heath.</p> <p>Saved allocation DUDH006 2. Site DUDH006 is unsuitable and unsound, as such it should be reviewed/de-allocated. Key issues include ground/soil conditions, drainage, flood risk, and highways. 3. DUDH006 is crossed by a public sewer which may restrict the development density of the site. However, it is not expected the proposed development would adversely impact on sewers.</p> <p>Alternative sites 4. DHG011 is within 480m of the centre of Dudleston Heath and associated amenity space. The site access is not on a bend or subject to double white lines.</p> <p>General comments Welshampton 5. Welshampton's proposed 'countryside' status is unsound, as this allows for no provision of housing for the local community. The settlement is currently a Community Cluster, is located on the A495, is in close proximity of Ellesmere, and benefits from a range of local facilities. It should be identified as a proposed Community Hub/Community Cluster.</p> <p>Alternative sites 6. Promotion of site WEL006 (Land south of the B5063), which adjoins Planning Permission 14/01603/OUT / 17/03500/REM, for residential development.</p> <p>General comments Cockshutt 7. Identification of Cockshutt as a Community Cluster is unsound. The settlement should be identified as a Community Hub (consistent with its current status in the adopted Local Plan). The Hierarchy of Settlements assessment which informs identification of Community Hubs is flawed as it is too inflexible, ignores the size of settlements, applies an arbitrary Community Hub threshold and incorrectly scores Cockshutt with regard to amenity green space.</p> <p>Alternative sites 8. Promotion of site CCT014 for residential development. The site benefits from good links to the village, Ellesmere and Shrewsbury; access off the main road, could improve the southern access to the village and community facilities.</p>	<p>General comments Dudleston Heath 1. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.</p> <p>Saved allocation DUDH006 2. Shropshire Council considers that the proposed development strategy for Dudleston Heath and the existing commitments (including the existing allocation), and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities. Proposed saved SAMDev Allocations have previously been the subject of assessment and examination. 3. Noted.</p> <p>Alternative sites 4. Shropshire Council considers that the Sustainability Appraisal of the draft Shropshire Local Plan and site assessment process which informs proposed allocations is proportionate and robust.</p> <p>General comments Welshampton 5. Shropshire Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such the list of proposed Community Hubs is considered appropriate. Draft Policy SP10 identifies the circumstances within which residential development in the countryside can occur, including within Welshampton.</p> <p>Alternative sites 6. Shropshire Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such the list of proposed Community Hubs is considered appropriate. Draft Policy SP10 identifies the circumstances within which residential development in the countryside can occur, including within Welshampton.</p> <p>General comments Cockshutt 7. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cockshutt. As such it is considered appropriate that Cockshutt is not identified as a proposed Community Hub. Identification of Amenity Green Space is primarily informed by the Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Within the draft Shropshire Local Plan, Cockshutt is proposed to be identified as a Community Cluster. Community Clusters consist of individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development. As such appropriate development is still expected to occur within such settlements. Draft Policy SP9 identifies the forms of residential development that are appropriate within Community Clusters, supported by other relevant draft Policies.</p> <p>Alternative sites 8. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cockshutt. As such it is considered appropriate that Cockshutt is not identified as a proposed Community Hub. Identification of Amenity Green Space is primarily informed by the Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Within the draft Shropshire Local Plan, Cockshutt is proposed to be identified as a Community Cluster. Community Clusters consist of individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development. As such appropriate development is still expected to occur within such settlements. Draft Policy SP9 identifies the forms of residential development that are appropriate within Community Clusters, supported by other relevant draft Policies.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S8.3. Community Clusters: Ellesmere Place Plan Area	<p>General comments Elson 1. Support identification of Elson as a Community Cluster which is vital to ensuring the settlement's long-term future. Elson is a highly sustainable location with good access to Ellesmere and significant employment provision.</p> <p>General comments Welshampton 2. Welshampton's proposed 'countryside' status is unsound, as this allows for no provision of housing for the local community. The settlement is currently a Community Cluster, is located on the A495, is in close proximity of Ellesmere, and benefits from a range of local facilities. It should be identified as a proposed Community Hub/Community Cluster.</p> <p>Alternative sites 3. Promotion of site WEL006 (Land south of the B5063), which adjoins Planning Permission 14/01603/OUT / 17/03500/REM, for residential development.</p> <p>General comments Cockshutt, Tetchill and Welsh Frankton 4. Need to ensure adequate foul drainage, water supply and protection of existing private supplies and groundwater in Cockshutt, Tetchill and Welsh Frankton.</p>	<p>General comments Elson 1. Noted.</p> <p>General comments Welshampton 2. Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. Draft Policy SP10 identifies the circumstances within which residential development in the countryside can occur, including within Welshampton.</p> <p>Alternative sites 3. Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. Draft Policy SP10 identifies the circumstances within which residential development in the countryside can occur, including within Welshampton.</p> <p>General comments Cockshutt, Tetchill and Welsh Frankton 4. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.</p>
S8.4. Wider Rural Area: Ellesmere Place Plan Area	N/A	N/A
S9. Highley Place Plan Area	See S9.1-S9.4	See S9.1-S9.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S9.1. Development Strategy: Highley Key Centre</p>	<p>General comments Highley</p> <ol style="list-style-type: none"> Support identification of Highley as a Key Centre. The proposed residential development guideline for Highley is unsound (specific reference to not justified, not positively prepared and not consistent with national policy), as it is too low. There is no evidence to support this proposed guideline. It is less than past delivery rates, which were impacted by an economic crash. Given Government aims to significantly boost housing, it should be higher than previous delivery rates. Applying growth rates associated with the 2018-based sub national household projections to Highley's dwellings would justify a guideline of some 332 dwellings. Concern about infrastructure capacity. Specific reference is made to the medical centre (including concerns about the need for the GP to identify capacity issues with the CCG, as documented within the Highley Place Plan), highways (specific reference to the road out of the village towards Kinlet). Proposed allocation of 250 dwellings within Highley could adversely affect congestion in Bewdley town centre, because access from Highley would be via Dowles Road which leads to the heavily used junction with Welch Gate (an air quality management area). Concern about the consultation process which has not been fair and transparent (specific references to the site selection process). Planning Permission on site HNN014 (southern element of HNN016) only granted due to proposed allocation of HNN016. The shared access for these sites is unsafe (on a dangerous bend with chevrons where there is difficulty passing oncoming vehicles, vehicles mount the pavement endangering pedestrians including school children, and numerous accidents have occurred). A pedestrian crossing is required in associated with this Planning Permission but no location for it has been identified. Pedestrians cannot safely access town without it. <p>Proposed allocation HNN016</p> <ol style="list-style-type: none"> Objections to proposed allocation HNN016, which is unsound. Reasoning for objections varied, but included failure to consider alternative sites/options (specific references to HNN010, HNN019 and consideration of smaller sites); inadequate site assessment/sustainability appraisal; lack of technical assessments and an indicative layout for the site; the size and relationship of the site to existing built form; the presence of a strip of land between the site and existing dwellings; 25-35% of the site is made-up land liable to slippage; access/highway constraints (the site has a limited road frontage constraining ability to achieve a standard junction and impacting on viability if 3rd party land is required; access is on a dangerous bend/corner with chevrons where there is difficulty passing oncoming vehicles, vehicles mount the pavement endangering pedestrians including school children, and numerous accidents have occurred; off-site works are not achievable); visual impact (specific reference to the Severn Valley, Severn Valley Railway and Alveley); failure to consider strong community, respondent (including through a solicitor), and Parish Council views; failure to consider reasons for past refusal of fences hedges and walls on the site; article 4 restrictions on the site (related to erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure); infrastructure capacity; and heritage impact. The Sustainability Appraisal is flawed as it fails to reference the Grade II listed Hazelwell's Farm House and other heritage assets in proximity of HNN016. Support for proposed allocation HNN016, which is a highly sustainable and deliverable site. Welcome guideline that development of HNN016 will reflect and respect the site's heritage and heritage assets within the wider area, including Grade II listed Hazelwell's Farm House, and that landscape buffers will be required to create appropriate settings for nearby heritage assets and built form. However, consider that to inform the above the Development Guidelines should also include the requirement for a heritage assessment. 	<p>General comments Highley</p> <ol style="list-style-type: none"> Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, and landscape/visual sensitivity. and 4. It is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. This of course applies to all development proposals and forms of infrastructure, including highways. Furthermore, where appropriate, proposed site guidelines for HNN016 identify some of the key infrastructure requirements and identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for the site. For the sake of clarity a minor modification is proposed to the draft site guidelines for proposed allocation HNN016 to confirm that of course all necessary highway improvements will be undertaken, informed by an appropriate Transport Assessment, in accordance with draft Policy DP25. Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation. In identifying proposed site allocations, a comprehensive site assessment process has been undertaken. This considers a range of sites that have been identified in and around Highley and explains the reasoning for proposed allocations. This site assessment process was first published alongside the 'Preferred Sites' Consultation and has since been updated to inform the consultation on the 'Regulation 18: Pre-Submission Draft of the Shropshire Local Plan' and the 'Regulation 19: Pre-Submission Draft of the Shropshire Local Plan'. The most recent iteration of the site assessment process form appendices of the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Planning Application 20/00193/FUL on site HNN014 was determined on its own merits, using the current Local Plan as the starting point for the decision making process. The Committee Report for this Planning Application is available on the Shropshire Council Planning Portal. Due to the stage of preparation, the draft Shropshire Local Plan carried no weight in the decision making process for this Planning Application. <p>Proposed allocation HNN016</p> <ol style="list-style-type: none"> Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, and landscape/visual sensitivity. The most recent Sustainability Appraisal undertaken to inform the draft Shropshire Local Plan (December 2020) identifies that the site is within 300m of a listed building and the Conservation Area. Noted. A minor modification is proposed to the 3rd paragraph of the draft Site Guidelines for site HNN016 in Schedule 9.1(i) to reflect the need for a heritage assessment, which will inform site design and layout.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S9.1. Development Strategy: Highley Key Centre continued	<p>Alternative sites</p> <p>11. HNN010 should be allocated instead of HNN016. HNN010 can deliver a 50 bed care home, new medical centre, approximately 60-70 affordable properties, provide unfettered access/expansion land for the sewage treatment works and provide improvement pedestrian links to the school. Land at the site could be released in phases for development. It is a better overall site, is considered to represent brownfield land, has better access to services and facilities, appropriate access is available which has been documented by the site promoter, and it is not visible from the Severn Valley.</p> <p>12. HNN019 should be allocated instead of HNN016. A comprehensive vision document and indicative layout has been prepared for the site. It can deliver residential development, a new medical centre with dedicated parking, an extra care facility, a dedicated bus pull-in, parking spaces for Clee Hill properties to alleviate existing parking issues, and public open space (including local area for play)/green infrastructure and SUDs. HNN019 would be a better fit for the settlement, is better located, has more potential, can deliver a better mix of housing, and can deliver more community benefits than HNN016. Sensitive design will enhance the adjoining conservation area (as will the betterment to parking on Clee Hill). It would not impact on the setting of local heritage assets or the local highway network. Whilst in an area of potentially high landscape and visual sensitivity, this can be considered during the design phase.</p>	<p>Alternative sites</p> <p>11 and 12. Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, and landscape/visual sensitivity.</p>
S9.2. Community Hubs: Highley Place Plan Area	N/A	N/A
S9.3. Community Clusters: Highley Place Plan Area	N/A	N/A
S9.4. Wider Rural Area: Highley Place Plan Area	N/A	N/A
S10. Ludlow Place Plan Area	See S10.1-S10.4	See S10.1-S10.4
S10.1. Development Strategy: Ludlow Town	<p>Ludlow</p> <p>1. Support Policy S10.1 recognising the strategic role of Ludlow as largest market town in south Shropshire and principal focus for investment and development.</p> <p>2. Support Policy S10.1 recognising the need to protect, conserve and enhance the historic significance of the heritage assets and the setting of Ludlow.</p> <p>3. Support the explanation to the policy and specifically paragraph 5.136 to provide flexibility to encourage a broad range of commercial premises and businesses.</p> <p>4. Support employment guideline for 11ha, policies inset map and proposed allocated employment site LUD052 and saved employment allocation ELR058 to significantly improve the employment land supply in Ludlow and to meet the future employment needs of the town.</p> <p>5. Object to the development guidelines for proposed employment allocation LUD052 and recommend that in addition to the requirement for an heritage impact assessment to assess the cumulative impacts of development on surrounding heritage assets, the proposed scheme should be for low rise development and seeking a future Local Development Order to control future permitted development rights.</p> <p>6. Support the requirement in the development guidelines for proposed housing allocation LUD056 for an heritage impact assessment to investigate the archaeological interest of the former Fishmore Brick and Pipe Works.</p> <p>7. Object to the proposed allocation of only two new housing sites and suggest the allocation of land at The Linney to provide a broader range of sites to deliver a better range of new dwelling types and sizes in Ludlow.</p> <p>8. Support the limited expansion of Ludlow town into the adjoining Ludford Parish with the intention to contain new housing development within the urban area and only permit peripheral employment development in Ludford.</p> <p>9. Object to the limited effect of the ‘countryside’ designation in the Site Assessment Schedules in controlling future rural windfall housing development around the edge of the built form of Ludlow and dissipating the focus in national policy on developing brownfield sites first.</p>	<p>Ludlow</p> <p>1, 2 and 6. Support is welcomed for Policy S10.1 Ludlow, the proposed strategy for the town and the protection of the historic significance of the heritage assets of Ludlow including the archaeological interest of the Fishmore Brick and Pipe Works adjoining proposed allocated housing site LUD052.</p> <p>3. Support for the explanation to Policy S10.1 Ludlow to promote a broad range of employment opportunities in the town is welcomed.</p> <p>4. Support for the employment guideline and the proposed and existing employment land allocations to meet the future employment needs of the town is welcomed.</p> <p>5. The need to manage the form of employment development on proposed allocation LUD052 is recognised to protect the historic significance of Ludlow and the development guidelines for LUD052 will be modified to read: “A proportionate Heritage Impact Assessment (HIA) will be needed to consider cumulative impacts on the significance of the heritage assets in the historic town (west) including their settings, and the significance of the scheduled monument Caynham Camp (east), including its setting. The findings of the HIA should be taken into account in the design of the development and should pay particular attention to building height, layout and materials.”</p> <p>7. Proposed site allocations have been informed by a proportionate and robust site assessment process. The site assessment process sets out the reasoning for the proposed allocation and the rationale for those sites that have not been selected for development at this time.</p> <p>8. Support for the proposed development strategy and the management of the effects of the strategy on the adjoining Parish of Ludford is welcomed.</p> <p>9. The draft Shropshire Local Plan strategic policies, development management policies and settlement policies set out an appropriate and robust policy framework for the protection of land in the countryside from speculative, windfall housing proposals except in exceptional circumstances affecting the supply of open market housing, in response to a quantified local need for affordable housing or the need for cross subsidy to deliver the quantified supply of affordable housing.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S10.2. Community Hubs: Ludlow Place Plan Area	<p>Burford</p> <p>1. Support Policy S10.2 Burford and the strategy, policy, inset policies map, development boundary, site allocations BUR002 land adjoining Lineage Farm and BUR004 for Land adjoining Boraston Drive on A456 and the development guidelines to continue to designate Burford as a Community Hub. Burford in combination with Tenbury Wells is a highly sustainable settlement and an important service centre offering a wide range of services, facilities and employment opportunities in Burford and Tenbury Wells for residents and the surrounding rural communities.</p> <p>2. The draft Shropshire Local Plan should recognise that Tenbury Town Council and Burford Parish Council have together designated a Neighbourhood Area within their combined administrative boundaries and intend, subject to a Regulation 14 consultation, to prepare a Neighbourhood Development Plan for the area.</p> <p>3. Support the significant housing guideline for Burford of 190 dwellings which reflects the sustainability of the settlement and the significant range of services, facilities and employment opportunities in Burford with Tenbury Wells.</p> <p>4. Object to the housing guideline for Burford of 190 dwellings. This will equate to a potential increase of 440 new residents in Burford placing additional demands on existing services, such as doctors, in Tenbury. The impact of the growth of Burford on local services in Tenbury should be taken into account in the housing guideline and site development guidelines in the planning strategy for Burford.</p> <p>5. Support the proposed allocated housing sites at BUR002 and BUR004 and the additional windfall allowance for small scale residential development to ensure the delivery of the housing guideline for this settlement as an important Community Hub.</p> <p>6. Support the proposed development guideline for allocated housing site BUR002 requiring an heritage impact assessment of the archaeological potential of the site and to ensure the design, layout and landscaping of the proposed development recognises the significance and setting of the heritage assets around the site including Turnpike Cottage, the former Turnpike route of the A456 and the Castle Trump Scheduled Monument.</p> <p>7. Object to the proposed development guidelines for allocated housing site BUR002 which should identify the presence of a borehole on this site and the need to de-commission (to appropriately seal and cap) the borehole as part of the proposed development.</p> <p>8. Object to the designation of BUR002 as an allocated housing site as the site has a low score in the Sustainability Assessment for Burford and the development of the site is expected to reduce the floodplain for the River Teme.</p> <p>9. Support the proposed allocated housing site BUR004 and the proposed capacity of 100 dwellings to provide a range of housing types including self-build homes, family housing, age specific/special needs housing and affordable homes. A Masterplan for the development of the site demonstrates compliance with the proposed development guidelines for the site and the site capacity has been informed by technical assessments and a consideration of the constraints and opportunities of the site.</p> <p>10. Object to the omission of site BUR008 Land adjacent to Burford Nursery which is well related to the settlement of Burford and can be provided to meet the employment needs of the locality as well as housing needs. BUR008 is promoted by a significant local business with the resources to deliver the proposed development. There is considerable, unmet self-build demand in the south of the County and BUR008 could provide dedicated land for custom build / self-build. Provision of employment land on BUR008 would allow existing businesses to plan for their expansion.</p>	<p>Burford</p> <p>1. Support for Policy S10.2 Burford and the strategy for the settlement is welcomed.</p> <p>2. The draft Shropshire Local Plan will provide the strategic policy framework for the Tenbury & Burford Neighbourhood Plan when this plan is prepared and examined.</p> <p>3 and 4. Support for the housing guideline for Burford of 190 dwellings is welcomed. It is recognised that this will increase the number of residents in the settlement. Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Furthermore, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site. Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so. Policy S10.2 Burford is proposed to be modified in Schedule S10.2(i) for sites BUR002 and BUR004 to read: <u>“The designation of Burford and the scale of the proposed housing development reflects the additional service provision in the adjacent town of Tenbury. Consequently, where development in Burford is required to make a contribution towards sustaining key local services, this might also include services located in Tenbury.”</u></p> <p>5. Support for Policy S10.2 and the two proposed allocated housing sites BUR002 Land at Lineage Farm and BUR004 Land adjoining Boraston Drive on A456 is welcomed.</p> <p>6, 7 and 8. Support for the development guidelines for proposed allocated housing site BUR002 is welcomed. The requirement to investigate and de-commission the borehole on the site should be recognised in the development guidelines through the addition of the following words as a modification to the Plan to read: “...flood storage measures along the southern boundary will help to manage the drainage of the site. <u>The presence of a former borehole on the site should be investigated and should be de-commissioned through the provision of an appropriate seal and cap over the shaft.</u>” The development guidelines for the site address the issue of the adjacent floodplain for the River Teme with on-site measures to maintain the flood storage capacity of the River.</p> <p>9. Support for Policy S10.2 and the proposed allocated housing site with a site capacity for 100 dwellings is welcomed.</p> <p>10. Proposed site allocations have been informed by a proportionate and robust site assessment process. The site assessment process sets out the reasoning for the proposed allocation and the rationale for those sites that have not been selected for development at this time.</p>
S10.2. Community Hubs: Ludlow Place Plan Area continued	<p>Clee Hill</p> <p>11. Support the proposed development guidelines for site CHK002 requiring an heritage impact assessment of the archaeological interest of the site as a former coal and ironstone workings.</p>	<p>Clee Hill</p> <p>11. Support for policy S10.2 Clee Hill and the development guidelines for proposed allocated housing site CHK002 to ensure development will be subject to an assessment of any impacts on the former coal and ironstone workings around Clee Hill.</p>
S10.3. Community Clusters: Ludlow Place Plan Area	N/A	N/A
S10.4. Rural Area Allocations: Ludlow Place Plan Area	N/A	N/A
S11. Market Drayton Place Plan Area	See S11.1-S11.4	See S11.1-S11.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S11.1. Development Strategy: Market Drayton Principal Centre	<p>General issues</p> <ol style="list-style-type: none"> 1. Support Market Drayton's role as a Principal Centre. 2. United Utilities note that the current water infrastructure requires upgrading. Continued discussions are needed. Recommend a policy be put in Local Plan to this effect. 3. Cross referencing to draft policy DP22 in policy S11 would strengthen that policy's requirements <p>Housing guideline</p> <ol style="list-style-type: none"> 4. Support the aspiration to deliver 1,200 homes 5. Additional housing should be allocated to align with the 35ha of available employment development. 6. The housing guideline should be increased – the town can support more than 1,200 dwellings. It could accommodate housing not delivered in Whitchurch. 7. Additional housing allocations are required to deliver the residential development the town needs. More of the development currently proposed for the Hubs and Clusters should be focussed in Market Drayton. The risk of non-delivery on small sites is higher. 8. Suggest draft policy S11.1 should state 'at least' instead of 'around' 1,200 dwellings. <p>Employment guideline</p> <ol style="list-style-type: none"> 9. No justification has been provided for the increase from 13ha to 35ha in the employment guideline as the Draft Local Plan progressed. This guideline is now out of balance with the housing guideline. This imbalance is also not justified. <p>Site allocations general</p> <ol style="list-style-type: none"> 10. Consider all development north of the A53 would harm the town's character, landscape sensitivity and encroach on countryside. 11. The proposed site allocations are carried forward from the (failed) Neighbourhood Plan where they were rejected over concerns over the site assessment process. They proposed allocations have not been genuinely re-assessed, they are subject to a number of constraints and the site assessment process fails to show how other sites have been considered. <p>Community aspiration for a marina</p> <ol style="list-style-type: none"> 12. Support the community aspiration for a marina at Victoria Farm. Land should be allocated here for a marina based development with the caveat regarding the need to demonstrate the capability of the canal network to accommodate the development. 13. Suggest that a masterplanning approach is adopted to include proposed site allocations MDR012 and MDR034 and the protected employment sites in this general area, to deliver the desired marina for Market Drayton. 14. The Canal and Rivers Trust consider that an explanation should be provided in the supporting text for draft policy S11.1 as to why we do not support allocation of marinas in Local Plans. Marina proposals should be dealt with by a criteria based policy. 15. The Town Council re-iterate their support for a marina and express concern that a site for it has not been allocated. Development on sites MDR012 and MDR034 should contribute to the development of a marina. <p>Potential relocation of sports facilities</p> <ol style="list-style-type: none"> 16. Sport England consider that the identification of a broad location for replacement facilities does not demonstrate sufficient certainty that NPPF requirements regarding the relocation of sports facilities can be met. A specific site should be allocated for this, supported by a feasibility study to demonstrate the land is suitable and capable of accommodating all the required facilities 17. Sport England consider that Policy S11.1 should specify that replacement sports facilities should be equitable in quantity and quality in a suitable location 18. Support the potential provision of replacement sports facilities. 19. The re-location of sports facilities should not be promoted at the cost of unsustainable residential development. 20. The delivery of the replacement sporting facilities is reliant on land in third party ownership and is therefore unlikely to be delivered in the short term as shown in Appendix 7. 	<p>General issues</p> <ol style="list-style-type: none"> 1. Support welcomed 2. Requirements for discussions are noted. Draft policy DP19 includes a requirement for planning proposals to demonstrate that they will be served by adequate water infrastructure. <p>Housing guideline</p> <ol style="list-style-type: none"> 4, 5, 6, 7 and 8. The Council considers that the housing guideline for Market Drayton is appropriate, effective, sustainable and deliverable. It is not considered there is any need to provide additional land in order to support non-delivery in Whitchurch. <p>Employment guideline</p> <ol style="list-style-type: none"> 9. The Council considers that the employment guideline for Market Drayton is appropriate, effective, sustainable and deliverable. <p>Site allocations general</p> <ol style="list-style-type: none"> 10 and 11. The Council has undertaken a proportionate and robust assessment of all of the promoted sites and considers the approach taken to the preferred allocations is reasonable and appropriate for the Local Plan. The preferred allocations are all considered as being suitable, available and achievable (including viable). <p>Community aspiration for a marina</p> <ol style="list-style-type: none"> 12, 13, 14 and 15. Following consultation comments at the Regulation 18 stage from the Canal & River Trust, the draft Plan does not specifically seek to allocate land for a marina. Rather, the Council considers that policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. This also provides flexibility in terms of location. <p>Potential relocation of sports facilities</p> <ol style="list-style-type: none"> 16, 17, 18, 19 and 20. The relocation of the Market Drayton sports facilities, currently located at Greenfields (on land owned by Shropshire Council), is a major local priority, having been considered as part of the draft Market Drayton Neighbourhood Plan. The Council is seeking to plan positively for this delivery and in doing so continues to assess the overall viability of the relocation of the current sports facilities at Greenfields, which includes an assessment of likely relocation costs, against an assessment of the likely re-use of the current site for alternative uses. This is recognised in paragraph 5.154 of the draft Local Plan. It is currently considered that the proposed relocation remains a viable proposition and is supported locally by the Town Council.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S11.1. Development Strategy: Market Drayton Principal Centre continued</p>	<p>Site MDR006 21. Strong support for this site. The proposed allocation is for approximately 125 dwellings. We consider that this quantum of development is realistic and is therefore supported.</p> <p>Site MDR012 22. Strong support for this proposed allocation. The site is suitable, available and deliverable early in the proposed Plan period. 23. Site guidelines should be amended to reference; the canal instead of the marina; enhancement of pedestrian and cycle links; opportunities to positively address the adjoining canal and ensure no adverse impact on its character; provision of appropriately designed landscape scheme rather than planting of large trees. 24. The Environment Agency advised that the site is located within SPZ3, there is a surface watercourse in the vicinity and the groundwater is likely to be shallow. Additionally, there is potentially a private water supply in the vicinity. Appropriate drainage and pollution prevention measures are therefore required.</p> <p>Sites MDR039 & MDR043 25. Sport England consider that If the re-location of the Greenfields sports facilities is not financially viable, developer contributions from this site may be needed. 26. Allocation of this site supported. 27. Both of these sites have fatal constraints (safe pedestrian and cycle access is not achievable, unsuitable topography, landscape impacts, Poor SA score and rejection of MDR043 at SLAA stage) and shouldn't be allocated. 28. No evidence that these sites are deliverable. Where a site is preferred due to its potential to cross subsidise other development (replacement sports facilities), viability should be clear. 29. The site does not seem to lend itself to a well-conceived and high quality development.</p> <p>Site MDR034 30. Strong support for this proposed allocation. The site is suitable, available and deliverable early in the proposed Plan period.</p> <p>Alternative sites 31. Site MDR046 could accommodate replacement sports facilities as part of a mixed use development that would also deliver a marina as part of an urban extension to the town. 32. Site MDR049 has the potential to provide both necessary housing including affordable housing (capacity for around 550 dwellings having considered constraints) and other community benefits like relocated/additional sports facilities in a more sustainable location closer to the town centre and other potential new development (including site allocation MDR006). MDR049's Poor SA score does not reflect the potential for on-site play areas and amenity space. 33. Sites MDR014 and MDR031 are suitable, available and achievable for housing or employment development and should be included as proposed allocations. If both are allocated, they could open up the Tern Valley as natural green space. The land is in a single ownership.</p>	<p>Site MDR006 21. Support welcomed.</p> <p>Site MDR012 22. Support welcomed. 23. Some of the points raised are covered in other policies within the draft Shropshire Local Plan, such as SP5: High Quality Design or would be a discussion to be had during the planning application process. With regard to the draft site guideline regarding pedestrian and cycle links, a minor modification is proposed to recognise these links should also be to the canal towpath. 24. Comments dealt with in the Statement of Common Ground with the Environment Agency (EV022)</p> <p>Sites MDR039 & MDR043 25. The proposed housing scheme on this site is required to enable sufficient improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site (identified as a broad location on the draft Policies Map). In addition, there is the potential for CIL funding to support other necessary activities or to make up a shortfall. 26. Support welcomed 27, 28 and 29. The Council has undertaken a proportionate and robust assessment of all of the promoted sites and considers the approach taken to the preferred allocations is reasonable and appropriate for the Draft Local Plan. The preferred allocations are all considered as being suitable, available and achievable (including viable).</p> <p>Site MDR034 30. Support welcomed.</p> <p>Alternative sites 31, 32 and 33. The Council has undertaken a proportionate and robust assessment of all of the promoted sites and considers the approach taken to the allocation of sites for housing is reasonable and appropriate for the Draft Local Plan.</p>
<p>S11.2. Community Hubs: Market Drayton Place Plan Area</p>	<p>General Comments 1. Whilst Woore, Irelands Cross and Pipe Gate are included as a cluster in the Market Drayton Community Hubs, Colehurst is not included. There is no rational or objective reason for this exclusion and the plan is unsound for this reason. Relationship with the main town and each of the other settlements is similar and spatial relationship to services are no different. This settlement was identified as sustainable at the SAMDev stage but was removed as soon a someone stepped forward to actually build houses here.</p>	<p>General Comments 1. Shropshire Council undertook a robust Hierarchy of Settlements process where it was found that Colehurst did not have a sufficient number of facilities or services to be classified as a Community Hub.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S11.2. Community Hubs: Market Drayton Place Plan Area continued	<p>Hinstock</p> <p>2. Hinstock has long been recognised as a village to which other smaller settlements look for services and facilities. As such is identified as a Community Hub in the adopted Local Plan (residential guideline of 60) and proposed to be a Community Hub in the draft Shropshire Local Plan (residential guideline of 155). Hinstock has clearly been growing and offers a good range of services and facilities, however it has few employment opportunities and no provision has been made for employment within the last two iterations of the Local Plan for the area. Despite an increase in the amount of dwellings proposed, there remains no planned provision for employment development.</p> <p>Draft Policy S11.2.3 states "new employment development will be delivered through appropriate small-scale windfall development within the settlements development boundary". Clearly no consideration has been given to provision of employment in or on the edge of settlements and sites within the development boundary are likely to be resisted by nearby residents.</p> <p>The draft Shropshire Local Plan and the Plan for the Market Drayton Place Plan leaves provision of employment to chance with no coherent policy guidance, creating commuter settlements (conflicting with draft Policies which seek to improve sustainability, reduce pollution and reduce private car travel) and as such is not positively prepared or sound.</p> <p>Site HKW014 could provide a small employment development. It is accessible to Telford, Wolverhampton and Market Drayton via the A41 (without travelling through the village), is well screened and there are few residential properties in the immediate vicinity.</p> <p>3. Out of a total of 18 site assessments, 6 sites were automatically removed from the site assessment process, including my own site, being HKW006. The summary of my site is inaccurate and I did not put it up for assessment because I was not approached to participate in the process. I feel that it is unreasonable to give a site assessment if the necessary information has not been sought or confirmed by relevant parties. For example, this site is recorded as being used as allotments, despite it not being used for allotments since 2014. The size of the land has been recorded inaccurately. It is stated as being 0.34 acres but is actually 0.42 acres. Since 1976 to present day the land has stood mainly unused apart from its use as allotments from 2009 until 2014.</p> <p>The details of the land provided via the Strategic Land Availability Assessment (29 November 2018) indicates that there is only one piece of land (as shown in appendix A), some of which is still currently allotments. The land is actually in two parts and has been since around 1975, as indicated in Appendix B, which shows two boundary lines. These have been incorporated into one piece of land in the site assessment. I will be updating the status of the land with the council to make them aware of these issues and to avoid any future problems. I believe that it is necessary and fair that I am involved in the assessment of the land and provide the necessary information so that a valid decision can be made on the piece of land. This process if not giving people a reasonable chance to be included in the plan or for proper decisions to be made.</p> <p>If proper checks had been made it would have been seen that this piece of land is in fact two separate pieces. Ideally land that has not been put forward for assessment should have been checked via the Land Registry to ensure accurate information is gained.</p>	<p>Hinstock</p> <p>2. Shropshire Council considers that the proposed development strategy for Market Drayton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>3. The Call for Sites was undertaken in 2017 and land owners had the opportunity for years after this to promote their land as part of the Local Plan Review. It is therefore considered that landowners or those representing them had significant time to promote their land for development, and Shropshire Council undertook a long and robust site assessment process which ultimately led to the preferred allocations.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S11.2. Community Hubs: Market Drayton Place Plan Area continued</p>	<p>Hodnet</p> <p>4. Note the Council has undertaken ‘Supplementary Site Assessments’ with regard to proposed allocations HHH001 and HHH014. Whilst this is welcomed, it is unclear that the significance of these sites to the Hodnet Conservation Area & to the Registered Park and Garden of Hodnet Hall has been fully considered. Further analysis, in line with the methodology set out in HEAN 3, is therefore suggested prior to allocation.</p> <p>Specifically, the 1st edition OS map shows a gap in boundary planting along the east side of Hodnet Hall Registered Park, opposite HHH001 and HHH014. This would appear to have provided a view to the rural landscape to the east, across the allocation site, and possibly into the distance; perhaps intended to be seen while travelling along the south drive of Hodnet Hall. Although this view is no longer available, it could be recoverable. Development on HHH001 and HHH014 would remove this possibility and also lead to the further, incremental loss of the rural setting of the park along its east boundary, as new clusters of settlement would join and become contiguous with the original village and conservation area. This would have a degree of harmful impact on the significance, derived from its setting, of the registered park and garden and potentially the other heritage assets within it. Note that the Development Guidelines for these sites include the requirement for a Heritage Impact Assessment and a high-quality site design and layout. However, note that the Supplementary Site Assessment sets out several more detailed measures to ensure that any residual harm to the Hodnet Conservation Area and other heritage assets will be mitigated, such as: low density development; incorporating well designed landscape and amenity space; good quality timber joinery detailing; and a palate of materials that is informed by, and in keeping with, the local vernacular. Suggest the proposed Development Guidelines are strengthened by the inclusion of these additional measures in order to conserve and enhance the historic environment of Hodnet.</p>	<p>Hodnet</p> <p>4. It is considered that sufficient analysis of the impact of development on the significance of Hodnet Hall Registered Park and Garden and its setting has been undertaken both through the site assessment process and the Supplementary Site Assessment carried out by the Historic Environment Manager. However, a minor modification is proposed to the 3rd paragraph of the draft site guidelines for site HHH001 and HHH014 in Schedule 11.2 to reflect the need for good quality timber joinery detailing and a palate of materials informed by, and in keeping with, the local vernacular.</p>
<p>S11.2. Community Hubs: Market Drayton Place Plan Area continued</p>	<p>Woore, Ireland's Cross and Pipe Gate</p> <p>5. Where no allocations are proposed as is the case of Woore, it undermines the ability of the settlement to ensure its longer term sustainability. We therefore consider the policy unsound as it is not effective in that it will not enable Woore to ensure its longer term sustainability which is set out as an objective in Policy SP2.</p> <p>6. SP9 is overly restrictive in controlling new housing development on sites outside the development boundary around a settlement. The application of this policy in conjunction with SP7 will in our view lead to the constraint of new housing coming forward in Woore</p> <p>7. The absence of an allocation in the Local Plan coupled with the Neighbourhood Plan’s silence on allocating any land for residential development combine to seriously undermine the Council’s objective of sustaining rural villages such as Woore.</p> <p>8. Syllenhurst Farm (NW of Woore's) is no longer a commercially viable farming unit and there is an opportunity to provide a mixed used site which will have a variety of benefits for the local community. Appreciate that this proposal has come forward at a late stage in the plan review. However, the changes to care over the past 12-18 months have highlighted the need for more community based residential and care based options. Woore’s development boundary is so tightly drawn that it does not allow for any sustainable expansion.</p> <p>9. Agree with Woore’s proposed Community Hub status but feel the draft Policy is not effective as Woore only has a residential guideline of 88 dwellings, whereas other proposed Community Hubs’ are much higher. Para 2 of draft Policy S11.2 indicates development should be delivered within development boundaries, but Woore’s is so tight it leaves no room for sustainable expansion. A mixed site allocation is suggested to the north of Woore, which can provide housing as well as facilities such as a doctor’s.</p> <p>10. The Community Hub relates to all three parts of the settlement – It is irrational not to include all parts of the group of settlements for inclusion from housing development which is sustainable without reasoned justification and. All the more so when the presence of the Public House in Pipe Gate close to our site was an important consideration in the original allocation of this cluster grouping for housing development. The landowners of Pipe Gate are entitled to equal consideration. For this reason the plan is unsound.</p>	<p>Woore, Ireland's Cross and Pipe Gate</p> <p>5, 6, 7, 8 and 9. Shropshire Council considers the proposals for Woore is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement.</p> <p>10. Pipe Gate forms part of a wider Hub with Woore and Irelands Cross. Shropshire Council considers the proposals for the Hub is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement. Self-Build development should be discussed at the planning application stage.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S11.3. Community Clusters: Market Drayton Place Plan Area	N/A	N/A
S11.4. Rural Area Allocations: Market Drayton Place Plan Area	N/A	N/A
S12. Minsterley and Pontesbury Place Plan Area	See S12.1-S12.4	See S12.1-S12.4
S12.1. Development Strategy: Minsterley and Pontesbury Community Hubs	<p>Minsterley Proposed Site Allocation MIN018 1. Housing guideline for this site is too low, particularly when compared to adjoining site. Increase the site's housing guideline to 30 and overall requirement by 30 to 185 2. This site is adjacent to spring/surface watercourses. Groundwater is potentially shallow, so foundation dewatering and surface water management aspects will need consideration. 3. MIN018 has greater highway implications than alternative sites Alternative promoted site MIN019 4. MIN019 should be considered for residential allocation as a well located and fully deliverable site of 16.71 ha with access and adjoining previously developed land and the development boundary. The preferred site, MIN018 has greater highway implications. Scope for new boundary hedgerows and development to be phased to address SA concern that it is a very large, open site, which if developed would yield development which would be out of scale with the existing settlement of Minsterley. Propose the northern part of the site be developed to fulfil target housing supply of 20 dwellings and provide a new school car park. This will also provide future proofing with the remainder available for future development.</p> <p>Pontesbury General Issues Pontesbury 5. Parish Council has been adequately consulted. Sites identified are capable of delivering required number of houses within the time span of the plan. Alternative promoted site PON001 6. PON001 should be considered for residential allocation as a well located and fully deliverable site of 1.25 ha, to assist in the delivery of the remaining dwellings to meet the proposed dwelling guideline of 175 dwellings by 2038. Site adjoins existing housing to the south and east with natural screen to the north of the land. The site also adjoins allocated site (PBY019), presently being developed, providing a natural infill. Alternative promoted site PON040 7. Many anomalies in Development Boundary Line adjacent to PONO40 and the site assessment for PON040 therefore unsound. Neither reflect the facts on the ground, or available evidence. Do not comply with paragraph 35 NPPF Test b. Development Boundary Line for Pontesbury should be corrected to include properties (1&2 Hinton Lane) existing more than 40 years. Site PON040 should be included as a site allocation alongside existing proposed or at least allocated as having long term potential in SLAA.</p>	<p>Minsterley Proposed Site Allocation MIN018 1. Shropshire Council considers that the proposed development strategy for Minsterley & Pontesbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable. This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities Shropshire Council considers the proposed capacities of the preferred allocations are appropriate. It should be noted that Para 4 of Draft Policy S12.1 recognises that the Provision figures are 'approximate'. Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage 2. Noted. Proposed site allocations have been informed by a proportionate and robust site assessment process which has been informed by comments from the Council's Drainage and Flood Risk Officers. Their recommendations have been incorporated into proposed site guidelines for MIN018 and other Local Plan policies also cover the issues raised for example in relation to sustainable drainage requirements. 3. Shropshire Council have undertaken a proportionate and robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations as being reasonable and appropriate for the Local Plan. Highways issues are one consideration amongst the full range of matters which are taken into account. The site assessment process has been informed by comments from the Council's Highways Officers. Their recommendations have been incorporated into this proposed site guidelines for MIN018 and include requirements for appropriate access, traffic calming and new pedestrian facilities. Alternative promoted site MIN019 4. Shropshire Council have undertaken a robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations as being reasonable and appropriate for the Local Plan which covers the period to 2038. Sites to meet any future development needs will be considered through formal review of the Local Plan.</p> <p>Pontesbury General Issues Pontesbury 5. Noted. Alternative promoted site PON001 6. Shropshire Council considers that the proposed development strategy for Pontesbury and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable. In identifying proposed site allocations, a proportionate and robust site assessment process of all promoted sites has been undertaken. Alternative promoted site PON040 7. Shropshire Council have undertaken a robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations (as well as the Development Boundaries) as being reasonable and appropriate for the Local Plan. The SLAA is a strategic assessment of individual site suitability and does not allocate sites or include all locations where future development may occur.</p>
S12.2. Community Clusters: Minsterley and Pontesbury Place Plan Area	N/A	N/A
S12.3. Wider Rural Area: Minsterley and Pontesbury Place Plan Area	N/A	N/A

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S13. Much Wenlock Place Plan Area	See S13.1-S13.4	See S13.1-S13.4
S13.1. Development Strategy: Much Wenlock Key Centre	<p>General</p> <ol style="list-style-type: none"> 1. Plan is not sound because it has not proposed an appropriate strategy and has not considered reasonable alternatives or evaluated alternative and better planning solutions. Does not reflect broader policy support for the appropriate reuse of land as suitable brownfield sites. Option of no allocation should be considered as there are infill sites available and housing completions target already met Shropshire Council has not explained what change of circumstances apply to justify the change in approach (from MWNP). 2. Development should be directed away from the town altogether due to the high risk of flooding. Proposed approach directs substantial development to most flood-prone site in a flood-prone catchment. Approach not consistent with national policy in ignoring alternative options which would contribute positively to both sustainability and climate change and consider flood risk. 3. Shropshire Council evidence is insufficient/out of date. The required housing needs survey has not been carried out. Shropshire Council have failed to consider significant evidence (including from Much Wenlock Refresh Group) & national policy and guidance. 4. Proposals for Much Wenlock do not meet the Local Plan Policy tests (notably those set out in policies SP1, SP2, DP21 as well as others) and so will not deliver on the Vision (2.31) e.g. community cohesion, enhancement of historic assets; sustainability. 5. Significant increased traffic impacts, particularly on A4169 Smithfield Road /Gaskell Corner junction which operates close to capacity are evidenced, (evidenced by Ironbridge Power Station Transport Assessment (TAA) which recommends improvements to the junction). 6. Local Plan Review process purely focused on site allocation, ignores wider strategic issues (such as transport/traffic and flood management) and is insufficiently strategic. 7. No explanation of how scale of development arrived at and how it will maintain character and setting of Much Wenlock as a historic market town. Unique and fragile character, characteristics and aspirations have not been taken into account and reflected in a local vision. Proposals will undermine characteristics of Much Wenlock (including as a tourist destination with medieval heritage). 8. Insufficient recognition of Much Wenlock’s fragile environment, characteristics, relative size, infrastructure and service limitations in its identification as a key centre and its strategic role. The strategy for the east of the County needs to be re-thought and Much Wenlock should be deleted from being within a ‘strategic growth corridor’. 9. The proposed housing requirement exceeds need, does not reflect evidence and no justification provided. It does not meet objectively assessed needs as described in the MWNP, Place Plan and supporting evidence. 10. Residential guideline is developer led rather than need led, with increase of guideline to achieve sufficient development to make proposed allocated site viable. Unsuitable proposals which are commercially driven. 11. Proposed housing is not affordable and not in line with local need. Only a small number of dwellings should be provided to meet the needs of local young people. 12. Approach driven by 5-year land supply requirements, including potential of a large site for fast delivery, with insufficient attention to delivery of sustainable development and impacts. 	<p>General</p> <p>1, 2, 3, 4, 5, 6, 7 and 8. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable and consistent with national policy including that relating to previously used land and climate change. The Council has also considered flood risk through its Strategic Flood Risk Assessments (Stages 1 and 2) and these have informed the proposed site allocations and the Sequential and Exception Tests. The Local Plan development process has involved consideration of and consultation on appropriate range of options, supported by robust evidence, with Sustainability Appraisal as an integral part of plan making, informing the development of vision, objectives and policies and site allocations. This evidence has been published and is available on the Council’s website.</p> <p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the Place Plan area and the proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to settlements characteristics, constraints and opportunities that exist and the identification of proposed allocations has been informed by a robust and comprehensive site assessment process, including consideration of issues such as flooding, natural and heritage assets, highways and other infrastructure.</p> <p>9, 10, 11 and 12. The Local Plan development process has involved consideration of and consultation on appropriate range of options, supported by robust evidence which has informed the development of vision, objectives and policies. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Much Wenlock and the existing commitments (including existing allocations and permissions), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable.</p> <p>The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>The draft Shropshire Local Plan should be read as a whole, and the development strategy is supported by housing policies which provide for the delivery of an appropriate mix of housing including affordable dwellings.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S13.1. Development Strategy: Much Wenlock Key Centre continued</p>	<p>General continued</p> <p>13. No evidence that local employment can be generated in Much Wenlock. Existing employment allocation has not been delivered and housing and employment provision is not balanced in Much Wenlock. Insufficient employment opportunities for the residents of the proposed housing for Much Wenlock, trend to commuting and retirement location will therefore increase exacerbating congestion and increasing pollution/carbon emissions, contrary to climate emergency and climate change policies in the draft Shropshire Local Plan.</p> <p>14. To achieve balanced growth the Local Plan should identify and commit to a delivery plan for the allocated employment site and the release of the housing site(s) should be linked to the employment provision.</p> <p>15. Support the approach which recognises the role of Much Wenlock as a service centre for a large rural hinterland on a 'strategic corridor' (the A458) and needs to reflect Strategic Corridor Policy SP14 objectives. Part 4(a) of policy SP14 identifies that, in order to achieve a sustainable pattern of development, employment growth in these corridors will need to be balanced with an appropriate level of housing growth. Given this context Much Wenlock should, socially and economically, be a significant growth centre.</p> <p>16. Given, Place Plan geographies represent areas with functional relationships, need for large site in Much Wenlock should be seen in context of Place Plan area. Notably redevelopment of the Ironbridge Power Station reduces the need for the town to provide additional housing.</p> <p>17. Development proposals (MUW012VAR, Former Power Station and CES005Cressage) will more than double the Place Plan Area population (within a concentrated area), placing a disproportionate burden on Much Wenlock town. This does not constitute balanced growth (housing, employment and infrastructure balanced).</p> <p>18. Development proposals and existing commitments result in significant overdevelopment in the Place Plan area and place too much demand on over-burdened local infrastructure. Traffic impacts on Much Wenlock, particularly at critical junctions have been underestimated (by TAA) due to failure to consider wider development effects including from proposals, including from HGVs from predevelopment mineral extraction at the former Ironbridge Power Station site.</p> <p>19. Section 13.1 of the draft Shropshire Local Plan omits to reference Place Plan and other development proposals within the place plan area (Cressage, Buildwas Power Station). Since the Place Plan provides the structure for planning and infrastructure provision, there should be consideration of role of and impact on Much Wenlock infrastructure in providing a service centre for other settlements in place plan area and beyond. Need to adjust proposals for Much Wenlock based on analysis of the impact of the redevelopment of the Former Ironbridge Power Station. Need to consider impact of development in other Place Plan areas on Much Wenlock infrastructure (Bridgnorth highlighted).</p> <p>20. Proposals do not take into account the evidence that current policy approaches (Much Wenlock Neighbourhood Plan -MWNP) are effectively delivering housing and can meet increased target. Strategy should reflect MWNP which has demonstrated it can meet the local development targets and needs and safeguards local infrastructure, health and environment through incremental sustainable development.</p> <p>21. The development strategy for Much Wenlock has not considered and is not in accord with the approved Much Wenlock Neighbourhood Plan (MWNP) which sets out clear policies. These reflect community desire to not have large scale development and maintain the scale, style and setting of Much Wenlock in particular: small scale development (total housing target and limit on the size of individual residential developments); nature of development or prioritisation of local housing needs for affordable homes and the elderly.</p> <p>22. Does not help deliver community needs and vision strategy and proposals should be agreed in consultation with community through MWNP review.</p> <p>23. Shropshire Council has wrongly interpreted its role as site identification rather than strategic policies, solutions and objectives or evaluating a range of options or integrating development with the town's strategically assessed infrastructure needs.</p> <p>24. Rejects evidenced scope for and clear community preference for small scale development (in MWNP).</p>	<p>General continued</p> <p>13 and 14. It is considered that the draft Shropshire Local Plan provides an appropriate framework for the future development of Much Wenlock to 2038 which addresses, and balances needs and opportunities in relation to housing and employment, the local economy and infrastructure; seeks to safeguard the environment and enable adaptation to climate change. The draft Shropshire Local Plan should be read as a whole, and a range of policies seek to support the development of the employment land supply to meet the needs of Shropshire and its communities.</p> <p>15. Support noted.</p> <p>16, 17, 18 and 19. It is considered that the draft Shropshire Local Plan provides an appropriate vision and framework for future development to 2038; addresses needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seeks to safeguard the environment and enable adaptation to climate change. The Place Plans are documents which focus on local infrastructure needs in communities across the county. Place Plan Areas generally consist of a main centre, its surrounding settlements and rural hinterland. These documents have informed consideration of infrastructure requirements associated with development proposals within the draft Shropshire Local Plan.</p> <p>Within the settlement policies section of the draft Shropshire Local Plan, Place Plan Areas are used for the presentation of settlement policies, rather than as areas subject to draft policies. Whilst Cressage is identified within the much Wenlock Place Plan section, the Former Ironbridge Power Station site is presented separately as draft Policy S20 in recognition of the scale of the site. However, consideration of the infrastructure requirements associated with this development and its wider implications have been informed by the Place Plan and have/will be informed by appropriate technical studies.</p> <p>20, 21, 22, 23 and 24. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council also considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S13.1. Development Strategy: Much Wenlock Key Centre continued</p>	<p>General continued 25. Approach has ignored windfall sites (including brownfield sites MUW001 and MUW002) coming forward to achieve the originally proposed settlement residential guideline of 150 dwellings. Development therefore likely to (significantly) exceed the proposed residential guideline. 26. Significant reliance on windfall and exception sites to meet the needs of the settlement over the Plan period is a wholly inappropriate. This approach fails to recognise that windfall sites are a finite and diminishing resource. It is essential that additional land is included within the development boundary and allocated to ensure that the housing needs are met; that existing issues with the built environment can be addressed and, that the Plans aims and objectives are realised. 27. Need to explain why cross-boundary need from the Black Country is being accommodated in Shropshire. Proposal to accommodate housing and employment land for the Black Country risks that Much Wenlock on the east side of the county will become a car-dependent commuter settlement/dormitory town for the Black Country. Insufficient infrastructure to support this proposal which should be deleted.</p> <p>Flooding 28. Much Wenlock has an evidenced long term flood problem and is designated a highest category Rapid Response Catchment by the Environment Agency. Construction of attenuation measures following 2007 serious flood event, have resulted in flood impact reduction but not solved the problem, with continuing serious flood events across the town in 2020. 29. Lack of opportunity for public scrutiny and transparency about flooding alleviation proposals. 30. Incomplete understanding of the causes and potential solutions for flooding is lacking. Plans to manage development flood risk unclear. No new housing/substantial should be permitted until existing flood problem fully assessed and resolved. 31. Flood risk liable to increase due to climate change. 32. Shropshire Council has not complied with legal duty as a risk management authority to avoid development on land that floods (notably failing to identify and address flooding issues to the Hunters Gate estate). 33. Shropshire Council have failed to take preventive actions flooding issues as recommended by consultants in 2011. Do not consider transferring floor risk management to developers is acceptable. 34. Flood attenuation measures that alleviate flooding at the Hunters Gate Estate will not alleviate flooding throughout the town/along Farley River. Comprehensive whole town flooding solution and infrastructure needed to enable any growth to happen safely. Complex geo-physical local circumstances mean simple site related attenuation schemes are not appropriate. Need to reflect National Flood Risk Strategy (July 2020) with a more sophisticated, integrated approach requiring strategic flood risk assessment and solutions for the entire catchment with appropriately funded overall remediation, using nature-based solutions and supporting wider environmental benefits, is necessary. 35. Current proposals are premature in view of programmed Environment Agency National Flood Risk Assessment which will provide more accessible and trusted information for making good investment decisions. 36. Evidence that alternative (non-housing led) solutions to flooding exist, have available national funding and are viable. Consider developer led infrastructure solutions are often inadequate e.g. Hunters Gate (adjacent to MUW012VAR), which still experiences flooding issues. 37. A new comprehensive strategic flood risk assessment needs to be undertaken as a priority to underpin all future development policy and decisions. Should be undertaken prior to considering any site allocations, rather than partial and limited proposals from a single landowner and commercial developer. 38. Concern that increased run-off associated with increased urbanisation will increase risk to existing properties, particularly those associated with Farley Brook.</p>	<p>General continued 25 and 26. Shropshire Council considers that the proposed development strategy for Much Wenlock and the existing commitments (including existing allocations and permissions), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable. The residential guideline is a significant policy consideration in considering the delivery of sustainable development and draft policy SP7 sets out the criteria against which housing proposals (which are otherwise policy compliant) which would lead to the residential development guideline for a settlement being exceeded will be considered. 27. Paragraphs 2.27,3.7 & 3.18, Policies SP16 & SP17 DP33 of the Draft Local Plan address cross boundary requirements and the duty to cooperate, referencing the preparation of Statements of Common Ground to reflect conversations with relevant bodies. These have been published and are available on the Council’s website. Whilst the draft Shropshire Local Plan, is proposing to accommodate part of the ‘unmet’ housing and employment needs forecast to arise in the Black Country Authorities no specific sites are identified to accommodate these contributions which it is proposed will be integrated into the wider housing and employment land requirements for the whole of Shropshire and be delivered in accordance with the proposed spatial strategy for the level and distribution of development in the draft Shropshire Local Plan. Shropshire Council considers that the proposed development strategy for Much Wenlock and the existing commitments (including existing allocations and permissions), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable.</p> <p>Flooding 28, 29, 30, 31, 32, 33, 34, 35, 36, 37 and 38. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The identification of proposed allocations has been informed by a comprehensive site assessment process, including consideration of issues such as flooding. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S13.1. Development Strategy: Much Wenlock Key Centre continued</p>	<p>Infrastructure 39. Concern that Place Plans are not a statutory part of the local plan and carry no weight in decision making. 40. Plan omits to address infrastructure needs. Significant existing infrastructure issues and needs are set out in Much Wenlock Place Plan. Approach not consistent with national policy as; proposals will not deliver sustainable development because of the lack of necessary infrastructure investment. No indication of delivery mechanisms or funding streams to address infrastructure needs identified in Place Plan. 41. Need to identify a comprehensive, deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town’s needs. This needs to address development in the Place Plan area and elsewhere which will impact on Much Wenlock, in line policies on climate change and sustainability (and with the Neighbourhood Plan). 42. No infrastructure improvements are referenced or proposed to support the (15%) increase in the size of the town. No consideration of education facilities to serve development and medical facilities in Much Wenlock and Cressage are already at capacity. Improvements necessary include additional school places, expanded medical centre, sewage disposal capacity, water supply, recreation facilities, roads, public transport and traffic management. 43. CIL from Ironbridge Power Station development should be used to deliver significant improvements for Much Wenlock. 44. Impacts from development at Ironbridge Power Station site (together with proposals for Much Wenlock) will have significant detrimental impacts on Much Wenlock and its Conservation Area due to: increased traffic flows along unsuitable roads and problematic junctions (A458 and A4169 Gaskell Arms) . Impacts will include traffic congestion and air quality, safety issues and detriment to road users including pedestrians, cyclists and commuters. 45. Road infrastructure in and around Much Wenlock is fragile. Shropshire Council has not identified mechanisms for addressing traffic and highways issues including pinch points and challenges of narrow, medieval streets 46. Insufficient water supply and sewerage for existing demand. Shropshire Council has failed to cooperate with Telford Council and Severn Trent to ensure sufficient water supplies can be maintained.</p> <p>Consultation 47. Previous community consultation responses have not been taken into account. Proposals ignore local views and aspirations (including those clearly set out in MWNP). Lack of willingness to recognise local community’s multiple concerns. 48. Lack of consultation has meant Shropshire Council have failed to consider relevant local evidence. 49. Meaningful, proper community engagement through a Neighbourhood Plan required. 50. Undue reliance on Examination in Public to consider any dissenting views on proposals. 51. Shropshire Council have failed to work constructively in the local area. 52. Inadequate (meaningful) consultation and engagement with local community by Shropshire Council/Much Wenlock Town Council despite significant demand and local interest and involvement in Neighbourhood planning. No recent effective surveys or widespread consultation of the community have been undertaken. 53. Approach to consultation has not reflected Shropshire Council's Statement of Community Involvement. 54. Lack of transparency and openness and bias in the process. Specific concern that Shropshire Council delegated authority to run consultation meetings to a site promoter. Rationale for doubling of proposed allocated site size between Regulation 18 & 19 Plan versions not justified, clearly explained or appropriately consulted on and changed solely to reflect landowners’ commercial needs. 55. The identified original preferred Site MUW012 was identified with no other options being put forward to the town. Proposed residential guideline increased from 150 to 200 dwellings, despite objections to the original preferred Site MUW012, without community consultation in order to make proposed allocation MUW012VAR viable.</p>	<p>Infrastructure 39, 40, 41, 42, 43, 44, 45 and 46. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Place Plan Areas generally consist of a main centre, its surrounding settlements and rural hinterland. These documents have informed consideration of infrastructure requirements associated with development proposals within the draft Shropshire Local Plan. Within the settlement policies section of the draft Shropshire Local Plan, Place Plan Areas are used for the presentation of settlement policies, rather than as areas subject to draft policies. The Former Ironbridge Power Station site is presented separately as draft Policy S20 in recognition of the scale of the site. However, consideration of the infrastructure requirements associated with this development and its wider implications have been informed by the Place Plan and have/will be informed by appropriate technical studies. Additionally, the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p> <p>Consultation 47, 48, 49, 50, 51, 52, 53, 54 and 55. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and effective and complies with the requirements of the current and emerging Statement of Community Involvement. All consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S13.1. Development Strategy: Much Wenlock Key Centre continued	<p>Neighbourhood Plan</p> <p>56. Current MWNP was democratically approved by the majority of Much Wenlock residents. Failure of Draft Local Plan to reflect MWNP contrary to local democracy and the Localism Act 2011. Renders the Plan not legally compliant and unsound.</p> <p>57. Review the draft Shropshire Local Plan to take account of the MWNP. MWNP as non-strategic Plan remains relevant and applicable. It sets out a sustainable, comprehensive and effective policy approach reflecting significant community input (as evidenced by the independent assessor's formal report & referendum 2013). No justification for not continuing with policies or principles of MWNP in future.</p> <p>58. Approach to the Neighbourhood Plan is not positive. Shropshire Council have failed to engage with Neighbourhood Plan refresh group and consider its relevant work and evidence. Much Wenlock Neighbourhood Plan Refresh Group are able and willing to carry out Neighbourhood Plan update. Relevant work and evidence of Neighbourhood Plan Refresh Group has been ignored.</p> <p>59. Shropshire Council should have secured/should secure the required appropriate update of MWNP to make provision for Much Wenlock to 2038. Formal review of MWNP would identify better options than those currently identified in the Draft Local Plan, enabling the meeting of local housing needs and better reflecting Shropshire Councils own climate change, economic sustainability and flood alleviation policies. Also it would allow 25% of the revenues from the Community Infrastructure Levy arising from development to help deliver community vision.</p> <p>60. Inconsistency and conflicting approaches by Shropshire Council to Neighbourhood Plans in across Shropshire. Notably Broseley, Bishops Castle and Cleobury Mortimer are being allowed to decide on the location and scale of development in the neighbourhood plans they are bringing forward.</p> <p>MUW012VAR</p> <p>61. Site selection MUW012VAR is not in alignment with NPPF flood and climate change policies, including aims that development sites should prioritise pedestrian and cycle movements, facilitate access to good public transport and whose impact on the highway network and safety can be mitigated. Site, contrary to the NPPF, is also on best and most versatile (Grade 3a) agricultural land.</p> <p>62. Site selection MUW012VAR is not consistent with Draft Local Plan policies including DP21.</p> <p>63. The allocation of MUW012VAR is contrary to sequential preference given to brownfield sites (which are available in Much Wenlock), specifically identified in relation to strategic corridors.</p> <p>64. MUW012VAR is not in alignment with policies and aspirations of the Much Wenlock Neighbourhood Plan (MWNP) and is not supported by the community.</p> <p>65. Proposed allocation does not reflect SAMDev Inspector's report. This highlighted that development on the site would have a significant impact on town's economy through a negative effect on tourism.</p> <p>66. Unjustified doubling of site size between Regulation 18 & 19 Plan versions. Site would result in development at a scale incompatible with the nature of the historic settlement. MUW012VAR represents a 12% increase in the size of Much Wenlock, this is over-development in an environmentally sensitive area adjacent to the Shropshire Hills AONB.</p> <p>67. Site in an isolated position outside development boundary and more accessible sites are available. Site is beyond walking distance to local amenities increasing reliance on cars and likelihood that residents will seek in preference to access more comprehensive retail offers available elsewhere. As a result economic benefits will be limited.</p>	<p>Neighbourhood Plan</p> <p>56, 57, 58, 59 and 60. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy is appropriate, effective, sustainable and deliverable. The Draft Local Plan specifically recognises (at para 5.179) the role of the adopted Neighbourhood Plan and within 13.2 (5) stating that 'Development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs'.</p> <p>MUW012VAR</p> <p>61, 62, 63, 64 and 65. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy is appropriate, effective, sustainable and deliverable and that there is no conflict with policy requirements.</p> <p>66. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy is appropriate, effective, sustainable and deliverable. This proposed development strategy has given due consideration to settlements characteristics, constraints and opportunities that exist, and the identification of proposed allocations has been informed by a robust and comprehensive site assessment process, including consideration of issues such as natural and heritage assets.</p> <p>67. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy is appropriate, effective, sustainable and deliverable. This proposed development strategy has given due consideration to settlements characteristics, constraints and opportunities that exist and the identification of proposed allocations has been informed by a robust and comprehensive site assessment process, including consideration of location and distance to services and facilities.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S13.1. Development Strategy: Much Wenlock Key Centre continued</p>	<p>MUW012VAR continued 68. Flood risk has not been adequately considered for the proposed site allocation with insufficient consideration evidence presented, demonstrating the proposed allocation is liable to flooding and contributes to flooding elsewhere. 69. Site selection has ignored the sequential test that Councils should choose sites that are not at risk from flooding. More suitable, alternative sites which are not subject to flood risk exist. 70. The proposed allocation is unsustainable and unsound as it is located within flood zone with a history of flooding and no evidence of how flood risk is to be assessed/mitigated without exacerbating issues elsewhere (contrary to draft Shropshire Local Plan policies). 71. Unsuitable site proposed for allocation because it is believed this will address flooding issues on the adjacent Hunters Gate Estate despite previous failure by developers and Shropshire Council to address it. Flood mitigation rationale for a large site however no longer applicable due to commitment by Environment Agency/Severn Trent to funding a flood alleviation scheme. Concerned that allocation may result in withdrawal of existing committed Government investment for flood defences in Much Wenlock. 72. MUW012VAR is not guaranteed/ cannot be required to deliver solutions to a historic flood problems. Do not consider that water management proposals in site guidelines are achievable. Future development must include a pre-condition serious flooding Hunters Gate estate is resolved. 73. The site falls within SPZ2/3. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures will be required. 74. There is no guarantee that MUW012VAR would provide a range of house sizes and tenures to meet local needs, including level and type of affordable housing and whether this is reserved for those with local connections (as required within MWNP). 75. There is no guarantee that public open space and recreation facilities (especially for young people) would be provided. 76. Insufficient water supply and sewerage for existing demand, therefore it will not be able to cater for MUW012VAR without significant investment. 77. Increased traffic from the development will damage the social and physical fabric and restrain economic potential. It will damage to the town’s character and result in loss of the visual quality of its unique rural setting adjacent to an AONB and significantly harm the environmental setting of the Town. 78. Proposed roundabout is only necessary to meet highways requirements resulting from the development and is not identified as necessary in the Place Plan which identifies other priorities for traffic management. There are other potential effective mechanisms for traffic calming if required. Roundabout will create delays, noise and street lighting intrusion and badly impact both congestion and air quality and critical Gaskell Corner junction. 79. The land is unconstrained in a highly sustainable location and will deliver substantial community benefits both on and off site by way of flood alleviation. The land will therefore make a significant and unique contribution towards meeting the growth needs. 80. Flood modelling has shown that the proposed allocation will enable the provision of surface water drainage infrastructure that will provide a betterment by alleviating the risk of flooding in this area of the town and will assist in mitigating the effects of climate change. 81. The implementation of a roundabout would improve the highways for the area.</p>	<p>MUW012VAR continued 68, 69, 70, 71 and 72. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The identification of proposed allocations has been informed by a comprehensive site assessment process, including consideration of issues such as flooding. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR. 73. Local Plan policies cover the issues raised. No change proposed 74, 75, 76, 77 and 78. Place Plans have informed consideration of infrastructure requirements associated with development proposals within the draft Shropshire Local Plan. The draft Shropshire Local Plan should be read as a whole Draft Policy DP25 also addresses infrastructure provision to support development and a range of policies address requirements such as open space and residential mix and affordable housing provision. Shropshire Council also considers that the proposed development strategy for Much Wenlock and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable. This proposed development strategy has given due consideration to the settlement’s characteristics, constraints and opportunities and the identification of proposed allocations has been informed by a robust and comprehensive site assessment process, including consideration of issues such as flooding, highways and other infrastructure. 79, 80 and 81. Noted.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S13.1. Development Strategy: Much Wenlock Key Centre continued</p>	<p>MUW012VAR Site Assessment 82. Site assessment is flawed by lacking appropriate consideration of positive outcomes for the town or limitations in terms of negative impact. insufficient acknowledgement of NPPF requirements for sites, local infrastructure constraints and traffic impacts. 83. The Site Assessments for Much Wenlock are defective and the selection of MUW012VAR is based on a flawed site assessment process that contains inaccurate information and inconsistencies. Assessment is negligent, site floods but the SA states that 0% of the site lies within 20m of a historic flood event. Other factual and technical flaws and inconsistencies detailed. 84. Site selection process is flawed as it ignores higher rated and potentially better and more sustainable sites. Need for reconsideration using a better process/accurate information. Process has wrongly eliminated alternative viable options including specific sites for small scale development to meet need. 85. Sequential test that Councils should choose sites that are not at risk from flooding has been ignored as chosen site that requires serious flood attenuation. Whilst surface water flooding attenuation has been identified, serious threat from ground water has not been taken into account. Alternative Sites MUW008 86. MUW008 should have been selected instead. Compared to proposed allocation MUW008 closer to the town centre, less isolated and with far better pedestrian and public transport. Partial site development is also possible in respect of MUW08. Alternative Sites MUW001; MUW002; MUW008 & MUW011C 87. Scope for appropriate, sustainable development on various combinations of alternative sites including MUW001; MUW002; MUW008; & MUW011C for employment. The three identified residential sites offer a better, more flexible opportunity than preferred site MUW012VAR, with less negative impacts and ability to meet specific local housing needs. 88. MUW012VAR should be replaced by MUW001 and MUW002 which are more sustainable brownfield sites within Much Wenlock development boundary.</p>	<p>MUW012VAR Site Assessment 82, 83, 84 and 85. Shropshire Council considers that it has undertaken a proportionate and robust site assessment process. The identification of proposed allocations have been informed by this comprehensive site assessment process, which has taken into account the range of considerations including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR. Alternative Sites MUW008 86. Shropshire Council also considers that the proposed development strategy for Much Wenlock and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable. This proposed development strategy has given due consideration to the settlement’s characteristics, constraints and opportunities that exist. Furthermore, proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of location and access to services, facilities and public transport. Alternative Sites MUW001; MUW002; MUW008 & MUW011C 87 and 88. Shropshire Council also considers that the proposed development strategy for Much Wenlock and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable. This proposed development strategy has given due consideration to the settlement’s characteristics, constraints and opportunities that exist.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S13.2. Community Hubs: Much Wenlock Place Plan Area</p>	<p>Cressage</p> <ol style="list-style-type: none"> 1. Support Policy S13.2 for Cressage and the strategy, policy, inset policies map, development boundary and the site allocations and development guidelines for sites CES005 and CES006 which are sound, legally compliant and consistent with national policy including the aims and objectives of delivering sustainable development. 2. Support Cressage as a Community Hub as it is an accessible and sustainable village that acts as a service centre for the surrounding rural area and the site allocations have been identified through a consistent approach and proportionate in scale to the village and will offer a range of house types and sizes. 3. Support site allocation CES006 which will deliver significant improvements to the urban realm and street scene along Harley Road as an important gateway site in the village. 4. Support the development guidelines for CES006 and the need for supporting studies and a sympathetic development scheme for the pub building and car park that reflects the heritage value of the site. 5. Support the consultation methods and processes including additional (extended) consultation periods which are compliant with the duty to co-operate. 6. Cressage development proposals do not offer the most appropriate development strategy for the village. It is proposed that the housing guideline be increased to 140 dwellings to provide housing proportionate to the size of the local population, provide 500sq.m of employment floorspace, provide adequate green space and deliver highway safety improvements. To achieve these objectives, site CES002 should be allocated for mixed housing and employment uses and the capacity of allocated housing site CES005 should be reduced to 40 dwellings. 7. Object to the designation of Cressage as a Community Hub as the village should remain as a countryside settlement to ensure no significant housing development will take place in the proposed Plan period to reflect the views of the majority of residents and the limited capacity of existing facilities and services in the village. 8. Community Hub status based on flawed scoring system particularly awarding the same points (3 points) for mobile library and a permanent library; awarding points for a closed place of worship (3 points), awarding point for a pharmacy with only a dispensing chemist (3 points) and awarding points for public transport links (5 points) in Cressage in the same way as larger towns. These issues would reduce the service score for Cressage from the current 50 points to a revised lower score below the 48 point threshold for a Community Hub. 9. The Regulation 18 Preferred Sites Consultation states Cressage was a proposed Community Hub but the Regulation 19 draft Shropshire Local Plan states it has been a Community Hubs since 2015 which is inaccurate, erroneous and misleading. 10. Housing guideline for Cressage is too high and a full needs assessment is required to understand what is needed for the village , particularly in view of the climate emergency (lack of soundness on this basis also highlighted by CPRE) which should lead to housing being directed to brownfield sites in the main urban centres of Shrewsbury and Telford. 11. Proposed scale of development will not deliver sufficient affordable housing to meet local needs especially for younger people making the identified growth unsustainable. 12. Object to site CES005 as the site assessment is unclear the reasoning is unconvincing. There are a number of issues with the development of the site including: the proposed access which is extremely dangerous with speeding traffic on the hill at Harley Lane, traffic calming (with lights or roundabout) will be required, the proposed crossing to the A458 to access services could be very dangerous for pedestrians, access to Wood Lane could be very difficult due to the gradient and existing housing, the site has been subject to flooding and there is a 'Special Interest Woodland Site' on Wood Lane. 13. Proposed allocation CES005 is located on the A458 Harley Road at a narrow stretch where speeding is common and dangerous. The additional traffic from CES005 during construction and on the occupation of the site will increase these dangers. Traffic safety is a concern for residents and is raised in consultation responses but the proposed planning solutions are not considered to be effective. 14. Schedule S13.2 should be amended to show a site capacity of 5 dwellings for CES006. 15. Proposed improvements to pedestrian links in the village are welcome but through traffic know when they enter the village so why should new development be provided to encourage this traffic to respect the amenity and safety of the village residents. 	<p>Cressage</p> <ol style="list-style-type: none"> 1. Support for Policy S13.2 Cressage and the strategy for the settlement is welcomed. 2. Support for the designation of Cressage as a Community Hub is welcomed. 3 and 4. Support for the housing allocation and development guidelines on site CES006 is welcomed. 5. Support for the consultation processes for the draft Shropshire Local Plan, included extended consultation periods over key public holidays, is welcomed. 6. Proposed allocations have been identified through a proportionate and robust site assessment process that identifies the reasoning for the preferred site allocations and the rationale for those sites not selected for development in the proposed Plan period. 7. Objection to the designation of Cressage as a Community Hub is noted. Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Furthermore, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site. Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so. 8. The Council considers the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. Using the methodology within the HoS, further assessments of the service provision in Cressage were undertaken in 2018 and 2020. In 2018, the presence of a pharmacy was recognised with the addition of 3 points taking the service score from 51 to 54 points. In 2020, the service score was reduced by 4 points to reflect the closure of the local post office. The revised lower score of 50 points is still above the threshold for the designation of a Community Hub (48 points) and consequently, Cressage is correctly identified as a proposed Community Hub. 9. Include a New Minor Modification to the Explanation to Policy S13.2 to amend the first sentence of paragraph 5.184 to read "Cressage is the only Community Hub in the Much Wenlock Place Plan Area and has changed its <u>previous</u> status from being a 'Countryside' settlement since 2015". 10. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Cressage in respect of its previous status as a countryside settlement is appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlement's characteristics, constraints and the opportunities that exist. 11. Provision of affordable housing in Cressage will be consistent with the policy requirements of draft Shropshire Local Plan and will be appropriate, effective, sustainable and deliverable. 12, 13 and 15. Proposed site allocations have been informed by a proportionate and robust site assessment process which has been informed by comments from the Council's Highways Officers and the County Ecologist and others and their recommendations have been incorporated into the guidelines for site CES005. 14. Schedule 13.2 in the development guidelines for site CES006 records that the site capacity is for around 4 dwellings allowing for the site to deliver 4 to 5 dwellings.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S13.2. Community Hubs: Much Wenlock Place Plan Area continued	<p>Cressage continued</p> <p>16. Parish Council has not challenged Community Hub status or accurately represented the local views and the planning authority is not sufficiently resourced to properly consider consultation responses and to make specific feedback on the issues raised. This makes the plan preparation process undemocratic particularly by recording the issues from identical responses but not counting the number of people who made the points.</p> <p>17. Consultation process has not been adequate or appropriate during Covid 19 pandemic restrictions and the Regulation 19 consultation should be re-run since libraries have been closed which denied access for persons with no internet access.</p> <p>18. The consultation processes for the Local Plan have not satisfied the Gunning principles to give adequate access and time for consideration and response and to give proper weight to the facts that the majority of respondents did not agree with the identification of Cressage as a Community Hub, or its proposed housing guideline, or its proposed development boundary or the proposed allocation CES005 or the loss of countryside.</p>	<p>Cressage continued</p> <p>16, 17 and 18. The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the Gunning Principles. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>
S13.3. Community Clusters: Much Wenlock Place Plan Area	N/A	N/A
S13.4. Wider Rural Area: Much Wenlock Place Plan Area	See S20.	See S20.
S14. Oswestry Place Plan Area	See S14.1-S14.4	See S14.1-S14.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.1. Development Strategy: Oswestry Principal Centre	<p>Oswestry</p> <ol style="list-style-type: none"> 1. The Strategic Approach for the county and the Oswestry Place Plan Area is wrong, and the reference to Oswestry 2050 to justify the proposed development at Park Hall is a distortion of the facts. Park Hall was provided as an example of village settlements within an enlarged Oswestry, but this was a part of a wider example of what could be the result of a strategic planning exercise. 2. Such a reliance on unplanned windfall development and allocations outside of the town is considered inappropriate given the opportunity to direct some of this growth to identifiable sites in sequentially more appropriate (sustainable) locations within the town. OSW017 should be re-introduced as an allocation 3. The proposed employment guideline for Oswestry earlier in the Local Plan Review was some 19ha (based on the 'balanced' employment land calculation identified within the Preferred Scale and Distribution of Development Consultation), this increased during the last Regulation 18 consultation (and remain as such in the draft Shropshire Local Plan) to 57ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed. No actual quantified justification has been evidenced for this large proposed increase in the employment land guideline, or for the departure from balance with the housing guideline. This means housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting. To that extent, the employment land guideline is not justified by proportionate evidence. The housing guideline for Oswestry also increased by 100 dwellings at the same time the employment guideline increased. 4. With regard to proposed allocations at Park Hall: Para 2 of draft Policy S14.1 references Oswestry 2050 as an inspiration, this misses the point of this document which identified the need for a long term plan (including a transport plan) aiming to reduce carbon emissions and made no reference to a mixed use 'garden settlement', rather than being the Plan. 5. Proposals include provision for key worker housing for the RJAH Hospital and Derwen College, this is welcomed, but there is no mechanism to secure it. The site location presents conflicts - it is an allocation for Oswestry (some distance from Oswestry), in Whittington Parish, but will benefit employment sites in Gobowen Parish. Allocation of resulting CIL monies may be problematic. Parts of these site were rejected in the SLAA but no mitigation is proposed within the Sustainability Appraisal (SA). 6. The allocations at Park Hall are not supported by proportionate evidence, and are therefore unsound. It is unsustainable to treat allocations at Park Hall to meet the needs of Oswestry and some of the new allocations now proposed for Park Hall were rejected in the SLAA. 7. Do not consider road infrastructure (narrow; prone to flooding; parts are without pedestrian footways; and poorly maintained) or schools (oversubscribed) are sufficient to support proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032. 8. Park Hall lacks local amenities and development of PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 would double its size. The proposals for PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 represent overdevelopment. A pond at the bottom of PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 floods and has protected newts. 9. The site at the Swan Hill/Brogyntyn Registered Park should be an allocation for housing 10. Oswestry and Llanforda Reservoir and WTW is located adjacent to Oswestry's proposed Development Boundary. The asset is operational but includes surplus land following recent major investment, which is appropriate for alternative uses. The Vyrnwy Aqueduct, passes through Oswestry. This should be a consideration when allocating future development sites (note this asset passes through a number of existing/proposed allocations). This infrastructure is imperative to the water distribution network and the Council and relevant site promoters must have detailed understanding of associated constraints, legal easements and the need for unrestricted access for operation/maintenance - will not permit development over or in close proximity to it. Future developers of relevant sites should (the Council should encourage future developers of relevant sites to) contact United Utilities early in the process to ensure consideration of the Vyrnwy Aqueduct in design and layout of development - free Pre-App Service available (details in representation) 	<p>Oswestry</p> <ol style="list-style-type: none"> 1. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including Community Hubs proposed in the Oswestry Place Plan Area and the allocations. However, recognising the diverse nature of Community Hub settlements the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements' characteristics, constraints and opportunities. 2. The site referred to was considered appropriate in previous consultations however now the site assessment states that the: "Scale of development on this site would be minimal in terms of a contribution to the open market housing need of the town. It is acknowledged that there are issues with highways towards Upper Brook Street, however these are not substantive. It is considered that there is little rationale for an open market housing allocation in this location." Shropshire Council retains this stance. 3. Shropshire Council considers that the proposed development strategy for Oswestry and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed employment land guideline for Oswestry provides appropriate choice and competition within the market, recognises the role of Oswestry and its contribution towards strategic growth objectives in the north-west of the County and meets the needs of the town and its surrounding hinterland, including attracting inward investment and allowing existing businesses to expand. It is noted that no additional employment land allocations are proposed for Oswestry. 4. In identifying proposed site allocations, a comprehensive site assessment process has been undertaken – not merely looking into the Oswestry 2050 document. The Strategic Land Availability Assessment (SLAA) represents the first phase of this site assessment process and represents a very strategic assessment of an individual site's suitability, availability and achievability (including viability). It is not intended to be an exhaustive exercise and has not been informed by a direct assessment from officers from other relevant services areas such as development management; heritage and design; natural environment; public protection; highways; or flood risk management. 5 and 6. Shropshire Council considers that the proposed development strategy for Oswestry/Park Hall and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). 7. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Draft site guidelines for proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 include "Any necessary improvements to the local and strategic road network will be undertaken..." 8. Shropshire Council considers that the proposed development strategy for Oswestry/Park Hall and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). 9. Shropshire Council considers that the proposed development strategy for Oswestry and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocations have been identified through an appropriate, proportionate and robust site assessment process. The southern element of the site was assessed under ref OSW028. It was rejected as it forms part of a registered park. Likewise, the land north of this site reference is also Registered Parkland, and is therefore unsuitable for development and there are more suitable sites elsewhere (Park Hall). 10. Shropshire Council considers the proposed development strategy for Oswestry and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed site allocations have been informed by a proportionate and robust site assessment. Shropshire Council also considers that the proposed development boundary is appropriate. Draft Policy DP19 includes "Development must not adversely affect the quality, quantity and flow of both ground and surface water and must ensure that there is adequate water infrastructure in place to meet its own needs."

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.1. Development Strategy: Oswestry Principal Centre continued	<p>Oswestry continued</p> <p>11. Support Oswestry's status and the employment land identification of 57ha</p> <p>12. Supports ELR042</p> <p>13. OSW017 this site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change</p> <p>14. Significant development already occurred in this area [Park Hall] already. Insufficient infrastructure, school capacity and poor roads.</p> <p>15. Significant development already occurred in this area already. Insufficient infrastructure, school capacity and poor roads.</p>	<p>Oswestry continued</p> <p>11 and 12. Noted.</p> <p>13. No action needed - OSW017 has already been removed as a preferred allocation, for the reasons outlined the site assessment.</p> <p>14 and 15. The preferred allocations situated in Park Hall are to address the need for Oswestry town, due to the town's constraints, over the Plan period in conjunction with those allocation from SAMDev. As per the site guidelines, various infrastructure will be required for development to be acceptable and compliant with the emerging plan.</p>
S14.2. Community Hubs: Oswestry Place Plan Area	<p>Oswestry Hubs General Issues</p> <p>1. Object to the preferred sites in Kinnerley, Knockin, Llanymynech, Pant, Ruyton XI Towns, Trefonen, West Felton, Weston Rhyn and Whittington. Most of the hubs only have rudimentary bus services and schools/employment are far from the settlement. Avoidable GHG emissions will be created if development is in these locations. Development should be limited to local need in all of the following locations:</p> <p>-Kinnerley: There is no evidence that the services are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>-Knockin: Has no primary school or other facilities. There is no evidence that any support which further development might bring might be effective in maintaining the village hall. The settlement is not sustainable.</p> <p>-Llanymynech: Whilst Llanymynech has shops, access to a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>-Pant: Whilst Pant has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>-Ryston XI Towns: Whilst Ruyton XI Towns has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. The site allocated is a brownfield site, but it is distant from main services.</p> <p>-Trefonen: Whilst Trefonen has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>-West Felton: Whilst West Felton has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>-Weston Rhyn: Whilst Weston Rhyn has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>-Whittington: Whilst Whittington has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>- Similar principles should be applied to development in Community Clusters as to open countryside. It is unlikely that any development in the listed Community Clusters would be sustainably located in relation to the policy to move to a low carbon economy. There is no convincing evidence that any of the small scale development envisaged in cluster settlements would make any significant difference to the viability of such settlements.</p>	<p>Oswestry Hubs General Issues</p> <p>1. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to those Community Hubs proposed in the Oswestry Place Plan Area. However, recognising the diverse nature of Community Hub settlements the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S14.2. Community Hubs: Oswestry Place Plan Area continued</p>	<p>Gobowen</p> <p>2. Support Hub status, previous SAMDev allocation GOB012's issues now resolved and support its re-allocation</p> <p>3. GWR023 should remain a preferred allocation – its removal from the 2018 Reg-18 stage has had no discussion or explanation. Access is available off an adjacent development off Whittington Road. Areas in the floor zone have been removed from our submission.</p>	<p>Gobowen</p> <p>2. Support welcomed.</p> <p>3. GWR023 was a preferred allocation in the Reg-18 Preferred Sites Consultation (November 2018) document, however it was removed as a preferred allocation as part of the Reg-18 Pre-Submission Draft of the Shropshire Local Plan (Aug 2020), and this remains the case at Reg-19 stage. It should be noted that when GWR023 was a preferred allocation, it was immediately N of the existing consent and immediately adjacent to Fernhill Lane. As the SE corner of GWR023 lay in a flood area, Shropshire Council required data from the SFRA Level 2 before a confirmed decision could be made on the site for the August 2020 Reg-18 stage. This data was received fairly late, and so very shortly after this was received, the document needed publishing, however the data confirmed that no access points should run through the site's SE corner (i.e. off Fernhill Lane). As this was the only possible access due to the design of the now-extant consent blocking off any possible access, the site was removed as it was inaccessible. This, contrary to the representation, was explained to the site promoters in an email thread in August 2020. It was also discussed "shifting" GWR023 to the west slightly - avoiding all the flood area and having access through the existing consent to the south. However, at the time the design and positioning of the housing in the existing consent meant that no access could go through the site northwards. A representation was subsequently submitted as part of the Aug 2020 Reg-18 Consultation for this "shifted" site, however it relied on an access through a semi-detached house whereby there were no applications to amend the scheme to remove this dwelling. The council was therefore not confident in the accessibility of this shifted site and retains this stance.</p>
<p>S14.2. Community Hubs: Oswestry Place Plan Area continued</p>	<p>Kinnerley</p> <p>4. Residential guideline is too high, past completions not included at Coly Anchor and Centenary Close, which would reduce the guideline. Guideline is disproportional to Kinnerley's size and in comparison to other hubs in the Oswestry area.</p>	<p>Kinnerley</p> <p>4. The completions at Coly Anchor and Centenary Close took place prior to 31st March 2016, and so are correctly not included in Shropshire Council's figures as they pre-date the plan period (i.e. before 1st April 2016). In terms of proportionality of development in Kinnerley - Shropshire Council takes due consideration on all settlements in terms of its housing guideline, looking at each settlements' opportunities and constraints. Kinnerley's percentage increase is comparable to several settlements in the Oswestry Place Plan area, including St Martins and West Felton. Each settlement is reviewed on a case-by-case basis, as every settlement has its own respective constraints and opportunities, and Kinnerley is seen as being a suitable settlement for the housing guideline given. Notably there are no allocations here, as it is expected the guideline will be reach through windfall development</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.2. Community Hubs: Oswestry Place Plan Area continued	<p>Knockin</p> <p>5. The Council has undertaken a ‘Supplementary Site Assessment’ with regard to KCK009, which concludes that ‘in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, subject to it being of a comparable design, scale and layout to that which has been built most recently to the south’. This is welcomed and we note that the proposed Development Guidelines for KCK009 include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Knockin Conservation Area. However, it is considered that the proposed Development Guidelines should be strengthened by the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation (as per the Supplementary Site Assessment), and thereby mitigating any harm that may be caused to the significance of the Conservation Area.</p> <p>Additionally, welcome that the 'Supplementary Site Assessment' of KCK009 includes assessment of the site in relation to the significance of the Scheduled Monument of Knockin Castle and its setting. With regard to non-designated archaeology, it is noted that two linear earthwork features (HER PRN 03723), (the remains of two substantial, infilled medieval ditches), would be partially destroyed by development of HHH001 and HHH014. Although, it is suggested that mitigation could be achieved at the development management stage through archaeological recording, secured by a planning condition, and that the requirements of which should be informed by an initial desk based assessment and field evaluation that are undertaken prior to submission of a planning application, this is not mentioned in the Development Guidelines at present and it is therefore recommended that these specific requirements be included.</p> <p>6. The site falls within the SPZ3 of a public water supply borehole. The depth to groundwater is likely to be shallow. There are also a number of private supplies. Given the sensitive hydrogeological setting appropriate drainage solutions will be required, foundation dewatering will need to be considered and we would discourage the proliferation of non-mains foul drainage</p> <p>7. Support the proposed allocation of KCK009 for 25 dwellings.</p> <p>Development of site KCK009 would enable the sustainable development of Knockin within the Plan period. Site is adjacent to the existing built edge of Knockin & a logical location for village future expansion. There are limited site-specific constraints, and development would be proportionate to Knockin’s role as a Community Hub.</p> <p>No known in principle reasons why detailed policy requirements re access, heritage, trees & drainage & flood risk set out in draft guidelines cannot be met.</p> <p>Site is deliverable – landowner in negotiations with developers and pre-application discussions have taken place with Shropshire Council under the pre-application process. Extract of masterplan scheme submitted at the pre-application stage shows how the site can accommodate 27 dwellings and demonstrates that it could address the detailed KCK009 policy requirements as part of a future planning application. The Estate has experience & a track record of timely delivery of residential sites. Consider forecast delivery timetables for the site at Appendix 7 of the Draft Local Plan are achievable & delivery could comfortably occur before identified medium term subject to the planning process.</p> <p>8. The preferred allocation floods, and last did so in 2014 but also the flooding is every year along the east aspect of the field along the Weirbrook... this field is lower than the brook which is buffered... drainage will be compromised and sewage treatment is already over-subscribed in the reedbed plant north end of church lane.</p>	<p>Knockin</p> <p>5. A minor modification is proposed to the 2nd paragraph of the site guidelines for KCK009 in Schedule S14.2(i) to reflect the need for an archaeological assessment prior to a planning application, the need to take into account non-designated archaeological features and that the design of development should reflect the findings of the Heritage Assessment.</p> <p>6. Local Plan policies cover the issues raised. No change proposed.</p> <p>7. Noted.</p> <p>8. As specified in the site guidelines: "The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.2. Community Hubs: Oswestry Place Plan Area continued	<p>Llanymynech</p> <p>9. Welcome that the Council has undertaken a ‘Supplementary Site Assessment’ for LYH007, regarding the potential impact on the significance of the Llanymynech Village and Heritage Conservation Area and the potential impact on the settings and significance of the Scheduled Monument of Lime kilns, associated tramways, structures and other buildings at Llanymynech (Llanymynech Lime Works) (NHLE ref. 1021412). Note proposed Development Guidelines for LYH007 include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Llanymynech Conservation Area and its setting. However, recommend that proposed Development Guidelines be strengthened through the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation, to ensure that the development is comparable to the recent development of site LLAN009.</p> <p>Additionally, welcome the assessment of the site in relation to the significance of the Llanymynech Lime Works Scheduled Monument and note that a well-designed landscape buffer along the canal is also recommended, in addition to the design considerations set out in relation to the Conservation Area. However, this is also not mentioned in the proposed Development Guidelines and it is therefore recommended that these specific requirements also be included.</p> <p>10. Support the proposed allocation of LYH007 for 50 dwellings. Development of site KCK009 would enable the sustainable development of Llanymynech within the Plan period. Site is adjacent to the existing built edge of Llanymynech & a logical location for village future expansion. There are limited site-specific constraints, and development would be proportionate to Llanymynech role as a Community Hub. Support the Regulation 19 Local Plan’s policy requirements for LYH007 re access, heritage, rights of way; hedgerows and watercourses; drainage & flood management and the canal as set out in draft guidelines. Site is deliverable as demonstrated by pre-application submission to Shropshire Council which has appropriate evidence submitted. Further evidence would be commissioned at planning application stage. The pre-app scheme for site development is in accordance with the LYH007 draft site guidelines. It proposes 53 new homes of mixed size and tenure, with 10% affordable housing in accordance with emerging policy DP3. The scheme would be accessed through the recently implemented residential development at Barley Meadows, which until its development was also owned by Bradford Estates. This demonstrates that the Estate has ability, experience & a track record of delivery of residential sites. Consider forecast delivery timetables for the site at Appendix 7 of the Draft Local Plan are achievable & delivery could comfortably occur within the identified short-medium term.</p>	<p>Llanymynech</p> <p>9. A minor modification is proposed to the 2nd paragraph of the draft Site Guidelines for site LYH007 in Schedule 14.2(i) to reflect the need for the design of development to be based on the results of the Heritage Impact Assessment and to include a buffer to the canal.</p> <p>10. Noted.</p>
S14.2. Community Hubs: Oswestry Place Plan Area continued	<p>Pant</p> <p>11. Support Pant's status as a Hub, however the guideline for the settlement is too low. Overdependence on windfall and the allocation (PYC021) for 25 dwellings which is fairly linear in nature and the highway requirements would impact the housing capacity on the site. PYC020 should be considered for allocation.</p>	<p>Pant</p> <p>11. This site was assessed as part of the site assessment process, where it was considered that it "is located in an area where only very narrow roads reach, therefore there would be difficulties for HGVs etc. in accessing the site. There are also other more appropriate sites for allocation." A very minor snippet of the Conservation Area does overlap with the site at the west side.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.2. Community Hubs: Oswestry Place Plan Area continued	<p>Ruyton XI Towns</p> <p>12. The guideline of around 125 dwellings for Ruyton XI Towns and around 155 dwellings for Weston Rhyn could be construed by some as being a maximum. The policy should make it clear that these figures are not meant to be seen as a “cap” but instead be expressed as a minimum.</p> <p>13. WRN016 in the maps does not show the full extent of the site which has been granted.</p> <p>14. As Ruyton XI Towns is a Community Hub, more than one site allocation should be identified as there is then more potential for delivery.</p> <p>There appears little evidence that proposed allocation RUY019 will be released for development in the near future, as it is currently used as a haulage site. As such RUY005 should be included as a proposed allocation. RUY005 lies in a sustainable location within walking distance (existing footway) of services and facilities and would represent infill development. Appears the Council did not give sufficient consideration to the benefits of this site to deliver housing.</p> <p>15. The site is located within SPZ3 of a public water supply borehole. Shallow groundwater is probable. Dairy/industrial former site use, so contaminated land considerations. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures would therefore be required.</p> <p>16. The policy wishes for any redevelopment of the site to consider the potential for interpretation of heritage features on the site and also the contribution it might make to the wider heritage features elsewhere in the settlement (e.g. Ruyton Castle Scheduled Monument), but there are no known features on the site (our Archaeological Desktop that supported the Outline PP ref. 10/04143/OUT) demonstrates this and to associate this site with the Castle remains SAM located way beyond the site demise to the east of the village (as depicted on the Place Plan extract below) is unreasonable. More dwellings could be included in the site guideline for the allocation.</p>	<p>Ruyton XI Towns</p> <p>12. The figures illustrated for the sites are only guidelines and so appropriate housing numbers around the figures would be considered at the planning application stage.</p> <p>13. The site outlined in brown indicates the land which was adopted as a SAMDev site. Any subsequent additions to this would be from a planning application only, as only the land indicated was adopted as part of SAMDev and so this will not change.</p> <p>14. Noted. Shropshire Council considers that the proposed development strategy for Ruyton XI Towns and the proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p> <p>15. Local Plan policies cover the issues raised. No change proposed.</p> <p>16. The figure of 65 for the site is only a guideline and so appropriate housing numbers around this figure would be considered at the planning application stage. The site as preferred is considered appropriate in terms of size and scale. Likewise the additional land to the west was not promoted at any stage until now</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.2. Community Hubs: Oswestry Place Plan Area continued	<p>St Martins</p> <p>17. Support the modifications made at Reg18 stage.</p> <p>18. Supports the policy wording to account for the Clwydian Range and Dee Valley AONB.</p> <p>19. St Martins The Parish Council requests that as part of the current review Shropshire Council consider moving Stan's store and playing field to the rear within the development boundary as a minor modification to the Plan</p> <p>20. St. Martin's residential guideline of 'around 355 dwellings' is unjustifiably low. SMH037 should be a preferred housing allocation.</p> <p>21. St Martins The development boundary of St Martins has not been reviewed to take account of / reflect developments that have occurred on the edge of the settlement. The plan is not positively prepared as a result. Windfall development is unnecessarily restricted despite the sustainable credentials of the settlement. The Plan is not therefore positively prepared or justified.</p> <p>Sites that should properly be considered under Policy SP8 as sustainable windfall sites in Community Hubs would, on the basis of the Policy Map, incorrectly be considered as falling within open countryside for policy purposes. The Inspector is asked to look at the soundness of St Martins settlement boundary.</p> <p>In particular SMH041 'West of Cottage Lane, St Martins' remains outside the settlement boundary despite being surrounded on all sides by an existing sub-urban housing development. It appears the Council has simply not correctly reviewed the boundaries to reflect existing developments.</p> <p>An outline planning application was made on part of the site Ref 16/03362/OUT, dated 28 July 2016 for residential development of circa 8 dwellings. It was refused solely due to its location outside the settlement boundary. The Inspector determining a subsequent appeal noted:</p> <p>The site is surrounded on all sides by existing suburban housing development and is effectively landlocked. The site lies outside the development boundary of St Martins. Immediately to the south is a small recently built housing scheme of nine properties that was approved at a time when the Council could not demonstrate a five year housing supply.</p> <p>That development should now be included in the Local Plan review as being within the development boundary of St Martins as it is a well-established development clearly forming part of, and not separated from, other built development in St Martins. It clearly forms part of the Community Hub.</p> <p>22. St Martins The fourth paragraph relating to SHM031 is incorrect and must be corrected. As worded, this paragraph wrongly refers to a sewer, its implication upon development and seemingly a resulting assessment required of the Sewage Pumping Station to establish improvement requirement.</p> <p>The Estate, as Landowner, submitted a Concept Masterplan and Vision Document (CM&VD) to previous stages of the Local Plan process, including the Regulation 18 consultation (August 2020). This identifies a utility easement which is associated with a gas pipe and not sewer infrastructure. The CM&VD identified this utility easement and as a result demonstrates the ability of SMH031 to deliver, through a considered masterplan, the capacity of 60 dwellings in line with the site allocation. In view of the drafting error, it is appropriate to delete the final (fourth) paragraph associated with the SMH031 allocation.</p> <p>23. St Martins This is a former mining area so there may be ground contamination/stability issues that will need to be addressed. Given the proposed scale of the development mains foul drainage will be required.</p> <p>24. St Martins The public sewerage network can accept the potential foul flows from the proposed development site (SMH031) however an assessment of the Sewage Pumping Station (SPS) would need to be undertaken to establish whether improvements are required. Potential developers need to be aware that this site is crossed by a sewer and protection measures in the form of an easement width or a diversion of the pipe would be required which may impact upon the housing density achievable on site.</p> <p>25. St Martins I object to the smaller field directly behind the rear gardens of 1-14 Moors Bank being included in the plans for SMH031. This is due to residents using this field for recreational walking to access the right of way paths, to walk to the canal, for many years. Access is also needed to our rear gardens, for purposes such as large machinery, due to narrow access at the front. If this field is developed for residential housing, it will have a detrimental impact on our quality of life, as we as a family spend large amounts of time in our garden. Our garden is a safe place for our children to play and enjoy the outdoors, especially during the Covid-19 Pandemic, where our gardens and fields are the only means to exercise and ensure wellbeing of mental health. This would no longer be the case, if this field is included as a site for residential development, as we'd be living next to a building site, and then being overlooked by housing, with no access to the right of way paths to the canal, and no access to our rear garden.</p> <p>26. St Martins SMH038 The public sewerage network can accept the potential foul flows from the proposed development site.</p>	<p>St Martins</p> <p>17 and 18. Support welcomed.</p> <p>19. It is considered that the proposed development boundary for St Martins is appropriate, having had due consideration of the built form of the settlement.</p> <p>20. Shropshire Council undertook a robust site assessment exercise and it was considered that site SMH037 was "...compromised by poor highway access and by limited accessibility to local services. Better sites available." It is therefore considered that the preferred allocations are suitable alongside any windfall development to meet the housing target of the settlement</p> <p>21. Shropshire Council considers that the development strategy proposed for St Martins (including existing and proposed allocations), which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). It is also considered that the proposed development boundary for St Martins is appropriate, having had due consideration of the built form of the settlement.</p> <p>22. A minor modification to Schedule S14.2(i) is proposed to SMH031 to recognise the presence of a utility in the site</p> <p>23. Local Plan policies cover the issues raised. No change proposed.</p> <p>24 and 26. Noted.</p> <p>25. A PROW runs near the site, with its nearest point around 130m from the preferred allocation's SE corner. However, the main access points for this PROW are from either Moors Lane to the south or off an unnamed road off Church Street to the north. Notably there are no PROWs running through the preferred allocation. All sites promoted since the Call for Sites went through a robust site assessment process and this site is deemed appropriate for residential development. Any planning application for housing would have to ensure that it is appropriate in terms of encroachment on existing dwellings etc. however this is dealt with at the planning application stages.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S14.2. Community Hubs: Oswestry Place Plan Area continued</p>	<p>Trefonen 27. Trefonen does not have "significant Employment opportunities" or "peak time public transport". Trefonen has been proposed as a "Hub Settlement". It is the only proposed "Hub Settlement" that have neither of the above key requirements. Giving Trefonen "Hub" status would contravene the substance on SP3 Climate Change and Sustainability Objectives SO5/6 & 12. Trefonen as a "Hub Settlement" is unsound. 28. Trefonen should be regarded as a "Rural Settlement" with housing development to meet the needs of local people over the plan period. This can be achieved by "Affordable Exception" and "Rural Exception" as a housing policy set out in the Draft Plan for rural settlements with a school, this would include many types of housing such as houses, bungalows starter homes. This could be achieved with small developments of say 5 homes. Consideration should be given to the extensive work performed by the community to produce the Village Design Statement. This should be referred to in the SP5 High Quality Design. 29. Trefonen is the only proposed hub settlement with neither significant employment opportunities or peak time public transport. Making it a hub would be contrary to Shropshire’s climate change and sustainability objectives and is unsound. Sufficient housing to meet the needs of local people during the plan period can be achieved by ‘exception’ mechanisms. Trefonen as a rural settlement should only have small scale housing of a type and size that reflects requirements for starter, intermediate, downsize and accessible houses or bungalows. Any development should conform to the village design statement. Important to guard against the cumulative impact of developments by additional wording within the affordable exception policies DP4,5,6 and 7. 30. Trefonen has a full school, with no scope for expansion, and with existing housing provision meeting “identified local needs” for local people. Future housing needs can be provided for by Rural Exceptions Policies DP4, DP5, DP6 & DP7 “ascertained by reference to Shropshire Council’s Home Point Housing Waiting List or by Right Homes Right Places or local Housing Needs Survey.” The village would benefit from these small-scale developments of affordable housing over a period of time. Shropshire Council should respect our Village Design Statement 2016. 31. Trefonen is the only proposed Hub that does not have significant employment and peak time public transport. It would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12 if it was allocated hub status. This would be unsound. 32. Trefonen is the only Hub with no allocations, and so is wholly inconsistent with the approach to all other hubs, with no evidence to justify the lack of a housing allocations. The justification for Trefonen having no allocations is poor. TRF014 should be considered as a site allocation for housing. 33. Development of housing on sites TRF006, TRF008, TRF010, TRF015 & TRF017 would have an adverse impact on both the setting of Offa's Dyke (Scheduled Monument (SM)) and the Offa's Dyke National Trail path. Would be very concerned in particular, at the prospect of any development on TRF008, this field contains a section of Offa's Dyke SM along the entire eastern side (inside the hedge-line) and is clearly visible to walkers from the National Trail path. Any development of this field, would be contrary to the guidance laid down in the Offa's Dyke Conservation Management Plan (ODCMP 2018) - which has been adopted by regional authorities along the length of the monument, including Shropshire Council. Would also have very strong reservations in the event of housing development on TRF010, as this would be immediately adjacent to (and overlook) the Offa's Dyke National Trail path. Development on TRF006, TRF015 & TRF017 would not affect the monument as much as TRF008 & TRF010, but would still go against the core principles of the ODCMP.</p>	<p>Trefonen 27 and 28. Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. Community Led Plans are considered to be appropriately referenced within the proposed explanation of draft Policy SP5 and other draft policies/proposed explanations to draft policies. Village Design Statements are considered a form of community-led plan. However, for clarity a minor modification is proposed to the explanation to draft Policy SP5. 29. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub. Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. It is noted that the proposed requirements in draft Policy S14.2, which applies to the proposed Community Hubs in the Oswestry Place Plan Area - including Trefonen, includes "development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs." 30. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub. Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. It is noted that the proposed requirements in draft Policy S14.2, which applies to the proposed Community Hubs in the Oswestry Place Plan Area - including Trefonen, includes "development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs." 31. As above, Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. A minor modification is proposed to reduce the gross housing requirement for the village over the plan period. 32. The site assessment conclusion for TRF014 states: "Site has good access but is slightly far out but is still in proximity to the main services of the village. However available information about local housing need suggests that the greatest need is for affordable and low cost market housing of a range of types and tenures. No site allocations are therefore proposed and it is instead proposed that the housing guideline will be delivered through the development of appropriately located ‘cross-subsidy’ exception sites." Therefore site would be appropriate for cross subsidy or affordable etc. The housing guideline is also relatively small and a large site of the size suggested may be considered inappropriate. 33. Noted. No sites are proposed for allocation at Trefonen.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.2. Community Hubs: Oswestry Place Plan Area continued	<p>Trefonen continued</p> <p>34. Trefonen cannot reasonably be considered as meeting the requirements of a proposed Community Hub. Consider the methodology used and conclusions reached in the “Hierarchy of Settlements” (HoS) as applied to Trefonen are fundamentally wrong and the village falls well short of fulfilling several of the criteria required for Community Hub status.</p> <p>Previously to qualify as a Community Hub, “significant employment” and “peak time public transport” were required, Trefonen has neither (and is the only proposed Community Hub with neither). This is now relaxed by para 5.41 of the HoS, which undermines proposals relating to climate change and sustainability, introduces a subjective element into an objective assessment and leads to the conclusion that some aspects of HoS are unsound.</p> <p>Other factors which demonstrate the HoS has not been correctly applied in Trefonen include:</p> <p>The library is a mobile library with short fortnightly visits, this cannot be considered a full service. Note that TRF001 and TRF017 score 0 within the site assessment for access to library, showing two different and contradictory assessments.</p> <p>There is no “convenience store”, rather there is a very small shop which has a Post Office counter within it.</p> <p>Whilst there is a primary school, it is understood that there is little or no capacity for additional pupils. In addition to the above, consider Trefonen should not be a Community Hub as it is in the wrong place. Community Hub status would cause significant residential development pressure, with residents (apart from retirees), needing jobs. The main focus for jobs in the Oswestry area is the other site of town (near Mile End Roundabout). This and job locations further afield (Wrexham, Shrewsbury, Chester etc) all require travel through/round Morda in private vehicles (often single occupied) on heavily trafficked unclassified roads. Makes no sense to identify a Community Hub that will significantly increase existing traffic problems in and around Oswestry at peak hours</p> <p>Identification of Trefonen as a Community Hub is contract to draft Policy SP3 and Sustainability Appraisal (SA) objectives SO5, SO6, & SO12.</p> <p>Parish Council have consistently indicated wish for Trefonen to remain classified as countryside, which allows for 100% affordable small-scale rural exception development for identified local needs (reflecting the Trefonen, Treflach and Nantmawr VDS (2016) and the Council’s Housing Needs Survey (2018)).</p> <p>Proposed for an additional 50 houses in Trefonen during the proposed Plan period cannot be considered modest growth the context of the built community of Trefonen and would constitute overdevelopment.</p> <p>Consider sites at Trefonen (including TRF 001, 006, 008, 009, 010, 015 & 017) identified as having long-term potential within the Strategic Land Availability Assessment (SLAA) are entirely unsuitable for residential development, for reasons including location, access, traffic, flooding and drainage, geology/geomorphology, heritage, preservation of the rural environment, landscape character and ecology.</p> <p>35. Very concerned that multiple “small” developments to reach the currently proposed “guideline” of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater, impact as a large development on our village over the course of time. Do not believe that is the intention of the (NPPF) in allowing Rural Exception developments in and around rural settlements.</p> <p>36. Regarding planning for building in Trefonen, surely the extra traffic generated would impact on the bottle neck getting into town passed the Catholic school and Oswestry School. I understand planning permission was recently refused on a plot near to the school due to the congestion it would cause.</p>	<p>Trefonen continued</p> <p>34. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>With regard to the proposed local housing requirement, it is considered appropriate to review the position having regard to consistency with other similarly scaled community hub settlements, as well as the likelihood of delivery over the plan period, having taken account of the overall net requirement remaining to be delivered over the remainder of the plan period, and that it has not been considered appropriate to allocate any land in the village due to site constraints identified through the SLAA process. It is therefore proposed to include a minor modification to the Plan to reduce the gross housing requirement for the village from 55 to 35 dwellings. It is considered this requirement will be met by: Suitable infill development within the defined development boundary; single plot and larger affordable housing exception schemes, potentially outside the development boundary but on sites well related to the village; and Cross-subsidy exception schemes (at least 70% affordable housing), potentially outside the development boundary but on sites well related to the village.</p> <p>35. As specified within draft Policies DP4, DP5 and DP7 the primary factor that determines the size threshold for affordable housing exception sites is local need (with DP7 also specifying schemes will not normally exceed 10 dwellings). However, they also include a cross-reference to para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. It is considered that this effectively manages cumulative impact.</p> <p>36. There are no housing allocations for Trefonen. Rather, the housing need for Trefonen is to be met by infill and windfall sites. Therefore any concerns relating to traffic will be considered at the planning application stages</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S14.2. Community Hubs: Oswestry Place Plan Area continued</p>	<p>West Felton 37. Not legally complaint as there has been no public consultation. The target of 25,400 is too high, other sites in West Felton have a better SA score, 60 new houses in West Felton will bring issues 38. In West Felton, Shropshire Council has allocated site WEF025. Shropshire council’s sustainability assessment gave this site a rating on -5 (Good). 10 sites had a better sustainability score than this site. 15 had a worse score. One other site had the same score. Objectively there were more sustainable sites they could have chosen. 39. The site is within the SPZ3 of a public water supply borehole. The depth to groundwater is likely to be relatively shallow. There are also a number of private supplies. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures would therefore be required. Foundation dewatering will need to be considered. 40. WEF002 and WEF032 should be considered for residential allocation - a well located and fully deliverable site with an area of 0.33 ha or 2.00ha. We believe this site is suitably placed to provide development in West Felton towards the target of dwellings by 2038, being situated with an established access to the former A5 and adjoining recently developed land. Our proposed site WEF002/WEF032 has achieved a sustainability rating of GOOD, which is one of the better ratings compared to the other sites in West Felton. The land is well positioned with access to the highway on the southern boundary and is adjoining land that has recently gained planning permission and has already been developed for caravan storage.</p>	<p>West Felton 37. Contrary to this representation, there have been numerous public consultations over several years for residents to express their views. A robust approach was taken during site assessments which deemed that the allocation was suitable. 60 houses is considered appropriate for this settlement and is in a good location given that it extends the recent development across to the east. 38. The SA is not the defining factor when allocating sites. Other criteria and factors are taken into consideration as outlined in the site assessments. The conclusion for WEF025 is: "Site is adjacent to existing development and would link onto this, acting as a natural extension to an area already under development. The site is suitably located in terms of proximity to services, and would support an appropriate number of dwellings for the village. Furthermore, there are few constraints given by service providers for this site. Good SA scoring. Southern element of site not to be allocated - see Design Requirement below." Notably the SA score was 'Good' for the preferred allocation 39. Local Plan policies cover the issues raised. No change proposed. 40. Shropshire Council undertook a robust site assessment for all sites promoted for housing or employment. In terms of WEF002 and WEF032, the conclusions in the site assessment was: WE002 - "As the sites availability for residential development is unknown the site will not proceed to the next stage of the site assessment process." WEF032: "Site is slightly set away from the core of the settlement. There are other more suitable sites to allocate." Shropshire Council still considers that the preferred allocation (WEF025) is a more suitable site for allocation.</p>
<p>S14.2. Community Hubs: Oswestry Place Plan Area continued</p>	<p>Weston Rhyn 41. Confirm that site WRP001VAR is promoted for development and the proposed allocation is supported. 42. Support the site and its associated guidelines. Site is available, deliverable and viable. 43. The site is adjacent to springs/issues and surface water course. So groundwater is likely to be shallow. Foundation dewatering and surface water management aspects will need consideration. 44. WRP001VAR and WRP017 - A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.</p>	<p>Weston Rhyn 41 and 42. Noted. 43. Local Plan policies cover the issues raised. No change proposed. 44. Noted. The Council expects hydraulic modelling to be carried out by the developer at the planning application stage and assessed through the Development Management process. Information on capacity of Five Fords WwTW is welcomed (see also Statement of Common Ground with Dwr Cymru Welsh Water).</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.2. Community Hubs: Oswestry Place Plan Area continued	<p>Whittington</p> <p>45. Welcome that the Council has undertaken a ‘Supplementary Site Assessment’ for WHN024, regarding the potential impact on the significance of the Whittington Conservation Area as a consequence of impacts upon its setting and the potential impacts on the setting and significance of the Scheduled Monument and Grade I Listed Building of Whittington Castle (NHLE refs. 1019450 & 1178307).</p> <p>Note proposed Development Guidelines for WHN024 include the requirement for a proportionate Heritage Impact Assessment to be carried out, and its recommendations taken into account, with respect to the impact of the development on the significance of the Whittington Conservation Area and its setting, and the significance, including the setting, of any other heritage assets close to the site. Also note that the Supplementary Assessment undertaken recommends that an archaeological desk-based assessment, and if appropriate a field evaluation, should be submitted with any planning application so that a suitable level of archaeological mitigation can be secured by condition if necessary. However, this is not mentioned in the proposed Development Guidelines, recommend that these specific requirements also be included.</p> <p>46. Support classification of Whittington as a proposed Community Hub, which is considered a significant rural service centre.</p> <p>Support allocation of site WHN024 for the development of 70 dwellings. The site is viable and deliverable within the first five years of the Local Plan Review period, consistent with draft Appendix A7. It is also considered that development of WHN024 is capable of complying with draft Policy SP7. A highway report (summarised within the representation) confirms appropriate access consistent with proposed guidelines can be achieved, whilst traffic calming/extension of the 30mph zone/pedestrian footways will be investigated in support of any future Planning Application. Heritage and ecology assessments would also be undertaken at this stage. High quality design and layout (range of house types and sizes including necessary affordables), biodiversity enhancements, habitat enhancement/mitigation (including retention of mature trees) and sustainable drainage (informed by a sustainable drainage strategy) would be achieved. Consider it can positively respond to any mitigation measures associated with Cole Mere.</p> <p>Potential additional land (0.3ha) promoted, which would allow for a direct pedestrian link into the centre of Whittington (plan appended to representation) and open space provision/enhanced tree planting.</p> <p>Query why within the Sustainability Appraisal (SA) WHN024 is identified as being within a conservation area (Section 13), not within proximity of a bus stop (Section 6) and not within 480m of a mobile library (Section 5). Consider the SA score should increase by 3 points.</p> <p>47. The site is located within SPZ3 of a public water supply borehole and shallow groundwater in places. Given the proposed scale of the development mains foul drainage will be required. Foundation dewatering and surface water management aspects will need consideration</p>	<p>Whittington</p> <p>45. A minor modification is proposed to the 2nd paragraph of the draft Site Guidelines for site WHN024 in Schedule 14.2(i) to reflect the need for an archaeological assessment (desk based with field work as necessary).</p> <p>46. Noted.</p> <p>47. Local Plan policies cover the issues raised. No change proposed.</p>
S14.3. Community Clusters: Oswestry Place Plan Area	N/A	N/A
S14.4. Wider Rural Area: Oswestry Place Plan Area	N/A	N/A
S15. Shifnal Place Plan Area	See S15.1-S15.4	See S15.1-S15.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S15.1. Development Strategy: Shifnal Town	<p>Shifnal</p> <ol style="list-style-type: none"> Support the inclusion of built development on both the west and east sides of Park Lane within the development boundary around the south of the town. Shifnal has already had more than its share of development and the town has lost much of its character and identity and it is important that the small-town character and appeal of the town is conserved. Housing need in Shropshire is recognised but development can blight the lives of residents of small towns and villages. The infrastructure in Shifnal already cannot cope with existing demands as the roads are in need of repair, there is limited parking capacity, the GP surgery requires an expansion of the floorspace and the schools have limited capacity. Object to the proposed windfall allowance for 92 dwellings to be built on unidentified housing sites in Shifnal. The allowance of 92 dwellings is considered excessive and, in relation to NPPF paragraph 71, there is insufficient evidence to show that windfall sites will provide a reliable source of housing land in Shifnal. The windfall allowance should be reduced from 91 dwellings to 48 dwellings to avoid the need for further Green Belt releases to satisfy an unmet windfall allowance. Support the provision of new housing development opportunities along the southern route of the A464 Wolverhampton Road through the retention of 'saved' housing allocation SHIF006 and proposed allocated housing sites SHF022 and SHF023. Object to the Shifnal spatial development strategy and the impacts on the conservation of the historic character of Shifnal and the need to conserve and enhance the historic assets in the built area and setting of the town. Object to the residual housing guideline figure for Shifnal and the proposed site capacity figures for the proposed allocated housing sites. It is proposed that all housing sites in Shifnal be developed at a density of 30dws/ha to increase the site capacities for SHF13 to 116dws and adjacent sites SHF022 & SHF023 to 160dws giving an increased capacity of 276dws to permit the removal of adjacent sites SHF015 & SHF029 and the reduction of the windfall allowance to 48 dwellings to satisfy the residual requirement for 324dws. Object to the Shifnal spatial development strategy as a significant number of residents believe that: exceptional circumstances for the planned release of land for development from the Green Belt have not been demonstrated. The scale of new residential development will significantly and adversely change the character of Shifnal and the setting of the town. There has been insufficient investment in the infrastructure of the town to support the proposed scale of development in Shifnal. There has been insufficient investigation of the existing local employment land supply resulting in an excessive release of 39ha of employment land in Shifnal on proposed allocated employment sites SHF018b and SHF018d. Shropshire Council has failed to engage the Town Council and local community and to recognise the Shifnal Neighbourhood Plan through a proactive, positive and collaborative approach to the preparation and consultation of the draft Shropshire Local Plan and its informal Preferred Options. Shifnal is a sustainable location on the M54 growth corridor, with significant market demand and is well-related to Birmingham/Black Country to deliver housing and employment in parallel and should receive a higher level of residential growth to support aspirations for growth corridors and to move towards carbon neutrality by 2030. Community wish to see infrastructure deficiencies addressed following recent large housing development approvals with 40% population increase before further development is permitted and feel these needs are not adequately considered in the draft Shropshire Local Plan. Shifnal proposals including role of the town, amount of employment, new neighbourhood to the south west and unmet cross boundary needs fail to reflect the character, need and opportunities of Shifnal as required by para 9 of the NPPF. Community planning objectives and their expression in the Neighbourhood Plan (as part of the adopted Development Plan) have not been taken into account, as required by para 15 and 16c of the NPPF. NPPF requires consideration of all reasonable alternatives and demonstration of exceptional circumstances to justify any changes to Green Belt boundaries but the justifications for the planned development and safeguarding proposals for Shifnal are inconsistent and contradictory. 	<p>Shifnal</p> <ol style="list-style-type: none"> Support for the proposed Shifnal development boundary around the built form of development along Park Lane in the south of the town is welcomed. 3, 8, 10, 23, 24, 31, 32, 34, 35, 48 and 60. As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans and by Statements of Common Ground with infrastructure providers. Furthermore, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site. Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate. 4, 5, 6, 7, 8, 9, 11, 14, 15, 22, 35, 36, 39, 40, 41, 42, 43, 44, 45, 48, 49, 50, 53, 54, 55, 56, 57, 58, 59, 61, 62, 63, 64 and 65. Shropshire Council considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance and the provision of safeguarded land for future development that contribute towards achieving the proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlement characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. Proposed site allocations have been informed by a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. The site assessment process also sets out the reasoning for the proposed allocation and the rationale for those sites that have not been selected for development at this time. Support for the 'saved' housing allocations and the proposed allocated housing sites at Wolverhampton Road in Shifnal is welcomed. 12, 36, 37, 38 and 47. The Draft Submission Local Plan gives due consideration to the Shifnal Neighbourhood Plan but where the needs of the community and settlement conflict with the community's planning objectives it is necessary for strategic planning objectives to take precedence and for Neighbourhood Plan to conform in accordance with NPPF paragraph 30. 13. 15, 28, 33, 36, 38, 39, 47, 49, 51, 52, 54, 57, 58, 61, 62, 63, 64 & 65. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. This has been based on objective assessments of development needs for the County and makes an appropriate and justified distribution across the County. Where required by national policy, due consideration has been given to the protection of environmental assets and the redistribution of development to other locations for this purpose but where this has not been possible and exceptional circumstances are considered to exist to support the proposed development strategy for particular settlements including Shifnal then an appropriate, effective, sustainable and deliverable development strategy has been advocated to meet the development needs of the community and the settlement. This also includes the need to safeguard sufficient land to adequately provide for the future needs of the community and settlement without requiring an early review of the Green Belt to ensure that the removal of land from the Green Belt will be effective and that the redefined Green Belt will remain permanent for some considerable time into the future. 16, 25 and 29. The land proposed to be removed from the Green Belt and allocated for development has been defined on the Policy Inset Map from first inception in the Preferred Sites consultation in 2018 and has been maintained consistently throughout the process of preparing the Draft Local Plan. The determination of the exact land take within these consistently defined boundaries is derived through cartographic assessments which are subject to variation. The determination of the land take that is proposed in sites SHF018b and SHF018d is considered to be 39ha but different measurements, at different times undertaken by different assessors may produce variations indicating a site area that is a greater or lesser area than 39ha. The indicated variations of 40ha (+2.6%) to 41ha (+5%) therefore fall into a reasonable range for different cartographic assessments. It should also be noted that the saved employment allocation of 2ha added to the proposed employment allocation of 39ha equals a total of 41ha for the town.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S15.1. Development Strategy: Shifnal Town continued</p>	<p>Shifnal continued</p> <p>14. Shifnal residential windfall allowance of 92 dwellings (30% of residual housing requirement) excessive, unsustainable and unjustified with limited potential within the proposed development boundary and is contrary to para 70 of the NPPF.</p> <p>15. The size and density of the proposed allocations is unclear and inconsistent between different documents with sites SHR013 and SHF022/pt023 being able to accommodate more housing with reference to past densities, with possible phasing beyond 2026, , more efficient use of land, a lower land take, lower windfall allowance, reduced Green Belt land release in order to make the size and density of allocated sites clear, appropriate and unambiguous.</p> <p>16. There are inconsistencies in the employment land supply/guideline/capacity of proposed allocations which require clarification (with capacities increased from 16ha to 40ha to 41ha) because land is proposed to be removed from the Green Belt. Public comment on these inconsistencies have not been clarified which fails the Gunning Principles and challenges the soundness of the Plan.</p> <p>17. Shropshire Council indicates local circumstances explain the different land areas including (1) employment floorspace represents 40% of total site size even though this applies across Shropshire and the adjustment is double counting being taken into account in the determination of the land requirement and (2) commercial buildings are singly storey, but this is true across the whole of the County. There is no justification to increase the employment land guideline above 16ha and there are no exceptional circumstances to remove an additional 25ha from the Green Belt.</p> <p>18. The Council reference need to balance housing and employment, yet as much of the 1,500 residential guideline is already completed/committed, proposals are for 41ha of employment land for just 322 dwellings, far higher than other settlements with no explanation. The Council also suggest need to balance past housing delivery, but residents will already have a place of work.</p> <p>19. Previous approach in Shifnal brought forward over 1,000 dwellings without a balanced employment but in 2016, as part of the loss of an employment allocation, the Council conceded a need for just 2ha of employment land to 2026. There was no deficit in 2016 and yet now with no significant additional housing proposed a deficit exists.</p> <p>20. The Council previously stated if a specific employment opportunity arose that would clearly support specific needs of the town, it could be considered on its own merits as a policy exception - unclear/unjustified why this approach cannot continue as it would avoid identified problems with the proposed employment land guideline and concerns about sustainable development.</p> <p>21. The Council claim past employment land opportunities were limited. This is incorrect, 12ha of land was allocated adjacent to the existing industrial estate, which was not taken up and eventually used for education. This is a truer reflection of need.</p> <p>22. There are a number of inconsistencies, alterations and omissions contained within the Stage 2 and 3 site assessment process (and its associated evidence base) which has informed proposed site identifications as such this process, proposed identification of SHF034, the draft Shropshire Local Plan and associated Sustainability Appraisal are not robust, consistent with the National Planning Policy Framework (NPPF) are unsound and should be reviewed.</p> <p>23. Given the scale of development proposed and the additional safeguarding of approximately 93 ha of land around Shifnal for future development, evidence should be provided to demonstrate, through discussions with Highways England, that the strategic transport impacts on Junctions 3 and 4 of the M54 have been considered and appropriately addressed. There should be a mechanism to capture the impacts of growth around Shifnal for future improvements to these junctions. If the evidence concludes there is no spare capacity to meet the impact of the proposed development, clarification should be provided in the Local Plan or infrastructure planning evidence that contributions would be collected towards strategic highways infrastructure works.</p> <p>24. The strategic implications of the Shropshire Council Water Cycle Study (July 2020) for Telford & Wrekin Council are unclear. Clarification should therefore be provided through the relevant Local Plan policies (Policy S15 Shifnal Place Plan Area and Policy DP25 Infrastructure Provision) and supported by evidence of engagement with the Environment Agency and Severn Trent Water. The Council are also interested in understanding the impact of development proposed within the plan on secondary school provision.</p>	<p>Shifnal continued</p> <p>17, 18, 19, 20, 21,25, 27, 28, 29, 33, 37, 49, 51, 52 and 54. The Council wishes to ensure that there will be an adequate level of employment land in the east of the County and that the town of Shifnal should have a sustainable strategy and a sustainable pattern of development as indicated in the Employment Strategy and Requirement Topic Paper, Housing Topic Paper and Green Belt Topic Paper and Exceptional Circumstances Statement including the need to balance inadequate and unsustainable historical levels and patterns of development in the town. Two land parcels are identified for employment development in Shifnal that reflect this objective and recognise the evidence in the Employment Strategy and Requirement Topic Papers that the density (plot ratio) of employment development in Shropshire is deficient and affects the out-turn of built floorspace and new employment in the County. It is proposed that both land parcels be allocated in the Draft Local Plan rather than safeguarding one parcels to redress these material considerations and to ensure that the release of the employment land will be sufficiently viable to ensure that the land will receive the necessary infrastructure investment including strategic highway, energy, drainage and communications infrastructure and that the land will be brought forward for development and largely built out during the Local Plan period to 2038.</p> <p>26. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and the presence and availability of land previously safeguarded from the Green Belt to meet the future development needs of Shifnal. Sites SHF015 and SHF029 comprise safeguarded land removed from the Green Belt in the previous Green Belt Review in the mid-1990s and the development guidelines for these sites require further detailed ecological assessments particularly for Great Crested Newts whose presence may reduce the housing capacity of the site.</p> <p>30 and 31. Employment development in the Green Belt advocated on the grounds of exceptional circumstances must satisfy the requirements of national policy to mitigate for the loss of Green Belt, respect the need to protect the remaining Green Belt and to preserve its purposes and to facilitate access to and enjoyment of the Green Belt as a community resource. It is considered to be appropriate and necessary that employment development be limited to single storey development to help achieve these objectives. It is also recognised that single storey development may still achieve significant floor to eave/ridge line heights with a need for significant design and landscaping measures to protect the Green Belt character and purposes. It is appropriate that the loss of Green Belt to also be justified through the provision of new development that is fully integrated into the existing built form of the town providing the best possible benefits to the community from the loss of land that protects the setting of the town and provides an important amenity and leisure resource for the community.</p> <p>55. Sites SHF018b and SHF018d have yet to be subjected to the preparation of a Master Plan and Design Code with the identification of a delivery programme and phasing plan followed by public consultation on the detailed proposals and delivery of this allocation. The allocation is simultaneously criticised for the level of support for the allocation and the limited detail about its delivery as indicating predetermination of the principle of development and insufficient detail about its delivery. The identification, planning and delivery of the employment allocation is following due process and currently the promoter of the site and the Council are following due process to establish the principle of removing the land from the Green Belt and the principle of establishing the allocation and use of the land for employment purposes. The earlier inclusion of the proposed employment allocation in an Invest in Shropshire brochure sought to contribute some initial evidence on demand for the site through a related marketing exercise as part of the promotion of Shropshire as an investment location.</p> <p>38, 39, 40, 41, 42, 43, 44, 45, 46, 56, 57, 58, 59, 63, 64, 65 and 66. The Draft Submission Local Plan is considered to provide an adequate level and choice of land for development in Shifnal to meet the needs of the town through the period to 2038. There is a further need for infrastructure investment in the town some of which is already programmed or will be planned and supported through the scale of development proposed in the town. It is anticipated that the planned scale of housing development is likely to be built out in the early part of the plan period and that employment development will proceed at a rate through the remaining plan period. The town is therefore likely to experience a period of respite at least from housing development and this will facilitate the delivery of further infrastructure and the assimilation of the programmed growth. To achieve these objectives it is considered that the identification of additional development land in the form of an early release of safeguarded land or the identification of reserve sites is not advisable and will only serve to increase the likely level of development in the town significantly above the planned scale of growth and the current capacity of the infrastructure in Shifnal.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S15.1. Development Strategy: Shifnal Town continued</p>	<p>Shifnal continued</p> <p>25. Safeguarded land proposals are contrary to the Gunning Principles, case law, national Green Belt policy (demonstrating consideration of reasonable alternatives and exceptional circumstances) and are unsound: -There are no parcel references for proposed safeguarded land, this means it is not possible for the public to relate parcels to accompanying documents and the Sustainability Appraisal (SA), this is legally flawed. -There are disparities in the size of parcels proposed to be released from the Green Belt. -The amount of safeguarded land is considered excessive and unjustified - it exceeds previous proposals and that needed for choice and flexibility to meet long term needs. As such there are no required exceptional circumstances and proposals are contrary to national policy and unsound.</p> <p>26. Object to the proposed, joint allocated, housing sites SHF015 & SHF029 because the development guidelines do not recognise the ecological value of the sites.</p> <p>27. Object to the proposed allocated employment sites SHF018b and SHF018d which are considered to only meet local employment needs due to the distance from the M54 Junction 3 via the A41 and Stanton Road. The scale of sites SHF018b and SHF018d, the distance from the strategic road network and the lack of transport evidence indicates these sites will not make a significant contribution to regional or sub-regional economic strategies. This employment land provision should be identified at Junction 3 of the M54 motorway where it will provide a complementary role to Shifnal providing new employment opportunities for the town.</p> <p>28. Object to the land for proposed allocated employment sites SHF018b and SHF018d being released from the Green Belt and the exceptional circumstances for the release of this land need to be demonstrated including the assessment of reasonable alternative locations for development.</p> <p>29. Object to the site capacity of 39ha for proposed allocated employment sites SHF018b and SHF018d which should be reduced to 16ha to reflect the past take up of employment land in Shropshire, the management of employment land in Shifnal and the anticipated post Covid-19 downturn in economic growth in the UK. The requirement for the delivery of 16ha of net built floorspace (at 40% of the site area) is not justified for Shifnal as this already forms an assumption in the total employment land requirement and the size of buildings and use of land will be consistent with other proposed employment allocations in Shropshire where a net built floorspace is not required.</p> <p>30. Object to Policy S15.1 Explanation in para 5.212 and the development guidelines for sites SHF018b & SHF018d requiring single storey commercial buildings which will constrain the ability of these sites to respond to demand, support sustainable development and economic growth in Shifnal and to perform a sub-regional role in delivering employment floorspace with the potential to serve the strategic corridors of the A5, M54 and M6.</p> <p>31. Object to Policy S15.1 Explanation and the development guidelines for sites SHF018b & SHF018d requiring a link with the existing Shifnal Industrial Estate in addition to sustainable routes along Stanton Road and Upton Lane. Also object to the requirement for improvements along Stanton Road which should be a requirement arising from evidence of highway safety or capacity submitted with any future planning application.</p> <p>32. Sites SHF018b & SHF018d fall within SPZ2 and associated SPZ1 where groundwater levels are relatively shallow and it is essential appropriate land uses, drainage design and pollution prevention measures are adopted. This is necessary for an employment site with a wide range of activities where the mains foul drainage infrastructure must support the development with appropriate surface water drainage design and pollution prevention measures.</p> <p>33. Consider proposed allocations SHF018b/SHF018d are not sound being contrary to NPPF Green Belt policy, the law, Gunning Principles and policy on sustainable development and sustainability appraisal and the legal requirement to consider reasonable alternatives and to give reasons why those alternatives were not selected and the need to justify exceptional circumstances (as required for Green Belt release).</p> <p>34. Draft site guidelines for SHF018b/SHF018d include significant improvements to Stanton Road and no traffic to go west into Shifnal. However, no evidence of improvements, costs or how they will be undertaken (including restrictions to traffic to the west).</p>	<p>See above responses.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S15.1. Development Strategy: Shifnal Town continued</p>	<p>Shifnal continued</p> <p>35. Sites SHF018b & SHF018d will create a substantial increase in traffic on Stanton Road and Aston Street even if commercial vehicles could be effectively restricted from using this route. These sites will draw traffic from Telford to the west particularly to avoid the longer route through M54 Junction 3, Stanton Road and Aston Street already have stationary traffic morning and evening which will be worsened by increasing volumes of heavier traffic because: (a) The junction with Bradford Street and the A464 trunk road is already well beyond capacity and causes substantial delays and congestion at peak periods. Proximity of buildings within the Shifnal conservation area preclude any opportunity of additional land take for upgrading. (b) The turning movements at this junction currently disrupt traffic flows on both the A464 and the A4169. (c) The existing carriageway is narrow (6 metres) and cannot be widened due to the proximity of buildings. (d) The existing carriageway construction is not engineered and is not capable of taking additional and heavier traffic. It is currently in a poor state of repair. (e) The station approach and the main shopping car park access onto Aston Street, both junctions having severely impaired sight. (f) Aston Street residents are obliged to park on Aston Street causing single line traffic flows as there is no access to the rear of their properties. (g) Aston Street dwelling doorways access directly onto the pavement, and the increase in noise, dust and vibration will be detrimental to their environment. (h) The Bradford Street/ Aston Street junction is crossed by the principal walking route to the train station from the town centre including provision for those with impaired sight and wheelchair users. (i) The existing pedestrian footpaths at the junction are narrow and hazardous.</p> <p>36. Council need to demonstrate the very special circumstances for the release of allocations SHF018b and SHF018d and show that this omission will not provide a precedent for the release of further safeguarded land in a future review of the Local Plan. Council also needs to have regard to the conservation of the historic character of Shifnal and make available any submitted heritage assessments to illustrate the proposed mitigation of to conserve and enhance the historic character of the town. The Local plan also needs to recognise the underlying consensus of the local community set out in the objectives of the Shifnal Neighbourhood Plan that any development should retain the small market town character as a principal attraction of the town.</p> <p>37. Council should justify the large release of Green Belt land which are contrary to national policy including paragraph 006 of the Planning Policy Guidance and which undermine the Shifnal Neighbourhood Plan. It is recognised that the Neighbourhood Plan only goes to 2026, the principal issues brought forward by the community and underpinning the Plan, are still relevant and should be reflected in the Local Plan proposals. The proposals are clearly a significant departure from the Neighbourhood Plan and the community and Shifnal Town Council has understandably raised the question about whether their efforts to produce the Plan were worthwhile. If the proposals were to go ahead this would naturally cause a great deal of local resentment. Council takes into account both Market Drayton and Broseley Neighbourhood Plans, while Shifnal's Plan has not been acknowledged. We would like to understand why this is the case.</p> <p>38. Object to the safeguarding of land released from the Green Belt to the west, south and east of Shifnal on site SHF034 which accepts the principle of development on this land. Residents are concerned this land will be considered for development under very special circumstances where Shropshire cannot demonstrate an adequate supply of land. The Council need to justify the release of land from the Green Belt in relation to national policy, the significant release of land around Shifnal and the impacts on the local objectives in the Shifnal Neighbourhood Plan.</p> <p>39. Object to the safeguarding of land released from the Green Belt to the west, south and east of Shifnal on site SHF034 (including SH017 and P16) which lies in the gap between Shifnal and Telford. The release of this land from the Green Belt is considered to be affected by: the failure to release evidence to justify the safeguarding of this land, the failure to consider and provide reasons for rejecting reasonable alternatives including SHF015/SHF029/P15a/P15b, the inadequate assessment of the developability and deliverability of the land likely to trigger an early review of the Green Belt, the failure to justify the safeguarding of the land in terms of the full provision of a bypass from the A464 west to the A464 south and the proposal for housing use on the land contrary to national policy.</p>	<p>See above responses.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S15.1. Development Strategy: Shifnal Town continued</p>	<p>Shifnal continued</p> <p>40. Land between Park Lane and the A464, proposed as safeguarded land is the right location for growth in Shifnal and comprehensively aligns with aspirations of the draft Shropshire Local Plan. It is deliverable during the Plan period to accommodate 175-200 dwellings; owned/controlled by a single landowner/developer; in close proximity of a range of services and facilities; with no overriding environmental or physical constraints; and access could be secured off both the A464 and Park Lane. A vision framework/illustrative masterplan has been prepared for the site informed by extensive evidence to demonstrate opportunities/constraints, site delivery, sense of place for Shifnal and growth in this part of Shropshire. Commitment provided for holistic masterplan for delivering development to the south and west of Shifnal although Land between Park Lane and the A464 can come forward independently.</p> <p>41. A Vision Framework and illustrative Masterplan supported by detailed technical assessments for the safeguarded Lodge Hill proposals also including the separately promoted land between Park Lane and the A464 demonstrate how this safeguarded development proposal could actually be developed during the Plan period to 2038 as an allocated sustainable urban extension to Shifnal for up to 1,100 new homes to meet medium and long-term housing needs.</p> <p>42. SHF034 in its entirety represent a logical extension to the settlement Shifnal in the M54 growth corridor, contributing to the economic and demographic strategies for Shropshire. SHF034 has a 'good' overall score in the Sustainability Appraisal, is highly sustainable with proximity to areas of employment, no significant constraints and will not materially reduce the gap between Shifnal and Telford and contributes to the case for exceptional circumstances for releasing the land from the Green Belt supported by a site-specific Green Belt and Landscape assessment.</p> <p>43. Delivery of new housing in the Shifnal will address historic under provision and provide a range of homes to meet long term housing needs, address the steep affordability ratio, provide a choice of well-designed energy efficient homes; improve sustainability and address the ageing demographic by attracting a larger working-age demographic.</p> <p>44. An Illustrative Masterplan and potential phasing plan for SHF034 offers to deliver 1,100 new homes, in conjunction with public open space, new transport infrastructure and community facilities early in the plan period informed by technical assessments relating to environmental considerations, heritage designations, flooding and drainage, landscape, open space and ecology, and phasing of new homes.</p> <p>45. A major benefit of SHF034 is that the development of this site will not exacerbate traffic conditions in the town centre & will deliver a new link road around the south and west of Shifnal(plan provided) on a phased basis over the life of the development. The through road from the A464 Wolverhampton Road to Park Lane serving the site has the potential to offer wider strategic benefits to Shifnal. It would form the first section of a local link road, ultimately connecting to the A4169, with the potential to connect to the A464 Priorslee Road. Link road will enable a significant proportion of through traffic to be removed from the town centre which could be combined with already proposed improvement to the Five-Ways roundabout & Innage Road on-street parking/waiting control. The link road will provide an alternative route that by-passes the town and will ensure that the development does not generate any further pressure on key junctions in the town. The development of the site could ease current traffic congestion conditions associated with St Andrews Primary School by also including provision of a pick-up and drop-off . The introduction of the roundabout for access and improvements to footways would act as a gateway feature at the entrance to the town from the southwest. This will act as a traffic calming feature facilitating a reduction in the speed limit.</p> <p>46. Council need to present evidence to justify the release of Green Belt land for safeguarding for future development beyond 2038 to the east, south and west of Shifnal. This designation implies the principle of development on this land is accepted despite the community not being consulted on this prior to including the land in the Plan. The safeguarding of this significant area of land will also place further strain on Shifnal should the County be unable to demonstrate an adequate housing land supply in the short to medium term. Council needs to justify the reason for considering Green Belt policies in the event that an earlier development proposal was considered for the safeguarded land under very special circumstances and whether the development of the land would be afforded the same weight as Green Belt land.</p>	<p>See above responses.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S15.1. Development Strategy: Shifnal Town continued</p>	<p>Shifnal continued</p> <p>47. Council should justify the large release of Green Belt land which are contrary to national policy including paragraph 006 of the Planning Policy Guidance and which undermine the Shifnal Neighbourhood Plan. It is recognised that the Neighbourhood Plan only goes to 2026, the principal issues brought forward by the community and underpinning the Plan, are still relevant and should be reflected in the Local Plan proposals. The proposals are clearly a significant departure from the Neighbourhood Plan and the community and Shifnal Town Council has understandably raised the question about whether their efforts to produce the Plan were worthwhile. If the proposals were to go ahead this would naturally cause a great deal of local resentment. Council takes into account both Market Drayton and Broseley Neighbourhood Plans, while Shifnal's Plan has not been acknowledged. We would like to understand why this is the case.</p> <p>48. Provision of a new strategic highway between the A464 and A4169: not been subject to public consultation, informed by detailed proposals; contrary to expressed public opinion during the Reg 18 Preferred Sites Consultation; it would not create the suggested 'by-pass' (new residents will still have to just the town centre junction for the town centre exacerbating issues); if so important, why is the land only proposed for safeguarding and not allocation; given the costs of such a scheme, unlikely development proposals could carry it - need detailed costings and only represents an exceptional circumstances if development can fully meet them; as the route no longer links to the A464 (north) where considerable traffic originates, only likely to serve the new extension and even then only a small part of journeys south to Wolverhampton; claims it will avoid traffic going into the town are incorrect.</p> <p>49. Safeguarded sites SHF018a/P14 are more sustainable sites in the SLAA assessment and have a lower negative sustainability score in the Sustainability Appraisal and would cause less harm if released from the Green Belt than the allocated employment sites SHF018b/SHF018d.</p> <p>50. No evidence has been submitted to justify the reasons why sites SHF018a/P14 were not considered appropriate for allocation as the preferred employment sites even though they were 'reasonable alternative' sites.</p> <p>51. The requirement for 'exceptional circumstances' for releasing sites SHF018b/SHF018d from the Green Belt has not been met, they have not been subject to a Sustainability Approval as required by law and policy despite having a high degree of harm to the Green Belt incorrect statement that the combined effect of releasing sites SHF018b/SHF018d has a Moderate-High harm.</p> <p>52. NPPF Green Belt policy, the law and policy on sustainable development and sustainability appraisal places a legal requirement to consider reasonable alternatives and to give reasons why those alternatives were not selected which was not done for SHF018a/P14.</p> <p>53. SHF018a/P14, benefit from a functional relationship with the adjacent Shifnal Industrial Estate and it is illogical to allocate sites SHF018b/SHF018d for development whilst leaving undeveloped sites SHF018a/P14 along the boundary.</p> <p>54. SHF018a/P14 are less harmful to the Green Belt than SHR018b/SHF018d encroaching beyond Lamledge Lane with SHF018d lacking defined boundaries as recognised in the Green Belt Review, contrary to para 139(f) of the NPPF. Para 5.211 of the draft Shropshire Local Plan also references the harm of SHF018b & SHF018d as medium-high when it will be high.</p> <p>55. Sites SHF018a/P14 are more sustainable sites in the SLAA assessment, have a lower negative sustainability score in the Sustainability Appraisal, meet the original requirement for 14ha of additional employment land, there is no evidence of early delivery on SHF018b and SHF018d (also indicating predetermination of the allocation as does the inclusion in the Invest in Shropshire promotional brochure.</p> <p>56. Object to the omission of potential housing sites SHF018c and SHF032part from the Shifnal spatial development strategy as these sites are closer to the town centre facilities and services, the proposed allocated employment sites SHF018b & SHF018d and the local schools serving Shifnal.</p> <p>57. It is considered that SHF018c and SHF032part which are adjoining sites are in a sustainable location, their release from the Green Belt will cause less harm than the proposed safeguarded land at SHF034 and will not affect the narrow gap of Green Belt between Shifnal and Telford.</p> <p>58. It is considered that SHF018c and SHF032part should be safeguarded but not for specific land use purposes whereas SHF034 is proposed for housing use contrary to national policy.</p>	<p>See above responses.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S15.1. Development Strategy: Shifnal Town continued	<p>Shifnal continued</p> <p>59. The land east of Shifnal, encompassing employment allocations SHF018b and SHF018d, proposed reinstated allocation SHF032 and proposed residential safeguarded land at SHF018c will benefit from excellent opportunities for both future residents and employees to travel to the Town Centre on-foot or bicycle. In terms of walking and cycling routes, the sites will be developed with a focus on prioritising pedestrian activity and cycle movements. Links to wider routes will be provided by linking proposed internal pedestrian and cycle routes with existing and proposed off-site routes on Coppice Green Lane and along Stanton Road, including connection to National Cycle Route 81.</p> <p>60. The travel planning strategy for the respective sites will ensure the long-term management of sustainable transport initiatives will be secured for employment and residential uses. This transport approach has been developed to align with the requirements of draft Policy DP28 and NPPF paragraph 103.</p> <p>61. SHF035 has not been properly considered within the site assessment process. Concerned evidence submitted in support of site SHF035 has not been considered.</p> <p>62. Consider site SHF035 performs better than SHF034 (evidenced through submission of a range of site assessments and technical reports) and should be safeguarded for future development instead. Alternatively more land could be safeguarded to provide greater choice and flexibility in the future, particularly given the ‘need’ and ‘affordability’ challenges surrounding Shifnal and having regard to likely Green Belt review restrictions as a consequence of the current White Paper.</p> <p>63. SHF035 would be an exemplar in sustainable development practises, aligning itself to achieve all 17 of the United Nations sustainable development goals and helping to overcome the global challenges we face, can deliver sustainably located housing adjacent to the proposed employment allocation (would enhance performance and suitability/achievability/deliverability of the proposed employment allocation, through enhanced accessibility from Wolverhampton and the south side of Shifnal (key to its success)).</p> <p>64. Object to the omission of potential housing site SHF035 from the Shifnal spatial development strategy. SHF035 capable of delivering sustainably located housing adjacent to the proposed employment allocation at SHF018b & SHF018d, consolidate existing and other proposed housing development in east Shifnal, enhancing accessibility from Wolverhampton into south Shifnal via the A464 and enabling a direct and dedicated green cycle and footpath accesses straight into the town centre.</p> <p>65. Object to the scale of safeguarded land released in Shifnal which is considered to be insufficient to meet the future development needs of the town, provide a range and choice of future development locations and ensuring the long-term sustainability of the Local Plan resulting in an early review of the Green Belt contrary to paragraph 139 of the NPPF.</p> <p>66. The Council should allocate/safeguard reserve sites to provide for future development needs including increasing housing demand and increasing affordability issues, offering a range and choice of sites and facilitating additional compensatory improvements to the environmental quality and accessibility of the Green Belt.</p>	See above responses.
S15.2. Community Hubs: Shifnal Place Plan Area	N/A	N/A
S15.3. Community Clusters: Shifnal Place Plan Area	N/A	N/A
S15.4. Wider Rural Area: Shifnal Place Plan Area	<p>1. Land adjoining the Telford Hotel and Golf Course at Sutton Maddock on the A442 is suitably placed to provide development towards the target of dwellings by 2038. The land is well positioned with access to the highway on the eastern boundary adjoining the Sutton Hill residential development. The land includes woodland available for community amenity use, easy reach of Halesfield employment opportunities, Telford schools and amenities and within range of M54 motorway.</p>	<p>1. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. This has been based on objective assessments of development needs for the County and makes an appropriate and justified distribution across the County. Where required by national policy, due consideration has been given to the protection of environmental assets and the redistribution of development to other locations for this purpose but where this has not been possible and exceptional circumstances are considered to exist to support the proposed development strategy for particular settlements including Shifnal and its Place Plan area then an appropriate, effective, sustainable and deliverable development strategy has been advocated to meet the development needs of the communities and the settlements in the Place Plan area. This also includes the need to safeguard sufficient land to adequately provide for the future needs of these communities and settlements without requiring an early review of the Green Belt to ensure that the removal of land from the Green Belt will be effective and that the redefined Green Belt will remain permanent for some considerable time into the future.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16. Shrewsbury Place Plan Area	See S16.1-S16.4	See S16.1-S16.4+C96:C102
S16.1. Development Strategy: Shrewsbury Strategic Centre	<p>General comments Shrewsbury</p> <ol style="list-style-type: none"> Support for the proposed urban focus to development. The housing requirement for Shropshire should be increased and additional land allocated for residential development. The minimum employment land requirement for Shropshire is 300ha (Oxford Economics Growth Forecast – 2016). The employment requirement for Shropshire should be reduced (only 7.6ha of employment land per annum is necessary and justified, plus any agreed provision for the Black Country) and less land allocated/land re-allocated for residential development. The Plan is unsound (all four tests referenced) as despite recognising the need (around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision) there is no specific requirement for housing for older people. Furthermore, the draft Local Plan does not specifically seek to meet this need and as such will fail to deliver sufficient provision. Proposals in draft Policy DP1 are inadequate and will not deliver sufficient quantity or quality (including as only a limited number of allocations (36) are for 50+ dwellings, of which only sites for 100+ dwellings (16) are likely to make any significant contribution to the 6,000 units required. Furthermore, few of the promoters of these general market sites are proposing specialist provision for older people). There is also no specific reference to such provision within draft Policy SP10. One suggestion is to identify specific allocations (as encouraged within national guidance). An alternative suggestion is a criteria-based policy and site allocations. The needs of older people (if total need is distributed based on the distribution of the housing requirement, 28% of the identified need for Shropshire should be accommodated in Shrewsbury, equating to 980 specialist C3 units and 700 specialist C2 units), in Shrewsbury will not be met, as the policy does not make appropriate provision/there are no sites specifically identified for such housing (required to meet the care communities financial model). Investment in new roads is not consistent with the climate emergency or net zero carbon dioxide target and it is inappropriate for the draft Shropshire Local Plan to include/promote the North West Relief Road (NWRR) or be reliant on it to facilitate delivery of proposed allocations. Specific objections to the NWRR varied, but included: views that there is a lack of justification/rationale (need a revised business case/carbon assessment; and the Shrewsbury Integrated Transport Strategy, Big Town Plan - Movement Strategy and Shropshire Local Transport Plan are not available for this consultation and unclear how they support/are supported by the NWRR); proposals are unsustainable; it is not sufficiently progressed/there is currently only an EIA Scoping Opinion for the proposal; impact on the viability of Oxon Hall Caravan Park; and it will increase car usage and carbon emissions. Concerned about proposed support for additional commercial uses along the NWRR corridor, particularly in proximity of Oxon Hall Caravan Park, which would create noise and disturbance. Such development would not be supported. Support for the NWRR. However, there were also varied comments on the NWRR including suggestion that references to the NWRR should also recognise linked to Shrewsbury West SUE; restrictions on residential development between the road and existing built form are unsound (not effective/justified) as the NWRR represents a fundamental change to the landscape character/visual relationship of countryside to the town and there is little logic in supporting commercial but not residential, and there is no rationale for the approach. Wait for the North West Relief Road to determine locations/deliver new development. The route of the NWRR is only indicative and may need to change to respond to environmental constraints. Need for a walking and cycling strategy for the town. Support the policy which recognises that Shrewsbury is a Strategic Centre, a primary focus for development and supports the strategic role of the town. Support for the proposed residential development guideline for Shrewsbury. Shrewsbury is well placed to support new development (housing, employment, retail, leisure and necessary infrastructure improvements). 	<p>General comments Shrewsbury</p> <ol style="list-style-type: none"> Noted. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. and 4. The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. and 6. It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically: <ul style="list-style-type: none"> -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation. No change proposed. <p>As such, it is not considered necessary (nor is it considered a requirement of national policy), to identify specific targets for the provision of older persons accommodation.</p> <p>Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>7, 8, 9, 10, 11 and 12. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). References to the North West Relief Road (NWRR) are considered appropriate given the significance of this infrastructure project. However, it is not considered the overall spatial strategy for Shropshire or Shrewsbury is predicated on the specific delivery of the NWRR, with the exception of the delivery of proposed site allocation SHR173.</p> <p>13 and 14. Noted.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.1. Development Strategy: Shrewsbury Strategic Centre continued</p>	<p>General comments Shrewsbury continued</p> <p>15. The draft Plan is unsound as more of the total residential development proposed should be directed towards Shrewsbury (and other urban locations). Further growth in Shrewsbury would respond to the role and function of the town, available development opportunities, available employment, services, facilities and existing/proposed infrastructure (including the NWRR), and contribute to achieving the aspirations of the Big Town Plan. Specific reference to the opportunity to reduce growth in proposed Community Hubs within the Shrewsbury Place Plan (particularly those with significant reliance on windfall development which is less certain) and direct this towards Shrewsbury which is more sustainable and secure.</p> <p>16. The employment guideline proposed for Shrewsbury should be reduced (specific reference to re-allocating employment land at the Shrewsbury South SUE for residential development).</p> <p>17. The employment guideline proposed for Shrewsbury is too low and unsound (all four tests referenced) as it fails to: meet the areas objectively assessed need for employment land; respond to the conclusions of the Economic Development Needs Assessment (EDNA); respond to the Shropshire Economic Growth Strategy; meet quantitative and qualitative needs of the commercial market (particular reference to smaller, modern and flexible facilities to respond to demand from on-shoring, e-commerce, tech, research and food science, and local agricultural landscape production industries); provide a clear strategy for the town; and provide necessary certainty/flexibility about meeting the guideline/short and longer term needs as required in national policy. More land should be allocated for employment at Shrewsbury. This land should be deliverable early in the draft Plan period (proposed allocations will delivery later in the period) and be suitable for more diverse uses than traditional business park uses. Specific reference to the potential of SHR197VAR.</p> <p>18. The Shrewsbury Place Plan allows commercial development west of Ellesmere Road, but this is not clear in the draft Shropshire Local Plan.</p> <p>19. The policy should be amended to include support for re-use of under-utilised/vacant employment for residential development, particularly where it contributes to the regeneration objectives for the wider town centre, providing the necessary technical and environmental constraints can be satisfactorily managed.</p> <p>20. Concerned aspects of the strategy are led by developer proposals rather than prescribing the approach.</p> <p>21. Rather than large site allocations, smaller sites should be allocated for development.</p> <p>22. The potential for windfall within the development boundary should be reflected (The Big Town Plan identified capacity for 1,904 units within the town centre, there is further capacity within the rest of the town, and there is also a need to consider changes to employment practices which may release offices for residential development) reducing the need for allocations.</p> <p>23. Concerned about the level of development on greenfield land as development is directed to the edge of the town's existing development boundary. Also concerned about the quality of access, community facilities, energy efficiency, and distinctiveness of building design (including ability to meet current needs e.g. home working) on these sites.</p> <p>24. Concerned about reliance on windfall development (505 dwellings) in Shrewsbury and more widely across Shropshire, which can result in uncertainty/clarity and impact on the ability to plan for jobs, services and infrastructure. Further suitable sites identified through the site assessment process should be allocated for residential development.</p> <p>25. Many of the proposed allocations in Shrewsbury do not have reasonable scope for early delivery/concern about delivery assumptions made: SHR173 is dependent on delivery of the NWRR which does not have Planning Permission and SHR060, SHR158 and SHR161 is large/complex so will take many years to be delivered, parts of the site have not yet been marketed/developer option is not in place, and Council assumptions are for delivery to extend beyond the proposed Plan period. Therefore, alternative sites should be allocated (specific reference to BIT026 and SHR225).</p> <p>26. Whilst there are high-level trajectories for the delivery timescales of proposed allocations these should be more detailed. There are also none for existing allocations, these should be provided. Delivery assumptions should be informed by considered of site suitability, availability and achievability; and information from developers/local agents. There is a need for confidence/flexibility in delivery assumptions to ensure the proposed housing guideline for Shrewsbury is achieved.</p> <p>27. Development in the Shelton between the NWRR and existing built form would be strongly opposed.</p>	<p>General comments Shrewsbury continued</p> <p>15, 16, 17, 18, 19, 20, 21, 22, 23, 24 and 25. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken.</p> <p>26. The draft Shropshire Local Plan and Housing Land Supply Statement present information on trajectories for the development of proposed allocations and existing SAMDev allocations as appropriate.</p> <p>27. Noted.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16.1. Development Strategy: Shrewsbury Strategic Centre continued	<p>General comments Shrewsbury continued</p> <p>28. The aspirations of the Shrewsbury Test within the Big Town Plan have been watered down.</p> <p>29. References to supporting delivery the Big Town Plan should be deleted, these are either premature as it has not been finalised or undermine the consultation process.</p> <p>30. Concerned that the draft Local Plan infers that sites identified within the Big Town Plan have the same status as proposed allocations or site identified through SPD's or Neighbourhood Plans. Sites in the Big Town Plan may represent windfall opportunities.</p> <p>31. Need to include reference to the need for carbon free development in Shrewsbury Town Centre (this is absent from the Big Town Plan).</p> <p>32. The policy should reference the towns unique architecture and heritage and seek to enhance and protect it.</p> <p>33. A comprehensive map showing the whole of the Shrewsbury area and the spatial strategy for future development should be provided.</p> <p>34. General support for the proposed development boundary. However, Meole Brace Park and Ride should be included within it. The A5 forms a natural boundary to the settlement.</p> <p>35. Plan provided showing the location of National Grid assets in relation to Shrewsbury.</p> <p>36. The draft Policy should include support for expansion of the Local Centres proposed within the two existing Sustainable Urban Extensions, to help meet current and future residents shopping needs.</p> <p>37. Unaware of the existence of green infrastructure.</p> <p>38. With regard to Para 19c, preference is to avoid inappropriate development within the floodplain. Also need to reference 'water abstraction areas', as a key environmental consideration to avoid inappropriate development and impact upon in para 12b.</p> <p>39. The approach to identifying proposed allocations (sustainability appraisal and site assessment) is inconsistent and unjustified. The same concern applies to the approach to identifying policy mechanisms (specific reference to employment). Informing the site assessment process, the landscape assessment undertaken to inform the draft Shropshire Local Plan is too broad brush and lacks granularity, as such it is unsuitable for site specific assessments/to inform site allocations.</p> <p>Protected Employment Land</p> <p>40. Support identification of the ABP Plant and surrounding land as a protected employment area.</p> <p>41. Potential conflict between the draft Shropshire Local Plan identifying sites on Castle Foregate and Sentinel Works as protected employment land (no specific comment on this proposal) and the Big Town Plan which proposes office and residential uses (not supportive of non-employment uses on these sites).</p> <p>Existing Allocation – ELR006</p> <p>42. Support continued allocation of ELR006 for employment purposes. But extremely concerned about proposals for non-employment use that are encroaching on the ABP Plant. This has the potential for future conflict due to proximity of non-compatible uses (including uses which attract significant numbers of the general public such as restaurants, retailing, car-showrooms and hotels). Site guidelines should ensure the access and use of the site takes full account of and is not detrimental to the operation (including impeding site access) employment uses (with particular reference to ABP) to the south. Conscious of existing access points onto this stretch of road.</p> <p>Existing Allocation – SHREW09-115</p> <p>43. Do not object to SHREW09-115, but site guidelines should ensure the design, layout, access and use of the site takes full account of and is not detrimental to the operation (including impeding site access) employment uses and employment allocations (with particular reference to ABP) to the south. Conscious of existing access points onto this stretch of road.</p> <p>Existing Allocation - Shrewsbury South SUE</p> <p>44. Employment land on the allocation should be re-allocated for residential development (during marketing, there has been little interest in the land and the site does not have direct access to the strategic road network nor is it associated with established employment sites).</p>	<p>General comments Shrewsbury continued</p> <p>28, 29 and 30. The Shrewsbury Big Town Plan is a visionary urban design document which has established a compelling and challenging shared vision and development framework for the town. It is considered appropriate to identify the objectives of the Big Town Plan and its associated masterplan documents as material considerations in decision making as they underpin the proposed strategy for Shrewsbury. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.</p> <p>31. The draft Shropshire Local Plan should be read as a whole. Shropshire Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation and does not propose any changes.</p> <p>32. The draft Shropshire Local Plan should be read as a whole. Policy DP23 addresses heritage matters.</p> <p>33. Shropshire Council considers that the draft Policies Map effectively illustrates the spatial aspect of draft policies. We would note that alongside the PDF versions of the maps (extents informed by file sizes and maximum print sizes) an interactive version of the policies map, which covers the entirety of Shropshire is available.</p> <p>34. The proposed development boundary for Shrewsbury is considered appropriate. It is not considered that the Meole Brace Park and Ride needs to be included within the development boundary to facilitate its continued operation.</p> <p>35. Noted.</p> <p>36. Locally the issue of protecting Town Centres is important and the current approach is consistent with how the Retail Hierarchy has been applied to Local Centres as part of SUEs.</p> <p>37. Shropshire Council has undertaken a Green Infrastructure Strategy to inform the draft Shropshire Local Plan. Draft Policies DP15 and DP15 specifically address green infrastructure and open space.</p> <p>38. The Plan should be read as a whole. Policy DP21 follows national policy and guidance on minimising flood risk. Policy DP19 safeguards groundwater Source Protection Zones.</p> <p>39. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>Protected Employment Land</p> <p>40. Noted.</p> <p>41. The Shrewsbury Big Town Plan is a visionary urban design document which has established a compelling and challenging shared vision and development framework for the town. It is considered appropriate to identify the objectives of the Big Town Plan and its associated masterplan documents as material considerations in decision making as they underpin the proposed strategy for Shrewsbury. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.</p> <p>Existing Allocation – ELR006</p> <p>42. Site ELR006 is an existing allocation. The draft Shropshire Local Plan should be read as a whole, draft Policy DP18 addresses pollution and public amenity.</p> <p>Existing Allocation – SHREW09-115</p> <p>43. Site SHREW09-115 is an existing allocation. The draft Shropshire Local Plan should be read as a whole, draft Policy DP18 addresses pollution and public amenity.</p> <p>Existing Allocation - Shrewsbury South SUE</p> <p>44. The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.1. Development Strategy: Shrewsbury Strategic Centre continued</p>	<p>Existing Allocation - Shrewsbury West SUE 45. Broad support for the overall approach to the policies and proposals for the Shrewsbury West SUE. However, reference should be made to the Masterplan for the site and illustration of the site could be clearer and more precise on the policies map. 46. No reference to compliance with the adopted Masterplan for the site. Existing Planning Application on the site is contrary to this and should be refused. 47. Concerned about impact of development on this site on the viability of Oxon Hall Caravan Park. 48. Specific reference to the benefits of the Shrewsbury West SUE should be included within the draft Policy, which will ensure a coordinated approach for the town. 49. Planning Application on Parcel R1 (as shown on the adopted Masterplan) illustrates the site may have capacity for more residential development than originally allocated, this should be explored. 50. Support continued allocation of Parcel R2 (as shown on the adopted Masterplan). It is suitable/available/achievable and as such deliverable. 51. Broad support for the trajectory for the site within the housing land supply and the assumption that all dwellings on the site will be delivered by 2038.</p> <p>Proposed Site Allocation SHR054a 52. The sites approximate provision is unsound (not consistent with national policy or justified). It should be increased to 85 dwellings. 53. The site adjoins private water supplies and close to a spring. Therefore, drainage design and pollution prevention measures will be required.</p> <p>Proposed Site Allocation SHR057 and SHR177 54. Site guidelines should require the developer to demonstrate how any new on-site facilities will be managed and maintained. 55. These sites are located within source protection zone 3. Therefore appropriate mains foul and surface water drainage will be required.</p> <p>Proposed Site Allocation SHR060, SHR158 and SHR161 56. Support allocation and identification of this site as a focus for development (also support for specific components of the site). The site is unconstrained (no abnormal costs or technical constraints); lies in a sustainable location adjoining the existing development boundary; will provide social, environmental and economic benefit; is viable (although question some of the broad brush viability assumptions made); deliverable; and will make a unique contribution towards meeting the needs of the town/county. Landowners are working together to prepare a strategic masterplan is being prepared for the site. Components of the site (specific reference to SHR060 and SHR158) are deliverable in the short term and the wider site is deliverable in the proposed Plan period. 57. Level and density of development proposed is too high and should be reduced (particular reference to SHR060). This will exacerbate issues of flooding, and impact on areas of natural beauty and ecological value (including trees and hedgerows). 58. Presence of a large pool on the eastern boundary/within SHR060 (which should be a local wildlife site with its diverse permeant and migrating waterfowl, nesting birds and amphibious creatures, and needs to be protected) is recognised but does not receive negative scoring within the site assessment. Development of SHR060 could damage this site, particularly as it proposed housing at the water's edge. This and other green space and natural habitats on the site should be protected through creation of a more substantial green corridor through the site (that proposed is in the wrong place as it is inconsistent with the Big Town Plan Green Network and fails to identify the above referenced large pool). This will also assist with leisure offer and health/wellbeing. 59. Essential that flexibility on the precise amount and mix of uses is provided so it best meets development requirements of the town. 60. Support overall quantum's of development proposed on the site, however employment should be 5ha rather than a minimum of 5ha to provide certainty for masterplanning/development. 61. Amount of employment on the site is reduced and unclear when it will come forward (upfront infrastructure required and expect higher value uses first), so likely delivery will occur later in the plan period. 62. Concern about delivery assumptions - SHR060, SHR158 and SHR161 is large/complex so will take many years to be delivered, parts of the site have not yet been marketed/developer option is not in place, and Council assumptions are for delivery to extend beyond the proposed Plan period.</p>	<p>Existing Allocation - Shrewsbury West SUE 45. Noted. It is considered the current proposed policy wording is appropriate and provides a suitable policy framework with which to use agreed masterplans as material considerations in the delivery of the 'saved' SUEs to the south and west of the town. Shropshire Council considers that the draft Policies Map effectively illustrates the spatial aspect of draft policies. 46. It is considered the current proposed policy wording is appropriate and provides a suitable policy framework with which to use agreed masterplans as material considerations in the delivery of the 'saved' SUEs to the south and west of the town. 47. Significant engagement has occurred in relation to the proposed North West Relief Road (NWRR). The scheme is now the subject of a Planning Application to which consultation responses can be submitted. Any Planning Application on the existing allocation Shrewsbury West SUE would also be subject to consultation. 48 and 49. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). 50 and 51. Noted.</p> <p>Proposed Site Allocation SHR054a 52. It is considered the current housing provision figure for SHR054a, which provides an approximate figure for on-site delivery, should be maintained and is justified given it has been subject to the site assessment at this level. It is, however, recognised that the planning application process will provide additional opportunity for an applicant to justify a potential increase in housing on the site as material considerations. 53. Noted. The draft Shropshire Local Plan covers the issues raised.</p> <p>Proposed Site Allocation SHR057 and SHR177 54. For the sake of clarity, it is proposed that a minor modification is made to the guidelines for site SHR057 & SHR177, regarding management and maintenance of any new on-site facilities. 55. Noted. The draft Shropshire Local Plan covers the issues raised.</p> <p>Proposed Site Allocation SHR060, SHR158 and SHR161 56. Noted. 57, 58 and 59. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion. It is also considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application. 60. In supporting an appropriate mixed development, it continues to be considered appropriate to express the employment land guideline as a minimum. This will ensure the greatest opportunity to deliver an appropriate range of high quality and flexible employment uses, potentially as part of an enhancement to the town's Park and ride offer to the north of the site. 61 and 62. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion. It is also considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application. The draft Shropshire Local Plan and Housing Land Supply Statement present information on trajectories for the development of proposed allocations and existing SAMDev allocations as appropriate.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.1. Development Strategy: Shrewsbury Strategic Centre continued</p>	<p>Proposed Site Allocation SHR060, SHR158 and SHR161 continued</p> <p>63. Recognise need for a masterplan and quality, design, mix and layout of the development will be informed by site constraints and opportunities. However, greater clarity should be provided regarding the approval process for masterplans, to avoid undue delays.</p> <p>64. Support provision of a local centre. However reflecting scale and function this should be referred to as a neighbourhood centre. The precise size, composition and location should be considered through masterplanning/planning application process.</p> <p>65. Services and facilities including the local centre and children’s play space need to be guaranteed and delivered as part of the development (including improved access to the schools which will be completed in advance of the scheme).</p> <p>66. Support provision of land for further education needs within SHR060, SHR158 and SHR161 to consolidate existing facilities. However, evidence is required to understand/justify the quantum of education need in the local area, this should inform determination of the specific quantum of land required within the guidelines. Alternatively, the quantum and location should be determined through the masterplanning process.</p> <p>67. Support provision of land for health facilities within SHR060, SHR158 and SHR161. The quantum and location should be determined through the masterplanning process.</p> <p>68. Acknowledge/support provision of an appropriate access and the need to provide funding for road network improvements. However, concern expressed about the imprecise and open ended reference to all improvements to the local and strategic highway network being undertaken. Instead, reference should be made to mitigation of unacceptable impacts on the highway network are provided/funded by the developer.</p> <p>69. Concerned about impact on congestion on the inner link road, particularly where there is congestion on the A5. Opportunity for traffic signals where the A5 joins Hanwood Road to in part address this.</p> <p>70. Support provision of a park and ride. However some concern about links to Hanwood Road.</p> <p>71. Separate cycle and pedestrian routes should be created to and through the site, particularly linking to the new schools.</p> <p>72. Recognition of suggested provision of a park and ride on SHR161 and desire to integrate/link from the wider development.</p> <p>73. Support provision of pedestrian/cycle links to and through the site.</p> <p>74. In line with the Council's Playing Pitch and Outdoor Sports Strategy, site guidelines should include a requirement for appropriate playing pitch, ancillary car parking/changing room provision, and the future management of these facilities.</p> <p>75. Support approach to green/blue infrastructure. Sustainable drainage and green infrastructure strategies will be key components of masterplanning.</p> <p>76. Concern about flooding on the site. Need for a sustainable drainage plan, given existing drainage issues.</p> <p>Proposed Site Allocation SHR145</p> <p>77. Inappropriate for residential development and should be removed from the draft Plan. These housing numbers can be met through windfall sites in the town centre identified through the Big Town Plan process.</p> <p>78. Support proposed allocation of SHR145, which represents a sustainable location for housing, with good access to services and facilities, and will contribute towards meeting housing needs. The site is available, viable and deliverable.</p> <p>79. Site guidelines should be amended to provide greater clarity, in relation to access; mature trees, hedgerows and priority habitats; and noise.</p>	<p>Proposed Site Allocation SHR060, SHR158 and SHR161 continued</p> <p>63. It is considered the current proposed policy wording with regards to the Council agreement of the masterplan is sufficient.</p> <p>64. It is considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application.</p> <p>65. Noted. It is considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application. The draft Shropshire Local Plan should be read as a whole.</p> <p>66. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion. It is also considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application. Discussions have been had with the Council's education department and it is currently considered this scale of provision for a new education facility is appropriate to meet future needs.</p> <p>67. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion. It is also considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application.</p> <p>68. Noted. A minor modification is proposed to ensure greater clarity with regards to level of developer contribution to highway infrastructure.</p> <p>69, 70 and 71. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion. It is also considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application.</p> <p>72 and 73. Noted.</p> <p>74. For the sake of consistency and clarity, it is proposed that a minor modification is made to insert a new paragraph into the guidelines for site SHR060, 158 & 161 regarding the delivery of on-site play facilities.</p> <p>75. Noted.</p> <p>76. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion. It is also considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application.</p> <p>Proposed Site Allocation SHR145</p> <p>77. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken.</p> <p>78. Noted.</p> <p>79. The proposed site guidelines for SHR145 are considered appropriate and provide clarity to the decision maker, local community and development industry.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.1. Development Strategy: Shrewsbury Strategic Centre continued</p>	<p>Proposed Site Allocation SHR166 80. SHR166 is sound. 81. SHR166 is subject to numerous constraints that restrict the net developable area (assumption is 40% net area is deliverable, would normally expect 60% to ensure site effectively meets needs). Constraints include: flood risk (pluvial and fluvial), ecology (adjoins a Local Wildlife Site and unclear if necessary species surveys have occurred), loss of agricultural land (grade 2), heritage impact (setting of scheduled monuments on Haughmond Hill and archaeology), landscape impact (high sensitivity), lack of sustainable travel options (separation caused by the River Severn). 82. SHR166 should not be allocated for development as this would likely result in a direct negative impact to the significance of a non-designated heritage asset (archaeological remains) and its setting. There is insufficient evidence about the significance of this non-designated heritage asset to inform this proposed allocation, as such there is a risk that a non-designated heritage asset that is demonstrably of equivalence to a scheduled monument would be lost. There is therefore a need for an thorough archaeological evaluation to determine the significance of the non-designated heritage asset before the site is considered for allocation. Mitigation is not a clear/convincing justification for substantial harm that is likely to be caused by development. 83. Development on SHR166 would be within the setting of three Scheduled Monuments on Haughmond Hill (one is also a Grade I Listed Building). Whilst harm to their settings would be less than substantial, the cumulative impact of development (particularly as employment use means very large sheds in the foreground of views) for all three would be detrimental to understanding their relationship to Shrewsbury. 84. Development of SHR166 would mark a major change to the eastern edge of Shrewsbury. This rural setting east of the River Severn is important for the Scheduled Monuments on Haughmond Hill and a finer grain and more accessible context for understanding the town's historical setting within the tight loop of the river. Development here may increase pressure for further development between the River Severn and Haughmond Hill. Also unclear how this site fits with other development opportunities that may arise associated with the planned North West Relief Road. 85. A heritage assessment has been undertaken to support the proposed allocation. Development guidelines could be expanded to require a masterplan and provide greater detail on how development can mitigate impact on heritage assets.</p> <p>Proposed Site Allocation SHR173 86. Supportive of this broad area as a sustainable part of Shrewsbury, particularly in the context of the North West Relief Road. 87. Support proposed allocation SHR173. The site is suitable/available/achievable and will deliver sustainable development in accordance with identified policy requirements. The site promotion is informed by various technical assessments. 88. SHR173 is unsound (reference to not justified) and should not be allocated for development. Objections varied, but included reference to: it being unclear how the decision to allocate the site was reached given other suitable, available and achievable sites (specific reference to jointly promoted SHR163, SHR174, SHR109 and SHR02); the site being too large and should be reduced; lack of housing demand; reliance on the NWRR the deliverability of which is uncertain (timescales and funding); infrastructure capacity (particular reference to highways – congestion and carbon emissions); environmental impact of the sites development (including specific reference to wildlife (including bats) and wildlife corridors on the site, nearby local wildlife sites, SSSI's and SAC's); and the sites amenity value. 89. SHR173 is dependent on delivery of the NWRR. Various comments/objections relating to this including: evidence supporting the NWRR is not robust/outdated (specific reference to failure to consider recent developments in the area increasing numbers of vehicles and failure to consider SHR173 (need to consider cumulative impact); subsequent congestion on Ellesmere Road and capacity of Coton Hill Junction; the scheme has not sufficiently progressed (only an EIA Scoping Opinion) to inform proposals; concern about the availability of funding (construction costs have increased, the Council need a further £17m plus any cost increases and there is no evidence of where this will come from, LEP funding must be spent by 2024 so may be lost, and Shrewsbury West SUE is expected to contribute £8m but has been subject to significant delay); the NWRR will have an environmental impact, increase carbon emissions and increase traffic on nearby roads - full details of the impact of the NWRR were not available during the Local Plan consultation, so this was not legally compliant; any benefit of the NWRR will be negated by development of SHR173; and lack of certainty about the NWRR could make SHR173/the plan unsound.</p>	<p>Proposed Site Allocation SHR166 80. Noted. 81. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. 82, 83 and 84. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. Agreement has been reached on the issue of the impact of development on the significance of the settings of the Scheduled Monuments on Haughmond Hill and a minor modification is proposed to the 7th paragraph of the site guidelines. Haughmond Abbey Scheduled Monument has been excluded from this on the basis of no likely effect due to distance from the proposed allocation. Agreement has not been reached on the allocation's effect on the significance of the early Roman Marching Camp and the Council proposes to continue with the site's allocation with the addition of a second minor modification to the 7th paragraph of the site guidelines. Details of the Council's responses to these issues are set out in the Statement of Common Ground between Historic England and Shropshire Council. 85. Appropriate minor modifications are proposed to the draft site guidelines for SHR166.</p> <p>Proposed Site Allocation SHR173 86 and 87. Noted. 88 and 89. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. References to the North West Relief Road (NWRR) are considered appropriate given the significance of this infrastructure project. However, it is not considered the overall spatial strategy for Shropshire or Shrewsbury is predicated on the specific delivery of the NWRR, with the exception of the delivery of proposed site allocation SHR173.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.1. Development Strategy: Shrewsbury Strategic Centre continued</p>	<p>Proposed Site Allocation SHR173 continued</p> <p>90. Concern about climate change impact of SHR173. Whilst the site is identified as in proximity of a bus stop, the number of car journeys is such that the site is reliance on the NWRR.</p> <p>91. Need to consider if the site is deliverable given its reliance on the NWRR (and the processes necessary to deliver this) and the need for a Masterplan to be prepared prior to determination of a Planning Application. Assessment of the site has concluded that the Council’s delivery assumptions are unrealistic. A highly optimistic scenario would see the site built out in 2039 but with little flexibility and raises concerns about the financial package for delivering the NWRR (as this scenario has construction of the NWRR occurring before development on the Shrewsbury West SUE which is intended to contribute to funding it). A more realistic scenario would see SHR173 commencing in 2035 and completing in 2042 (aforementioned funding issues still apply). Therefore, the site should either be deleted or timescales amended so delivery extends beyond the proposed plan Period.</p> <p>92. Delivery assumptions for the site are too protracted, delivery is expected to occur in the short/medium term.</p> <p>93. Significant concern about the draft site guideline restricting commencement until the NWRR is operational. This is unnecessary as a highway assessment shows at least 100 dwellings are deliverable on the site pre-NWRR without causing significant highway impact. Guideline, if included, should also be linked to occupation rather than construction. As a minimum, site guidelines should be amended to allow occupation of 100 dwellings on the site pre-NWRR. However, given delivery timescales for the NWRR this guideline is unnecessary.</p> <p>94. The Sustainability Appraisal and Site Assessment process for SHR173 and other sites is inconsistent (different weight/emphasis applied to the implications and potential mitigation/management of issues such as developability, highway/traffic, ecology, air quality and noise), is not comprehensive, fails to consider relative importance/magnitude of different SA indicators, and there are generalised assumptions about capacity and effects of development. Whilst the site assessment identifies an adjacent Local Wildlife Site and nearby SSSI (Old River Bed, one of the most important nature conservation sites in Shropshire, the area of the river bed to the north of SHR173 is of similar character), the sites relationship to the SSSI not appropriately considered/assessed and this is not reflected in the Sustainability Appraisal matrix. The site assessment process also fails to correctly record the high landscape character of the site.</p> <p>95. Approximate site provision figure is 450 dwellings, but the site can deliver 500 dwellings and requisite infrastructure (including a local centre; and play areas, green space and wildlife ponds). Site capacity should not be artificially restricted and should ensure efficient use of land, particularly following completion of the NWRR.</p> <p>96. Support broad principles of the site guidelines.</p> <p>97. Site guidelines require adoption of a Masterplan before determination of a Planning Application. This is unnecessary to ensure sustainable development and to alleviate any delays should be amended to require a Masterplan informed by public consultation to be submitted as part of the Planning Application.</p> <p>98. Site guidelines require a Masterplan that reflects the objectives of the Big Town Plan, but this is also currently subject to public consultation and could therefore change.</p> <p>99. Support provision of a local centre, but would welcome flexibility to provide a single retail outlet to maximise suitability and attractiveness.</p> <p>100. Concerned about the level of services and facilities to be delivered on the site, which will not meet all needs.</p> <p>101. Site guidelines reference need for either on/off-site playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. Unclear which document this is, this must be clear of the guideline deleted. If retained, it should be amended to where necessary and identified as part of the aforementioned strategy.</p> <p>102. Site guidelines should require the developer to demonstrate how any new on-site facilities will be managed and maintained.</p> <p>Alternative sites</p> <p>103. BIT026 (Land east of Calcott Lane) is in a sustainable location (adjacent to Bicton, Bicton Heath and the eastern fringe of Shrewsbury) in proximity of existing development and infrastructure and represents a logical extension. It has no constraints, can be immediately delivered, can meet future housing and affordable housing need, and can support the growth of the Shrewsbury urban area.</p> <p>104. SHR015 (Land at Whitehall) should be allocated for residential development. The site is previously developed land within the urban area and has a ‘good’ rating within the sustainability appraisal. The existing occupier has chosen to leave the site so it will be vacated in the near future and its residential use will secure the occupation of the list building, enhance the setting of adjoining listed buildings, benefit the amenity of surrounding properties. Its allocation will ensure the draft Plan is sound and provide greater certainty about housing delivery.</p>	<p>Proposed Site Allocation SHR173 continued</p> <p>90. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p> <p>91, 92 and 93. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. With specific regard to site SHR173 it is considered that appropriate and robust assumptions have been made with regard to delivery timescales.</p> <p>94. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The landscape and visual sensitivity for housing on this site are medium for housing and medium low respectively, so the Sustainability Appraisal and Site Assessment conclusion is correct. Proposed changes to the scoring in respect of the SSSI would have no material effect so are not considered necessary.</p> <p>95. Shropshire Council considers that the proposed development strategy for Shrewsbury, including the proposed development guidelines for Site SHR173 are appropriate and will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. Furthermore, the developer guidelines have been through several stages of public consultation and have been confirmed by the promoter to be viable for delivery.</p> <p>96. Noted.</p> <p>97, 98, 99, 100 and 101. Shropshire Council considers that the proposed development strategy for Shrewsbury, including the proposed development guidelines for Site SHR173 are appropriate and will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>102. For the sake of clarity, it is proposed that a minor modification is made to the guidelines for site SHR173, regarding management and maintenance of any new on-site facilities.</p> <p>Alternative sites</p> <p>103 and 104. Shropshire Council considers that the proposed development strategy for Shrewsbury, including the proposed development guidelines for Site SHR173 are appropriate and will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.1. Development Strategy: Shrewsbury Strategic Centre continued</p>	<p>Alternative sites continued</p> <p>105. SHR023, SHR109, SHR163 and SHR174 (West of Ellesmere Road) should be allocated for residential-led development (alongside/instead of SHR173). The site is available, suitable (no physical or environmental constraints), would create a hard urban edge, is achievable and would deliver sustainable residential-led development and support infrastructure delivery. Characteristics/accessibility of the area will fundamentally change following delivery of the NWRR (which runs through the site). No evidence why this area is not allocated when SHR173 is, given that it is equally if not more appropriate and positively addresses the NWRR. The Sustainability Appraisal for this and other sites is inconsistent (different weight/emphasis applied to the implications and potential mitigation/management of issues such as developability, highway/traffic, ecology, air quality and noise), is not comprehensive, fails to consider relative importance/magnitude of different SA indicators, and there are generalised assumptions about capacity and effects of development.</p> <p>106. SHR176 (Land at Weir Hill) should be allocated for residential development (400 dwellings). The site is available for early delivery in the proposed Plan period; suitable, as informed by a landscape-led vision and various technical assessments, the site adjoins existing residential development / represents a logical extension without extending into the countryside (could be further enclosed by SHR166), and would provide a well-defined settlement edge; is deliverable; and would represent sustainable residential development with significant open space/riverside park (recreation/ecological value and support Council green infrastructure and Big Town Plan aspirations), and a new local centre/other community uses which will support the sustainability of the site, the phases of development on the existing allocation (SHREW027) and wider community. No good reason presented for not allocating the site. The site assessment process is flawed/SHR176 not fairly assessed (specific reference to landscape impact (lack consideration of site-specific assessment informed by specific proposals), transport infrastructure/access (including impact on the highway network and delivery timescales/attractiveness of new link road through SHREW027), flood risk/location in the flood zone, presence of environmental network/opportunities to enhance the river corridor, presence of contaminated land, noise impacts, assumption that delivery must follow that on SHREW027, and sustainable land uses). The Sustainability Appraisal includes errors (presence of TPO's on the site; and proximity to a primary school, GP and bus stop) and incorrectly scores the site.</p> <p>107. SHR196 (north-eastern corner north of Hanwood Road) lies between current allocation SHREW019 and proposed allocation SHR060. This is a sustainable location for development (including windfall development) and as such should be included within the proposed development boundary to allow for windfall development, connectivity between development on SHREW019 and SHR060, cycle routes, green corridor.</p> <p>108. SHR197VAR (Land adjacent to Battlefield Roundabout) should be allocated for employment development. It is ideally suited to address quantitative and qualitative issues in the employment land supply in Shrewsbury/Shropshire and will positively support the delivery of the Shropshire Economic Growth Strategy. Substantial evidence supports the sites availability (early in the proposed plan period), sustainability, flexibility (suitable for various uses), commercial attractiveness and ability to comply with proposed policies. It has previously been proposed for allocation and is a logical location for employment provision. There is insufficient justification for the exclusion of the site – specified reasons include relationship to the built form of the settlement (new direction for growth beyond the A49), which was apparent earlier in the process and is in any event incorrect as there is already commercial and employment development on three sides of Battlefield Roundabout (including to the north beyond the A49) which would be complemented by development of this site; and concerns about controlling end uses due to Use Class changes, but there is potential to specifically reference sub-use classes as per at other examinations.</p> <p>109. Part of SHR216 (Land at Holyhead Road) should be allocated for a specialist retirement village, including a range of types of older person's accommodation, including bungalows, assisted living and extra care housing. Retirement villages provide residents opportunities to move from more independent accommodation to more supported accommodation as needs change and also provide services for residents and the wider community. The site is close to and will complement existing provision and the adjacent Shrewsbury West SUE, has an existing access, is well served by public transport, has good access to the countryside, is well screened in the landscape and is outside the source protection zone and drainage will not impact on it.</p> <p>110. SHR221 (South of Mytton Oak Road) should be allocated for residential development. It is well located (adjoining recently developed land) and fully deliverable.</p> <p>111. SHR224 (Land at Hencote) should be allocated for a Care Community (Use Class C2). The site can provide a flexible range of accommodation with graduated access to supporting care, social, recreational, therapy and well-being facilities, within a safe setting, offering access to open space, wildlife and other interests. It will meet older person's needs in an effective manner. Proposals on the site are informed by dialogue and engagement and would comply with the draft Local Plan objectives.</p>	<p>Alternative sites continued</p> <p>105, 106, 107, 108, 109, 110 and 111. Shropshire Council considers that the proposed development strategy for Shrewsbury, including the proposed development guidelines for Site SHR173 are appropriate and will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.1. Development Strategy: Shrewsbury Strategic Centre continued</p>	<p>Alternative sites continued 112. SHR225 (land at Nobold) should be allocated as a sustainable urban extension or alternatively considered as a reserve site/future direction of growth. It is suitable, available and represents a sustainable location for development, adjacent to the existing built form of Shrewsbury with access to a range of services and facilities. Two options available with or without land beyond the A5. Without land beyond the A5 the site can deliver around 1,750 dwellings and supporting infrastructure (specific reference to a primary school, local centre, highways, pedestrian links, and variety of open spaces/green infrastructure). With land south of the A5, the site can also deliver 18ha of employment land. Land beyond the site could also be included within a wider masterplan. Main reason for not selecting the site is lack of need for development beyond the A5, however there is an option presented which would not involve this (although railway line/landscaping/design could in any event achieve an effective boundary) and capacity of other proposals which can contribute to achieving the aspirations of the Big Town Plan. This site can equally contribute and is not dismissed due to any suitability/availability/achievability ground (indeed proximity of other allocations shows this). This site would complement wider proposals and is the next logical place for development. 113. Berwick Estate Land (including part of SHR096, SHR169, SHR216 and SHR222) should be allocated to deliver up to 450 dwellings as a first phase of development (masterplanned through a Whole Estate Plan to deliver environmental and public benefit, and ensure the Estate including numerous listed buildings remains viable. Transport assessment confirms the site is deliverable in advance of the NWRR). This would safeguard delivery of the NWRR (in lieu contribution) and subsequent delivery of allocations reliance on it. Appropriate site guidelines suggested.</p>	<p>Alternative sites continued 112 and 113. Shropshire Council considers that the proposed development strategy for Shrewsbury, including the proposed development guidelines for Site SHR173 are appropriate and will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken.</p>
<p>S16.2. Community Hubs: Shrewsbury Place Plan Area</p>	<p>Baschurch 1. The approximate site provision figure for BNP024 is too low (particularly in comparison to the adjoining site) and should be increased to 60 dwellings. 2. Site BNP035 should be removed from the draft Plan. There are insufficient services, facilities and infrastructure (including access) for the number of dwellings proposed and proposals will negatively impact on existing property values. 3. Support for proposed amendments to the Baschurch development boundary near Shropshire Stone and Granite Works, which reflect ongoing development. 4. There are a number of private water supplies in the area. As such given the scale of proposed development, appropriate mains foul drainage will be required.</p>	<p>Baschurch 1. Shropshire Council considers the proposed capacity of BNP024 is appropriate. It should be noted that Para 4 of Draft Policy S16.2 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage. 2. Shropshire Council considers that the proposed development strategy for Baschurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. Proposed site allocations have been informed by a robust and proportionate site assessment process. 3. Noted. 4. Local Plan policies cover the issues raised.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S16.2. Community Hubs: Shrewsbury Place Plan Area continued</p>	<p>Bayston Hill</p> <p>5. Support identification of Bayston Hill as a Community Hub.</p> <p>6. Support the proposed residential development guideline for Bayston Hill.</p> <p>7. To achieve the proposed residential development guideline for Bayston Hill, further land should be allocated for development.</p> <p>8. The proposed residential development guideline for Bayston Hill (200 dwellings) should be the 'minimum' amount of development and it could be identified as a Key Centre. The settlement has a range of services and facilities and access to those at Shrewsbury, is an attractive place to live, has a high value market, there is unmet housing need in the village, and given the viability of development in the settlement can contribute to meeting affordable housing need (no need identified for specific settlements within the Strategic Housing Market Assessment, but delivery in Shropshire has fallen well below need despite very high completions). This scale of development will enable the provision of much needed affordable housing and market housing in an area which is attractive to developers. There are also less sustainable Community Hubs with larger development guidelines than Bayston Hill. Development above the residential development can be considered on its own merits.</p> <p>9. The proposed residential development guideline for Bayston Hill is unsound (specific reference to 'positively prepared', 'justified' and 'effective' tests) and should be increased (one figure suggested is 445 dwellings). This is because the proposed housing requirement does not reflect latest household projections and fails to meet local housing need, the residential development guideline for Bayston Hill shares this failure. Furthermore, Bayston Hill is the largest village in Shropshire, has a good range of services/significant local employment (second highest performing Community Hub within the Council's Hierarchy of Settlements Assessment), is located on the A49 strategic corridor (where investment is intended to be prioritised within the strategic approach), but the level of annual growth (0.45%) is significantly less than that proposed for Shropshire (1.01%) and that of other Community Hubs with similar scores in the Council's Hierarchy of Settlements Assessment (1.03% for Pontesbury, 1.66% for St Martins, 1.1% for Clun and 1.2% for Gobowen).</p> <p>10. The proposed priority of retaining a 'green gap' between Shrewsbury and Bayston Hill is unsound (specific reference to 'positively prepared', 'justified' and 'effective' tests). There is no evidence to support this approach as it is not referenced within the Council's Open Space and Recreation Needs Assessment or Green Infrastructure Strategy for Shrewsbury. In contrast land to the south of Bayston Hill is associated with Lyth Hill, crossed by many well-walked public rights of way and to the south and east of Bayston Hill are the South Shropshire Hills AONB. The Council's Landscape and Visual Sensitivity Assessment also illustrates that land to the south of Bayston Hill is also more sensitive from a landscape and visual perspective than land to the north (within the Green Gap).</p> <p>11. There is an opportunity to enhance the Green Gap between Shrewsbury and Bayston Hill, through improved recreational opportunities facilitated by development, rather than simply retaining it.</p> <p>12. Support proposed allocation BAY039.</p> <p>13. The approximate site provision figure for proposed allocation BAY039 is too low and use of the term 'approximate' within the draft Policy lacks certainty. The term should be amended to 'at least' and the amount increased to 115 dwellings (19.8 dwellings/ha).</p> <p>14. Lack of development within Bayston Hill during the current plan period may mean there are limited windfall opportunities.</p> <p>15. Site BAY005 should be allocated for residential development and attractive open space/landscaping. The site benefits from good access to services and facilities and is deliverable.</p> <p>16. Land to the north of BAY039 should be allocated for residential development.</p> <p>17. Site BAY040 should be allocated for residential development.</p> <p>18. Reserve sites should be identified within the draft Shropshire Local Plan / subsequent Development Plan Document to ensure that the Plan can be flexible and can deal with rapid change/avoid delays to delivery in the event that either housing need increases or allocations fail to come forward.</p>	<p>Bayston Hill</p> <p>5 and 6. Noted.</p> <p>7. Shropshire Council considers that the proposed development strategy for Bayston Hill and the existing commitments, proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. Proposed site allocations have been informed by a robust and proportionate site assessment process.</p> <p>8 and 9. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that the proposed development strategy for Bayston Hill and the existing commitments, proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. The proposed approach to managing development proposals where they exceed settlement residential development guidelines is also considered appropriate.</p> <p>10 and 11. The retention of the Green Gap between Shrewsbury and Bayston Hill is considered an appropriate policy consideration. Proposed site allocations have been informed by a robust and proportionate site assessment process, including consideration of the landscape and policy considerations such as retention of Green Gaps between settlements.</p> <p>12. Noted.</p> <p>13. Shropshire Council considers the proposed capacity of BAY039 is appropriate. It should be noted that Para 4 of Draft Policy S16.2 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.</p> <p>14, 15, 16 and 17. Shropshire Council considers that the proposed development strategy for Bayston Hill and the existing commitments, proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. Proposed site allocations have been informed by a robust and proportionate site assessment process.</p> <p>18. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Bicton</p> <p>19. The proposed residential development guideline for Bicton should be increased.</p> <p>20. Support proposed allocation BIT022.</p> <p>21. The approximate site provision figure for BIT022 should be increased to 30 dwellings/at least 30 dwellings (to deliver the entire proposed residential development guideline).</p> <p>22. BIT022 is located within PZ3 and is adjacent to a well. Therefore it will be necessary to ensure appropriate mains foul drainage and surface water drainage.</p> <p>23. Site BIT022 can be extended further north to accommodate further dwellings if required.</p> <p>24. BIT022 has a higher highway impact than documented within the site assessment.</p> <p>25. Site BIT023 should be allocated for residential development. The site is will located adjoining the existing built form and in walking distance of the primary school, fully deliverable and can contribute to achieving the proposed residential development guideline for the settlement.</p>	<p>Bicton</p> <p>19. Shropshire Council considers that the proposed development strategy for Bicton and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement.</p> <p>Proposed site allocations have been informed by a robust and proportionate site assessment process.</p> <p>20. Noted.</p> <p>21. Shropshire Council considers the proposed capacity of BIT022 is appropriate. It should be noted that Para 4 of Draft Policy S16.2 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.</p> <p>22. Local Plan policies cover the issues raised.</p> <p>23, 24 and 25. Shropshire Council considers that the proposed development strategy for Bicton and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement.</p> <p>Proposed site allocations have been informed by a robust and proportionate site assessment process.</p>
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Bomere Heath</p> <p>26. Support identification of Bomere Heath as a Community Hub, as it is a sustainable settlement with a good range of services and significant local employment.</p> <p>27. Proposed allocations BOM019 and BOM020 form natural extensions of the village linking it to the football/cricket pitches. Confident they will be very popular and delivered quickly (as per SAMDev Plan allocation BOM004).</p> <p>28. The proposed site guideline for BOM019 requiring access off Shrewsbury Road is unnecessary. The recently constructed roundabout access onto Shrewsbury Road (for an adjacent site) was designed to also accommodate traffic from this site and this should be recognised in the proposed site guidelines.</p> <p>29. The proposed site guideline for BOM019 and BOM020 regarding pedestrian links, seeks to duplicate an already provided pedestrian footway between the cricket/football pitches and village. This is unnecessary and fails the 'justified' test. The proposed guideline should be updated to recognise this duplication.</p> <p>30. Proposed allocations adjoin (within 45m) of a playing field which has been leased to the cricket club. Concerned development may prejudice this use due to risk of ball strike (balls can be hit 70-80m). Site guidelines should be amended to require a ball strike assessment for the relevant playing field to be submitted alongside any Planning Application and any mitigation measures be undertaken and maintained in perpetuity.</p> <p>31. SAMDev allocation BOM004 (adjoins proposed allocation BOM019) included SUDs designed to cater for BOM019 and BOM020.</p> <p>32. BOM021, BOM022a and BOM022b should be allocated instead of proposed allocations BOM019 and BOM020. They have a lower agricultural value than the proposed allocations.</p>	<p>Bomere Heath</p> <p>26 and 27. Noted.</p> <p>28. The current proposed guideline indicates that "an appropriate highway access will be provided off Shrewsbury Road". Should the current access be acceptable when assessed against the detail of a planning application, the policy does not stipulate that the access arrangements need to new.</p> <p>29. This pedestrian link runs through these sites and there is a need to ensure it is retained/enhanced or an alternative provided. As such the draft guidelines are considered appropriate.</p> <p>30. For the sake of clarity, it is proposed that a minor modification is made to the 5th paragraph of the guidelines for site BOM020.</p> <p>31. Noted.</p> <p>32. Shropshire Council considers that the proposed development strategy for Bomere Heath and the existing commitments (including the existing allocation), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. Proposed site allocations have been informed by a robust and proportionate site assessment process.</p>
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Condover</p> <p>33. Condover is a major settlement and close to Shrewsbury. It should be identified as a proposed Community Hub to deliver substantial development. Proposal to rely on the Neighbourhood Plan to possibly bring forward residential development is unsound and an abdication of the Council's responsibilities.</p> <p>34. CON004VAR (Land at Station Drive, Condover) should be allocated for residential development.</p>	<p>Condover</p> <p>33 and 34. Shropshire Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such is considered appropriate for Condover to not be identified as a proposed Community Hub.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Cross Houses</p> <p>35. Berrington Parish Council have commented on their desire to remain as countryside settlement in preference to being identified as a Community Hub. The Parish Council accept that Cross Houses meets a number of criteria that would identify the village as a Community Hub and so they also accept the proposals for Cross Houses for further windfall development of 9 dwellings but no further, significant housing development.</p> <p>36. Object to reduction in Cross Houses housing guideline from 130 dwellings to 90 dwellings.</p> <p>37. Object to the windfall only strategy for Cross Houses and request that site CSH006 Land south of the Bell Inn be allocated for housing development.</p> <p>38. Cross Houses should be a countryside settlement not a Community Hub to prevent significant housing development occurring in the Local Plan period.</p> <p>39. A housing need survey should have been undertaken to establish what the community wants as Cross Houses has accommodated significant levels of new housing with associated construction traffic movements, increases in traffic, increases in traffic noise and the loss of countryside.</p> <p>40. There are several areas of contention within the Hierarchy of Settlements Assessment comprising objections to the recognition of a mobile library which visits twice a month for 25 minutes each time (3 points) instead of a permanent facility which is not present in the village, recognition of more than one amenity green space as multiple provision (increasing 3 points to 4 points), recognition of more than one children's playground as multiple provision (increasing 3 points to 4 points) and recognition of an outdoor sports facility (3 points) that is not owned by the Parish Council and which has been regularly affected by recent flooding events. This has raised the Cross Houses assessment of services to 53 points but should be re-assessed to only 45 points which is below the threshold of 48 points and should remove the Community Hub designation from Cross Houses.</p>	<p>Cross Houses</p> <p>35. Support for the Cross Houses development strategy is welcomed.</p> <p>36, 28 and 39. The effect of the proposed housing allocation on CSH004 Berrington Station being considered to be an unsuitable site at this time, has persuaded the Council to reduce the housing guideline for the village by the number of houses previously proposed on CSH004 and to propose a windfall only strategy for Cross Houses. The proposed windfall allowance identified to contribute towards achieving the proposed development strategy is appropriate, effective, sustainable and deliverable and gives due consideration to the settlement's characteristics, constraints and the opportunities that exist.</p> <p>37, 38, and 39. Proposed site allocations have been informed by a proportionate and robust site assessment process which has taken account of the continuing provision of large-scale housing developments in Cross Houses despite the village previously being designated as a countryside settlement. The effect of the proposed housing allocation on CSH004 Berrington Station being considered to be an unsuitable site at this time, has persuaded the Council to propose a windfall only strategy for Cross Houses to enable the settlement, its highway network and the community to assimilate the previous significant housing developments in the village.</p> <p>40. The Council considers the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses. A further assessment of the service provision in Cross Houses was undertaken in 2018 using the methodology within the HoS and the service score of 53 points was confirmed in this assessment. Consequently, it is considered appropriate that Cross Houses is identified as a proposed Community Hub.</p>
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Dorrington</p> <p>41. DGN018 should be allocated for residential development. The site is suitably located (adjoins a recent development and represents a natural infill and benefits from excellent access to the A49) with well defined site boundaries. Within the Sustainability Appraisal it achieves one of the better ratings for sites in Dorrington. It is deliverable and can contribute towards the achievement of the proposed residential development guideline for the Community Hub.</p>	<p>Dorrington</p> <p>41. A Neighbourhood Plan is being progressed which covers the settlement of Dorrington. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the proposed Community Hub of Dorrington.</p>
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Ford</p> <p>42. Designation of Ford as Community Hub is not justified by the methodology in the Hierarchy of Settlements Assessment (HoS), other Local Plan evidence and the declaration of a Climate Emergency in Shropshire. Ford should be designated as a Countryside settlement.</p> <p>43. Designation of Ford as Community Hub supported but further windfall development opportunities are suggested by extending the development boundary around the cluster of development at junction of Back Lane and A458.</p> <p>44. Deliver essential infrastructure before any further development permitted in Ford.</p> <p>45. Proposed allocation FRD011 and the development guidelines for the site are welcomed but further detailed investigations, an appropriate development scheme and specific infrastructure investments are required to address the heritage value of the site and its hydrogeological setting over a source protection zone for a public water supply.</p> <p>46. A second site for residential development suggested in Ford to offer a range and choice of housing sites in addition to proposed allocation FRD011.</p>	<p>Ford</p> <p>42. The Council considers the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Ford. Consequently, it is considered appropriate that Ford is identified as a proposed Community Hub.</p> <p>43 and 46. Support welcomed but development strategy has given due consideration to Ford's characteristics, constraints and opportunities and the proposed allocations and windfall allowance are appropriate, effective, sustainable and deliverable.</p> <p>44. Proposed site allocations have been informed by a proportionate and robust site assessment process which has taken account of the need for infrastructure investment.</p> <p>45. Support for proposed development guidelines for FRD011 welcomed and additional matters noted but they are addressed in the policies of the Draft Local Plan.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Hanwood</p> <p>47. The proposed residential development guideline for Hanwood cannot be achieved through windfall development within the development boundary which is out-of-date (two large sites have come forward outside the boundary in the adopted Local Plan) and needs to be expanded and/or site(s) allocated for development (specific reference to HWD005).</p> <p>48. No more housing needed in the Hanwood area. There has been overdevelopment in recent years.</p> <p>49. A large development (1,500 dwellings) is proposed on a nearby site off the A5.</p> <p>50. HWD004 and CRU002 should be allocated for residential development. The site can accommodate 22 dwellings and is well placed to accommodate the expansion of Hanwood. It benefits from being within walking distance of the school (with a safe off-road access route), local amenities (such as the village hall) and playing fields. It can gain access to the highway through land to the west which has already been developed. This adjoining site sold quickly, providing demand.</p> <p>51. HWD005 should be allocated for residential development/included within the proposed development boundary. The site was identified as having 'long term potential' within the Council's Strategic Land Availability Assessment, it could deliver an upgrade to Orchard Lane and the unmade track to Highfield (community benefit) - site promoter engaging with the Local Highway Authority regarding existing highway concerns and considering a Planning Application.</p> <p>52. Access to site HWD002 is restricted to via an unadopted road which is not suitable for more vehicular traffic and the location it Access to this unadopted road from the main highway is also unsafe.</p> <p>53. Access to site HWD001X is restricted and it represents only a very small site.</p> <p>54. Access to site HWD003 is restricted and access onto the main highway is not good. The site is also separated from the built form of the settlement by open countryside.</p> <p>55. Access to site HWD004 is restricted and access onto the main highway is not good. The site is also separated from the built form of the settlement by open countryside.</p> <p>56. Access to site HWD005 is restricted and access onto the main highway is not good. The site is also separated from the built form of the settlement by open countryside.</p> <p>57. Access to site HWD006 is restricted and access onto the main highway is not good. The site is also separated from the built form of the settlement by open countryside. The north site of the village is the wrong area for further development, it is important to maintain the green wedge between existing developments and rurality would be lost.</p>	<p>Hanwood</p> <p>47, 48, 49, 50, 51, 52, 53, 54, 55, 56 and 57. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Longden</p> <p>58. The methodology for the distribution of development across Shropshire is flawed, irrational and unsound. It would make more sense to focus development in urban areas (when considering climate change and carbon emissions).</p> <p>59. Longden should not be identified as a proposed Community Hub, this is not supported by evidence and is fundamentally unsound (specific reference to not justified). Reasons included: disagreement with the methodology utilised within the Hierarchy of Settlements as applied to Longden, Longden is much smaller than other proposed Community Hubs (aligning Longden with them will inevitably lead to pressure for development), the status is inappropriate for the village - Longden does not have the necessary infrastructure to support the level of development of other Community Hubs, and this proposed status disregards local opinion (particular reference to correspondence from Longden Village Action Group and past objections which will not be considered during the examination).</p> <p>60. The level of development proposed in Longden contradicts Core Strategy objective 3 (part of the adopted Local Plan).</p> <p>61. There has been significant development in Longden Parish (nearly double that within the SAMDev guideline). This development has caused increased congestion and now road links, infrastructure, and amenities in the village are at capacity, whilst others are only accessible via car on single track lanes.</p> <p>62. Development resulting from Community Hub status would not be in keeping with local character (ancient village with mature trees and hedgerows); would be beyond the capacity/infrastructure capacity (particular reference to highways - narrow roads and poor links to other settlements) of this small rural community; would increase carbon dioxide emissions and contribute to climate change; would result in loss of green spaces, trees and hedgerows; would harm the landscape; and would destroy the village's identity. Also concerned about noise, dust and disturbance during construction. This has been given little weight. Reference to the need to deliver infrastructure before any development.</p> <p>63. Community support identification of Longden as a Community Cluster, which would allow for some growth through infill development, but preserve the character of the settlement and safeguard the countryside (provided this is carefully considered).</p> <p>64. The draft Shropshire Local Plan and the Hierarchy of Settlements evidence base is not sound or sustainable.</p> <p>65. The methodology and scoring applied within the Hierarchy of Settlements is flawed, inappropriate, blunt and wrong. It has also not been appropriately scrutinised and should be reviewed. Specific reference to the lack of 'weighting' to reflect / failure to recognise the size and capacity of infrastructure, services and employment opportunities. Examples provided include provision of the same points for a permanent and mobile library that visits once a month/10 minutes a fortnight (as is the case in Longden); the same points for a small and large shop and post office / separate and combined shop and post office facilities (such facilities in Longden are combined and small); and the same points as settlements with multiple provision. Other comments included a failure to recognise the size of a settlement; aware other villages and individuals have concerns regarding the scoring system; Longden should have negative points for lack of employment opportunities; Public transport in Longden is regular but infrequent (timetable does not allow for use by office/shop workers in Shrewsbury and connection timing prohibit onward transportation to other towns), should not achieve 10 points; Longden pub opens only 3 days a week; the shop is expensive and has limited stock; Longden has only a small primary school and nursery; there is no doctors surgery; no superfast broadband; sports facilities are limited (two tennis courts and a football field adjacent to a small children's playground); and no cycle lanes or potential for them due to narrow roads. If issues were addressed Longden would not be a Community Hub. Frequent reference to correspondence from Longden Village Action Group.</p> <p>66. Development within a rural settlement such as Longden without adequate public transport links or employment is unsustainable and will have a negative impact on zero carbon targets/carbon emissions as more need to commute.</p> <p>67. Unclear how new housing will be delivered given the proposed development boundary. The Council have indicated affordable exception sites. The Right Home Right Place survey indicate housing need (18 dwellings specified), however unclear how exception sites will meet this need. Do not want unplanned adhoc approach to development resulting in loss of high-value agricultural land.</p> <p>68. Concerned about dissemination of information, particularly due to Covid 19 restrictions.</p> <p>69. Does not understand why some proposed development sites are included when they have been subject to appeals and previously rejected, particularly LGN016 and LGN002.</p> <p>70. Little reference in the draft Local Plan to those with disabilities.</p> <p>71. Query why an Infrastructure Plan and up-to-date Local Transport Plan have not been prepared.</p>	<p>Longden</p> <p>58. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>59, 60, 61, 62, 63, 64, 65, 66 and 67. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>68. The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>69. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p> <p>70. It is important that the needs of all groups within the community, including those with disabilities are met. The housing need of groups within the community are considered within the Strategic Housing Market Assessment (SHMA), which forms part of the evidence base and has informed draft Policies within the draft Shropshire Local Plan. Draft Policies also address such issues as high-quality design and health and wellbeing.</p> <p>71. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Nesscliffe</p> <p>72. The parish council supports the Nesscliffe policy.</p> <p>73. Schedule of Saved Allocations (page 322) indicates site NESS012 is allocated but the sustainability appraisal states NESS012 will remain in the countryside.</p>	<p>Nesscliffe</p> <p>72. Support for the Nesscliffe development strategy is welcomed.</p> <p>73. Part of NESS012 was previously allocated in the SAMDev Plan (2015) but the remainder of site NESS012 is proposed to remain in the countryside.</p>
S16.2. Community Hubs: Shrewsbury Place Plan Area continued	<p>Westbury</p> <p>74. Westbury should be identified as a proposed Community Hub. Suggested proposed residential development guideline of 60 dwellings, based on the size of the settlement. Suggested development boundary for Westbury extending the village development boundary eastwards along Shrewsbury Road/B4386 Roman Road to include sites WEY006 and WEY019.</p> <p>75. The Hierarchy of Settlements score for Westbury should be 52 (which exceeds the threshold for Community Hub status), as such the draft Local Plan is unsound.</p> <p>76. WEY006 and WEY019 should be allocated for residential development (20 dwellings and 30 dwellings respectively). Most of the central and western portions of Westbury lie within the conservation area (map provided within representation). However, these sites to the east of the town are unconstrained and a suitable access can be established off Shrewsbury Road.</p> <p>77. WEY015 should be allocated for residential development. The site is a well located for the expansion of Westbury; is well placed for access to the village hall, Church and public house; and has an access that will not have a negative impact on the existing infrastructure. The site is deliverable and can be fully self-contained to provide a phased level of housing required.</p>	<p>Westbury</p> <p>74, 75, 76 and 77. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Westbury. As such it is considered appropriate that Westbury is not identified as a proposed Community Hub. As such it is not proposed to identify a development guideline, development boundary or identify proposed allocations - consistent with other rural settlements considered to be a settlement in the countryside for policy purposes.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Westbury. Consequently, it is considered appropriate that Westbury is not identified as a proposed Community Hub and it is not proposed to identify a development guideline, development boundary or identify proposed allocations - consistent with other rural settlements considered countryside for policy purposes. Within the HoS, the size of a settlements population/number of dwellings are specifically considered within Stage 2: Screening of Settlements, whilst provision of services and facilities; high speed broadband; employment opportunities; and public transport links are specifically considered within Stage 3: Assessment of Screened-In Settlements. This is considered an appropriate methodology by which to identify Community Hubs, which are considered significant rural service centres. With regard to Westbury:</p> <p>-Within the HoS consideration of open space is primarily informed by the Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Within this Open Space Needs Assessment two outdoor sports facilities were identified in and around Westbury, however one was excluded from the assessment as it was a dedicated school facility (consistent with the HoS methodology). Whilst this primary school has since closed, this facility is now used as a special education needs school, as such the associated outdoor sports facility remains a dedicated school facility. Within this Open Space Needs Assessment, no amenity green space is identified in or around Westbury, rather Westbury Recreation Ground is identified as an outdoor sports facility (and included within the assessment as such).</p> <p>-Within the HoS both Nigel Farr Farm Services and G O Davies (Westbury) Ltd were considered within the assessment of significant employment opportunities. However, whilst it was concluded that G O Davies (Westbury) Ltd represented a significant employment opportunity as defined within the HoS (and is included within the HoS as such), it was concluded that Nigel Farr Farm Services did not constitute a significant employment opportunity as defined within the HoS. Westbury Special Education Needs School is also not considered to constitute a significant employment opportunity as defined within the HoS.</p>
S16.3. Community Clusters: Shrewsbury Place Plan Area	<p>Uffington</p> <p>1. Uffington should be identified as a Community Cluster. No justification is provided for this status not continuing from the adopted Local Plan, which is surprising given that the current residential development guideline has not been delivered. No discussions occurred with have occurred with the promoters of sites in the village.</p> <p>2. UFF005 promoted for residential development in Uffington. It is suitable for providing a mix of housing types (as required by the NPPF). The promoter is considering submitting a planning application for cross-subsidy housing with a developer.</p>	<p>Uffington</p> <p>1 and 2. Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. As such, it is considered appropriate for Uffington to be classified as countryside.</p>
S16.4. Wider Rural Area: Shrewsbury Place Plan Area	<p>Hanwood Bank</p> <p>1. No more housing needed in the Hanwood area. There has been overdevelopment in recent years.</p> <p>2. A large development (1,500 dwellings) is proposed on a nearby site off the A5.</p> <p>3. Access to site HWB001X is restricted and access onto the main highway is not good. The site is also separated from the built form of the settlement by open countryside. It is important to maintain the green wedge between existing developments and rurality would be lost.</p> <p>4. Access to site HWB003 is restricted and access onto the main highway is not good. The site is also separated from the built form of the settlement by open countryside. It is important to maintain the green wedge between existing developments and rurality would be lost.</p> <p>5. Access to site HWB004 is restricted and access onto the main highway is not good. The site is also separated from the built form of the settlement by open countryside. It is important to maintain the green wedge between existing developments and rurality would be lost.</p>	<p>Hanwood Bank</p> <p>1, 2, 3 4 and 5. Noted. No allocations are proposed at Hanwood Bank which is proposed to be classified as countryside.</p>
S17. Wem Place Plan Area	See S17.1-S17.4	See S17.1-S17.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S17.1. Development Strategy: Wem Key Centre	<p>Wem</p> <p>1. WEM033 could accommodate 84 dwellings rather than the 60 dwelling guideline</p> <p>2. Strongly support identification of Wem as a Key Centre as it is a sizeable settlement, has a good range of services and facilities (highest scoring Key Centre within the Hierarchy of Settlements Assessment undertaken to inform the draft Shropshire Local Plan Review), is identified as a strategic focus for growth in north-east Shropshire (proposed explanation to draft Policy S17.1) and is located on a Strategic Corridor (as recognised within the draft Shropshire Local Plan) and draft Policy SP14 seeks to focus major development into such corridors. This status is vital to its long-term future. Despite this and high demand for housing/affordability issues in the town (documented within the Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan), a low level of growth is proposed and a significant reliance placed on windfall development (89 dwellings) to meet need over the proposed Plan period. The level of growth proposed is also less than that experienced during the current Plan period (27.2 and 32.8 per annum respectively), less than the Shropshire average (20.8% and 21.9% respectively), and less than the average percentage growth forecast for Shropshire in latest 2018-based household projections (20.8% and 26.9% respectively) which would indicate demand for 774 dwellings, although in practice Wem's popularity is likely to attract higher demand than the County average - low levels of development will result in pressure on house prices and reduce affordability, undermining social and economic sustainability. Given the strategic importance of growth in Wem, this is considered inappropriate and not positively prepared, justified or effective.</p> <p>Additionally, the group of proposed housing allocations north-west of Wem are subject to infrastructure capacity constraints (highway congestion/pinch points (including the rail crossing), being on the opposite side of the town from main employment areas, strategic road links and the railway station; and surface/foul water drainage constraints), and as such are not considered justified. Furthermore:</p> <ul style="list-style-type: none"> -Proposed saved Allocation WEM003 is also not considered deliverable and may not be developable (as defined within para 67 of the National Planning Policy Framework (NPPF)) as it is undeveloped but has been allocated for a number of years and an Outline Planning Application was refused in 2020, as based on available information benefits did not outweigh visual and biodiversity harm. -Proposed allocation WEM010 is intended to represent phase 2 of WEM003, so subject to the same uncertainties. <p>WEM033, whilst closer to services than WEM010, is considered subject to the same highway infrastructure constraints and so also not justified.</p> <p>Consider WEM035 is unconstrained (as evidenced in the site assessment undertaken to inform the draft Shropshire Local Plan) far more sustainable, and deliverable/developable than proposed allocations (illustrative Plan appended to representation). It is not proposed for allocation due to its location on the opposite side of the rail line to the town centre and distance from services and facilities compared to proposed allocations (but residents of all these sites could walk to many services and facilities) and the site assessment does not consider proximity to employment areas and strategic road network (involving vehicular travel through the town centre for proposed allocations and not WEM035). Furthermore, due to size, on-site provision of some services can be made (including allotments and a playground), over provision (15%) of affordable housing, 10% on-site renewable energy generation, a good housing mix and biodiversity net gain etc</p> <p>3. Fails to address the duties under the Self Build Act or allocate sufficient land (if any) for self-build and custom build housing. The site at Chez Nous was specifically put forward to meet an existing need by 3 local residents and an additional 5 plots for other interested self-build residents.</p>	<p>Wem</p> <p>1. Shropshire Council considers the proposed capacity of WEM033 is appropriate. It should be noted that Para 6 of Draft Policy S17.1 recognises that the Provision figures are 'approximate'. It states: "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage 2 and 3. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlement's characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S17.1. Development Strategy: Wem Key Centre continued</p>	<p>Wem continued</p> <p>4. Relieved concerns about traffic congestion east of the level crossing in Wem have been taken into account. Removal of the level crossing would divide the town into two parts, significantly damage retail businesses operating in Wem High Street and increase the number and length of car journeys. As such, this option is not available and residents have to live with existing congestion, but they do not want it (and associated problems) exacerbated. Further development in this area would lead to just that situation. Also encouraged that the integrity of small settlements, such as Aston, has been maintained. All 'sensible' areas for development at Wem have been taken but the town still has to develop, so it is a case of choosing the least damaging options. There will be concerns about all the three proposed allocations, but we are where we are. However, would ask for reconsideration of WEM025. The ecological value of this area is clearly recognised by the Council, since numerous mitigation measures are required. All area aware that such mitigation measures have differing degrees of success. Additionally, any development should have regard to neighbouring developments and the character of the town, rather than appearing parachuted in - matching the shades and types of bricks really does not cut it. Pleased that development proposals will be expected to positively respond to policies and guidelines identified within the Wem Town Design Statement any other relevant community-led plans and any master plans adopted by Shropshire Council.</p> <p>During the last Regulation 18 consultation, requested that the development boundary on Mill Street be amended so an area of open land would be excluded from development. Many Wemians feel strongly that development should not take place on this site as it is a key gateway, provides essential green space and natural/historic environment concerns (numerous applications refused on the site). Adjustment of the development boundary in this area would have a minimal impact on the development of Wem but a major and positive impact on the environment of Wem.</p> <p>5. Development Boundary should be amended to run parallel with Mill Street from Roden Weir alongside the western edge of the pavement on Mill Street to the Mill House.</p> <p>6. Land south east of Wem Industrial Estate, Souldon Road, Wem is a well located and fully deliverable site with an area of 3.259 ha. We believe this site is suitably placed to provide the development in the Key Centre of Wem being situated with an access off the B5056 and adjoining previously developed land and the development boundary.</p> <p>The land is well positioned with access to the highway on the southern boundary and is adjoining land that has already been developed. The land is well placed for the expansion of Wem in terms of its location to the A49. A smart new commercial development here would enhance the entry towards Wem from the North.</p> <p>7. Site WEM025 should not be included – WEM033 could have its capacity increased to 90 as an alternative.</p> <p>8. Agree with WEM003, this could be expanded to the west.</p> <p>9. WEM037 is a good site and is deliverable, sustainable, has a better SA score than some of the preferred allocations, and is positioned well in terms of highways. We are pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation</p>	<p>Wem continued</p> <p>4 and 5. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers that the proposed development boundary is appropriate.</p> <p>We would note that with regard to the design of development, a draft Policy (SP5) specifically on high-quality design is proposed within the draft Shropshire Local Plan. Furthermore draft Policy S11.1 recognises development proposals should positively respond to community-led plans, this includes in relation to design."</p> <p>6, 7, 8 and 9. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlement's characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S17.2. Community Hubs: Wem Place Plan Area	<p>Clive</p> <p>1. Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status. The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.</p> <p>2. Outdated information used to determine Clive's status as a Hub - it should be a Cluster. Infrastructure cannot cope with new development, particularly roads.</p> <p>3. Clive's score is incorrect - it should be 47. It's lack of employment and facilities make it unsuitable for Hub status. The shop and bowling green are either gone or private.</p> <p>4. Draft Policy S17.2 is unsound as associated overarching draft Policies SP2 and SP8 are unsound. The policy is based on inaccurate, out of date and inconsistency evidence on settlement sustainability. In addition, there has been inconsistent consideration and treatment of the presence of local facilities and changing circumstances across Parishes during plan development. In Clive, the current scoring within the Hierarchy of Settlements Assessment for Clive includes the bowling green as an outdoor sports facility and the local convenience store, but neither of these facilities are publicly accessible to the community, following closure of both the bowling green and local convenience shop. Both now fall under private residential ownership and use. As such Clive does not meet the requirements for Community Hub status.</p> <p>With regard to the bowling green, Shropshire Council recognise there is no active club in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020) (PPOSS), a comprehensive assessment undertaken between 2018 and 2019 within which Clive is not recorded as having such a facility. However, Shropshire Council justify retention of the facility in Clive following its inclusion in the Open Space Needs Assessment (2017 - based on 2009 data with limited desk-based updates) (OSNA), this assessment acknowledges that "without a catchment area analysis it cannot detect the reality of variations in provision within each Place Plan Area"... this data is considered out-of-date, has not been verified locally and has been superseded by the PPOSS.</p> <p>With regard to the local convenience store, Shropshire Council has acknowledged receipt of recent correspondence from both the Parish Council and store owner that it is no longer in use and now falls within a residential curtilage. This has now been formalised with a change of use planning application to convert the store to a residential annex (ref 21/00048/FUL).</p> <p>An inconsistent approach has been taken to reflecting changes during development of the draft Shropshire Local Plan. For instance Myddle was initially identified as a Community Hub, but following the closure of the local convenience store in 2018, fell below Community Hub status within the assessment. Similar situations occurred in Cockshutt and Westbury. The same circumstances occurred in Clive but it remains a Community Hub. Also, there is no evidence that other Parish Councils were required to provide additional evidence to support this change in designation other than notification of the change. In comparison, Clive Parish Council were asked for evidence of marketing more widely and suitable assurances about the potential future uses for the facility. This deferred a decision on any change.</p> <p>The policy is therefore not considered effective or justified and therefore unsound.</p>	<p>Clive</p> <p>1, 2, 3 and 4. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive. With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S17.2. Community Hubs: Wem Place Plan Area continued</p>	<p>Clive continued</p> <p>5. Clive Hub: support the designation of Clive as a Community Hub in the new Local Plan to encourage development which will sustain the level of village’s facilities into the future. Objections submitted on basis that the Hierarchy of Settlements for Clive is based on facilities that do not exist and will not open again, and that this takes the settlement scoring for Clive below the threshold for designation as a Community Hub are not correct. The village convenience store is a well valued, established, important and needed community facility. Insufficient evidence that loss of shop permanent to justify loss of points awarded. Despite Parish Council support for the current change of use application for reversion to private- still requires Council approval. Objection to the planning application on the basis that rather than an ‘A1’ retail use , it is a community facility under Class F2(a) of the amended Use Classes Order (2020), and loss of this important community facility is contrary to Core Strategy Policy CS8, and Paragraph 92 of the NPPF. For this reason, the Council have indicated that they will resist the loss of the village shop. The Council highlighted a requirement for additional information and in particular evidence of marketing (at the Council’s Cabinet meeting on 7 December 2020). Demonstration of lack of financial viability and marketing evidence however has not been provided with the planning application and given vacancy only since October 2020, scope for marketing would have been severely limited by the pandemic. It is understood that reasons for relinquishing lease were personal and that the business was successful and viable . A continuing need for the facilities has been highlighted by the pandemic.</p> <p>The bowling green facility can be privately owned and qualify as an open space. Whilst not currently in use, the bowling green has not been removed, is included within the Open Space Needs Assessment and removal would need to show this facility is surplus to requirements (in line Sport England advice) as well as meeting any other policy requirements. It therefore should not be deleted from the scoring. There is an additional facility Renshaw’s Field, a community owned asset in regular use which should be also be included as an outdoor sports facility which would contribute a further 3 points.</p> <p>No points are scored under the assessment for a public house, however Clive Hub on Back Lane in Clive village is bar and social club open to the public with (pre Covid19) regular opening hours and events which is treated by Clive residents as a public house. Additionally The Railway Inn ,Yorton (approximately 500 metres from the proposed development boundary of Clive) retains its public house sui generis use and is being renovated with the intention of marketing it for rent as a public house later this year. These facilities should be taken into consideration and appropriate points allocated.</p> <p>Whilst Clive has scored four points for community hall, due to the inclusion of Clive Village Hall the Clive Hub provides an additional facility so used as a community events & meeting place Any re-assessment of the scoring for Clive should also consider whether there is a need to include Clive Hub as a secondary community hall, which would add two points to the current score of four, giving six points overall for this category.</p> <p>The Council has undertaken extensive consultation in advance of publication of the Regulation 19 Draft Local Plan & it is sound and legally compliant. As a rural village with a large range of facilities Clive meets the criteria to be designated as a community hub. Inadequate justification for the evidence base relating to Clive’s designation as a Community Hub to be reviewed at this stage. Should re-assessment be required the following facilities should be taken into consideration :Convenience Store (4 points) ; Outdoor sports facilities to include the Bowling green (3 points) + Renshaw’s field outdoor sports field (+1 point);Clive Hub /Railway Inn as Public Houses (+ 4 points for both or +3 if Clive Hub is not counted); Community Halls to include Clive village hall (4 points) , + 2 points if Clive Hub counted. This could increase total points score from 54 to 61.</p> <p>Land East of Clive Hall: Identified site allocations (CLV012 & CLV018) for Clive will facilitate delivery of 20 dwellings , needing 18 dwellings to come forward as windfall infill sites, in addition to existing commitments to achieve 40 dwellings proposed for Clive. Land to the East of Clive Hall (as shown on plan provided) which is within the settlement boundary and more accessible to village services and facilities than the allocated sites is well placed to contribute to Plan housing requirements . As it is an even more suitable location for residential development it should be allocated to ensure delivery of the site.</p> <p>6. Consider proposed allocations CLV012 and CLV018 fail the 'justified' and 'effective' tests of soundness, as they are further from the railway station and village shop than CLV010 (previously preferred allocation) and cannot make the contributions to village infrastructure associated with CLV010.</p> <p>The justification for CLV012 and CLV018 rather than CLV010 within the site assessment relate to traffic through the village to access the A49 and access to services and facilities due to gradients. However, construction traffic through the village could be managed through condition requiring access of the A528 to the west and the gradient is very slight and CLV010 would also create a pedestrian footway along this length of Station Road, benefitting new and existing dwellings.</p> <p>CLV010 would also create a new footpath link to the existing public right of way (PROW) to the south of the village (intervening land owned by site promoter), providing residents with a largely off-road route to the railway station, school and village facilities (plan provided in representation) and would also provide hard surfacing to the element of the PROW between the school and CLV010. Land and the derelict Hilltop Cottages adjoining the school would also be made available to the school (it is currently physically constrained) as a contribution to community infrastructure and the sustainability of Clive (this is supported by school governors).</p>	<p>Clive continued</p> <p>5. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council’s published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement.</p> <p>6. Shropshire Council considers that the proposed development strategy for Clive and the proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocations have been informed by a proportionate and robust site assessment process.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S17.2. Community Hubs: Wem Place Plan Area continued	<p>Clive continued</p> <p>7. There are inaccuracies in the HoS. The current scoring within the Hierarchy of Settlements for Clive includes a bowling green as an outdoor sports facility and a local convenience store. Neither of these facilities exist following the closure of both the bowling green and the local convenience shop. The shop has now closed three times in recent years and has been shut for significant periods. It is clearly unviable as a convenience store. The Local Planning Authority has previously recognised that there is no bowling green as the facility now falls under a private residential dwelling. This was confirmed in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020). This should supersede the Open Space Needs Assessment 2017 as it is based on more up to date and comprehensive information. The Open Space Needs Assessment 2017 was a desk based update of data from 2009.</p> <p>The Local Planning Authority has acknowledged that it has received correspondence from both the Parish Council and the shop owner that the shop is no longer in use. This has been confirmed through a formal change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL). The Local Planning Authority were notified of these changes through the Regulation 18 consultation but no associated updates have been made to the Regulation 19 Plan, rendering Policy SP8 as unjustified and unsound.</p> <p>The Hierarchy of Settlements evidence base and Local Plan Policies are now based on inconsistencies which render them unsound.</p> <p>Revisions to the Hierarchy of Settlements evidence base over the Plan development has led to inconsistencies in the policy with the definition of Community Hubs continuing to be set out as ‘settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities’. The assessment criteria and associated threshold no longer require such facilities to be present. This is illustrated by the example of Clive which when assessed evidently doesn’t meet the criteria for a Community Hub in that it relies upon other settlements to meet many day to day needs such as employment and convenience goods. The Plan and Policy SP8 is therefore considered to be unsound as the methodology and application of associated evidence does not meet the intended definition of a Community Hub and overall settlement hierarchy needed to maintain overall sustainability and is therefore not justified.</p> <p>8. Objectively plots CLV012/018 provide fewer benefits to the village than plot CLV010. Therefore the plan is not sound as it is not justified. The reasoning behind changing sites is factually incorrect or not significant. CLV010 is a better site.</p> <p>9. Clive should be a Hub - The PC are suggesting that the bowling green should not be included in the HoS as an area of open space/outdoor recreation as the notice had been served to vacate the premises. However, the residents of Clive have the enjoyment of Ravenshaw’s field, with is an area of open space in the centre of the village. This land was purchased by the village residents and paid through an increase in council tax. It is currently run by a group of volunteers from the village (the Ravenshaw’s Field Association) and is available for hired events. It is used regularly by the local school for P.E and sports day and has 2 full-sized goalposts for anyone to play at any anytime – access is unrestricted. This facility clearly represents both an amenity green space and outdoor sports facility. Yet the Parish Council make no mention of this within their submissions. The convenience store remains as A1 retail use. Since the consultation on the Issues and Strategic Options Consultation, the former Clive Village Club has been set up as a Village Hub. This has a fully licenced bar, full-size snooker/billiards table, pool table, darts and dominoes. It is also available to book for private events/functions. The Hub holds quiz nights, bingo evenings, live music and private functions (when able to do so and restrictions permitting). This is a clear community facility that offers an array of services and supports the local and wider communities, further points should be awarded on this basis. There are also many small businesses in Clive, including 2 car repair garages. If Clive was to be dropped from Hub status, so too would all the settlements below it, a total of 17 further settlements being dropped to ‘other rural settlements’.</p> <p>10. The settlement comprises three cluster of development north, south and central all of which contribute to the services and welfare of the community. They are all linked by the same A49 highway and the same foot path. In terms of physical compactness and visual appreciation they are little different and certainly no different to warrant excluding the Northern Cluster from the settlement for an allocation for housing development . This is irrational and unsound.</p> <p>11. The Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board.</p> <p>Despite members of the community having concerns over the appraisal of the services and facilities afforded Clive, in assessment of the hierarchy of settlements, the status of Clive as a Hub is appropriate, reflective of the range of services and facilities afforded. As a Hub only a modest amount of future managed growth will be allowed, securing much needed community infrastructure, protecting the village from speculative inappropriate development via. the proposed settlement boundary.</p>	<p>Clive continued</p> <p>7. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to those Community Hubs proposed in the Wem Place Plan Area.</p> <p>8. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement.</p> <p>9 and 11. Noted.</p> <p>10. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement. The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S17.2. Community Hubs: Wem Place Plan Area continued</p>	<p>Hadnall</p> <p>1. Strongly support designation of Hadnall as a Community Hub, this is vital to ensure the village's long-term future. However the proposed residential guideline fails the 'justified' and 'positively prepared' tests of soundness.</p> <p>-Hadnall has a strong relationship to Shrewsbury (recognised within para 5.248 of the draft Shropshire Local Plan) and as such has significant potential for rural growth socially and economically. It is also located on the A49 strategic corridor (the draft Shropshire Local Plan proposes to prioritise investment in strategic locations and growth zones along strategic corridors), but the proposed residential guideline fails to reflect this.</p> <p>-The proposed residential guideline, excluding the 73 commitments, equates to just 3 dwellings per annum which is unjustifiably low for a well located, sustainable village. Also, as the capacity of the proposed allocation is 40 dwellings, the windfall allowance is just 13 dwellings.</p> <p>-The overall housing requirement for Shropshire is too low (see A0355 B001), Hadnall is ideally located to help meet the County's housing needs.</p> <p>-Previous experience shows incremental growth/single allocations fail to deliver much housing or significant changes to sustainability. A longer term strategic approach is required for transformational change (long-term plan for Sansaw Estates thriving business park is an example). A long-term vision for Hadnall (set out in an Appendix to the representation) has been ignored by the draft Shropshire Local Plan. As such, the draft Shropshire Local Plan fails to deliver significant improvements village sustainability and is not 'positively prepared' or 'justified'. Sites HDL012 and HDL014 are centrally located and can contribute to the vision set out in the Appendix to the representation. Both scored 'good' within the Council's sustainability appraisal (HDL014 scored higher than proposed allocation HDL006). Whilst the site assessment that informs the draft Shropshire Local Plan shows HDL014 has no major problems and was only discounted due to a preference for HDL006; and there are no technical reason why HDL012 cannot be allocated (highway information with the assessment is now out-of-date, as the highway authority has since undertaken work to the A49 that resolves the drainage issue).</p> <p>2. Fully support Hadnall's status as a Hub and site HDL006. I would also like to see HDL013 and HDL016 included within the development boundary.</p> <p>3. The preferred site for the Pre-Submission Draft of the Shropshire Local Plan for Hadnall (Wem area) has identified the site HDL006. I believe that this decision is unsound because there are other sites which are more appropriate as defined in the sustainability appraisal which have scored considerably higher and therefore should be placed as a priority over the site HDL006. For example the chosen site HDL006 has scored -1 where sites HDL0017 and HDL018 have scored +2 and +1 respectively. I also add that due to the scoring being so close, the difference of 3 points in real terms is statistically significant, and should as such be apportioned appropriately. Appraisal scores identified the "Range" of scores green colour code as a positive and white as zero, with amber being given with a negative score. Again how can a negative amber site have precedence over a green positive score site? This decision is not sound.</p> <p>4. Plans presented in the Pre-submission Regulation 18 and subsequent Pre-submission Regulation 19 Drafts of the Shropshire Local Plan provide no such protection and leaves unnecessary ambiguity in areas where further development would be inappropriate. The plans presented at these stages do not resemble the plans presented to the public throughout the various consultation phases prior to the Reg 18 and 19 stages. No explanation has been provided to why plans were changed at such a late stage of the development of the Local Plan. Shropshire Council declared Hadnall a Hub using the Hierarchy of Settlements methodology. Shropshire Council also stated that Hadnall was "in the third quarter of the list of 43 community hubs". The third quarter by Shropshire Councils definitions aims for 25% less development than the average 112 dwellings required in each rural area identified as a Hub. Using Shropshire Councils own figures and methodology the plan could be challenged as unsound as Hadnall should have been allocated 25% of 112 and therefore 84 dwellings not the current 125 allocated. Following this logic Hadnall would be required to build a further 11 dwellings to meet their own narrative which can be met by Windfall/infill/conversion.</p> <p>The preferred site in the Plan is not the preferred site locally. Alternative sites to the W and E of the village allow for a more practical and planned growth of the village. The proposed allocation was previously refused by an Inspector, and the PC concurs with the Inspector's conclusions. There is significant and historical flood risk. The access to the A49 is poor and this area of road is dangerous.</p> <p>Initial discussions with Shropshire Council during the early stages of consultation indicated that an even longer term strategic intent for the future direction of growth beyond the life of the plan could be developed (as indicated in the Local Plan 2016-38 Key shown on page 2 of the Wem-place-plan-area-inset-maps).</p> <p>Despite this initial early consultation and objections to SC's preferred site no changes to the preferred site or inclusion of strategic intent has been forthcoming.</p>	<p>Hadnall</p> <p>1. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council considers that the proposed development strategy for Hadnall and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocation have been informed by a proportionate and robust site assessment process.</p> <p>2. The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period.</p> <p>3. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement. The scores outlined in the SA are not the determining factor when deciding on a preferred site for allocation. Rather, it is a combination of many more factors, which includes expertise from those in areas such as Highways, Ecology, Public Protection etc. to ultimately determine the most appropriate site for an allocation.</p> <p>4. The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period. There have been numerous consultations throughout this Local Plan Review, and amendments have been made between each of these based on the most recent and reliable information available. This can either reinforce Shropshire Council's stance on a site, Development Boundary etc. or ultimately result in changes being made.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S17.2. Community Hubs: Wem Place Plan Area continued	<p>Hadnall continued</p> <p>5. The Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board. As a Hub only a modest amount of future managed growth will be allowed, securing much needed community infrastructure, protecting the village from speculative inappropriate development via. the proposed settlement boundary. Owing to the amount of services and facilities available within Hadnall and in assessment with the hierarchy of settlements, the status of Hadnall as a Hub is appropriate and reflective of the range and services.</p> <p>6. Support site HDL006 and the Development Boundary.</p> <p>7. I fully support Hadnall PC's endorsement of HDL006 as the preferred site and the Hub status. I believe that the consultation with the PC has been sufficient and they have been afforded the opportunity to respond to the pre-submission draft but chose instead to respond individually to represent their own personal interests.</p> <p>8. Support Hadnall Parish Council's endorsement of HDL006 as the preferred site and adoption of Hadnall as a Community Hub. Would also like to see HDL0013 & HDL016 included within the development boundary.</p> <p>9. As Hadnall has been proposed as a Community Hub, we believe this site to have significant potential, particularly as we can confirm this is a fully deliverable site with an area of 1.94 ha to deliver housing towards the preferred dwelling guideline of 125 dwellings, of which 52 remain to be identified. We believe HDL015 to be the most suitably placed to provide further parking to the Hadnall School, plus land suitable for a multipurpose sports centre, which the owner of the site has confirmed he would be pleased to make as a donation to the community subject to a review of the requirements of the school and the capacity needed (Please note: 1/3 an acre could provide up to 50 parking spaces). This land is the nearest available land to the school for car parking and providing a pavement, with access via Astley Lane. Therefore, there will be no requirement for a new access or pedestrian walkway on the very busy A49. This will provide a much safer route to the school for the children and parents than HDL006 which provides a potentially dangerous pedestrian route along the side of the busy A49.</p>	<p>Hadnall continued</p> <p>5, 6 and 7. Noted.</p> <p>8 and 9. Noted. Shropshire Council considers that the proposed development strategy for Hadnall and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocation have been informed by a proportionate and robust site assessment process. The proposed development boundary is also considered appropriate.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S17.2. Community Hubs: Wem Place Plan Area continued</p>	<p>Shawbury</p> <p>1. The groundwater is relatively shallow within the superficial deposits and there are a number of ponds/spreads, springs and watercourses in the vicinity. There is the potential for contamination issues associated with adjacent land uses which should be considered prior to development. Mains foul drainage should be adopted and the surface water drainage should also be carefully designed as there are a number of private water supplies in the immediate vicinity.</p> <p>2. Support reference to the need for noise from defence activities to be appropriately managed and requirement for engagement with the MOD as part of production of an appropriate noise assessment in the site guidelines for SHA019 - changed from an earlier draft. Also welcome and in principle support para 5.250 of the explanation to draft Policy S17.2. However, consider it needs to be amended to ensure clarity and factual accuracy. Also concerned this para only relates to development in the village and the designated safeguarding zones. In practice, sensitive development can still be impacted by noise from defence activities outside of these areas - see comments on draft Policy DP18.</p> <p>3. SHA012VAR is a well located and fully deliverable site with an area of 3.84 ha. We believe this site is suitably placed to provide development in the Community Hub of Shawbury towards the target of dwellings by 2038, being situated with an established access to the A53 and adjoining developed land. Shawbury is a thriving Community Hub with local facilities such as shops, public house, post office, medical centre and a school.</p> <p>4. False promises have been made relating to the recent development adjacent to SHA019. This was scheduled to be 50 houses maximum. Residents have been misled on historic developments. SHA019 has flood issues. Problems with the sewage systems in this area. Ecology and wildlife in this area needs protecting. Dangerous for pedestrians if roads are built around the PROW. There is a possible conflict of interest in relation to the agent, the landowner and his family and their planning backgrounds.</p> <p>5. Support for proposed allocation SHA019 - supported by initial plans (illustrating the site area, two phases, access, indicative layout including open space, and management of identified constraints including drainage) and technical assessments for the site. As the only proposed allocation in Shawbury anticipate that Phase 1 of the site will be developed for up to 40 dwellings and Phase 2 for up to 40 dwellings. The land is available, viable and deliverable and will be brought forward at the earliest opportunity. The site is confirmed as meeting the conditions (including landowners wishing to sell) for being available for development. The site will be made available for development when formally allocated. It is anticipated that the sites will come forward in the 'Short Term' (2020 to 2025) with completion in the 'Medium Term' (2025 to 2030). Specific comments on the details of the development:</p> <ul style="list-style-type: none"> -Part b) of Policy DP1 Residential Mix will apply as no RHRP Local Housing Need Survey for Shawbury. Affordable housing requirement of 10% through mix of affordable rent/discounted sale/shared equity etc determined in consultation with the provider and Shropshire Council. -CIL payment requirement is identified. -Arrangements for appropriate vehicular access via A53 roundabout and through Oaklands Park & protection of Bus Turning/Parent Parking Facility are confirmed. -Development Guideline for footpath links are identified and routes of proposed footpath link shown on submitted aerial imagery extract. -It is suggested that the strategic area of open space could be alongside open space within existing Lioncourt 'Oaklands Park' Development with localised areas of open space within the allocated site area. -Confirmation that the layout and design of the properties close to the site will respect the identified heritage assets, although it is expected that the built development will be a significant distance from these structures. -Aerial imagery extract shows trees and hedge lines & indicates that although elements of the internal hedge lines will be lost to provide access routes within the site but the remainder should be accommodated within the development of the site wherever possible. -Accommodation of Anaerobic Digester standoff distance of 175m can be accommodated. -Arrangements for foul and surface water drainage referencing site guidelines and agreed assistance (with £30, 000 allocated) in improving culvert related flood problems are set out (including detailed Plans of Shropshire Council agreed drainage works). -Noise considerations are detailed. -Measures to protect the amenity of the neighbouring properties are set out. -Availability of services detailed. 	<p>Shawbury</p> <p>1. Local Plan policies cover the issues raised. No change proposed.</p> <p>2. Noted. For clarity of the relationship between RAF Shawbury and Shawbury, a minor modification is proposed to the explanation of this policy.</p> <p>3 and 4. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement.</p> <p>5. Noted.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S17.3. Community Clusters: Wem Place Plan Area	<p>Grinshill</p> <p>1. Grinshill Parish Council wishes to re-affirm its requirement for Grinshill to become an independent Community Cluster. This is in line with our aspirations to maintain or enhance sustainability through modest levels of appropriate development.</p> <p>2. There is insufficient justification for Grinshill village having ' Community Cluster ' status. The following points support this removal :-</p> <p>The Government has placed a presumption in favour of sustainable development at the heart of its approach to planning (NPPF).</p> <p>Further new residential development in Grinshill would not be sustainable because the village is not served by any safe and accessible public transport. There is no village shop or public house to sustain. More residential development in Grinshill would conflict directly with the stated climate change aims of SP3 (there is no public transport serving Grinshill or to link or integrate with).</p> <p>In 2015 when the residents were asked for their views on future village priorities as part of the Grinshill Parish Plan review, only 3 out of 60 returned responses wanted to extend the village boundary. During the Local Plan preparation period Grinshill village was linked with the nearby larger Clive settlement to justify a Community Cluster designation for Grinshill, with Clive being proposed as a Community Hub. More recently Clive has permanently lost two key community facilities (village shop and bowling green) which results in Clive not meeting the definition of a significant rural service centre. Without this nearby Community Hub the justification for Grinshill becoming a Community Cluster is further reduced. The Neighbourhood Plan process should be used to determine if the residents of Grinshill want Community Cluster status for their village.</p>	<p>Grinshill</p> <p>1. Noted.</p> <p>2. Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. As such, it is considered appropriate for Grinshill to be identified as a proposed Community Cluster.</p>
S17.4. Wider Rural Area: Wem Place Plan Area	N/A	N/A
S18. Whitchurch Place Plan Area	See S18.1-S18.4	See S18.1-S18.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S18.1. Development Strategy: Whitchurch Principal Centre</p>	<p>Whitchurch</p> <p>1. Two doctors surgeries have already closed, the primary school is at full capacity and expansion has been repeatedly delayed. Public transport serving Whitchurch has continued to decline over the last several years, with reduced services and reliability. There are no published plans to improve public transport, both rail and bus services continue to be reduced. With reference to “existing access to health, leisure, recreational and cultural activities.” - as stated above ‘health care’ is already stretched with access to hospitals and emergency services severely compromised following the closure of the ambulance station and paramedic capacity compromised: leisure and recreational activities limited (in particular for young people with the decrease in youth provision) and cultural activities few and far between e.g. the nearest cinema is 12 miles (Wrexham). Therefore, the statement “this level of growth is likely to minimise the need for additional car-based transport” is misleading. The statements in the review indicating that this situation is likely to be maintained or improved should be clarified and changed to reflect the correct situation regarding these important areas which are indicated as highly likely to continue to degrade. It is also highly likely that car based transport will increase in line with further developments and not be 'minimised' to any degree as stated.</p> <p>2. Concern over SAMDev sites: Tilstock Road site and Alport Road sites have not started and account for 600 dwellings. We contend that the Council should look at other sites particularly MPG’s site at Tarporley Road.</p> <p>3. Whitchurch has been identified as a Principal Centre with three site proposed for allocation. As a Principal Centre, consider a broader portfolio of sites should be identified for allocation in order to maximise housing delivery, ensure achievement of the housing guideline and offer the widest possible range of dwellings. Have previously promoted land in Whitchurch (plans appended to this representation) which provides scope for delivery of housing and it appears the Council has not given sufficient consideration to the benefits of this site. It has the potential for access from the bypass thus avoiding adding congestion onto roads in the town, it is within walking distance of a range of local services and facilities and there are also a range of facilities and services proposed for the site (including medical facilities, leisure and recreation).</p> <p>4. Support identification of Whitchurch as a Principal Centre and the town acting as a focus for significant development over the plan period. Support allocation of WHT014 for 70 new homes. The site is suitable, available, achievable and therefore deliverable (promoters committed to its development early in the proposed Plan period and intend to submit a Planning Application upon adoption of the Local Plan, delivering 50 dwellings per annum), sustainable, complements the proposed spatial strategy and can be delivered in line with aspirations contained in the draft Policy. Refreshed illustrative Masterplan and visuals prepared (Appendices to this representation) show how the site could be developed in a manner than avoids adverse impacts, complies with the draft provisions set out in Schedule S18.1(i), whilst maximising the efficiency of the site to deliver the balance of the allocation. The site is not subject to any technical, physical or environmental constraints that would prevent its development:</p> <ul style="list-style-type: none"> -Consideration of past Planning Applications on the site established access onto Liverpool Road was acceptable and no wider issues arose on the road network requiring mitigation, whilst additional highway work shows principal accesses are deliverable and opportunities exist to support pedestrian/cycle connectivity. -Updated ecology work shows there are no fundamental ecological constraints as the site is dominated by poor semi-improved grassland with species-poor hedgerows and fencing field boundaries and that Great Crested Newts are not present in nearby ponds. -Consideration of past Planning Applications on the site did not raise any heritage concerns (Whitchurch Conservation Area is some distance away). <p>Object to omission of part of WHT046 (plan and visuals showing proposed allocation WHT014 and part of WHT046 provided as appendices to this representation). This land is deliverable; free from any technical, physical or environmental constraints; provides the potential to 'round off' proposed allocation WHT014; could be developed alongside WHT014 in a comprehensive manner (green infrastructure, highway etc); would improve the overall layout of these developments and allow efficient use of land; and provide around 30 additional dwellings. The site is enclosed on two sides by proposed allocation WHT014 and another by properties fronting Alkington Road. If additional housing land is required to meet cross-boundary needs, sites adjacent to proposed allocations should be considered.</p> <p>Concerned about deliverability of existing allocations WHIT009 and WHIT021 (capacity for 600 dwellings). Both sites have Planning Permission but neither are being developed to meet needs. As such consider additional sites and land in Whitchurch should be identified in order to provide a buffer and ensure that the housing requirement for the town is met. Part of WHT046 presents a sensible way to do this.</p> <p>5. Too much reliance on windfall for Whitchurch. The LVSS identifies the south of the settlement as having the lowest landscape and visual sensitivity for housing development. WHT022 has a Good SA score. A recent (withdrawn) application addressed the concerns on the site relating to ecological features.</p>	<p>Whitchurch</p> <p>1. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP28 addresses transport.</p> <p>2, 3, 4 and 5. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S18.1. Development Strategy: Whitchurch Principal Centre continued</p>	<p>Whitchurch continued</p> <p>6. Oppose proposed housing allocations in Whitchurch, as more appropriate and sustainable alternative sites (such as WHT035) exist. WHT035 is suitable, available and viable. It has clearly defined boundaries, has no overriding constraints to development and benefits from direct access onto Tarporley Road, and can help deliver the housing needs of Whitchurch and would represent sustainable development. Consider suitability of WHT035 has been overlooked and the strategic land availability assessment (SLAA) and wider site assessment process is flawed. The site assessment concludes WHT035 is divorced from the town, but this is incorrect as it is adjacent to the well-established Grove development, would represent a natural extension of the town and is in proximity of current and proposed allocations. Given this, it is clearly a sustainable location, benefits from direct and convenient access to services and facilities in the town centre and would help promote use of sustainable modes of transport. Indeed, its sustainability is confirmed within the Sustainability Appraisal (SA) of the draft Shropshire Local Plan which rates the site 'fair', with a better score than proposed allocations on Chester Road. Note a local Cllr has raised significant infrastructure concerns in relation to proposed allocations WHT037 and WHT044. Given these concerns, clear there are underlying issue which have not been properly considered in relation to proposed allocations. WHT044 was also rejected in the SLAA due to poor relationship to the existing built form/separation from the development boundary and WHT037 is dependent on WHT044 for access. Note this is a joint allocation, but it is difficult to see how this improves suitability given each sites failings. WHT042 is landlocked and requires the adjacent allocation to be developed first, before it can be considered available and its deliverability is questionable. As such consider the draft Shropshire Local Plan is unsound.</p> <p>7. The draft Shropshire Local Plan is unsound as it fails to fully address surface water flooding and concentrates the sequential test on fluvial flooding, to the extent that the sequential approach to surface water flooding has been missed. As such, do not consider that the flood risk sequential test adequately (in line with National Planning Policy Framework (NPPF) policy and guidelines) considers all sources of flooding, including surface water.</p> <p>Proposed allocations WHT037 and WHT044 are unsound. Whilst these sites are not located in flood zones 2 or 3, they suffer from considerable surface water (pluvial) flooding. This is evidenced in:</p> <ul style="list-style-type: none"> -The Environment Agency surface water flooding map (extract appended to representation) which shows a sizeable area of high surface flood risk in the central area of the two sites and along the watercourse that skirts around the Grove Estate on Tarporley Road; -Photograph of past flooding (appended to representation); -Site geology; -Written evidence from 30+ local households (within the Regulation 18 consultation); -Local knowledge as this area is recognised as being very wet; and -Past flood events in the area, exacerbated by recent construction. Development causes concentration of water which previously percolated into the ground, which is surfacing at lower level weak points and inundating homes and gardens. <p>New development sites at Oak Tree Way and the Beeches (adjacent to WHT037 and WHT044), have caused flood issues. An outstanding application (18/02583/FUL) validated in July 2018 remains for construction of storm drainage on Oak Tree Way, comments on this application document the major flooding problems residents in the Chester Road area experience, but the developer has sold all associated plots and moved on.</p> <p>Do not want existing problems to be further exacerbated by development. No comfort in proposals to include appropriate sustainable drainage as they don't work well, even if they happen, and result in ongoing issues once the developer has departed as per Oak Tree Way and the Beeches. The developer should be required to demonstrate necessary investigations and modelling has occurred and WHT037 and WHT044 are suitable for development during examination, rather than the local Councillor and residents arguing the case to prevent increased flood risk to existing properties.</p> <p>Page 61 of the level 1 Strategic Flood Risk Assessment (SFRA) recognises the surface water flood risk associated with runoff from high-ground to the unnamed watercourse which flows into Grindley Brook - this is the Chester Road area associated with WHT037 and WHT044. Awaiting a response to a Cabinet Question on infrastructure and facility deficiencies in Whitchurch. As such, reserve the right to produce further information evidencing deficiencies of infrastructure and utilities to sustain new development in Whitchurch.</p>	<p>Whitchurch continued</p> <p>6. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>7. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity. The Council considers that the risk of flooding from all sources has been adequately and appropriately assessed through the Strategic Flood Risk Assessments (Stages 1 and 2) and that the Sequential and Exception Tests (based on the SFRA-1 and SFRA-2) are compliant with national planning policy and guidance. We would also note that neither the Environment Agency or Welsh Water have objected to this proposed allocation.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S18.1. Development Strategy: Whitchurch Principal Centre continued</p>	<p>Whitchurch continued</p> <p>8. Consider the proposed housing allocations in Whitchurch are inappropriate, do not represent the most suitable or sustainable options for Whitchurch and are unsound. As such, the draft Shropshire Local Plan does not meet the principles/requirements of draft Policy SP1 or the principles of sustainable development prescribed by the National Planning Policy Framework (NPPF) and is unsound.</p> <p>Also consider there is a lack of consistency in the Council's approach to assessing suitability of the sites and identifying proposed allocations and the site assessment process is poor and vague. For example:</p> <ul style="list-style-type: none"> -Consideration of landscape/visual impact provides no explanation of the assessment, reaches inconsistent conclusions for sites and includes no recognition of site boundaries. -WHT042 is landlocked and requires the adjacent allocation to be developed first, before it can be considered available and its deliverability is questionable. It is also in close proximity of Staggs Brock Wildlife site and in flood zones 2/3 - it is difficult to see how the Council have determined these issues can be mitigated, particularly as a similar approach is not take within WHT017VAR. -A local Cllr has raised significant infrastructure concerns in relation to proposed allocations WHT037 and WHT044. Given these concerns, clear there are underlying issue which have not been properly considered in relation to proposed allocations. WHT044 was also rejected in the SLAA due to poor relationship to the existing built form/separation from the development boundary and WHT037 is dependent on WHT044 for access. Note this is a joint allocation, but it is difficult to see how this improves suitability given each sites failings. WHT037 and WHT044 is proposed for allocation despite the need for further highway assessment and part of the justification is a link between Chester Road and Tarporley Road, which is considered unnecessary as both routes are directly into town. This brings into question wider reasoning. <p>Site WHT017VAR is appropriate, suitable, available, viable and developable. It benefits from good access to services and facilities and the town centre, an appropriate access can be established, flood risk (identified as a concern within the site assessment process) is assessed and can be appropriately managed (access and sustainability appraisal and flood risk assessment for the site is appended to the representation), and it provides an opportunity to expand and restore the environmental network and has clearly defined boundaries. It represents a more sustainable and suitable housing allocation to meet the needs of Whitchurch than proposed allocations. The Sustainability Appraisal (SA) of WHT017VAR is incorrect scores for presence of tree preservation orders; access to a leisure centre and natural green space; presence of grade 1/2/3 agricultural land; and being in flood zones 2/3. The SA fails to consider access to essential goods and local shops. With these scores corrected it is a more sustainable site than the proposed allocations. WHT017VAR also scores comparably with the proposed allocations within the highway accessibility ratings. As such it is considered clearly a better and more sustainable housing option.</p> <p>Consider the proposed windfall allowance for Whitchurch is too high and there is no guarantee it will be delivered. This could be reduced by allocating WHT017VAR.</p> <p>9. Support proposed allocation of WHT037 and WHT044 for residential development. The site is available, deliverable and will come forward for development, at the first opportunity (site investigations have been undertaken, including ground investigation tests, arboriculture surveys, ecology, highways and drainage assessments in readiness for a full Planning Application in 2021). Promoter has a track record of delivery. The site forms a logical extension to the now completed WHIT046 site and will make a positive contribution to meeting the identified housing need for Whitchurch.</p> <p>However, consider the draft Shropshire Local Plan is unsound as site capacities are expressed in terms of 'Provision' (in the case of WHT037 and WHT044, 200 dwellings). Consider this should be expressed as a minimum, otherwise it has the potential to jeopardise housing delivery (and meeting housing need) and there is a realistic possibility that allocated sites could be developed at low densities which would not represent effective use of land. As currently expressed, the draft Policy is considered contrary to section 11 (paras 117 and 122) of the National Planning Policy Framework (NPPF) on making effective use of land.</p> <p>WHT037 and WHT044 has capacity to accommodate more than 200 dwellings, whilst complying with other Local Plan policies such as open space provision, sustainable drainage and habitat enhancement. As such, the provision should be a minimum of 200 dwellings, to ensure efficient use of land and maximise the prospect that the objectively assessed housing need will be met.</p> <p>10. Support the sites allocated for development on the Policies Map for Whitchurch - WHT014, WHT037, WHT042 and WHT044; and those saved and continued from the SAMDev.</p> <p>11. The plan proposal for Whitchurch is considered sound and logical, with site WHT042 providing a logical rounding off of the settlement alongside delivering the adjacent Employment site.</p> <p>12. Historically little development had occurred in this part of Whitchurch (around WHT044), but 4 schemes have occurred in the last 6-7 years, which is why the site is now described as infill. Rather it is loss of remaining fields and hedges. WHT044 is subject to groundwater issues which have caused problems for properties and damaged roads. Significant development has occurred in Whitchurch over the last 25 years and 500 dwellings at Tilstock Road is underway after delay. Brownfield sites such as Mile Bank Creamery should be prioritised. Given extent of approved development, see no need for WHT044.</p> <p>13. The site at Hill Valley Golf Course should be included.</p>	<p>Whitchurch continued</p> <p>8. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity. Shropshire Council also considers that the Sustainability Appraisal (SA) of the draft Shropshire Local Plan is appropriate and robust.</p> <p>9. Noted. Para 6 of Draft Policy S18.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage. With regard to the efficient use of land, Shropshire Council would note that draft Policies SP1 and SP5 specify development should make efficient use of land. Furthermore draft Policy DP1 specifies a residential mix for sites of 5 or more dwellings which will contribute to ensuring efficient use of land. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity</p> <p>10 and 11. Noted.</p> <p>12 and 13. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S18.1. Development Strategy: Whitchurch Principal Centre continued	<p>Whitchurch continued</p> <p>14. The public sewerage network can accept the potential foul flows from the proposed development site. The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.</p> <p>15. WHT014 should be retained as the area is already densely populated. The greenfield site is good for mental & physical health. Traffic problems exist here.</p> <p>16. Inclusion of land at Liverpool Road, Whitchurch, (WHT014) for the provision of 70 dwellings is unsound for the following reasons:- If this development goes ahead an extra 100 vehicles may use Wrexham Road twice a day during the rush hours. This highway is extremely narrow and due to off street parking is limited to single lane traffic. The consequent stopping, starting and reversing of vehicles causes delays, frustration to motorists and creates much pollution to pedestrians and residents, where dwellings are situated close to the highway, many of which have their ground floors lower than the road. Pollution in the UK exceeds the WHO recommended levels according to research carried out for Asthma UK. Data released by the House of Commons Library states that Whitchurch, Shropshire has the highest rate of Asthma incidents in England with 9.3 per cent of the population registered with this condition compared with a national average of 5.9 per cent.</p> <p>17. Unsound – Both these sites WHT037 and WHT044 were not included in the original Local plan which was not signed off within the original time frame. Therefore why have the areas, which were originally deemed too wet and prone to flooding, now been considered for development. There have been serious sewage issues at The Brambles and The Mount estate off the Tarporley Road. Development should not be allowed to take place when it causes increased run off and flooding of existing properties, as has occurred on Chester Road, as a consequence of Oak Tree Way and The Beeches being built.</p> <p>18. These sites will cause over-development of the area. The sites have flood issues. Habitats on site.</p> <p>19. This site continues the new housing that has been built in this part of town. Like WHT037 and WHT044 it is very well situated for the town centre. It makes perfect sense to continue to build houses on Liverpool Road. WHT014 is far more sustainable, both in terms of access to services and shops, and has less impact on things like roads and landscape than alternative options. The Council is correct to allocate WHT014 and I support it.</p> <p>20. The public sewerage network can accept the potential foul flows from the proposed allocation. Welsh Water will seek to control the points of communication to the sewerage network via appropriate planning conditions as such there would be a requirement for off-site sewers to be provided to the boundary of the development site. The sewers can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.</p> <p>21. These sites will continue the successful housing development that has already taken place around them. They are very well located and genuinely within walking distance of the town centre, including Sainsbury's which is only a few minutes away. I therefore support their allocation.</p> <p>22. Support and press for the retention of the allocation of sites WHT037 and WHT044. The site lies within a highly sustainable location close to Whitchurch town centre and its services and facilities. It is on the built up edge of Whitchurch and sits comfortably within the existing pattern of development. Opportunity for access to serve WHT044 from B5395 road frontage & for WHT037 via WHT004. Note 'Development Guidelines' suggest that there should not be a link between Chester Road and Tarporley Road The highway network is capable of accommodating the development proposed. Acknowledging local concerns raised regarding the issues of drainage around the site the response details drainage requirements, investigations & drainage solutions available including main sewer connection, SUDs and alternatives. It also confirms that drainage issues will be the subject of detailed assessment at the planning application stage and will fulfil the criteria within Building Regulation Approved Document H (extract provided) , NPPF and Local Plan Policy CS18 . The land is available, viable and deliverable and will be brought forward at the earliest opportunity. The site is confirmed as meeting the conditions (including landowners wishing to sell) for being available for development. The site will be made available for development when formally allocated. It is anticipated that the sites will come forward in the 'Short Term' (2020 to 2025) with completion in the 'Medium Term' (2025 to 2030).</p> <p>23. The settlement boundary of the town has been amended to accommodate the allocations WHT037 and WHT044 along Chester Road which form a logical extension to the settlement. The site lies off the B5395 (formerly an A41 trunk road). The highway network is capable of accommodating the development. However, the position of the site access should not prejudice the longer term development of site WHT043 on the opposite side of the B5395. Ideally the two sites would be accessed from a roundabout which would also provide traffic calming. It is requested that the Development Guidelines be amended to ensure the land to the west is not sterilized.</p>	<p>Whitchurch continued</p> <p>14. Noted.</p> <p>15, 16, 17 and 18. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>19, 20, 21 and 22. Noted.</p> <p>23. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity. The draft site guidelines for proposed allocation WHT037 & WHT044, including those relating to highways, are also considered appropriate.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S18.1. Development Strategy: Whitchurch Principal Centre continued</p>	<p>Whitchurch continued</p> <p>24. A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.</p> <p>25. This site is very well located by the railway station and to the jobs around Waymills. This combination delivers sustainable development. Both the station and industrial estate are walkable, as is the town centre along Station Road into Green End. This site is far superior to other options that the Council has quite correctly rejected for failing to deliver sustainable development. I therefore support its allocation.</p> <p>26. Support proposed residential allocation WHT037 & WHT044. They represent a logical solution to meeting housing need at Whitchurch; the adjoin residential development on existing SAMDev allocation WHIT046 (natural second phase/extension and complementary to this site); they are accessible to existing transport networks, local facilities/services; and are a sustainable location for residential development. A Vision Document/Concept Plan form an appendix to the representation and demonstrate site suitability and how the site can sustainably and comprehensively developed meeting housing needs and also providing appropriate connectivity, landscaping, open space & sustainable drainage technologies to prevent flooding. The site can be delivered early in the proposed Plan period. However would welcome the following minor amendments:</p> <ul style="list-style-type: none"> -Increase the proposed capacity from 200 dwellings to 215 dwellings (reflecting strategic objectives of the draft Shropshire Local Plan, the sites sustainable location and that this can be delivered whilst also meeting policy required open space/biodiversity mitigation) It would also increase effectiveness and alignment with the National Planning Policy Framework (NPPF) and provide greater certainty about housing land supply (reducing reliance on windfall). -Query guideline related to quality, design, mix and layout as there is no assessment of impact of different housing mix provisions on viability, a consistent theme in Planning Appeal Decisions regarding Planning Authority attempts to impose a housing mix on market dwellings. There is also no reference to demand, a key component of housing provision. <p>Remaining development guidelines are in line with proposals submitted to date and supported. Detailed requirements should be informed by additional site specific evidence as part of the Planning Application process.</p> <p>Comments on other policies relevant in the site-specific context.</p>	<p>Whitchurch continued</p> <p>24. Noted. The Council expects hydraulic modelling to be carried out by the developer at the planning application stage and assessed through the Development Management process. Information on capacity of the Whitchurch WwTW is welcomed (see also Statement of Common Ground with Dwr Cymru Welsh Water).</p> <p>25. Noted.</p> <p>26. Noted. Para 6 of Draft Policy S18.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.</p> <p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>The draft site guidelines for proposed allocation WHT037 & WHT044, including those relating to residential mix, are also considered appropriate. Furthermore, the draft Shropshire Local Plan should be read as a whole. Draft Policy DP1 specifically addresses residential mix.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S18.1. Development Strategy: Whitchurch Principal Centre continued</p>	<p>Whitchurch continued</p> <p>27. Whitchurch is a highly sustainable settlement which benefits from a range of facilities and services and sustainable travel connections to strategic settlements such as Shrewsbury and Crewe. It also has the potential to take advantage of the arrival of HS2 in Crewe and associated economic and housing growth expected to be generated. Consider Whitchurch is capable of accommodating a higher level of development and as such that the proposed development guideline for the settlement should be increased.</p> <p>28. Areas to the west of Whitchurch are particularly sustainable to accommodate new development, but there is a lack of proposed allocations in this area. Site WHT026 is available (site is in single ownership with willing landowner); suitable; viable; deliverable; sustainable for residential development (specific reference to draft Policy SP1); deliverable in the short/medium term; compatible with surrounding uses and could integrate into the area; well related to the town centre, local shops and services; served by sustainable modes of transport; and offers the opportunity to provide a range and mix of good quality family and affordable dwelling. There is scope to improve the sustainability and connectivity of the site to further improve its sustainability.</p> <p>None of the Council’s assessments of the sites have identified technical or environmental constraints that would prevent development. Proposal has also been informed by a development framework and technical assessments including ecological, Transport Statement, a preliminary Flood Risk Assessment (FRA) and drainage strategy which demonstrates absence of known ecological, highway, flood constraints that would prevent site development and demonstrates how development of the site could integrate into the wider area and provide a range of sustainability benefits, including pedestrian and cycle connections & climate change adaptation and mitigation measures. The site has been previously recognised as a suitable housing site, having been a proposed allocation in the North Shropshire District Local Plan in 2004, but was not required to meet need at that time. The location has more recently been recognised in the Council’s own reports and assessments to be in a sustainable location.</p> <p>Development is capable of contributing positively to the achievement of a number of identified strategic objectives and policies of the Local Plan. It can accommodate approx. 325 dwellings.</p> <p>29. The Council has failed to take an effective or justified approach to the identification of proposed housing allocations in Whitchurch.</p> <p>The approach taken in the Sustainability Appraisal Site Assessment is flawed and the conclusions reached reflect this. This includes lack of consideration given to mitigation and the approach to considering proximity rather than a more nuanced approach to likelihood of impact and potential for mitigation.</p> <p>With regard to WHT026, there are inconsistencies between the SLAA and site assessments undertaken to inform the adopted SAMDev Plan (examples provided of how sites are marked negatively in the SLAA despite scoring positively in earlier assessments).</p> <p>30. The proposed approach to meeting housing and employment requirements is through disaggregation of overall requirements to settlements (with guidelines reflective of the standing of a settlement in the hierarchy) to achieve a sustainable and appropriate pattern of development. Concerned that if settlement guidelines are not achieved this undermines the strategy. There are quantitative and qualitative housing supply issues in Whitchurch. Given flaws in the approach to identification of sufficient housing supply in Whitchurch, which may result in not meeting the guidelines, the soundness of the plan is threatened by virtue of failing to plan positively manner, being ineffective and not being in accordance with national policy.</p> <p>30a. Unclear whether any allowance has been made for non-delivery or delayed delivery of committed and allocated sites or what assumptions have been made about delivery from commitments. Supply includes a number of sites with Full Planning Permission which is 8-10 years old that have not yet delivered any dwellings and there is no evidence that they will. Constraints to delivery of proposed allocations (including within the site assessment process undertaken by the Council) also identified. These constraints support the assertion that non-allocation of WHT026 in favour of other sites is not supported by the evidence base and that there is a need to build in flexibility in sources of supply which will allow a range and choice of sites reducing the delivery risk which is currently inherent and ensure the draft Shropshire Local Plan is consistent with Government guidance and meets the test of soundness of being “effective” – i.e. deliverable over its plan period.</p> <p>30b. Concern about the role of small sites (less than 10 dwellings) many of which will not provide needed affordable housing and not be capable of accommodating features or facilities that might benefit the wider community (such as public open space). Despite the strong evidential requirements in NPPG for relying on windfall allowance there is none only a contrived figure, the difference between the settlement guideline figure less completions and the total supply from commitments and allocations. As such no reliance can be placed on any allowance made for windfall housing. Conclude therefore that the approach to housing supply is unsound, not justified and ineffective and contrary to national planning policy.</p>	<p>Whitchurch continued</p> <p>27, 28, 29, 30, 30a and 30b. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S18.2. Community Hubs: Whitchurch Place Plan Area</p>	<p>Prees</p> <p>1. Note the Council has undertaken a ‘Supplementary Site Assessment’ for PPW025, regarding the potential impact on the significance of the Prees Conservation Area as a consequence of impacts upon its setting and the potential impacts on the settings and significance of the three closest listed buildings (all Grade II): Nos. 14 to 16 (inclusive), Whitchurch Road (NHLE ref. 1236426); No. 9 Whitchurch Road (NHLE ref. 1222022); and the barn c.20m N of Tudor House (NHLE ref. 1264627). This concludes in principle development would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, due to the Conservation Area being bounded by existing development to the north and west and thus this land parcel not being considered to make any particular contribution to the significance of the Conservation Area’s setting. However, it is noted that the Supplementary Assessment states this would be subject to development being of a comparable scale to adjacent form and of good design standard, with a palate of materials that is informed by and is in keeping the local vernacular. Whilst proposed Development Guidelines require a proportionate Heritage Impact Assessment and its recommendations to be taken into account, they do not include the above requirements, it is suggested they should.</p> <p>With regard to the adjacent listed buildings, the Supplementary Assessment identifies the potential for harm to nos. 14 to 16 Whitchurch Road and also to the setting of the Barn c.20m north of Tudor House, which mainly comprises the surrounding historic farmstead of which it forms a part. Suggested mitigation, set out in the Supplementary Assessment includes careful consideration of scale, massing and layout of development on the part of the site fronting Whitchurch Road and provision of a suitable and well-designed landscape buffer at the southern end of the site, to provide an area of amenity space and a stand off from the Barn. These are not included within the proposed development guidelines and it is strongly suggested that these be added, together with the requirement for an archaeological desk-based assessment, and if appropriate a field evaluation, to be submitted with any planning application, also referenced in the Supplementary Assessment.</p> <p>2. Support for allocation of site PPW025. The site lies in a highly sustainable location on the built up edge of Prees and sits comfortably within the existing pattern of development. The site is available (single landowner and an option is held to develop for residential purpose), deliverable and viable. Previous Planning Application (14/03511/OUT) demonstrates the desire to develop the site. Documents required for a Planning Application are ready for submission (this will occur within 1 month of Plan adoption). Hawk Developments plan to swiftly develop once Planning Permission is obtained. Anticipate completion by Autumn 2026 assuming the site is allocated and the Planning Application subsequently approved.</p> <p>3. Initial proposals for PPW025 respond positively to the proposed Development Guidelines, including: appropriate mix of dwelling types informed by Prees ‘Right Home Right Place’ survey 2018; planning permission 14/03511/OUT agreed access point and design will be used along with any other required highways works; retention of frontage trees and hedges and provision of open space along the western side of the site; appropriate consideration of nearby listed buildings and heritage asset; use of acoustic design to appropriately manage road noise; 2018 application included an appropriate Flood Risk Assessment, informed by a sustainable drainage strategy & houses will be excluded from the elements of the site located in flood zones 2 and/or 3 which form part of the Green Infrastructure network.</p>	<p>Prees</p> <p>1. A minor modification is proposed to the 4th paragraph of the draft Site Guidelines for site PPW025 in Schedule 18.2(i) to reflect the need for the design of new development to be comparable in scale and form to adjacent buildings within the Conservation Area, particularly with respect to layout, scale, form and materials and should include a landscape buffer to the heritage assets to the south of the site.</p> <p>2 and 3. Noted.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S18.2. Community Hubs: Whitchurch Place Plan Area continued	<p>Prees continued</p> <p>4. Allocation of site PPW025 is not justified, unsound, unsustainable and not demonstrated as deliverable. Consideration of draft guidelines for PPW025 demonstrate significant and fundamental issues requiring resolution, including flood risk management and acoustic mitigation. There is no evidence of how such issues can be overcome. PPW025 is also likely to increase water run-off to the brook and is close to the Conservation Area and several listed buildings (it is not clear if or how impact on the historic environment can be mitigated which may prevent development).</p> <p>5. PPW021a is sustainable and deliverable (supporting material submitted). It is not subject to insurmountable constraints and as such it should be allocated instead of PPW025. Site PPW021a can deliver around 60 units with the added benefits of as well as the provision of retail. Benefits of PPW021a include provision of a shop on site (unachievable on PPW025); additional open space to serve the community; spacious well landscaped layout with opportunities for flexibility of development; better design and substantial housing mix; and addressing flood issues. Development of the site PPW021a can meet the 3 overarching objectives for sustainable development due to: close proximity of railway station; provision of convenience retail to serve the immediate area and discourage car use; high standard of design and spacious layout, including substantial open space; proposed mix of housing; make effective use of the land that is viewed as part of the existing village but has no public access to it, including open central area for community use, public footpaths along the brook through the site thus providing informal recreation facilities that are currently lacking in the village; all dwellings and gardens outside flood zone; provision of balancing ponds that will help ease existing flooding mitigating flood risk on site and providing betterment elsewhere; safe access outside flood zone or mitigated by ground raising achievable; and substantial site landscaping will encourage wildlife. Section 3 part (b) of the NPPF objective is particularly relevant as the site would provide a development of a high standard with benefits to the village that other sites cannot provide due to restrictions on size or siting. No evidence of benefits achieved through development of PPW025 to outweigh the benefits of PPW021a (including regarding helping to address existing flood issues in the vicinity).</p> <p>6. The Council identified a preferred site at a very early stage and have failed to justify why alternative sites (including PPW021a) are unacceptable and there is doubt whether they have received due consideration. Site PPW021a is not referenced within the Council’s sustainability report, which needs to be addressed as this is an unacceptable omission (Sustainability report appendices include preferred site (PPW025) but no reference is made regards the sustainability of PPW021a).</p> <p>7. Site PPW021a has not been properly or fairly assessed - supporting evidence not considered and meeting requests ignored/arranged too late to inform proposed allocations, meaning the Council has failed to work proactively with site promoters as is expected by the NPPF. The SLAA status is the same for PPW025 & PPW021 whilst the Regulation 18 Sustainability Appraisal scores PPW021a higher (good) than PPW025 (fair). Both sites in flood zone 3. There is evidence that preferred site (PPW025) was considered unacceptable by the Parish Council (Appendix A to response).</p> <p>8. Site Assessment reference to back land inappropriate as site has a road frontage as identified in Access Statement.</p>	<p>Prees continued</p> <p>4, 5, 6, 7 and 8. Shropshire Council considers that the proposed development strategy for Prees and the existing commitments (including existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>The proposed allocation has been informed by a proportionate and robust site assessment process. The Sustainability Appraisal undertaken to inform the draft Shropshire Local Plan and the site assessment process to inform identification of proposed allocations included appropriate consideration of site PPW021a at Regulation 18 and 19 stages.</p>
S18.3. Community Clusters: Whitchurch Place Plan Area	<p>Ash Magna</p> <p>1. The Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board. As a property owner in Ash Magna, I wish to self build a modest house on a previously developed site adjoining the settlement of Ash Magna, but outside of the current development boundary.</p>	<p>Ash Magna</p> <p>1. Noted.</p>
S18.3. Community Clusters: Whitchurch Place Plan Area continued	<p>Tilstock</p> <p>2. Hollins Strategic Land gained planning approval for TIL001 in December 2020. The land hatched out on plan S18 Whitchurch - Tilstock wrongly includes part of the cemetery and war memorial, and leave out the Vicarage and land to the east.</p>	<p>Tilstock</p> <p>2. TIL001 is an existing allocation within the SAMDev Plan. The draft Policies Map accurately reflects the extent of this existing allocation.</p>
S18.4. Wider Rural Area: Whitchurch Place Plan Area	<p>N/A</p>	<p>N/A</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S19. Strategic Settlement: Clive Barracks, Tern Hill</p>	<p>General comments Clive Barracks, Tern Hill</p> <ol style="list-style-type: none"> 1. Clive Barracks, Tern Hill may be better suited as a strategic employment site. 2. Clive Barracks, Tern Hill is a mainly greenfield site that will deliver a limited development in a remote location poorly served by existing facilities. It is too small to be self-sufficient. 3. Development should be directed to urban locations, like Market Drayton. 4. Concern expressed about the deliverability and robustness of the delivery trajectory for Clive Barracks, Tern Hill. Timescales for the sites release has changed and evidence base documents have not been published. Need to consider site specific constraints, risks to delivery, and discuss with developers/land agents. May be a need to provide more flexibility to the housing land supply to reduce risk of non-delivery. 5. Support the allocation of Clive Barracks, Tern Hill which is a large brownfield site and can for a successful and sustainable community. The site has been identified for release (vacated and available from 2025) and forms part of the Ministry of Defence (MOD) commitment to provide land for housing. Technical assessments and consultation have been undertaken to support its allocation and inform an indicative masterplan. Further technical assessments will inform refinement of the indicative masterplan and a future Planning Application. Development of the site will meet local need, provide local services and facilities to existing and new communities, and contribute towards economic growth aspirations. 6. Reference MOD safeguarding zones within the draft Policy and its explanation. 7. Given the sites history the potential for contaminated land must be considered. Should consider appropriate land uses, drainage design and pollution prevention measures. 8. Recognise potential infrastructure implications of the development of Clive Barracks, Tern Hill (including cross-boundary). 9. Need to provide clarity on the future use of the adjacent RAF airfield. 10. Concern regarding viability of affordable housing contributions. <p>Comments on site guidelines for Clive Barracks, Tern Hill</p> <ol style="list-style-type: none"> 11. Provide flexibility to the types of on-site employment generating uses. 12. Need to provide clarity regarding an “appropriate quantity” of Green Infrastructure. 13. Need to provide clarity regarding the need to retain existing on-site playing fields and the future need for playing fields (as identified within the Playing Pitch and Open Space Strategy (PPOSS)). These pitches could also accommodate sports clubs displaced from the Greenfields site in Market Drayton/other clubs needs. 14. Welcome clarity regarding nature of the underpass of the A41. 15. Support recognition that development of Clive Barracks, Tern Hill must not impede operation of the adjacent RAF airfield. 	<p>General comments Clive Barracks, Tern Hill</p> <ol style="list-style-type: none"> 1, 2 and 3. Shropshire Council considers that the proposed development strategy for the proposed Clive Barracks, Tern Hill Strategic Settlement is appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available, and achievable (including viable)). In identifying proposed site allocations, a comprehensive site assessment process has been undertaken. 4. Shropshire Council considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. The draft Shropshire Local Plan presents information on trajectories for the development of proposed allocations, informed by discussions with and submissions from the relevant site promoters. In identifying proposed site allocations, a comprehensive site assessment process has been undertaken. 5. Noted. 6. A map illustrating MOD safeguarding zones, as provided by the MOD, forms part of the evidence base for the draft Shropshire Local Plan and forms a consideration within the Planning Application process. The specific approach to the design and layout, dimensions of structures and materials used within any development of Clive Barracks, Tern Hill, to ensure it does not impede operation of the adjacent airfield and associated transmitter/receiver facilities will be determined through the Planning Application process, which can of course be informed by consultation with the MOD. As such it is considered sufficient certainty exists on this matter whilst also recognising the strategic nature of the draft Shropshire Local Plan. 7. The draft Shropshire Local Plan should be read as a whole. Draft site guidelines and wider policies appropriately address these concerns. For instance draft Policy DP18 addresses pollution and public amenity whilst draft Policy DP19 addresses water resources and water quality. 8. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision and applies to all development proposals, including on proposed site allocations. However, for clarity a minor modification is proposed to the explanation of draft Policy DP25 regarding cross-boundary CIL spend. 9. The proposed Strategic Settlement at Clive Barracks, Tern Hill does not extend onto the adjacent airfield, which it is understood is intending to remain an active RAF airfield. 10. Shropshire Council considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. With regard to the north of Shropshire, it is important to note that significant levels of development currently occurs and that this development does provide the current affordable housing contributions in this area which is a minimum of 10%. Within the Shropshire Viability Study 'strategic sites' including Clive Barracks, Tern Hill, are separately assessed. The assessment concludes that "these sites have capacity to bear both affordable housing and developer contributions. There is no doubt that the delivery of any large site is challenging so, rather than draw firm conclusions at this stage, it is recommended that that the Council engages with the owners in line with the advice set out in the Harman Guidance". Shropshire Council is committed to positive engagement with these site promoters and draft Policy DP3 provides appropriate flexibility on this matter. <p>Comments on site guidelines</p> <ol style="list-style-type: none"> 11. It is considered that the proposed site guidelines on employment provision, alongside other relevant policies relating to employment provision (including SP12, SP13 and SP14), provide a flexible approach to employment provision on the site, which allows this provision to positively respond to local need, market demands and the aspirations of the Economic Growth Strategy. 12 and 13. It is considered that the proposed site guidelines, alongside other relevant policies on open space and green infrastructure policies (including DP13 and DP15) provide clarity on what is considered an appropriate quantity of green infrastructure provision and the considerations regarding existing and future playing pitch provision. However, specifically in relation to playing pitch provision, a minor modification is proposed to clarify this issue. 14 and 15. Noted.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S20. Strategic Settlement: Former Ironbridge Power Station</p>	<p>General comments Former Ironbridge Power Station</p> <ol style="list-style-type: none"> 1. Relationship between the Former Ironbridge Power Station site and Much Wenlock town/place plan area must be considered. Particular reference to the implications of the Former Ironbridge Power Station on the proposed development strategy for Much Wenlock and the towns/wider infrastructure (including but not limited to highways, medical facilities and secondary school provision). 2. Relationship between the Former Ironbridge Power Station site and Shifnal must be considered. 3. Concern/must recognise potential infrastructure implications of the development of the Former Ironbridge Power Station (including cross-boundary). 4. Recognise the need to redevelop the Former Power Station to mitigate previous uses, but disagree with the development of adjacent greenfield land given impact on highways and surrounding communities (including congestion, road safety, pollution, vibration and noise). 5. Support for the proposed allocation of the former Ironbridge Power Station site, which is a deliverable and sustainable opportunity. A Masterplan has been prepared and an Outline Planning Application has been submitted, informed by extensive technical studies, consultation and which reflects the proposed site guidelines. The mix of uses proposed ensure a high-quality sustainable development can be delivered. 6. National policy seeks to optimise re-use of previously developed land. 7. Redevelopment of the Former Ironbridge Power Station can contribute to achieving the Shropshire Economic Growth Strategy and the housing/employment needs of Shropshire. 8. Welcome the masterplan approach to the development of the Former Ironbridge Power Station site. 9. Plan provided showing the location of National Grid assets in relation to the Former Ironbridge Power Station site. 10. Concern expressed about the deliverability and robustness of the delivery trajectory for the Former Ironbridge Power Station. Need to consider site specific constraints, risks to delivery, and discuss with developers/land agents. May be a need to provide more flexibility to the housing land supply to reduce risk of non-delivery. 11. Given the sites history the potential for contaminated land must be considered. Should consider appropriate land uses, drainage design and pollution prevention measures. <p>Comments on site guidelines for the Former Ironbridge Power Station</p> <ol style="list-style-type: none"> 12. Amend site guidelines to provide clarity regarding retention of existing on-site playing fields for provision of three new playing pitches, associated pavilion and car parking facilities (as identified within the Playing Pitch and Open Space Strategy (PPOSS)). Future management must also be secured. 13. Nearby Buildwas Abbey should be recognised as a constraint and opportunity. Important to undertake engagement with English Heritage. 14. Note reference to a heritage centre and the aim that the community facilities and buildings will tap-into the heritage of the site. 15. Recommend the design and layout of the site should be informed by clearer design guidance both of individual buildings and the overall structure of the development. 16. Support guideline relating to the Grade II listed Albert Edward railway bridge and buildings and structures associated with the Ironbridge A interwar power station. 	<p>General comments Former Ironbridge Power Station</p> <ol style="list-style-type: none"> 1 and 2. Shropshire Council considers that the proposed development strategy and the associated proposed allocations for the proposed Former Ironbridge Power Station Strategic Settlement, Much Wenlock Key Centre and Shifnal Key Centre are appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available, and achievable (including viable)). Representations on the proposed development strategy for Much Wenlock and Shifnal are specifically addressed under draft Policy S13.1 and Policy S15.1 respectively. Furthermore, the draft Shropshire Local Plan should be read as a whole, draft Policy DP25 addresses infrastructure provision and applies to all development proposals, including on proposed site allocations. 3. Proposed site guidelines for the proposed Former Ironbridge Power Station Strategic Settlement include a requirement to undertake "any necessary improvements to the local and strategic road network...", informed by an appropriate Transport Assessment at the Planning Application stage (a Transport Assessment has been undertaken in support of a Planning Application on the site - resolution reached to grant this Planning Application). Furthermore, the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision and applies to all development proposals, including on proposed site allocations. However, for clarity a minor modification is proposed to the explanation of draft Policy DP25 regarding cross-boundary CIL spend. 4. Shropshire Council considers that the proposed development strategy for the proposed Former Ironbridge Power Station Strategic Settlement is appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available, and achievable (including viable)). In identifying proposed site allocations, a comprehensive site assessment process has been undertaken. Proposed site guidelines for the proposed Former Ironbridge Power Station Strategic Settlement include a requirement to undertake "any necessary improvements to the local and strategic road network...", informed by an appropriate Transport Assessment at the Planning Application stage (a Transport Assessment has been undertaken in support of a Planning Application on the site - resolution reached to grant this Planning Application). Furthermore, the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision and applies to all development proposals, including on proposed site allocations. <p>5, 6, 7, 8 and 9. Noted.</p> <ol style="list-style-type: none"> 10. Shropshire Council considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. The draft Shropshire Local Plan presents information on trajectories for the development of proposed allocations, informed by discussions with and submissions from the relevant site promoters. In identifying proposed site allocations, a comprehensive site assessment process has been undertaken. 11. The draft Shropshire Local Plan should be read as a whole. Draft site guidelines and wider policies appropriately address these concerns. For instance draft Policy DP18 addresses pollution and public amenity whilst draft Policy DP19 addresses water resources and water quality. <p>Comments on site guidelines for the Former Ironbridge Power Station</p> <ol style="list-style-type: none"> 12. Proposed site guidelines, alongside other relevant policies on open space (including DP15) provide clarity on the considerations regarding existing and future playing pitch provision. However, a minor modification is proposed to clarify this issue. 13. Proposed site guidelines include that high-quality design and layout of the site will also reflect and respect the sites heritage, heritage assets on the site and its relationship with heritage assets within the wider area, which includes Buildwas Abbey (which is specifically referenced). As such it is considered that the need to consider the constraints and opportunities associated with Buildwas Abbey are already recognised within the draft site guidelines. 14. Noted. 15. Proposed site guidelines proposed for the Former Ironbridge Power Station Site include the requirement to prepare a masterplan to inform the sites redevelopment. It is considered that this process is the appropriate mechanism to consider any necessary design guidance for the site. 16. Noted.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S21. Strategic Site: RAF Cosford</p>	<p>General comments RAF Cosford</p> <ol style="list-style-type: none"> 1. RAF Cosford should remain in the Green Belt. Including because Green Belt status and the current policy approach have not prevented the forms of development proposed for the site from taking place, there are no exceptional circumstances for removing the site from the Green Belt and proposals are contrary to or there is a lack of clarity regarding consistency with national policy. 2. Concerned Strategic Site status would allow economic development unrelated to military/museum uses proposed, represents a contradiction within the draft Plan and contradicts the proposed exceptional circumstances. If removed from the Green Belt it should only be for military/museum purposes. 3. There is a need to identify exceptional circumstances to justify the release of the site from the Green Belt. 4. Concerned about the impact on the landscape, gap between RAF Cosford and Albrighton and wider Green Belt. 5. Support identification of RAF Cosford as a strategic site. It is and will continue to represent an important defence establishment and removal from the Green Belt will provide in-principle support for defence related development and reduce planning risk. 6. Much of the undeveloped land in the proposed RAF Cosford Strategic Site is constrained (including by open space and proximity to runway). As such, further land should be added for the identified development needs, residential development to support these development needs and achievement of the proposed strategic approach for Shropshire, and to meet development needs beyond 2038. 7. The site lies within Source Protection Zones 2/3. 8. Given the uses of the site, there is likely to be contamination. Should consider appropriate land uses, drainage design and pollution prevention measures. <p>General comments Midlands Air Ambulance Charity (MAAC) component of RAF Cosford</p> <ol style="list-style-type: none"> 9. The MAAC element of the RAF Cosford site should remain in the Green Belt. It now has the benefit of Planning Permission meaning there are no longer exceptional circumstances and its removal from the Green Belt risks alternative uses occurring contrary to stated exceptional circumstances. 10. If it is demonstrated there is an overriding need for the MAAC facility on the identified site, there are no alternative locations (non-green belt or within the RAF Cosford existing site), and the site is the minimum size needed, it should be independently allocated but retained in the Green Belt. This will retain planning control over future uses - which the current approach does not do. 11. The MAAC site is inconsistently referenced and its size unclear within the draft Shropshire Local Plan and its evidence base. 12. Support proposed release of the MAAC element of the RAF Cosford site from the Green Belt. Site selection was informed by a systematic assessment of possible locations, Planning Permission has been granted for the development, and work is now underway. Releasing the site from the Green Belt will allow flexibility regarding the future operation of the site. 	<p>General comments RAF Cosford (and 9 and 10 from General comments Midlands Air Ambulance Charity (MAAC) component of RAF Cosford and 20 from Additional sites)</p> <ol style="list-style-type: none"> 1, 2, 3, 9, 10 and 20. Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midlands Air Ambulance Charity (MAAC). This will of course complement and be complemented by the wider proposals within the draft Shropshire Local Plan. In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. 4. In identifying proposed site allocations a comprehensive site assessment process has been undertaken. This process included consideration of landscape/visual amenity and strategic issues such as the relationship to the existing built form. Indeed, the extent of the proposed strategic site has been informed by consideration of the need to maintain an appropriate gap between RAF Cosford and Albrighton. 5. Noted. 6. Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midlands Air Ambulance Charity (MAAC). Shropshire Council also considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. 7. In identifying proposed site allocations a comprehensive site assessment process has been undertaken. This process included consideration of source protection zones. 8. The draft Shropshire Local Plan should be read as a whole. Draft site guidelines and wider policies appropriately address these concerns. For instance draft Policy DP18 addresses pollution and public amenity whilst draft Policy DP19 addresses water resources and water quality. <p>General comments Midlands Air Ambulance Charity (MAAC) component of RAF Cosford</p> <ol style="list-style-type: none"> 9 and 10. See above. 11. In identifying proposed site allocations a comprehensive site assessment process has been undertaken. Within this assessment process it is considered that the MAAC is appropriately referenced to reflect its assessment, initially in isolation (within the Strategic Land Availability Assessment) and subsequently as part of a wider potential strategic site (within the assessment of potential strategic sites). The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. 12. Noted.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S21. Strategic Site: RAF Cosford continued	<p>Comments on site guidelines for RAF Cosford</p> <p>13. Unclear how the coordinated and complementary approach to development on the site is to be achieved and what engagement is required.</p> <p>14. The requirement for a masterplan must recognise RAF Cosford is an existing site and this requirement should not undermine ongoing activities.</p> <p>15. Support requirement that the MAAC site not adversely impact on MOD operations at RAF Cosford.</p> <p>16. Welcome reference to consideration of opportunities to improve pedestrian and cycle links into Albrighton.</p> <p>17. Support acknowledgement that sports and recreation facilities should be provided only where there is a need.</p> <p>18. Concerned about the requirement for sustainable drainage, which implies that it applies to all future planning applications, which dependent on the nature of the application may not be appropriate.</p> <p>19. Guideline relating to compensatory improvements to the Green Belt could be onerous and confusing. Further clarification is required.</p> <p>Additional sites</p> <p>20. Promotion of CFD003 (land at Newport Road) for inclusion within the wider RAF Cosford Strategic Site (part could be safeguarded for beyond 2038). This land has the potential for open market/affordable housing for services personnel, retired service personnel, civilian support staff, and potentially cross-boundary need; can support the uses on the RAF Cosford Strategic Site; performs a more limited Green Belt contribution than other land around RAF Cosford; would reduce pressure on the gap between RAF Cosford and Albrighton; links into the existing transport network; would increase public open space/green infrastructure provision; and enhances landscape and biodiversity.</p>	<p>Comments on site guidelines for RAF Cosford</p> <p>13. It is important and appropriate for the various components of the RAF Cosford Strategic Site to be coordinated and complementary, which will be achieved through the strategic planning, planning application and masterplanning processes. It is also considered appropriate to expect proactive engagement to occur on masterplans.</p> <p>14, 15, 16 and 17. Noted.</p> <p>18. It is appropriate to require any new development on the RAF Cosford Strategic Site to incorporate appropriate sustainable drainage and that this is consistent with the requirements of draft Policy DP22.</p> <p>19. It is appropriate and consistent with national policy for any new development at RAF Cosford to contribute to opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt. This can effectively be achieved through a coordinated approach led through the strategic planning, planning application and masterplanning processes. To provide certainty that compensatory improvements can be provided, it is considered appropriate to indicate that specific improvements will occur, however this does not necessarily mean that other improvements cannot occur. It is however recognised that any improvements undertaken must not impede operational activities at RAF Cosford, and as such a minor modification on this issue is proposed.</p> <p>Additional sites</p> <p>20. See above.</p>
Appendix 1	1. Comments on proposed saved SAMDev Plan allocations.	1. These sites are proposed 'saved' allocations, that were allocated within the adopted SAMDev Plan (which was informed by appropriate public consultation, Sustainability Appraisal and Habitats Regulations Assessment. It was then found sound and legally compliant through the Local Plan examination process. Allocations within the adopted SAMDev Plan were also the subject of a comprehensive site assessment process).
Appendix 2	1. Comments on proposed saved SAMDev Plan allocations.	1. These sites are proposed 'saved' allocations, that were allocated within the adopted SAMDev Plan (which was informed by appropriate public consultation, Sustainability Appraisal and Habitats Regulations Assessment. It was then found sound and legally compliant through the Local Plan examination process. Allocations within the adopted SAMDev Plan were also the subject of a comprehensive site assessment process).
Appendix 3	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 4	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 5	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 6	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 7	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Habitats Regulations Assessment	<p>1. Some responses asked that additional impacts on internationally designated sites or additional species and habitats should be considered.</p> <p>2. The issue of whether there would be sufficient water infrastructure in place to prevent an adverse effect on internationally designated sites was raised.</p> <p>3. Support was received for the assessment of the impacts of development on several internationally designated sites.</p>	<p>1. There needs to be credible evidence of an impact pathway to a European site for it to be subject to screening for likely significant effects. The Council considers that all relevant impact pathways have been identified.</p> <p>2. The Statements of Common Ground between SC and Severn Trent Water and SC and Welsh Water demonstrate that the red and amber constraints for wastewater infrastructure shown in the WCS can be overcome.</p> <p>3. Support is welcomed.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
Sustainability Appraisal	<ol style="list-style-type: none"> 1. Several responses requested that the Sustainability Appraisal (SA) score for a site be changed to reflect issues that they considered had either been omitted or incorrectly recorded. Many of these were directed to either adding or removing a proposed site allocation. 2. A few respondents commented on the legality of the SA. 3. Some respondents queried whether the SA criteria and/or the SA methodology were correct and had been properly applied. 4. A number of typographical errors were pointed out. 	<ol style="list-style-type: none"> 1. The Council has reviewed all the site scoring issues raised. None of the proposed changes would have a material effect so are not considered necessary. 2. Under Sections 19 and 39 of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The SA process for Development Plans also incorporates Strategic Environmental Assessment (SEA) in accordance with the requirements of European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (The SEA Directive). The SEA Directive has been transposed into UK law through Statutory Instrument 2004 No 1633: The Environmental Assessment of Plans and Programmes Regulations 2004. The Council considers that it has complied with the requirements of both the Planning and Compulsory Purchase Act 2004 and the Environment Assessment of Plans and Programmes Regulations 2004. 3. The SA Scoping Report set out the proposed criteria and methodology for the SA of the Plan. The Scoping Report was subject to consultation in the early stages of the Plan making process and amendments made as a result. As such, the Council considers the SA criteria and methodology comply with Environmental Assessment of Plans and Programmes Regulations 2004 and have been correctly applied. 4. Errors have been noted.