



The countryside charity
Shropshire

**Consultation on Shropshire Council Regulation 18:
Pre-Submission Draft of the Shropshire Local Plan
2016 to 2038**

**Response from CPRE, the countryside charity
(Shropshire Branch)**

September 2020

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1. Introduction

- 1.1 We welcome this opportunity to take part in another round of Regulation 18 consultation, before the final Regulation 19 stage, scheduled for later this year.
- 1.2 CPRE Shropshire supports a beautiful and thriving countryside that enriches all our lives. We support development in the right place which is sympathetic to the landscape and to the needs of local communities and those who work within them. We support building the right types of housing in the right places, in numbers that are clearly needed, to ensure that the County's special qualities are protected and that the genuine needs of its residents are met. We also support the targeted approach of the Productivity Growth economic option as originally put forward in the Issues and Strategic Options Consultation of the LPR, which would encourage the development of newer and more innovative industries.
- 1.3 However, we do not believe that the continued aspirational growth preferred by Shropshire Council will protect Shropshire's special qualities or serve its resident population to best effect.
- 1.4 This response from CPRE Shropshire expands on the high-level points, made in earlier submissions, that the plan:
 - i) is suffused with a model for growth well in excess of demographic need, which is not truly sustainable, because it is at odds with both the climate emergency and the ecological emergency;
 - ii) has targets for both housing and employment land that are too high, based on figures that are questionable;
 - iii) won't get the right sort of houses, particularly affordable houses, built in the right places; and
 - iv) has a flawed consultation process, which is undemocratic.
- 1.5 Two aims of this response are (1) to indicate areas which might be found unsound at Examination in Public, and (2) to further develop arguments touched on at earlier stages of consultation. Our response is partly restricted in its scope because of our limited resources.
- 1.6 We endorse many of the policies within the Plan but are not commenting primarily on these. We naturally concentrate on the elements of the plan with which we have reservations, although this response is necessarily selective in what we comment upon.
- 1.7 We recognise the huge effort made by the Planning Policy team in bringing the Draft Plan to the present stage, particularly latterly whilst working under the Covid19 restrictions. To this end we have tried to align this response with the requirements for the Part B Response form (reproduced below), by replicating the relevant elements of that form throughout the text, to reference exactly which part of the Draft Plan we are commenting on. It seems to us that it makes the Council's task, as well as ours, easier if we do not submit a separate Form B for each of our many comments.

Part B: Response

Q1. To which document does this response relate?

- Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal
- Habitats Regulations Assessment

Q2. To which part of the document does this response relate?

Paragraph		Policy	
Site		Policy map	

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

- Agree
- Disagree
- Don't know /no opinion

1.8 We would, however, point out in respect of Question 3, that it is not necessarily a binary matter whether one simply agrees or disagrees. Where our agreement or disagreement is qualified, we have indicated this along the following lines:

- Agree **in part**
- Disagree **in part**

1.9 We begin by commenting on the Covid-19 crisis and on Consultation.

The COVID-19 crisis

- 1.10 The current COVID-19 crisis has caused widespread disruption to the economy and has caused society generally to re-appraise some of its priorities. Those changes may be so great as to alter the ethos behind parts of the Local Plan, particularly the drive for economic growth. There may instead be a realisation that economic stability and a smarter approach is more sustainable than a drive for growth.
- 1.11 Another aspect of the COVID-19 crisis is that many more people have been working from home than was previously the case, as officers well know from their own experience. That might have highlighted the places in Shropshire that have such poor broadband connections that they inhibit the ability of people in those locations to be able to work from home. Shropshire Council should carry on trying to remedy such black-spots.
- 1.12 The COVID-19 crisis, with its restrictions to individual freedoms, has undoubtedly brought a new dimension to engagement with Council processes at this time of disruption. For instance, it was announced on 6 April that *"given the current circumstances surrounding Covid-19, Shropshire Council has decided to pause decision making on the Local Plan Review process for two months"*.
- 1.13 There is only one mention within the present consultation document of the crisis. At paragraph 4.255 it is stated: *'The response to the Coronavirus restrictions shows how we might respond positively to the effects of global challenges on our lives and realise tangible benefits for ourselves and our local, national and global communities'*.
- 1.14 We submit that the Local Plan could incorporate more of this emerging new thinking.

Consultation

- 1.15 The current consultation process has inevitably been affected by the COVID-19 restrictions. No public consultation events could be held, as they had been for the previous four rounds of consultation in this LPR process. The ability of people to see physical copies of the documentation was severely restricted, because appointments had to be made at the locations where a copy of the main consultation document had been deposited; the other supporting documentation was available only on-line, subject to a fee for non-library members.
- 1.16 The Council is aware of our previous comments on consultation. Our view is that proper notice has not been taken of public opinion and that the Council is pursuing its own agenda regardless of the fact that public opinion is against the high targets in the plan.
- 1.17 We have also asked questions during this current consultation as to why some evidence documents, that are stated in Appendix 3 to the consultation document to be Key documents, have not been published on the website of Evidence documents. The Council's response seems to be that, as long as those documents are published for the final and more formal Regulation 19 stage of consultation, that is sufficient. Our view is that that is an inadequate response and that the non-publication of such Key evidence is symptomatic of the Council's resources being stretched, and that this consultation has been launched prematurely, before all supporting evidence is fully available to the public.
- 1.18 We now comment on the Sustainability Appraisal and then move on to the lengthier comments on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan. We are not making any comments on the Habitats Regulations Assessment.

2. Sustainability Appraisal, Site Selection and the Climate Emergency

Q1. To which document does this response relate?

Sustainability Appraisal

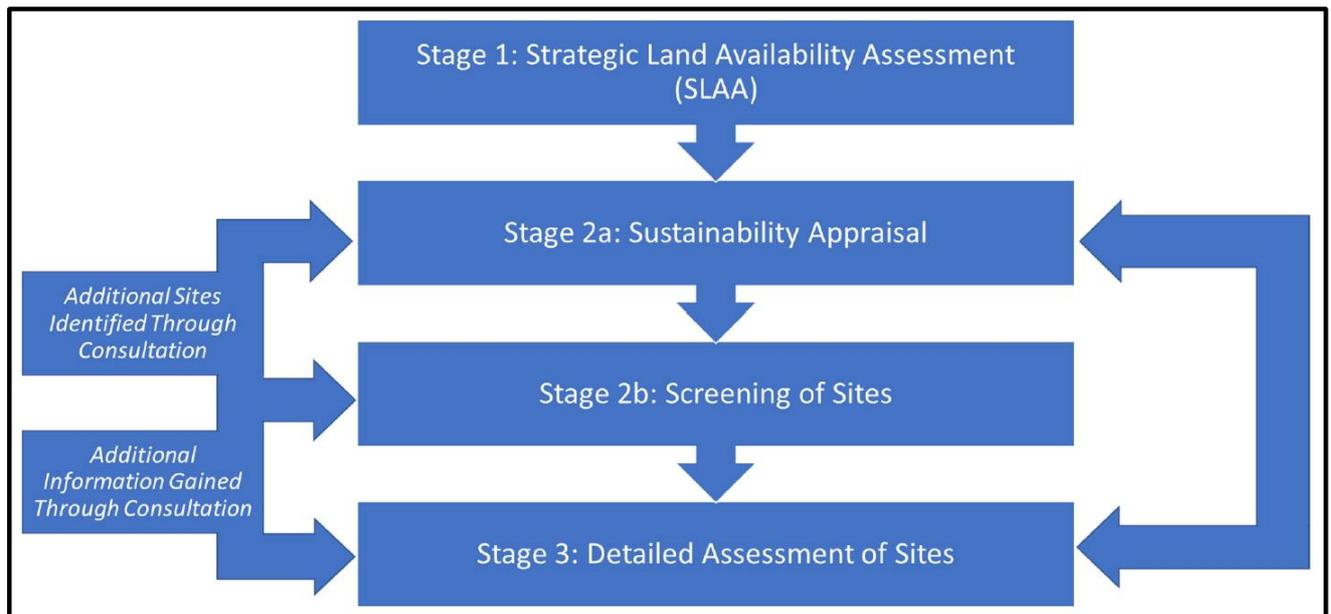
Q2. To which part of the document does this response relate?

Paragraph	Paras 2.19 & 2.24; Tables 2.3; 2.4, 2.6, 2.7, 2.8; and related points	Policy	
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree **in part**

- 2.1 The main 208-page Sustainability Appraisal document requires further proof-reading to remove typos and missing references e.g. five instances of 'Error! Bookmark not defined'.
- 2.2 Page 5 of the SA characterises the site selection process with the following diagram:



- 2.3 At the Preferred Sites stage of consultation we (and others) noted two particular deficiencies with the SA methodology, namely that:
- i) objectives SO2, SO3 and SO12 had not been translated into any of the criteria (which extraordinarily, includes the objective SO12 to *'reduce carbon dioxide emissions'*), and
 - ii) criteria 6, about the proximity of regular peak time public transport had then not been translated into the criteria used for scoring sites within the stage 2a detailed site assessments.
- 2.4 As to 2.3.i) above, paragraph 2.19 explains why objective SO3 has not been so translated, but refers to it incorrectly as SO1. It remains the case that objective SO12 to *'reduce carbon dioxide emissions'*, has not been translated directly from the objectives in Table 2.3 into the criteria in Table 2.6, although objectives SO5: *'Encourage the use of sustainable means of transport'* and SO6: *'Reduce the need of people to travel'*, which have elements of reducing carbon dioxide emissions, have been translated into criteria 4 and 5 as well as criteria 6.
- 2.5 As to 2.3.ii) above, Criteria 6 in Table 2.7 (which has 15 criteria) again does not appear in Table 2.8, the list of criteria actually used in the detailed Excel spreadsheets (which again shows only 14 criteria). However, the spreadsheets themselves do include that previously missing Criteria 6, even though it is not shown in Table 2.8. A huge amount of work must have been done to rescore each site by incorporating this missing Criteria 6, which in Table 2.7 is stated as *'regular peak time public transport service within 480m of site boundary'*, although, on the detailed stage 2a sheets, the criteria is stated slightly differently as *'site boundary within 480m of a public transport node with a regular service offered during peak travel times'*.
- 2.6 There do also appear to be further weaknesses in the SA methodology.
- 2.7 There is a mismatch between the services listed in criteria 4 and 5, and the primary and secondary services listed in Table 1 on page 3 of the Hierarchy of Settlements of Settlements document. The HoS document's prime function is to identify the relative sustainability of settlements. A similar list of services, and relative scores, could have been used in the list of

criteria in Table 2.7 of the SA, but it hasn't. Instead it uses a selective mixture of the primary and secondary services in the HoS document, and only one of its categories for public transport (it has no mention of proximity to railway stations like the HoS does).

- 2.8 The HoS scoring assessments also apply a weighting to the various services assessed (although that weighting is subject to criticism). By contrast, the SA scoring system set out in Table 2.8 uses a much more elementary system of double minus, minus, zero or plus scores. On the SA scoring system, for example, the double minus that a site would be given if it contains a SSSI or ancient woodland would probably be balanced out to a net score of zero because it might also receive a plus score for both *Amenity green space* and for *Accessible natural green space*. There is no mechanism within the SA scoring system for ruling some sites out altogether, because of a particular protected feature, such as the presence of a SSSI.
- 2.9 The criteria listed in Tables 2.7 and 2.8 have all been applied to the Stage 2a Residential Excel spreadsheet assessments, but two appear not to have been applied to the Stage 2a Employment assessments, namely (1) *library (permanent or mobile library stop)* and (2) *children's playground*. No rationale has been given for this difference in treatment, which appears illogical, particularly when proximity to a primary school remains within Criteria 5 for both the residential and the employment assessments.
- 2.10 Our Appendix 1 summarises the site allocations and shows the scores given to them both at the Preferred Sites stage and now at this Pre-submission stage. Because Appendix 1, as incorporated on pages 36 to 38, may be difficult to read, even when enlarged, we are also submitting it as a separate document.
- 2.11 We make these further points about the scores given on the Stage 2a Excel spreadsheets:
- i) As noted in paragraph 24 of the SA, the 'Good/Fair/Poor' ratings are arrived at from a comparison of sites only within each Settlement. It is a weakness of the system that there are no absolute scores, only relative ones. As shown on our Appendix 1, the range of scores for the proposed allocated sites is:

Overall sustainability conclusion	Number of allocated sites	Range of overall scores
Good	24	+ 2 to -6
Fair	62	+4 to - 13
Poor	26	-2 to -17

It can be seen that there is a huge overlap in these ranges, which renders the 'Good/Fair/Poor' ratings difficult to pin down in absolute terms.

- ii) Even sites with a 'Poor' rating have then been allowed to progress through to Stage 2b and Stage 3 of the site selection process. An example is the Ironbridge Regeneration site, IRN001, which has a 'Poor' score of -17.

2.12 At the end of the process of site selection shown diagrammatically at paragraph 2.2 above, 18 sites which were assessed separately at stage 2a have been included in the allocations even though they had a 'Poor' score at Stage 2a. These 18 sites are listed in Table 10.3 of the SA (on pages 197 – 203), and mitigation measures are proposed for them in Table 10.4. Our Appendix 1 identifies that, in fact, a total of 26 of the separately assessed sites included in the proposed allocations were rated as 'Poor' for sustainability at stage 2a, so eight of these sites have not been proposed for mitigation measures. Some of these sites were some of the sites proposed for 'safeguarding' of Green Belt land.

2.13 Shropshire Council has declared a Climate Emergency, it has engaged with the Shropshire Climate Action Partnership, and it is committed to achieving net-zero carbon by 2030, eight years before the end of this 22-year plan. It is recognised that the Climate Emergency is probably the greatest challenge facing mankind, much more so than the current, but temporary, Covid-19 emergency. Climate change considerations, and CO₂e emissions considerations, should therefore be given the highest priority throughout the Local Plan process.

2.14 The Welsh Government, in its revised Draft National Development Framework (now entitled 'Future Wales – the national plan 2040') as laid before the Senedd on 21 September 2020, has stated the situation cogently, as follows:

'We face a climate emergency which is actively changing our environment and directly affecting communities; we have an ecological emergency, where the behaviours and decisions of the human race are causing harm to the resilience of ecosystems and species; we have suffered the effects of a global health pandemic and must re-energise our economy in a sustainable way, demonstrating that we have learnt from previous excesses that have resulted in inequitable wealth and access to services'.

Incidentally the Welsh Government has very helpfully published the new 'Future Wales – the national plan 2040' in a form which shows, in Track Changes, all the changes that have been made to the original 'Draft National Development Framework' as originally issued for consultation (see <https://gov.wales/national-development-framework-schedule-changes>). It would be very helpful if the final Regulation 19 version of the Draft Plan could be issued in a format which also makes plain exactly what changes have been made to this current Regulation 18 Draft Plan.

2.15 At the very least, there should be some assessment throughout the Plan of the potential carbon emissions of each proposal, to give an idea of whether proposals contribute to the zero carbon goal or whether they continue to make the problem worse. In Councillor Carroll's assessment of progress one year after Shropshire Council's declaration of a Climate Emergency he stated that *"climate action appraisals are now compulsory in all key council decisions, forcing climate impact to be considered and criteria to be met"*.

2.16 The points arising from the above considerations are:

- i) In paragraph 2.19, the reference to SO1 needs changing to SO3.
- ii) In Table 2.8, Criteria 6, as actually used in the detailed Excel spreadsheets, needs to be added in.

- iii) Development will occur not just at the boundary of a site; for Criteria 6, the measurement of 480m should have been taken from the centre of the site, not from its boundary. The same applies to Criteria 5.
- iv) The detailed criteria listed against Criteria 4/5 and 6 should have a better match with those listed in Table 1 of the HoS document.
- v) The scoring system used in the stage 2a Excel spreadsheets should use absolute scores, not scores that are relative only to other sites in that particular settlement.
- vi) In order to assess the CO₂ emissions saving potential of a site, it seems insufficient only to consider the items within Criteria 4/5 and 6. Other factors could have included the propensity of the site for solar gain (e.g. north facing or south facing), or the distance from a supermarket.
- vii) The whole methodology as summarised in the diagram at paragraph 2.2 above is undermined when it is possible to override a highly negative sustainability score, as is the case with the Ironbridge site, by proposing mitigation measures. The implication is that the site has been allocated for other reasons than sustainability, and in spite of the sustainability appraisal process.

2.17 We agree with the Oswestry & District Civic Society who have previously drawn attention to the requirement in NPPF paragraph 8c that the planning system should pursue the overarching environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including “mitigating and adapting to climate change, including moving to a low carbon economy”. We endorse their view that:

The need to address carbon emissions is a responsibility which cannot be escaped, and must be addressed in order to safeguard the future of civilisations, mankind and the natural world. The Society takes the view that this issue is such that the need to address it outweighs all other considerations; and that it is of critical and urgent importance. Every nation and all sectors of society, and every individual must play a part, however small that might be. Thus the issue should be addressed by planning policy, such as those being developed in the Local Plan Review.

3. SP2: Strategic Approach

3.1 We now move on to commenting on aspects of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, beginning with the overriding Strategic Approach

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	SP2: Strategic Approach
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

3.2 The opening words of SP2 derive from CS1 in the existing Core Strategy. The phrase ‘Shropshire will flourish’ presumably stems from the motto ‘Floreat Salopia’ but is surely meaningless as a planning policy.

- 3.3 Policy SP2 has the headline figures of delivering:
- Around 30,800 new dwellings, of which 7,700 will be affordable, and of which 1,500 will be for the needs of the emerging Black Country Plan
 - Around 300 hectares of employment land

There will also be an urban focus.

3.4 An increased urban focus would undoubtedly be part of an appropriate response to the Climate Emergency, and an increased urban focus is what SP2 seems to imply. However, we note that the guideline figures indicate that a reduced urban element is now being planned. At the Preferred Sites stage the guideline figures for Shrewsbury and the Principal and Key Centres amounted to 72.6% of the overall guideline of 28,750 houses. The total for those centres in this plan is only 69.1% of the new guideline of 30,800.

3.5 We have consistently argued throughout this process that the guideline figures, both for housing and for employment land, are too high. This is because:

- a) The housing calculations can be broken down into separate constituent elements, highlighting their underlying potentially questionable assumptions
- b) The employment land figures can also be shown to be based on illogical assumptions.
- c) The aim of the Economic Growth Strategy to 'maximise our economic potential' (paragraph 3.16) is not only unrealistic but contrary to climate change goals.
- d) Public opinion is against the high targets.

3.6 We briefly elaborate again on each of these points further below.

3.7 We remain surprised that the Council has still not published Key evidence which is said in Appendix 3 to the consultation document to be supporting policy SP2. The latest response to our questions about this omission was at the Cabinet meeting on 7 September 2020 when it was stated that *'the Council will be seeking to make available additional evidence, including the items referenced in [our] question, as soon as possible within the current consultation period to 30th September'*.

3.8 One key document, the Shropshire Strategic Housing Market Assessment (SHMA) part 2 was subsequently published on 22 September, only eight days before the formal end of this consultation, although that had not been referenced as missing, because Appendix 3 listed only the SHMA, without distinguishing between its part 1 and part 2. However, contrary to the council's statement above, at least two other supposedly Key evidence documents remain unpublished, namely the Shropshire Economic Development Needs Assessment (2020) and a current Shropshire Authority Monitoring Report. The Authority Monitoring Report is mentioned 15 times in the consultation document, including a website reference on page 45, but that reference leads to a document that is now over three years out of date.

3.9 The Council's stance that these documents will become available by the time of the forthcoming Regulation 19 consultation does not satisfy the requirements for this present consultation, of the Gunning principles of consultation, that:

- Sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response
- Adequate time must be given for consideration and response

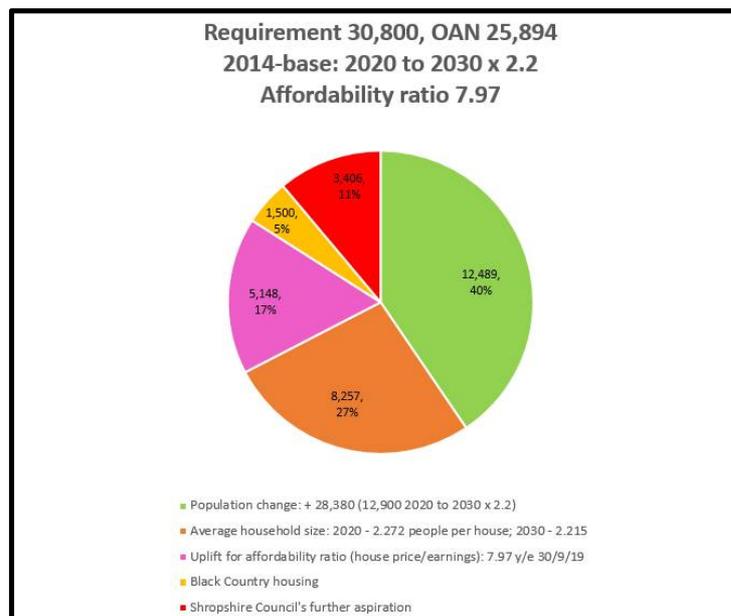
'Sufficient reasons' is assumed to mean that at least stated Key evidence should be available, and 'adequate time' is assumed to mean that such evidence should be available for the whole of the consultation period.

4. Housing guideline calculations

4.1 We set out again our breakdown of the elements making up the headline housing target. This breakdown shows the calculation of the Government's Standard Methodology housing need figure of 25,894, as noted in paragraph 3.5 of the consultation document and as set out in a degree of detail in the Shropshire Council Local Housing Need Assessment of August 2020. It then shows the additional figures to arrive at the proposed guideline of 30,800.

Shropshire Council - Local Housing Need Assessment for Pre-submission Local Plan					
	2020	2030	10-year change	Annual	for 22yrs
Step 1: Setting the baseline					
2014-based Subnational population projections	317,900	330,800	12,900	1,290	28,380
2014-based Subnational household projections	139,903	149,333	9,430	943	20,746
Average population per household	2.272	2.215			
Step 2: An adjustment to take account of affordability					
Median house price (y/e 30/9/2019)	217,500				
Median earnings (y/e 30/9/2019)	27,299				
Affordability ratio	7.97				
Excess of affordability ratio above 4.0 x 0.0625 of change in household projection			2,340	234	5,148
Totals			11,770	1,177	25,894
Elements of the Local Housing Need Assessment					
Due to population change: $12,900 \div 2.272 \times 2.2$					12,490
Due to reduction in average population per household: $(330,800 \div 2.272) - (330,800 \div 2.215) \times 2.2$					8,256
Due to affordability ratio: $2,340 \times 2.2$					5,148
Total Government Standard Method Objectively Assessed Need				1,177	25,894
Add proposed housing from Association of Black Country Authorities				68	1,500
Add further Shropshire Council ambition				155	3,406
Pre-submission Draft Local Plan 2016 to 2038				1,400	30,800

4.2 These figures can be also be represented in the following chart:



- 4.3 We have repeated this form of analysis again at this stage of consultation because:
- i) It identifies by how much the Council is exceeding the Government need requirement of 25,894 dwellings.
 - ii) It brings out the elements of that 25,894 that derive (1) from projections of increased population; (2) from projections of reduced average household size; and (3) from the 'affordability' ratio, derived from the mistaken Government mantra that building more houses will bring down their price (this Government approach to tackle affordability relies on private sector housebuilders building so many additional homes that the price of their products falls, even though this is self-evidently incompatible with their business model).
 - iii) It allows light to be cast on the Council's calculations of the 'balance' between houses and jobs.
- 4.4 It also remains the case, as evidenced in our previous consultation responses, that supply is underestimated (including the fact that infill and windfall figures are too low). It is also likely that more shops will be converted, giving town centre regeneration, particularly in the emerging post-Covid19 world.
- 4.5 More importantly, and running throughout, the Council has made no calculations of the greenhouse gas emissions that will be created by the extra houses built. It is our belief that each house built will create further emissions, thereby contributing further to the problem of climate change, rather than solving it, and certainly being a long way from moving towards the goal of zero carbon in ten years' time. The drive for high targets is therefore contrary to the Council's own Climate Change policies at SP3 and DP12.
- 4.6 Instead the Council should seek to minimise necessary growth. It should certainly not seek guidelines that exceed the Government's minimum requirement, and it could justifiably and soundly argue that the Climate Change agenda provides the exceptional circumstance, allowed by NPPF paragraph 60, that would allow it to seek fewer houses than that, were it so minded.
- 4.7 What is needed is a 'step-change' in thinking, not a 'step-change' in economic performance.
- 4.8 We note that paragraph 3.7 states the intention to incorporate 1,500 dwellings to support the housing needs of the emerging Black Country Plan, but that this is not a direct part of the policy as expressed in the box on page 12. The conclusion is that, without accepting this 1,500 from the Black Country, the overall housing guideline in this Draft Plan would have been 29,300 houses rather than 30,800.
- 4.9 The Black Country Plan has currently been delayed, and the housing numbers within it have yet to be finally determined. We therefore continue to believe that it is premature at this stage of its own Draft Plan for Shropshire Council to agree to accept any unmet need from the Black Country without reference to what is agreed between all relevant Local Authorities. Some LAs within the West Midlands orbit are better related to the Black Country than is the Shropshire Council area.

5. Employment land and balance with housing

- 5.1 The employment land figures are set out in Appendix 6 to the consultation document. Confusingly, (1) that Appendix is set out in a different format to the housing figures in Appendix 5; (2) although it is headed 'Employment Guidelines and Employment Supply', the actual guidelines set out in the Settlement Policies are not shown; and (3) parts of it do not add up.
- 5.2 In order to better understand the overall picture of what the Council is proposing around the county, we therefore drew up our own summary of the housing and employment land figures, as derived from the various parts of the consultation papers. This is reproduced in our Appendix 2 below. Because this appendix, like Appendix 1, may be difficult to read in this document, even when enlarged, we are again also submitting it as a separate document.
- 5.3 The Council's Preferred Strategy, stated at the Preferred Scale and Distribution of Development stage, and repeated throughout the present consultation document, is for a balance between new housing and local employment.
- 5.4 That is a sensible aim, but we still think that the calculation of the employment land so required has been overstated. The calculation behind the original figures was set out in Table 7 on page 42 of the Preferred Scale and Distribution of Development document:

	Housing Growth 2016 - 2036 (Dwellings)	Anticipated Employment Need 2016 - 2036 (Jobs)	Average Employment Density* (sq.m/job)	Total Employment Floorspace Need (ha)	Employment Land Requirement** (ha)
Balanced Growth	28,750	28,750	42.25	121	304

- 5.5 The logic behind this was that each household would on average require one job, each job would require on average 42.25 sq m of employment space, and each employment space would represent on average only 40% of the total employment site.
- 5.6 In the column headed 'Employment based on housing', our Appendix 2 shows the effect of applying this calculation to the housing guidelines for each settlement. It can be seen that this was the basis for every employment land guideline at the Preferred Sites stage, with the exception of Bridgnorth and Shifnal. The guidelines at this present stage of consultation have been altered for some settlements, without any apparent full justification, but the aim of balance between houses and jobs remains.
- 5.7 We continue to think that the logic behind the Council's 'balanced growth' calculations is flawed because:
- i. Each new house would not necessarily equate to a requirement for one new job. Not all occupants of new houses will have jobs which require employment land; some will already have jobs; and many will be beyond working age. For instance, we have heard it said by Mark Barrow that *'one-third of all new houses sold in the Shropshire Council area are to affluent down-sizers from outside Shropshire'*. It is therefore likely that each house will produce less than one job requiring employment land, thereby decreasing the calculation of the requirement for employment land

- ii. The aim of improving median earnings and going for 'smarter' jobs means that higher-skilled jobs should be provided. The assumption that each job requires 42.25 sq m on average is based on a weighting which includes 25% of warehouse-type jobs. The evidence base suggests that higher productivity jobs might require average floorspace of only 31 sq m per job. That would mean a further decrease in the calculation of the requirement for employment land.
- iii. Under that supposedly 'smarter' EGS strategy, buildings on employment sites might well represent more than 40% of an employment site.
- iv. Not all jobs require employment space on a dedicated employment site anyway, particularly in a post-Covid19 world where many more people may be working from home.

5.8 We set out below an update of the calculation we put forward at paragraph 4.14 of our submission to the Preferred Sites consultation, this time, on a precautionary basis and in line with the Council's calculation, allowing for one job per household as relevant, notwithstanding what we say at point 5.7i above:

	Element	Employment consideration	Employment
From population change	12,490		12,490
From reduction in average population per household	8,256	This element already exists within the workforce	nil
From affordability ratio	5,148	Much, if not all, of this element already exists within the workforce	2,574
From ABCA houses	1,500		1,500
From further ambition	3,406		3,406
Total	30,800		19,970

5.9 By applying the 'smarter' job density of 31 sq m per job that we previously demonstrated to be more likely, based on the Oxford Economics model, the employment land requirement would be only 155 hectares, instead of around 300 hectares as stated in SP2. That would be a reduction of nearly 50% in the employment land requirement.

5.10 Our Appendix 2 also demonstrates a further significant anomaly with the employment land figures. The guideline figures for employment land as set out in the individual Settlement Policies S1 to S21 actually add up to a total of 375 hectares. This is markedly in excess of the guideline figure in SP2 of delivering only around 300 hectares of employment land. This seems to us to be a major discrepancy between what is stated in SP2 and what is stated in the detailed settlement policies, and is therefore unsound.

6. SP3: Climate Change and sustainability

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	SP3: Climate Change and SP4: Sustainable Development
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree, **but it is not consistent with other policies**

- 6.1 We agree wholeheartedly with the thrust of policy SP3, in recognition that Climate Change is a present threat to life as we know it. However, as pointed out above, the Council cannot at the same time adopt the policy of business as usual, or in fact even more so, as far as housing and economic growth is concerned. Again, as already noted, what is needed is a 'step-change' in thinking around the issue of continued and relentless growth.
- 6.2 As for policy SP4, its term 'sustainable' carries a quite different meaning to what is generally meant by sustainable when talking about Climate Change issues. It is increasingly realised that the 'sustainable' development envisaged by the NPPF, and the 'business as usual' thinking, will indeed compromise the ability of future generations to live healthy lives.

7. SP5: High-Quality Design

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	SP5: High-quality design and SP1: the Shropshire Test
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree, **as far as it goes**

- 7.1 We fully endorse the thrust of policy SP5, in recognition of the importance of design for creating better places and better buildings within them. Design is notoriously difficult to pin down and there have been the Building for Life standards (mentioned in NPPF paragraph 129), the Shrewsbury Test, and the guidelines developed by Ian Kilby.
- 7.2 Our concern is simply that the guidelines in both the West Midland Design Charter and in the Shropshire Test are perhaps a bit general and possibly bland. Developers might therefore be able to say that they have met those tests whilst still presenting a development that is little better than those that are presently criticised.

8. SP6: Managing Housing Development

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	SP6: Managing Housing Development
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree, **on the whole**

- 8.1 We particularly welcome paragraph 2 of the policy insofar as it will be used to actively encourage the re-use of brownfield land, and the regeneration of town centres. We also particularly welcome paragraph 3 insofar as it will be actively used to refuse applications for development that are in excess of guideline figures. The public expect a guideline figure to be treated as a maximum, and are always perplexed that the Council permits development in excess of that. What is the point of a plan, they think, if its guideline figures can be exceeded with impunity?
- 8.2 There would be a greater chance of the re-use of brownfield land were the guideline figures for housing not so high. The numbers game has had a catastrophic effect on the ability of brownfield land to contribute to housing land supply in Local Plans. The higher the housing number, the harder it is to pursue brownfield and under-used land for supply, and therefore the greater is the pressure on greenfield sites. This is exacerbated by the huge financial incentive to landowners simply to gain outline planning permission, which is why land market reform is also crucial. There are currently 1 million homes' worth of unbuilt planning permissions on both greenfield and brownfield land in England, which is enough land in the system to meet the Government's mantra of needing 300,000 new houses a year for at least the next three years.

9. SP9: Managing Development in the Countryside

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph	4a particularly	Policy	SP9: Managing Development in the Countryside
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 9.1 We support the intention, within the Hierarchy of Settlements, that the countryside should come last in priority for development, below Strategic, Principal and Key Centres and new Strategic Settlements and below Community Hubs and Community Clusters.
- 9.2 We would continue to support the inclusion of single plot rural exception sites within paragraph 4a of the policy but we do not support the intention, within that paragraph, that either entry level exception sites or cross subsidy exception housing schemes be allowed in the open countryside. If there is an identified need within a parish for affordable housing, then for reasons of sustainability, any affordable exception site housing other than single plots should always be situated near an existing Hub by preference, rather than even a Cluster, and certainly not in the countryside.
- 9.3 To allow larger exception housing sites, such as entry level exception sites or cross subsidy exception housing schemes, in the countryside would conflict with the sustainability objectives of the Plan, particularly with the Climate Change objectives.

10. SP10: Shropshire Economic Growth Strategy

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph	3e particularly	Policy	SP10: Shropshire Economic Growth Strategy generally
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 10.1 Our response to the Preferred Scale and Distribution of Development consultation in December 2017 heavily criticised the underlying report behind the Council's Economic Growth Strategy, which was produced by IPPR North. That report was riddled with errors, many of them typos, but it also included some more fundamental errors. Its promise that *"Shropshire can be a world leading rural economy by 2030"* seemed more marketing hype than realistic policy, based as it was on a meaningless comparison of a largely rural county like Shropshire with the largely metropolitan UK. In any case, the conclusions of the report were based not on evidence, but on round-table discussions, several of which were internal to Shropshire Council itself. It was therefore a subjective report, rather than an objective one. We also had doubts about the Oxford Economics Productivity Growth Forecast spreadsheet incorporated into the IPPR report, which remains as part of the present published Evidence Base. Our conclusion was that the Economic Growth Strategy was unsound.
- 10.2 This conclusion was underlined by the fact that that no Sustainability Appraisal had been carried out for the EGS, a fact that was acknowledged at the time of its launch. A four-paragraph section on SP10: Shropshire Economic Growth Strategy has now been included on page 143 of the current SA but contains the puzzling statement that *'the policy has no effect on the sustainability objectives of . . . reducing carbon emissions and promoting adaption and mitigation to climate change'*.
- 10.3 Our contention is that, until all development becomes provably zero carbon then any development will make the problem worse, not better. To comply with policy SP3 Climate Change, the Council should therefore seek to keep economic development to the minimum required.
- 10.4 Instead, as noted earlier in the document at paragraph 3.16 on page 17 (under policy SP2) the vision of the EGS is stated as *"To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high quality assets"*.
- 10.5 This desire to *'be the best'* and to *'maximise our economic potential'* is precisely the sort of thinking that needs to be got away from if climate change objectives are to be met.
- 10.6 The desire to be the best seems a worthy aim, but it is simply fostering competition with other neighbouring local authorities, and Shropshire is unlikely to become a better place to invest than say the West Midlands conurbation. At the moment it is well down in the

'league tables' of economic indicators for counties, and is likely to remain so because it contains a high proportion of farm land.

- 10.7 On a more specific point we consider that reference to the Countryside should be removed in paragraph 3.e. For simplicity, the management of development in the countryside should be controlled solely via policy SP9.

11. SP11: Delivering Sustainable Economic Growth and Enterprise

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph	1, 2, 4d	Policy	SP11: Delivering Sustainable Economic Growth and Enterprise
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 11.1 As already commented on extensively above, we do not believe that the evidence supports the aim to deliver around 300 hectares of employment development. Not only is there a lack of evidence, but such an aim is not consistent with Climate Change objectives. Furthermore, the individual guidelines for employment land within the Settlement policies add up to 375 hectares, well in excess of the headline figure of 300 hectares, which again is an unsound inconsistency.
- 11.2 Paragraph 2 of the policy is too vague, as it encompasses almost all use classes. The opening statement that employment development will predominantly comprise Class B uses is also unhelpful without specifying more particularly which use classes will be favoured. The EGS seeks 'smarter' jobs. That aim will not be achieved if the Council has to allow Class B8 Storage and Distribution development, with low employment density and low wage jobs attached to it.
- 11.3 In paragraph 4d the reference to the Countryside should be removed, for the same reasons given in our sections 10 and 11 above.
- 11.4 At paragraph 3.107 we welcome the explanation that in the Countryside, agricultural and non-agricultural diversification and green tourism and leisure may also be supported at a scale that is appropriate for their location, as these are important economic activities in the rural economy. We note however the recent tendency in Development Management to refuse applications for tourist-related applications on the grounds that they are unsustainable, specifically because they are in rural locations, and will therefore foster the use of private cars for access. In this context, the word 'green' in paragraph 3.107 might need to be further defined.
- 11.5 At paragraphs 2e and 3.108 we welcome the fact that proper protection will be given to the Green Belt, the Area of Outstanding Natural Beauty, areas of landscape value and the natural and historic environment.

12. SP12: Whole Estate Plans

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph	Particularly 1c	Policy	SP12: Whole Estate Plans
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 12.1 The central concept of seeking to ensure sustainable land management is sound when, as we emphasise, the overriding concern of current policy for land use should be to mitigate against the effects of both the climate emergency and the ecological emergency. However, that should be achieved by a Whole Shropshire Plan (which should be this entire Draft Shropshire Local Plan) not by separate piecemeal Whole Estate Plans.
- 12.2 The proposed policy SP12 should offer some definition of what constitutes an 'Estate', for instance whether it would be of a size equivalent to that of a Parish.
- 12.3 The Council normally only adopts or endorses as a material consideration documents such as Neighbourhood Plans, which cover a substantial area and which have been subject to statutory consultation.
- 12.4 Whether or not there is a policy allowing Whole Estate Plans to be endorsed, it is always open to Estates, as it is to any developer, to put in planning applications to be tested against the policies in the Local Plan.
- 12.5 If, as is stated at your paragraph 3.115, many Estates are engaged in the preparation of Whole Estate plans, then it would have been open to them have presented those plans for consideration as part of the current process.
- 12.6 On the basis of the above points, this policy seems to us to be irrelevant, and would be better omitted.
- 12.7 If it is retained, then something more than 'meaningful' consultation is required. The existing wording of paragraph 1c should be replaced with the following wording:

It has been subject to the same level of public consultation as is required for Neighbourhood Plans.

13. DP1: Residential Mix

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph	2, particularly	Policy	DP1: Residential Mix
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree **in part**

- 13.1 We fully endorse the intention of paragraph 1 of the policy to provide a mix of dwelling types to meet the needs of the different sections of society, in accordance with the SHMA.
- 13.2 However, part 2 of the SHMA, giving details of the different sections of society, was not published until 22 September 2020. There is also a category mismatch between the sections of society dealt with in the RHRP surveys, in the SHMA and those listed in paragraph 1, as identified below:

RHRP survey – types of housing required	SHMA section headings	DP1 paragraph 1
Affordable housing	Affordable housing	
Open market housing		
Self-build	Self-build and custom-build	People wishing to build their own homes
Entry level housing		
Key worker		
Sheltered accommodation for older people	Older people	Older people
Adapted	People with disabilities	People with disabilities and special needs
	Families with children	Families with children
	Students	
	Service families	
	Private rent	

- 13.3 The idea behind the Right House Right Place surveys is admirable. However, at the moment, surveys covering only 18 of the 59 settlements with a housing guideline have been posted to the RHRP website, so there is still a way to go before there is widespread coverage.
- 13.4 Paragraph 2 of the policy refers only to open market dwellings. There should also be reference to the affordable housing need.
- 13.5 Paragraph 2a requires only 50% of open market housing to reflect the need profile identified in the RHRP surveys. From the wording of paragraph 2b, the implication is that it is the number of bedrooms that is being referred to, although that is not specifically stated. RHRP surveys seem to show that the vast majority of need is for 2 and 3-bed houses. The corollary of paragraphs 2a and 2b is that up to 50% of open market houses will still be 4+ bedroom houses, which are patently not what is being shown as needed. The policy contained in paragraph 2 will therefore continue to make worse the shortfall of houses that are needed.

- 13.6 The conclusion here is that the profile of need should be met to the extent of much more than 50%.
- 13.7 The final sentence of paragraph 2 also seems to us to be weak, in referring to a 'suitable' mix and variety. Developers are always likely to plead that what they propose is 'suitable'. The sentence would have more teeth if it read *'the remainder of the open market dwellings will include a mix and variety of dwelling sizes to be determined by the latest available evidence of need'*.

14. DP2: Self-build and Custom-Build Housing

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP2: Self-build and Custom-Build Housing
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Don't know /no opinion / **unsure**

- 14.1 The wording of paragraph 2 may need rethinking, or refining, in that 10% of 5 is only 0.5, so the requirement would be for only half a plot to be provided for self-build on sites with only 5 dwellings in designated rural areas.
- 14.2 One disadvantage of self-build is that they are currently exempt from CIL, so the burden of funding infrastructure falls elsewhere. We suggest that a discounted rate of CIL may be more appropriate for self-build rather than complete exemption.

15. DP3: Affordable housing provision

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

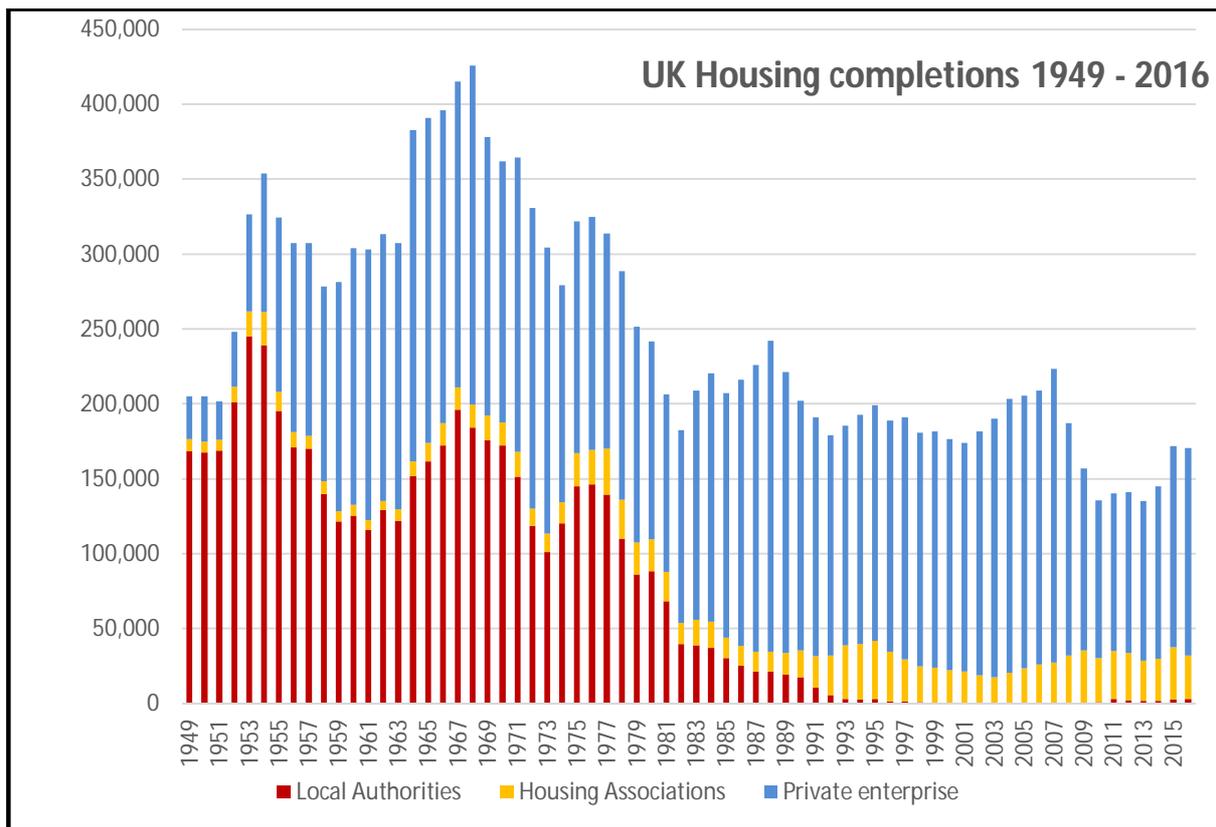
Q2. To which part of the document does this response relate?

Paragraph	Particularly 1a and 2	Policy	DP3: Affordable housing provision
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 15.1 We all know that much greater numbers of affordable houses are needed. Eddie West may remember Inspector Cullingford (at the rerun Teal Drive, Ellesmere Inquiry) causing a jolt by saying that he did not agree with the Government's assessment that the housing crisis could be solved just by building more houses (they still mistakenly believe that). He pointed to the collapse in council-house building from the early 1980s onwards. That is evidenced in the chart below:



- 15.2 Table 35 on page 50 of the SHMA part 2 (published in the Evidence Base only on 22 September) indicates that, over the plan period of 22 years, there is a need in the Shropshire Council area for 17,574 affordable houses, or 799pa (this latter figure is mentioned at paragraph 4.46, so was clearly known even though the SHMApart2 was not published until 22 September). Satisfying such a need would take 57% of the overall guideline figure of 30,800 houses. Yet the Council proposes an overall target of only 25% affordable housing (7,700 of the 30,800), whilst proposing targets of only 10% in the north and 20% in the south. At present (according to the latest AMR) only 21% affordable housing is achieved.
- 15.3 If the target is for only 10% of houses in the north to be affordable then nine open market houses will be built for every one affordable house built. That will make the problem of the overall inadequate proportion of affordable houses worse, not better.
- 15.4 The ambition should therefore be to build a greater proportion of affordable houses than is provided for in this draft plan in SP2 or DP3.
- 15.5 The existing Core Strategy originally aimed for 30% affordable houses. Our understanding is that this was reduced after the 2008 financial crash, by reference to viability assessments, to the current proportions of 10%, 15% and 20% in the different geographical areas. Viability studies have again been carried out. We therefore do not see the need for the proposed paragraph 2 of this DP3 policy. Developers will know from the outset what percentage of affordable housing is provided for in policy, and should therefore be able to pay an appropriate amount for the underlying land in order to provide them with an acceptable profit level, without recourse to further pleading of exceptional circumstance as to viability.

16. DP4 to DP7: Exception sites

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP4, DP5, DP6, DP7
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree

16.1 We broadly agree with these policies. We note in particular that the wording of the policies prevent such sites being built in the open countryside. That reinforces our view stated above at paragraph 10.2 that the wording of policy SP9 should be amended to remove paragraph 4a. Only single plot local needs affordable exception sites should be allowed in the countryside.

17. DP9: Strategic Corridors

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP9: Strategic Corridors
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 17.1 We broadly disagree with these policies for the reasons stated in previous consultation responses and because, as indicated above, the 'step change' that is referred to in this policy is fundamentally at odds with Climate Change objectives.
- 17.2 The wording of the first sentence to the policy appears to be somewhat tautological and could do with being refined. It essentially says 'Strategic Corridors' will be the primary focus for major development along 'strategic corridors'.
- 17.3 Paragraph 2 should first emphasise that there should be a presumption against development in the Green Belt or the AONB, regardless of whether a HRA is also produced.
- 17.4 The emphasis in paragraph 4a on the need to balance the delivery of housing and employment growth is not fostered by the proposals in Bridgnorth, Market Drayton, Oswestry and Shifnal, where there are considerable and marked imbalances between the proposed housing and employment land guidelines. The policy will therefore foster increased levels of commuting, which is against the Climate Change objectives.

18. DP12: Minimising Carbon Emissions

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP12: Minimising Carbon Emissions
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree, **but it doesn't go far enough**

18.1 We strongly agree on the need to minimise carbon emissions, and the hierarchy shown in paragraph 4.116. However, the fact remains that until zero carbon new builds, housing estates and employment sites are achieved, all development will continue to contribute to making the problem of global warming worse, not better. The hope embedded in the policy is presumably that, before the zero-carbon deadline of 2030 is upon us, costs of the technology will somehow have reduced such that the provisions in paragraphs 4 of the policy and 4.4.120 of the explanation as to viability (i.e. profit) will not need to apply.

19. DP13 to DP19: Natural Environment

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP13 to DP19: Natural Environment
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree

19.1 We agree with policy DP13: The Natural Environment, as a step towards helping to minimise the ecological crisis. We particularly welcome the adoption of the 10% net gain for biodiversity within the Environment Act (which has yet to become law), although we foresee differences of opinion in measuring existing and augmented biodiversity.

19.2 We agree with policies DP15 and DP16: Green Infrastructure and Open Space. The fundamental importance of Green Infrastructure and Open Space, which has sometimes been undervalued in the world of development, has been brought home and emphasised by the Covid-19 emergency. It is important to take all opportunities to extend and enhance networks of inter-linked Green Infrastructure in particular, rather than considering each development in isolation.

19.3 We agree with the vital importance of policy DP18: Landscape and Visual Amenity. Shropshire has a particularly rich variety of landscape and geological forms and it is reassuring to know that the Council places a high priority on their conservation and enhancement.

20. DP20 to DP23: Water

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP20 to DP23: Water
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree

20.1 We agree with the fundamental thrust of these policies in managing water resources and flood risk, in the light of the Climate Emergency and the ecological emergency. In some cases development, particularly major development, should take account of effects in other wider parts of the catchment area of which that development is part. No development

should contribute to increased flood risk in other parts of the county or the wider catchment area.

21. DP24: Conserving and Enhancing the Historic Environment

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP24: Conserving and Enhancing the Historic Environment
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree

21.1 We agree with all measures designed to protect, conserve, enhance and restore Shropshire's Historic Environment, including the setting of its historic assets.

22. DP25 and DP26: Green Belt and Areas of Outstanding Natural Beauty

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP25 and DP26
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

- Agree with the overall thrust
- Disagree with particular proposals

22.1 We agree with all measures designed to protect the Green Belt and the AONB against inappropriate development.

22.2 We endorse the comments made to this consultation by the AONB partnership. On the whole we welcome the increased recognition of the importance of the AONB and references to it and its Management Plan in a number of the policies, particularly DP26. The proof of Shropshire Council's commitment will come in future responses to planning applications, which in the past have sometimes paid scant attention to the importance of this designation. In the long term we would like to see adopted at the policy stage the recommendations, in the Glover report, that the AONB should become a statutory consultee for applications within the AONB.

22.3 We disagree with DP25 paragraph 4 in that we do not think it will be appropriate for Affordable Exception Sites of more than one house to be allowed in the Green Belt or the AONB.

22.4 We do not agree with the proposals for release of Green Belt land as set out in paragraph 4.218. We do not think that a sufficient exceptional circumstances case has been made for these releases. At the Strategic Sites stage of consultation we argued that there is no need to release the RAF Cosford land from the Green Belt because existing policies allow for the

type of development being proposed by RAF Cosford. The new area of release proposed for the Midlands Air Ambulance Charity is significantly larger than MAAC's identified need for its proposed operation there.

23. DP27 to DP29: Transport and Infrastructure

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP27 to DP29
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree, **as far as it goes**

- 23.1 We agree that new development should only take place where there is sufficient existing infrastructure capacity available.
- 23.2 The provisions as to CIL and Section 106 contributions may of course be overtaken by the proposals in the Government paper 'Changes to the current planning process' (which was released just as the current LPR consultation began), to replace them with a single new Infrastructure Levy.
- 23.3 It is vital that measures to promote good infrastructure and design are brought into the Local Plan in a way that gives them real teeth and the prospect of implementation. Efforts need to be targeted at infrastructure which will mitigate against Climate Change. Better provision is also needed for social facilities, and for rural broadband and public transport.
- 23.4 We and others have argued that the Local Plan should incorporate master plans.
- 23.5 The separate Place Plans are largely concerned with the provision of infrastructure. Regrettably, a lot of the funding for this infrastructure is to come from CIL moneys. The trouble with CIL is that (1) it is made available only after the housing developments that require the infrastructure have been constructed, and that (2) it takes years to make the decisions as to how to spend it. The provision of the infrastructure therefore lags well behind development, rather than being in place to facilitate it. That is one of the reasons why a masterplan would be a good idea.
- 23.6 Paragraph 3b of DP29: Communications and Transport provides for protection, extension or improvement of footways, cycleways, public rights of way and bridleways. That is welcome, but it is much more important to have a fully integrated Transport Strategy that discourages transport using fossil fuels and which positively encourages, and more importantly facilitates, active travel like walking and cycling. Presently, there is no such integrated policy.

24. DP30: Health and Wellbeing

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	DP30: Health and Wellbeing
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Agree

- 24.1 We agree that new development should ensure the health and well-being of individuals, communities and places, and agree with the intention that permission will be refused for development proposals that would adversely affect or prejudice the health and well-being of individuals, communities and places.
- 24.2 In practice such matters are difficult to pin down. The Council currently has such applications on its books, where the presumption in favour of development means that the tests for a valid refusal on health or other environmental grounds are set at a level which is higher than merely precautionary.

25. Settlement policies

- 25.1 We now set out comments on some, but not all of the Settlement policies. Comments from people living close to each area are likely to be more detailed than our own comments.
- 25.2 For reasons set out above, we consider that the Council's overall targets for housing and employment land are too high and this clearly has a knock-on effect on the individual settlements.
- 25.3 Again, as indicated above, we consider that the policies for some individual settlements are not consistent with the declared aim of balance between housing and employment land.
- 25.4 And we also consider, as alluded to above, that the necessary exceptional circumstance have not been adequately evidenced for the release of Green Belt land, either now or as safeguarded land for use in subsequent plan periods.

S3: Bridgnorth Place Plan Area

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph	Policy	S3: Bridgnorth Place Plan Area
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 25.5 At the Preferred Scale and Distribution of Development stage of consultation its Table 2 on page 21 stated the guideline figures for Bridgnorth to be 1,500 for housing and 16 hectares of employment land to balance that housing. Based on Table 7 on page 42 the calculation of this employment land figure would have been: 1,500 houses equals 1,500 jobs, multiplied by 42.25 sq m per job, divided by 10,000 to convert to hectares, divided by 40% because employment land in Shropshire historically delivers floorspace on 40% of the site area. So the calculation at that stage was:

$$1,500 \times 42.25 / 10,000 / 40\% = 15.84 \text{ Ha, which rounds to 16 Ha.}$$

- 25.6 At the Preferred Sites stage of consultation the housing guideline remained the same but the employment land guideline was increased by 12 ha to 28 Ha, 'to address local circumstances'.

25.7 In this consultation, the period of which has been increased by 10%, the housing guideline has been increased by 20% to 1,800, but the employment land guideline has been increased by a further 21 Ha to 49 Ha, an increase of over 300% from the original figure.

25.8 Nowhere in the consultation document itself or in the Bridgnorth section of the Green Belt Release Exceptional Circumstances Statement does there seem to be any cogent justification for this massive proposed increase in the employment land guideline, or for the departure from balance with the housing guideline.

25.9 The Council now proposes an allocation of 1,050 houses on the proposed Taylor Wimpey 'garden village' sustainable urban extension site at Tasley rather than the previously proposed allocation of 850 houses on the Stanmore site. It is therefore not consistent to continue to propose an employment land allocation at Stanmore, the more so because it is the Green Belt.

25.10 We summarised our comments dated 3 June 2020 to the consultation on the Taylor Wimpey proposals at Tasley as follows:

1.1 *We have reservations about Taylor Wimpey's Tasley Garden Village scheme as currently presented because:*

- a) *The consultation process was deficient for a number of reasons, including being rushed, under-publicised, web-based only, too short, unofficial, and limited in information provided; it appears to be more of a public relations exercise than a proper consultation and seems to have fallen short as to transparency*
- b) *The public are being asked to judge the merits of the scheme without the benefit of information which is known to have been produced*
- c) *Phasing details indicate that the road frontage would be dominated by industrial estates; that essential facilities would not become available until more than a decade into the scheme or, in the case of much of the country park, until after 2038; and that locals would have a large building site near them for most of the next 30 years*
- d) *There is some doubt as to whether the land has been assembled with sufficient certainty as to make the whole scheme as put forward viable*
- e) *There is no proven need for the scale of the proposals, either for housing numbers or for employment land*
- f) *The economic benefits claimed should be treated by the public as marketing hype rather than solid evidence in favour of the proposals*
- g) *The pursuit of profit should not be the motivating force for any development around Bridgnorth; there would be a greater benefit to Shropshire were Shropshire Council's Cornovii Developments Ltd to carry out any housing development proven to be needed*
- h) *Not enough account has been taken of the climate emergency*
- i) *Not enough account has been taken of the biodiversity gains that should be built into this scheme in view of the provisions within the current Environment Bill*

- j) *A different world might emerge after the Covid-19 emergency passes*
- k) *Transport considerations of the scheme need to be rethought*
- l) *There should be some indication as to the amount and the timing of Community Infrastructure Levy (CIL) payments available to fund infrastructure requirements*
- m) *The use of the epithet "Garden Village" to describe the scheme appears to be misleading; the present scheme remains a long way from the original concept of a walkable community, in fact it still remains dominated by the motor car*
- n) *The scheme would use up good agricultural land (likely to include Grade 2 and Grade 3a land); there is an increasing realisation that good agricultural land is a national resource and that, as far as possible, it should not be used for development; food security post-Brexit is also of importance.*

1.2 *However, some advantages of the proposals are that:*

- a) *The site appears to be better connected to Bridgnorth than is the Stanmore scheme*
- b) *The site is not within the Green Belt and its clear availability as an alternative site to the Stanmore proposals means there are not the exceptional circumstances under NPPF paragraph 136 for the release of Green Belt land around Stanmore.*

1.3 *The proposals are of course only promises at this stage, with no certainty to them whatsoever. The scheme does have advantages over the proposals at Stanmore, but needs considerable modification, not least in its scale, in order to become an acceptable proposal; a significantly smaller scheme is likely to be more acceptable. As a mark of the landowners' combined commitment to this scheme, Mr M Bower should now withdraw his application for Intensive Poultry Units.*

25.11 These comments remain valid for this consultation. In particular we emphasise that:

- i) There is no proven need for the scale of the proposals, either for housing numbers or for employment land, and
- ii) Not enough account has been taken of the climate emergency.

S5: Church Stretton Place Plan Area

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	S5: Church Stretton Place Plan Area
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

25.12 Church Stretton is the only Key Centre within the South Shropshire Hills Area of Outstanding Natural Beauty. It is therefore heavily constrained by the presence of those protected hills all around it. Shropshire Council should therefore treat it in a different way to other towns in Shropshire, and not necessarily require it to take 'its share of development'.

25.13 As to justification of the stated need for 200 new houses and 2 Ha of employment land in Church Stretton, the Shropshire Hills Area of Outstanding Natural Beauty (AONB) Exceptional Circumstances Statement simply repeats the fact that *'the Local Plan Review identifies a need for 200 dwellings and 2 hectares of employment land in Church Stretton'*. However, pages 183 to 185 of the consultation document offer no further explanation of how those figures have been arrived at.

25.14 Our understanding, however, is that the employment land figure will have been arrived at by the formula:

$$200 \times 42.25 / 10,000 / 40\% = 2.11 \text{ Ha, which rounds to 2 Ha.}$$

25.15 The housing site chosen for allocation, the Snatchfield Farm site CST021, remains particularly controversial, as witnessed by the considerable local opposition to it. It would be obtrusive in views of the town from the Long Mynd and surrounding hills.

25.16 We understand that local preference is that any development in Church Stretton should be on smaller sites around the town, rather than on a large site in a controversial location. These sites would conserve its character far better than large new housing developments.

S11: Market Drayton Place Plan Area

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph	Policy	S11: Market Drayton Place Plan Area

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

25.17 At the Preferred Scale and Distribution of Development stage of consultation its Table 2 on page 21 stated the guideline figures for Market Drayton to be 1,200 for housing and 13 hectares of employment land to balance that housing. Based on Table 7 on page 42, our understanding is that the calculation of this employment land figure would have been:

$$1,200 \times 42.25 / 10,000 / 40\% = 12.68 \text{ Ha, which rounds to 13 Ha.}$$

25.18 At the Preferred Sites stage of consultation the two guideline figures remained the same.

25.19 In this consultation, the housing guideline remains the same, at 1,200. However, the employment land guideline has been increased by 22 Ha to 35 Ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed.

25.20 This does mean that housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting.

S14: Oswestry Place Plan Area

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	S14: Oswestry Place Plan Area
Site	PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032	Policy map	S14: Oswestry Place Plan Area

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

25.21 At the Preferred Scale and Distribution of Development stage of consultation its Table 2 on page 21 stated the guideline figures for Oswestry to be 1,800 for housing and 19 hectares of employment land to balance that housing. Based on Table 7 on page 42, our understanding is that the calculation of this employment land figure would have been:

$$1,800 \times 42.25 / 10,000 / 40\% = 19.01 \text{ Ha, which rounds to 19 Ha.}$$

25.22 At the Preferred Sites stage of consultation the two guideline figures remained the same.

25.23 In this consultation, the housing guideline has been increased by 100 to 1,900, but the employment land guideline has been increased by 38 Ha to 57 Ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed.

25.24 This does mean that housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting.

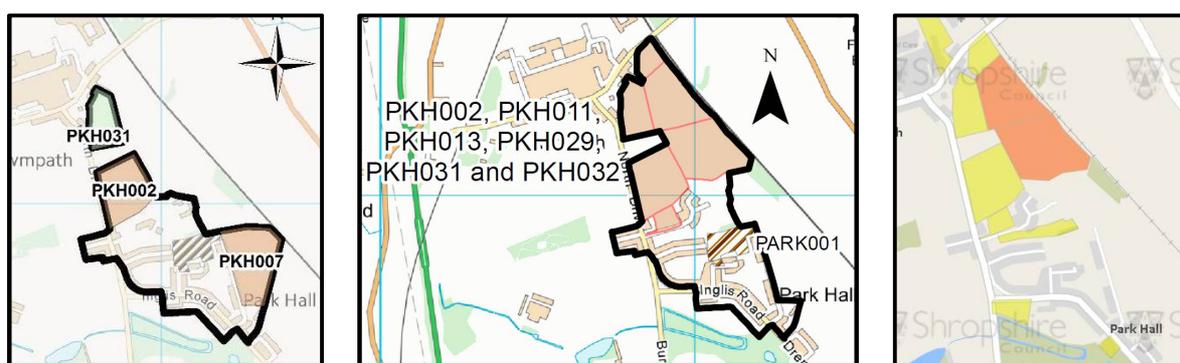
25.25 As to the allocations at Park Hall, we repeat the gist of our response to the Preferred Sites consultation in that:

- The proposed allocation at that stage was in response to the principles outlined in the Oswestry & District Civic Society's "Oswestry 2050" proposals. Those proposals were essentially, that there should be some sort of long term master plan for the general area encompassing Oswestry, Gobowen and Whittington, which should include a transport plan with the aim of reducing carbon emissions. An impression of such a plan was given within the "Oswestry 2050" outline, but it was not intended to be the plan. To make a single proposed allocation in the name of "Oswestry 2050" is to miss the point entirely.
- The proposal includes provision for key worker housing for the RJAH Hospital and Derwen College, which is to be welcomed. However, no mechanism is proposed to ensure that this comes about, rather than market housing being supplied.
- The site location itself presents conflicts. Although put forward as an allocation for Oswestry, the site itself is in Whittington Parish, but will benefit employment sites within Gobowen Parish. What will be the proposal for allocation of any resulting CIL monies? As the site is some distance from Oswestry, and is in Whittington Parish, it should be treated as a Whittington Parish matter, particularly as we have argued above that there is no need for further allocations for Oswestry.

25.26 As to masterplans, we do note that paragraph 5.194 refers to 'the Indicative Masterplan and Transport and Movement Strategy for Oswestry town', although we have been unable to locate such a document in the Evidence Base.

25.27 We note that the proposed allocations at Park Hall have been altered substantially from those proposed at the Preferred Sites stage, although no explanation is apparent. These changes appear to be that PKH007 has been removed as a proposed allocation, and PKH013, PKH 029 and PKH 032 have been added as proposed allocations. The overall allocation at Park Hall has been increased by 80 houses.

25.28 We show below, at approximately the same scales, the relevant sites as shown (1) at the Preferred Sites stage, (2) at the present Pre-submission stage and (3) on the web-based Residential Conclusion Map



25.29 The Residential Conclusions Map indicates that sites PKH029 and PKH 013 were rejected, so it is surprising that they are now being put forward as allocated sites. Site PKH007 does not appear on the Residential Conclusion Map at all.

25.30 Taking the above comments into account it therefore appears to us that:

- i) It is illogical, and seemingly unsustainable, to treat allocations at Park Hall as being to satisfy need at Oswestry
- ii) Some of the new allocations now proposed for Park Hall are in any case on rejected sites.

S15: Shifnal Place Plan Area

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	S15: Shifnal Place Plan Area
Site	SHF018b & SHF018d Schedule S15.1(iii) safeguarded land	Policy map	S15: Shifnal Place Plan Area

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

25.31 At the Preferred Scale and Distribution of Development stage of consultation its Table 2 on page 21 stated the guideline figures for Shifnal to be 1,500 for housing and 16 hectares of employment land to balance that housing. Based on Table 7 on page 42 the calculation of this employment land figure would have been:

$$1,500 \times 42.25 / 10,000 / 40\% = 15.84 \text{ Ha, which rounds to 16 Ha.}$$

25.32 At the Preferred Sites stage of consultation the housing guideline remained the same but the employment land guideline was increased by 24 ha (or 250%) to 40 Ha, 'to address local circumstances'.

25.33 The guidelines in this consultation remain substantially the same, although the employment land guideline is now stated as 41 Ha rather than 40 Ha.

25.34 Nowhere in the consultation document itself or in the Shifnal section of the Green Belt Release Exceptional Circumstances Statement does there seem to be any cogent justification for the massive proposed increase in the employment land allocation from 16 Ha to 41 Ha, or for the departure from balance with the housing guideline.

25.35 We quote below the full text of paragraph 8.40 on page 67 of the Green Belt Release Exceptional Circumstances Statement:

'The level of need and opportunity is based on two key assumptions. Firstly that employment land is developed out to 40% of the total land area, which takes into account the need for suitable levels of buffering, landscaping, servicing, access arrangements, and other on-site issues contributing to the delivery of a sustainable employment development. In applying this approach, it is considered that about 40 hectares will deliver around 16 hectares of built development. Secondly, it is assumed that commercial buildings will be developed as single storey properties'.

25.36 This statement raises the possibility that there is double-counting of the 40% factor for Shifnal in the same way as was done within Table 6 on page 40 of the Preferred Scale and Distribution of Development consultation document (as brought out by our Freedom of Information request CAS-1756500-T9V1C8 CRM:0182114 of June/July 2018). As noted at paragraph 25.31 above, the fact that 'employment land is developed out to 40% of the total land area' has already been accounted for in the formula arriving at the initial guideline for Shifnal of 16 Ha of employment land. The Council now seems to be incorrectly grossing up again at 40% for a second time in moving from the 16 Ha to the 40 Ha figure.

25.37 We therefore do not agree that the proposed allocation of 39 Ha of employment land at SHF018b & SHF018d is needed, justified or sound.

25.38 As we consider that the need for housing and employment land at Shifnal is misjudged, we also do not consider that any need has been soundly evidenced for the release of safeguarded land from the Green Belt, as listed in Schedule S15.1(iii) on page 248 of the consultation document. We note that no site references have been given for the land listed in Schedule S15.1(iii), which makes it more difficult to cross-check to other evidence documents.

S16: Shrewsbury Place Plan Area

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	S16: Shrewsbury Place Plan Area
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

25.39 At the Preferred Scale and Distribution of Development stage of consultation its Table 2 on page 21 stated the guideline figures for Shrewsbury to be 8,625 for housing and 91 hectares of employment land to balance that housing. Based on Table 7 on page 42 the calculation of this employment land figure would have been:

$$8,625 \times 42.25 / 10,000 / 40\% = 91.10 \text{ Ha, which rounds to 91 Ha.}$$

25.40 These figures were unchanged at the Preferred Sites stage of consultation.

25.41 Despite the plan period having been increased by 10%, and despite there being an increasing urban focus, the housing guideline figure for Shrewsbury in this consultation remains unchanged at 8,625, although allocations for 410 more houses are proposed. However, the employment land guideline has now been increased by 9 Ha to 100 Ha, although 6 Ha less employment land is proposed for allocation.

25.42 As outlined above in section 4 we consider that the overall housing guideline of 30,800 is exaggerated and should be considerably lower, which would have a knock-on effect on Shrewsbury. However, as noted above at paragraph 3.4, the relative proportion of the overall guideline that is earmarked for the main towns has been reduced slightly. The same maths applies to the guideline for Shrewsbury.

26. Strategic Settlement/Site Policies

S19: Strategic Settlement: Clive Barracks, Tern Hill

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	S19: Strategic Settlement: Clive Barracks, Tern Hill
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

26.1 We disagree with the housing and employment allocations to the extent that Tern Hill is sufficiently close to Market Drayton (particularly the Tern Valley Business Park) that houses and employment land at the Tern Hill site should be taken as satisfying the need in Market Drayton.

S20: Strategic Settlement: Former Ironbridge Power Station

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	S20: Former Ironbridge Power Station
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Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 26.2 The Ironbridge site is sufficiently close to Telford that its proposed houses and employment could be taken as satisfying need in Telford.
- 26.3 It is apparent that the local road network could not currently adequately cope with the volume of traffic likely to be generated.
- 26.4 As noted above, the Ironbridge Regeneration site IRN001, was scored as 'Poor' within the Sustainability Appraisal, yet has still been allowed to come forward as an allocated site. The pressure for development has over-ruled the objective assessment.

S21: Strategic Site: RAF Cosford

Q1. To which document does this response relate?

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Q2. To which part of the document does this response relate?

Paragraph		Policy	S21: Strategic Site: RAF Cosford
Site	MAAC element	Policy map	S21: Strategic Site: RAF Cosford

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

Disagree

- 26.5 As previously stated in our submission to the Strategic Sites consultation, we do not agree that there is any need to remove the RAF Cosford site from the Green Belt. The existing policy for RAF Cosford has enabled development to take place there over the years without too much difficulty. Why is it therefore necessary to remove the base from the Green Belt? This proposed removal carries the risk that if the military use ceases, the whole area could be redeveloped, without the protection of Green Belt status. While this is currently deemed unlikely by the Council, were the site to be removed from the Green Belt it is hard to see how protection against non-military development would be enforced.
- 26.6 In addition, we also do not agree that there is any proven need to remove the whole of the additional MAAC Element of the Strategic Site from the Green Belt. The area proposed appears to be considerably greater than is required by the actual needs of the MAAC. There should also be protection in place to prevent the use of the area for anything other than MAAC purposes.

Appendix 1: Summary of proposed allocations

		Sustainability appraisal					Housing allocations							Employment etc land allocations					Safeguarded land					
Place plan area	Settlement	Preferred Sites		Pre-submission		Mitigation proposed	Preferred Sites			Pre-submission			Change Houses / [Ha]	Preferred Sites		Pre-submission		Change	Preferred Sites		Pre-submission		Change	
		Score	Conclusion	Score	Conclusion		Site ref	Ha	Approx capacity	Site ref	Ha	Provision		Site ref	Ha	Site ref	Ha		Site ref	Ha	Site ref	Ha		Site ref
Albrighton	Albrighton	-7	Fair	-6	Fair		ALB017	5.49	165	ALB017/021		180	(15)											
Albrighton	Albrighton	-9	Poor	-10	Poor		ALB021	1.04	30															
Albrighton	Albrighton	-5/-4	Fair	-3	Poor														P36	6.98	Residential		6.98	-
Albrighton	Albrighton	-6	Fair	-3	Poor														P35	6.56	Residential		6.56	-
Albrighton	Albrighton	-4	Fair	-6	Poor														P32a	6.32	Employment		6.32	-
Bishops Castle	Bishops Castle	-5	Fair				BIS028	4.11	70				(70)											
Bishops Castle	Bucknell	-12	not given	-11	Fair		BKL008a	0.80	20	BKL008a (north)		20	-											
Bishops Castle	Chirbury	-6	not given	-5	not given		CHRO01	0.30	7	CHRO01		7	-											
Bishops Castle	Chirbury	-5	not given	-4	not given		CHRO02	0.30	7	CHRO02		7	-											
Bishops Castle	Clun	not assessed	not assessed	-6/-11	not given		CLU005/2	1.00	20	CLU005/2		20	-											
Bishops Castle	Worthen and Brockton	-8/-8	not given	-7	Poor	√	WBR007/008	1.30	25	WBR007/008		25	-											
Bishops Castle	Worthen and Brockton			1	Good					WBR010		20	20											
Bridgnorth	Bridgnorth/Tasley			-10	Poor	√				BRD030	55.0	1,050	1,050				BRD030	16.0	16					
Bridgnorth	Bridgnorth/Tasley									Direction for growth	41.5		41.5											
Bridgnorth	Bridgnorth/Stanmore						P54/56etc...	29.00	850				(850)											
Bridgnorth	Bridgnorth/Stanmore	-11	Poor				P54																	
Bridgnorth	Bridgnorth/Stanmore	-9	Fair				P56																	
Bridgnorth	Bridgnorth/Stanmore	-5	Fair	-7	Fair		P58a										P58a	6.8	6.8					
Bridgnorth	Bridgnorth/Stanmore	-6	Fair	-5	Fair		STC002										STC002	4.6	4.6					
Bridgnorth	Bridgnorth/Stanmore	-6	Fair				STC004																	
Bridgnorth	Bridgnorth/Stanmore	-9	Fair				STC005																	
Bridgnorth	Bridgnorth/Stanmore	-9	Fair				STC006																	
Bridgnorth	Bridgnorth/Stanmore	as above	Fair	-5/-5/-6/-6	Fair												STC002/4/5/6	16	(16)					
Bridgnorth	Bridgnorth/Stanmore	as above	Fair	-5/-5/-6/-6	Fair												STC002/4/5/6	[5]						
Bridgnorth	Bridgnorth/Stanmore	as above	Fair														STC002/4/5/6	[36]						
Bridgnorth	Bridgnorth/Stanmore	-10	Poor	-8	Fair														P56	32	Residential		(32)	
Bridgnorth	Bridgnorth/Stanmore	-12	Poor	-11	Poor														P54	48	Employment		(48)	
Bridgnorth	Alveley	-4/-4	Good	-3	Good		ALV006/007	2.50	35	ALV006/007		35	-											
Bridgnorth	Alveley	-4	Good	-3	Good		ALV009	1.40	35	ALV009		35	-											
Bridgnorth	Alveley	-5	Good	-4	Fair														ALV002	3.0	Residential		3.6	0.6
Bridgnorth	Ditton Priors	-3	not given	-4	Fair		DNP009	2.00	40	DNP009		40	-											
Broseley	Broseley	-4/-3	Fair				BRO012/024	0.86	10				(10)											
Broseley	Broseley	-1/0	Good				BRO040/041	2.99	45				(45)											
Church Stretton	Church Stretton	-16	Poor				CST020	2.39	40				(40)											
Church Stretton	Church Stretton	-6	Fair	-7	Fair		CST021	4.29	70	CST021		70	-											
Cleobury Mortimer							by NP		138				(138)											
Craven Arms																								
Ellesmere	Ellesmere	-4	Fair	-3	Good		ELL005	7.00	150	ELL005		170	10											
Ellesmere	Ellesmere	-3	Fair	-4	Fair		ELL008	1.33	10	ELL008														
Ellesmere	Ellesmere			-9	Poor		ELL033			ELL033														
Highley	Highley	3	Good	4	Fair		HNN016	5.42	120	HNN016		100	(20)											
Ludlow	Ludlow	ass'd only to LUD055	not assessed	0	Good		LUD056	2.10	74	LUD056(already has permisio		[90]												
Ludlow	Ludlow	not assessed	not assessed	2	Good		LUD057	0.45	10	LUD057		10	-				LUD052	4.85	LUD052	5.00	0.15			
Ludlow	Ludlow	-10	Poor	-11	Poor	√																		
Ludlow	Burford			-11	Poor	√	to be considered later		96	BUR001		35	35											
Ludlow	Burford			-13	Poor					BUR002		40	40											
Ludlow	Burford			-6	Good					BUR004		100	4											
Ludlow	Clee Hill	-4	not given	-5	not given		CHK002	0.95	20	CHK002		20	-											

Appendix 2: Summary of guidelines and allocations for housing and employment land

Place Plan	Estimated population	Estimated dwellings	% increase in houses	Preferred Sites housing guideline	Extra housing guideline	Residential Development Guideline	Completion	With planning permission	Existing commitments and allocations	Local plan allocations	Windfall Allowance	Preferred Sites allocation	Extra housing allocations	"Balanced" employment	Employment Land - Guideline	Preferred sites employment guideline	Extra Employment Land Guidelines	Completed Development 2016 & 2019	Existing Employment areas	Committed Sites	Saved Allocations	New Allocations	Strategic Land Supply 2016 - 2038	Preferred Sites employment guidelines	Extra employment allocations	Existing commitments and allocations at Preferred Sites stage	Proposed status	Total points - Pre-submission																				
																													Housing										Employment land									
																													From Appendix 5										From Appendix 6									
Shrewsbury	75,200	33,597	26%	8,625	-	8,625	1,743	3,019	798	2,560	505	2,168	410	91	100	31	9	5.3	1.5	38.4	17.0	59.0	121.2	65	(6.0)	41	Strategic Centre	116																				
Principal centres	65,037	30,387	25%	7,600	400	7,500	815	2,178	1,887	2,215	605	2,168	16	79	172	88	84	7.6	2.6	18.0	84.7	32.4	145.3	27	11.6	131.0																						
Key centres	44,686	20,658	25%	5,150	-	5,150	1,190	1,471	601	1,080	808	1,576	(238)	54	91	79	12	2.5	1.4	4.92	35.5	39.0	83.32	40	(1.0)	38.5																						
Strategic sites	2,359	530	-	1,750	1,750	-	-	-	-	1,750	-	-	1,750	18	12	-	12	-	-	-	-	12.0	12.00	-	12.0																							
ABCA (Black Country)				1,500	1,500																																											
Community Hubs	44,958	19,343	26%	4,908	100	5,008	952	1,289	530	1,640	629	1,735	(133)	-	-	-	-	3.4	4.9	2.8	1.5	-	12.6	-	-	-																						
Community Clusters				-	-	-												0.1	-	1.7	-	-	1.8	-	-	-																						
Countryside				-	-	-												13.6	14.7	9.6	0.3	-	38.2	-	-	-																						
Totals	232,240	104,515	28%	26,763	3,750	29,533	4,700	7,957	3,616	9,245	2,547	2,449	1,805	243	375	260	117	32.5	25.1	75.42	139.0	142.4	414.42	64.65	16.6	210.5																						
Other identified rural settlements	36,064	14,690																																														
Total on HoS sheets	278,020	118,875																																														
Therefore unidentified "countryside" balance	32,080	14,482	9%	2,267	-	1,267								-75	47																																	
Totals	310,100	133,357	23%	26,759	-	30,800								300	308											223																						
Totals (2016-based projections for 2020)	326,692	142,954																																														
Shrewsbury	Shrewsbury	75,200	33,597	26%	8,625	-	8,625	1,743	3,019	798	2,560	505	2,168	410	91	100	31	9	5.3	1.5	38.4	17.0	59.0	121.2	65	(6.0)	41	Strategic Centre	116																			
Bridgnorth	Bridgnorth	13,028	6,189	29%	1,500	300	1,800	52	38	500	1,050	160	850	200	19	49	38	21	0.4	1.3	0.3	8.2	27.4	37.6	16	11.4	12	Principal Centre	109																			
Ludlow	Ludlow	10,717	5,404	19%	1,000	-	1,000	106	802	0	10	82	84	(74)	11	11	0	0.4	0.4	0.9	6.0	5.0	12.7	4.85	0.2	7	Principal Centre	112																				
Market Drayton	Market Drayton	12,075	5,449	22%	1,200	-	1,200	85	474	0	435	206	625	(190)	13	35	13	22	4.6	-	12.6	12.0	-	29.2	-	-	35	Principal Centre	108																			
Oswestry	Oswestry	19,113	8,797	22%	1,800	100	1,900	312	116	1,127	270	75	300	70	20	57	19	38	2.1	0.9	0.5	39.0	-	42.5	-	-	57	Principal Centre	109																			
Whitchurch	Whitchurch	10,104	4,548	35%	1,600	-	1,600	260	748	60	450	82	440	10	17	20	17	3	0.1	-	3.7	19.5	-	23.3	-	-	20	Principal Centre	110																			
Albrighton	Albrighton	4,870	2,205	23%	500	-	500	24	171	77	180	48	185	(15)	5	5	0	-	-	0.02	-	-	0.02	-	-	0	0	Key Centre	94																			
Bishop's Castle	Bishop's Castle	1,970	930	16%	150	-	150	8	62	40	0	40	70	(70)	2	3	2	1	1.0	-	0.2	2.6	-	3.8	-	-	3	Key Centre	97																			
Broseley	Broseley	5,372	2,416	10%	250	-	250	128	72	0	50	55	(55)	3	3	3	0	-	-	-	1.3	-	1.3	-	-	-	1	Key Centre	87																			
Church Stretton	Church Stretton	3,936	1,987	10%	250	(50)	200	17	62	0	70	51	110	(40)	2	2	3	-1	0.1	-	-	1.3	-	1.4	-	-	1	Key Centre	98																			
Cleobury Mortimer	Cleobury Mortimer	3,049	1,306	15%	200	-	200	30	43	7	0	120	158	(138)	2	2	0	0.1	-	0.1	0.5	-	0.7	-	-	1	Key Centre	96																				
Craven Arms	Craven Arms	2,607	1,210	41%	500	-	500	33	377	0	90	0	0	-	5	15	5	10	-	-	0.3	14.0	-	14.3	-	-	14	Key Centre	89																			
Ellesmere	Ellesmere	4,188	1,930	41%	800	-	800	112	348	0	170	170	160	10	8	9	8	1	-	-	0.3	9.2	-	9.5	-	-	9	Key Centre	99																			
Highley	Highley	3,195	1,462	17%	250	-	250	72	47	0	100	31	120	(20)	3	3	3	0	-	-	1.0	-	-	1.0	-	-	2	Key Centre	83																			
Much Wenlock	Much Wenlock	2,357	1,118	18%	150	50	200	32	21	0	120	27	80	40	2	2	2	0	0.8	0.2	-	0.6	-	1.6	-	-	1.5	Key Centre	89																			
Shifnal	Shifnal	6,931	3,215	47%	1,500	-	1,500	605	573	0	230	92	180	50	16	41	40	1	0.2	-	0.3	2.0	39.0	41.5	40	(1.0)	2	Key Centre	97																			
Wem	Wem	6,151	2,879	21%	600	-	600	129	72	100	210	89	210	-	6	6	6	0	0.3	1.2	2.7	4.0	-	8.2	-	-	4	Key Centre	102																			
Tern Hill - Clive Barracks	Market Drayton	607	107		750	750					750		750	8	6	6	6	-	-	-	-	6.0	6.0	-	6.0			Strategic Site	35																			
Ironbridge Former Power Station	Much Wenlock				1,000	1,000					1,000		1,000	11	6	6	6	-	-	-	-	6.0	6.0	-	6.0			Strategic Site																				

