



**Shropshire Local Plan Review  
Consultation on Preferred Sites**

**Response from the  
Campaign to Protect Rural England  
(Shropshire Branch)**

**February 2019**

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## Summary

This Preferred Sites stage is the third in a series of informal<sup>1</sup> consultations (with a fourth yet to come in early summer 2019), leading to the deposit of a Final Plan (expected in late 2019) which will be subject to formal consultation, followed by Examination in Public by a Government planning inspector.

The main objectives of this stage of consultation are<sup>2</sup> to obtain feedback concerning:

- a. A housing policy direction to improve the delivery of local housing needs;
- b. Development guidelines and development boundaries for Shrewsbury, Principal and Key Centres and each proposed Community Hub;
- c. The preferred sites to deliver the preferred scale and distribution of housing and employment growth, across the settlement hierarchy, during the period to 2036;

Key points arising from this CPRE Shropshire submission to the consultation are:

### The consultation process:

- We continue to consider that public opinion has not been given due regard. Publicity, and availability of documents could have been improved.
- The process appears to be a moving target. The subject matter of the next consultation makes consideration of some aspects of this consultation premature, including Green Belt issues.

### The numbers:

- **Housing:** The housing target of 28,750 is well above demographic need, is above the Government's minimum requirement (as set out in its Standard Methodology), and is opposed by public opinion. A target of 26,250 would be more appropriate. It is instructive to recognise that the current target is made up of four distinct elements. Demand/aspiration is thereby overstated. On the other hand, supply (including aspects of density, windfall etc) may be understated.
- **Employment land:** New evidence suggests that the "Balanced Growth" strategy and the Council's published Economic Growth Strategy both require less employment land than the stated guidelines suggest. Also, the one-size-fits all approach is too blunt an instrument; existing differences between the towns should be accounted for within the guidelines.
- For the above reasons we think that housing and employment land targets should be scaled back proportionately.

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<sup>1</sup> See *Shropshire Local Plan Review 'Preferred Sites': Consultation Plan* (2-page document), page 1, third paragraph (at <http://www.shropshire.gov.uk/media/11262/consultation-plan-preferred-sites.pdf>)

<sup>2</sup> Second paragraph of the same document, repeated on page 1 of the main consultation document.

### Types of housing:

- There should be an assessment of the needs of differing sections of the population, particularly including the ageing population.
- Cheaper housing is needed in order to retain working age and younger people within the County. The market cannot be relied on to provide this and the Council's measures to increase the proportion of affordable or low-cost housing are to be welcomed.
- The use of cross-subsidy sites is but one measure, and should be backed up by housing needs assessments, and predicated on each such site having a very high percentage of affordable housing.

### Sustainability:

- There does not appear to have been enough emphasis placed on carbon reduction measures. Continued growth, particularly in commuter villages, exacerbates the problem.
- Examples include the methodology of the Sustainability Appraisal, the allocation of sites with "Poor" sustainability scores, and the selection, as potential Hubs, of villages without sufficient primary services.

### Rural Hubs:

- The Hierarchy of Settlements methodology, used to identify the proposed Hubs, remains flawed.
- We have identified that twenty of the proposed Hubs do not appear to qualify for Hub status under the current definition. They should instead become Clusters.

### Infrastructure and design

- 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. Better provision is also needed for social facilities, and for rural broadband and public transport.
- The Local Plan should incorporate master plans.

### The sites:

- All of the above have been applied in our consideration of, and our responses to, the questions about individual settlements and sites. For that reason, there is a large measure of repetition within the responses to the questions, partly so that a reader of only particular sections can clearly follow our reasoning.
- Because of the limitation of CPRE resources, including that of time, we have not been able to form a view on every question asked.

# 1. Introduction

- 1.1. CPRE Shropshire welcomes the opportunity to respond to this Preferred Sites stage of the Shropshire Council Local Plan Review. This document elaborates on our detailed responses to the Preferred Sites Questionnaire. We submit both documents as a single combined response.
- 1.2. This submission is made on behalf of CPRE Shropshire which is a registered charity run by volunteers, with one part-time employee, and which currently has 334 registered members/supporters.
- 1.3. 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 earlier Issues and Strategic Options Consultation, which would encourage the development of newer and more innovative industries.
- 1.4. 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. We argue that:
  - i. The housing target of 28,750 is well above demographic need, is above the Government's minimum requirement (as set out in its Standard Methodology), and is opposed by public opinion. A target of 26,250 would be more appropriate.
  - ii. There is a greater potential supply of housing available than the numbers within the consultation papers suggest.
  - iii. The present concept of "balanced growth" is based on flawed calculations. Employment land needed to satisfy "balance" and the Economic Growth Strategy is grossly overstated.
  - iv. Not enough emphasis has been placed on the climate change goals of sustainability. A more modest growth aspiration would be more appropriate.
  - v. The market will never supply cheaper homes for local people, without which there is likely to be a continued drain of younger, working-age people from Shropshire. The cross-subsidy idea may help as one measure to alleviate this, but it needs careful implementation.
- 1.5. We appreciate the pressures under which Shropshire Council officers and members operate, and we appreciate that the consultation process surrounding the Local Plan Review is therefore a "moving target" under which fresh evidence and commissioned reports appear, resulting in the Council's position emerging only over a period of time. Although this

particular consultation focusses on Preferred Sites, we therefore think it appropriate to repeat, and to develop, views previously expressed at earlier stages of consultation, in order to consolidate them within this document.

- 1.6. Because of the volume of documents associated with the consultation, we produced a catalogue detailing them all, which is reproduced as Appendix 1. We believe that this Local Plan Review and this consultation give an important opportunity to shape the future of the County but that the usefulness of this consultation is undermined by weaknesses in it which are noted in Appendix 2 and Appendix 3.
- 1.7. Shropshire Council's officers and members are aware that CPRE has raised concerns about the Council's approach in this Local Plan Review. We have communicated about these issues with officers and members, in meetings, by e-mail, and via the press, but the Council has continued on its preferred course despite our arguments and evidence.
- 1.8. For the continued record, our general concerns about the Local Plan Review process at the last round of consultation are set out in an updated form in Appendix 10.
- 1.9. Since the previous round of consultation we have communicated with officers over two significant new pieces of evidence relevant to the Local Plan Review process.
  - i. Our *Consultation Response Analyses* document of July 2017. We sent this document by email to both Adrian Cooper and Eddie West on 10 July 2017.
  - ii. The Council's response dated 19 July 2017 to our Freedom of Information request relating to Table 6 in the consultation document for the Preferred Scale and Distribution of development. We followed this up by email of 24 July 2017 to Gemma Davies.
- 1.10. We do appreciate the pressures that the Council is under, from Government, from finances, from staff constraints, from time constraints, and from developers. However, we do find it extraordinary that we have never received any direct response or acknowledgement from officers to either of the above two emails.
- 1.11. We expand on these two new pieces of evidence in the following two sections.

## **2. Consultation Response Analyses**

- 2.1. Our conclusion remains that Shropshire Council is not taking enough account of the views of its electorate in favour of arguments from the development industry and of the promotion of its own economic agenda. A more detailed discussion surrounding our Consultation Response Analyses is confined to Appendix 2.

### 3. Freedom of Information Request

- 3.1. CPRE had felt that there was something inconsistent about Table 6 as published for the Preferred Scale and Distribution of Growth consultation. We tried to get to the bottom of this during the consultation period, in communication with officers, but failed. We asked a question of Cabinet on 2<sup>nd</sup> May 2018 but this got us no further. So we pursued a Freedom of Information request in June 2018 which revealed that the final figures in the table had been miscalculated by a factor of 2.5. Critical figures had been grossed up (by 100/40) twice instead of only once.
- 3.2. The detail is set out in Appendix 4. The first page shows Table 6 and related tables, as originally published. The second page shows the corrected calculations in full detail.
- 3.3. The net employment land requirement under the Productivity Growth scenario is actually only 115Ha, not the 288Ha as stated in Table 6. Similarly, the net employment land requirement under the Baseline Growth scenario is actually only 55Ha, not the 138Ha as stated.
- 3.4. Shropshire Council has yet to explain how this error occurred, and got to be published in the final document, thus creating a misleading impression of “balance” in Table 8.
- 3.5. Shropshire Council’s officers argue that this error does not matter, because their chosen strategy is “Balanced Growth” not “Productivity Growth”.
- 3.6. CPRE Shropshire points out, in countering this stance, that:
  - i. The only evidence so far on the Council’s Evidence base under the heading of Employment is the “*Productivity Growth Forecast*”. This is a spreadsheet produced by the firm Oxford Economics, which was used by officers in calculating the figures summarised in Table 6. It also formed part of the evidence within the IPPR North report, which itself was the main evidence behind the Council’s published Economic Growth Strategy. It therefore remains the only “employment” evidence adduced so far in support both of the Economic Growth Strategy and of the Local Plan Review.
  - ii. The scenario outlined in “Productivity Growth” therefore more accurately reflects the thrust of this published Economic Growth Strategy than does the “Balanced Growth” scenario. The EGS favours a move towards higher-value, “smarter” jobs and away from “warehouse-type” jobs.
  - iii. The “Balanced Growth” strategy postulates an average job density of 42.25 sq m per job, which hardly reflects this wish for higher-value jobs. For instance, the figures applied by Shropshire Council on the second (corrected) page of Appendix 4 show that office-based jobs are deemed to require a job density of only 16 sq m per job. The average job density actually arrived at in Appendix 4 (and therefore also in Table 6) is



31 sq m per job, showing an “efficiency” of over 25% on the 42.25 sq m per job used in Table 7. This is more in accord with the “step-change” in economic growth sought by Shropshire Council and therefore seems a less unsound figure to apply than the 42.25.

- iv. The Council’s Economic Growth Strategy therefore appears to require much less employment land than is envisaged under the Balanced Growth Strategy.
- v. Had the Table 6 figures been correctly shown, then when they were translated into Table 8, the lack of comparability with the other figures might have alerted respondents to the inconsistencies involved. As it was, the inclusion of the incorrect figures was unfortunately misleading.

3.7. These considerations have led us to re-consider Shropshire Council’s whole concept and calculation of “balanced growth”, as outlined in the following section.

## 4. The flawed concept of “balanced growth”

4.1. The principle of “balanced growth” between housing and employment was set out In Table 7 at the previous consultation (see Appendix 4). Firstly, the somewhat simplistic assumption was made that each new house would bring in one new worker. Secondly, it was assumed that each worker will require 42.25 sq m of space on average, and that thirdly, that space requirement will form part of a building occupying 40% of the required employment land. That resulted in the calculation of the overall requirement for 304 Ha of employment land, as reproduced below.

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

4.2. This “balanced growth” model appears to us to be flawed because:

- i. Each new house would not equate to a requirement for one new job.
- ii. The average employment density sought by the Council under its Economic Growth Strategy of seeking higher value jobs should be significantly less than 42.25 sq m per job.
- iii. Under that EGS strategy buildings on employment sites might well represent more than 40% of an employment site.

4.3. We explore each of these in turn below.

### *Equation between houses and jobs*

- 4.4. Firstly, the current equation between houses and jobs is not one to one, as is borne out by other figures. At 2016 the estimated number of dwellings in the Shropshire Council area was 142,700<sup>3</sup>. The estimated number of jobs in January 2016 was 147,400<sup>4</sup>. That equates to an average of 1.03 jobs per dwelling.
- 4.5. Secondly, and more importantly, no account has been taken of the fact that many of the houses that the Preferred Option requires to be built in Shropshire will be occupied by people already working within Shropshire. The Council has failed to take note of the four separate elements making up their overall preferred requirement for 28,750 houses.
- 4.6. Shropshire Council, like all Local Authorities, is obliged to adopt the Government's minimum requirement for housing "need", as set out in the Guidance to the new NPPF. That current minimum figure is 25,400, as recorded in Shropshire Council's FOAHN 2017. That 25,400 is itself made up of three elements, as shown in Appendix 5. Shropshire Council's ambition, taking that minimum to the preferred requirement of 28,750, represents a fourth element.
- 4.7. However, two of the elements making up the overall housing requirement of 28,750 will not require extra jobs, because many, if not all, the people who will be occupying the houses involved in those elements are already present in the existing Shropshire population and workforce.
- 4.8. Firstly, there is the assumption that, over the plan period, the average number of people in each house will decline slightly, due to various factors. The reduction in the average is only about 5% but it has a 30% effect on the new houses required because it applies to the whole quantum of houses, not just to the increase. People giving rise to this element are already present in Shropshire's population and workforce and will therefore not require extra jobs.
- 4.9. Secondly, the "due to affordability ratio" amount (see Appendix 5) is the extra housing the Government requires Local Authorities to provide for in order to "catch up" on the housing shortage. The rationale is that it will bring house prices down and therefore enable people, already within the existing population and workforce, to afford to acquire a house. This Government affordability ratio requirement applies to all Local Authorities across the country, so its theory is that it will not result in cross-border movement between LA areas. The people catered for by the "affordability ratio" mechanism, who presently cannot afford a house, but will be able to after the implementation of the policy, are therefore theoretically already present in each Local Authority's population and workforce.

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<sup>3</sup> FOAHN July 2016, Table 22, page 61, V5B Ten Year Trend - including students

<sup>4</sup> Productivity Growth Forecast, total Employment by sector for 2016; reproduced by IPPR North report, page 27, Table 4, date given as January 2016

- 4.10. Furthermore, even if, in practice, some of that housing was taken up by incomers, there is no reason to believe they would work in Shropshire. Many might well be retirees from other areas. A conservative estimate, that half would already be accounted for, is assumed in our working below.
- 4.11. The ONS released 2016-based figures in September 2018 which showed significantly lower household projections than the 2014-based projections on which the FOAHN 2017 is based. The Government has recently consulted on its plan to retain the 2014-based figures, rather than to adopt the revised, lower projections, and has yet to announce the result of that consultation. Our CPRE National Office's submission to this consultation began by stating *"the standard method for the estimation of local housing demand is already deeply flawed, and the proposal to retain the use of the 2014-based household projections is a fudge of staggering ineptitude"*.
- 4.12. The calculation using the 2016-based figures and a more recent affordability index is given on the second page of Appendix 5. It gives a figure of 26,040, which is very close to the original "Moderate Growth" option of 26,250 which was preferred by the majority of the electorate.
- 4.13. However, for the purposes of the current exercise, the FOAHN 2017 figures are the latest figures in the Council's evidence base, so we continue to refer to those below.
- 4.14. Applying the factor of 1.03 jobs per house, the table below therefore shows that a "balanced" number of jobs might well be more like 18,216 than the 28,750 that Shropshire Council thinks is required.

|  | Element       | Employment consideration  | Employment    |
|--|---------------|---|---------------|
| From population change                             | 11,972        |   | 12,331        |
| From reduction in average population per household | 8,694         | This element already exists within the workforce                      | nil           |
| From affordability ratio                           | 4,740         | Much, if not all, of this element already exists within the workforce | 2,441         |
| From extra ambition                                | 3,344         |   | 3,444         |
| <b>Total</b>                                       | <b>28,750</b> |   | <b>18,216</b> |

### *Average employment density*

- 4.15. As noted above, the original Table 7 adopted an average employment density of 42.25 sq m per job. That in itself was derived as a simple, unweighted average of the four industries listed in the footnote to Table 7.
- 4.16. The Council has itself, via the table revealed by the FoI request (see Appendix 4), calculated a weighted average of 31 sq m per job from the scenario it is promoting via its Economic Growth Strategy.
- 4.17. In view of the aims of that Economic Growth Strategy to promote higher value jobs it seems to be a much sounder strategy to adopt 31 sq m per job as the average. It has also been calculated using a more considered method than the simplistic average adopted in Table 7.

### *Percentage of buildings on an employment site*

- 4.18. The use of the 40% figure as the proportion of an employment site devoted to employment floorspace does seem to be a sweeping assumption. It also pre-supposes that employment land is not used very intensively, which in turn means that an inefficient use of land is built into the Council's figures. As far as we are aware, no empirical evidence has been put forward by the Council to support the figure of 40%, for instance from existing employment sites. It would be instructive, for instance, to know what the actual job densities are on the Shrewsbury Business Park, the Battlefield Enterprise Park, the Harlescott Industrial Estate and the Oxon Business Park.
- 4.19. In the absence of evidence to the contrary, we do not put forward any alternative figures.

## **5. Overestimate of need for employment land in Shropshire**

- 5.1. Taking the above considerations into account, the need for employment land can be restated as:

|                 | <b>Housing Growth 2016 - 2036 (Dwellings)</b> | <b>Anticipated Employment Need 2016 - 2036 (Jobs)</b> | <b>Average Employment Density (sq.m/job)</b> | <b>Total Employment Floorspace Need (ha)</b> | <b>Employment Land Requirement (ha)</b> |
|-----------------|---|---|--|--|---|
| Balanced Growth | 28,750  | 18,216  | 31   | 56   | 141                                     |

- 5.2. This is clearly a very different calculation of "balanced growth" to that proposed by the Council (see paragraph 4.1 above). By making evidence-based assumptions our calculation produces a figure of a need for employment land of only 40% of the figure that the Council has put forward.

- 5.3. The basic employment land guidelines that the Council is now proposing for each relevant settlement are in every case based on the “Table 7 calculation” applied to the housing guideline for that settlement. It is a one-size-fits-all policy. The only exceptions at this round of consultation are Bridgnorth and Shifnal, for which extra amounts have been added on *“to address local circumstances”*.
- 5.4. The aim of balancing jobs and houses is sensible, so that more people live nearer to their employment and therefore reduce commuting, which is presently a major contributor to greenhouse gas emissions. But the one-size-fits-all calculation of employment land requirements (and also of housing requirements/guidelines) appears to take no account of the existing imbalances around the County, as indicated in Appendix 6. In order to achieve greater long term sustainability, these differences should surely be factored into the calculations.
- 5.5. Also, no account has been taken of the already significant existing oversupply of employment land for at least four settlements, most notably for Oswestry. The existing allocated employment land already totals 211 Ha, which is significantly more than the evidence-based calculation of need of 141 Ha as above.
- 5.6. These existing proposed allocations by the Council, which have been made without any attempt to “balance” the oversupply of employment land with housing (where it occurs), necessarily means that the Council will cause considerable further commuting of people to the jobs that might be created on these sites.
- 5.7. That excess of commuting will reduce the requirement for “balance” at other locations.
- 5.8. Taking all this into account, the Council’s strategy for employment land does not seem to be soundly based, and it is likely that their preferred requirement for 305 Ha of employment land is a significant overestimate of need.

## 6. Housing supply issues

- 6.1. Appendix 7 sets out a report we commissioned into Housing Supply Issues.
- 6.2. We repeat below the conclusions of that report (see pages 84 and 85):
- i. The figures in the table at paragraph 4.2 of the report are necessarily crude, but do suggest the Council has more than sufficient land to meet the housing requirement resulting from the Standard Methodology calculation, which is itself above demographic need.
  - ii. It also suggests that assumptions, particularly about windfalls and density may be being unnecessarily downplayed and that the overall capacity (including existing sites and proposed sites) is probably higher.

- iii. In particular the options for higher densities on larger sites should be investigated before additional countryside is released.
- iv. There is a particular requirement in relation to Green Belt releases which is set out in Para 137 of the NPPF.

*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*
- v. The lack of minimum density standards within the Plan as it stands may also need to be addressed to fulfil this requirement before Green Belt releases can properly be considered.
- vi. Further work to address the issues and options relating to housing need and supply is needed before additional green field land allocations, and particularly on Green Belt sites, can be considered acceptable in Shropshire.

- 6.3. Those conclusions indicate that the present plan as put out for consultation is insufficiently sound as regards housing supply issues.

## 7. Green Belt Review

- 7.1. Paragraph 136 of the NPPF requires that:

*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.*

- 7.2. The text at paragraph 6.2. iv above sets out the requirements of paragraph 137.
- 7.3. We do not believe that, within the consultation papers, the Council has adequately demonstrated that the necessary exceptional circumstances exist to justify the proposed releases of Green Belt land.
- 7.4. This is particularly so in view of our above arguments demonstrating that:
  - i. There is no demonstrated demographic need for the number of houses proposed; the only justification given is a Government requirement, but this does not have to be exceeded.
  - ii. The amount of employment land proposed is likely to be significantly overestimated.

- iii. There is a greater potential supply of housing available than the numbers within the consultation papers suggest.

- 7.5. Furthermore, the consultation papers do not include any statements of common ground with neighbouring authorities. The proposed releases of Green Belt land around Bridgnorth and particularly Shifnal appear to be driven by perceived development pressure (rather than need) emanating from the West Midlands conurbation, in particular, the Black Country. That perception has yet to be evidenced sufficiently robustly to justify the necessary exceptional circumstances for release of Green Belt land.
- 7.6. We expect further evidence from the Black Country, as its Core Strategy progresses, and will address that when it is available.
- 7.7. A recent decision on 18 December 2018 by the South Planning Committee sets out the Council's current stance towards proposed development in the Green Belt. The decision, as announced in the Newsroom<sup>5</sup>, was:

**Royal Oak, Alveley, Bridgnorth, WV15 6LL (18/03476/FUL)** Application under Section 73A of the Town and Country Planning Act 1990 for the erection of toilet block, shower block and change of use to glamping and touring caravan site.

**Decision**

*That, as per the officer's recommendation, planning permission be refused for the following reasons:*

- *It is acknowledged that the proposed development would contribute to the rural economy and to the role of Shropshire as a tourist destination to stay. However these benefits are considered to be outweighed by the harm the openness of the Green Belt and be at odds with one of the five purposes of the Green Belt, namely safeguarding the countryside from encroachment. No very special circumstances have been demonstrated or exist that would be of sufficient weight to justify inappropriate development in the Green Belt. The development would therefore be contrary to the adopted Core Strategy policy CS5, SAMDev policy MD6 and the guidance set out in the National Planning Policy Framework Part 13.*
- *Notwithstanding the above the benefits of proposed development are considered to be outweighed by the environmental harm. The introduction of the structures proposed would appear as incongruous additions to the area and as such would result in a detrimental impact upon the character and appearance of the area. Accordingly, the proposed development is contrary to Local Plan policies CS5, CS6, CS16 & CS17 of the adopted Core Strategy and policies MD2, MD11, MD12 of the SAMDev and national guidance contained within the NPPF, in particular paragraphs 83 and 110.*

- 7.8. This does seem at odds with any rationale for release of Green Belt land.
- 7.9. Green Belt Reviews were commissioned by the Council for Albrighton, Alveley, Bridgnorth, Cosford, Junctions 3 and 4 of the M54, and Shifnal. The conclusion for most of the assessments is that:

*Whilst development on Green Belt land may inevitably lead to some degree of encroachment into the countryside within the Green Belt, the strategic function of the West Midlands Green Belt will not be affected by such small scale releases of land in XXX. At both a strategic level and local level, there will be no harm to the role played by the West Midlands Green Belt in*

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<sup>5</sup> See <https://newsroom.shropshire.gov.uk/2018/12/south-planning-18-december-2018-2/>

*checking the unrestricted sprawl of the large built areas, preventing the merging of neighbouring towns, or preserving the setting and special character of historic towns.*

- 7.10. However, the conclusion for Junctions 3 and 4 of the M54 and Shifnal is that release of some of the land parcels would cause harm.
- 7.11. The current proposal is to release Green Belt land immediately around Bridgnorth and to “safeguard land for future development” around Albrighton, Alveley, Bridgnorth and Shifnal. No plans are presently announced for release of any land around Junctions 3 and 4 of the M54, and any plans around Cosford will presumably be announced in late Spring 2019, which is when there is proposed to be another round of consultation on the so called “strategic sites” (Ironbridge Power Station, Tern Hill, Garden Villages around Tong etc, Cosford etc).
- 7.12. It therefore seems premature at this stage to make decisions about the release of Green Belt land, without also having information about what will be proposed for the strategic sites at the next round of consultation. It may be that the suggested need or demand may well be satisfied from elsewhere.

## **8. Sustainability Appraisal**

- 8.1. The Sustainability Appraisal Report lists 16 Sustainability Objectives (Table 2.1) which are incorporated into 15 Criteria for assessing sites (Table 2.3). Those criteria are then applied in making the specific assessments in the detailed appendices.
- 8.2. However, firstly, objectives SO2, SO3 and SO12 have not been translated into any of the criteria. Extraordinarily, this includes the objective to “*reduce carbon dioxide emissions*” (SO12).
- 8.3. Secondly, criteria 6, about the proximity of regular peak time public transport has then not been translated into the criteria used within the detailed site assessment spreadsheet appendices. The 15 criteria in Table 2.3 have been reduced to 14 criteria in the appendices, by the omission of this essential criterion. The numbering of the criteria in the appendices is therefore skewed by one for all criteria from 7 onwards.
- 8.4. Therefore, the detailed site assessments have not taken any account of availability of public transport, or propensity for use of the private motor car, in assessing the sustainability of any of the sites assessed.
- 8.5. It does seem odd, and unsound, that this most important criteria for carbon savings and therefore sustainability, appears simply to have been omitted from the site assessments.
- 8.6. Furthermore, several of the sites which have then made it all the way through the site selection triage process, and have become proposed allocated sites, have been marked as



“Poor” for sustainability, because they have particularly low sustainability scores, and are in the lowest third of scores in comparison with other nearby sites<sup>6</sup>. An example is SHR216, which has a sustainability score of minus 14.

- 8.7. The allocated sites and their sustainability scores are summarised on Appendix 8. This identifies that a total of 16 of the allocated sites were rated as “Poor” for sustainability. It also identifies that 7 of the allocated sites were not assessed for sustainability at all.
- 8.8. Mitigation measures have been proposed for most of the sites rated as “Poor” for sustainability (see pages 31 and 32 of the SA). Site P15b (allocated as safeguarded land) appears to have been omitted from this list. Site P56 (also allocated as safeguarded land) has been included as an employment site on this list although on page 52 of the consultation document its likely use is given as residential.
- 8.9. It remains surprising that sites with a “Poor” rating have been chosen as allocated sites, and mitigation is proposed for them. Why not choose sites where no mitigation is required in the first place, because they are more sustainable sites?
- 8.10. CPRE Shropshire agrees with the Oswestry & District Civic Society in drawing 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.*

- 8.11. The above paragraphs suggest that Shropshire Council is not pursuing this responsibility as it should. Indeed, it appears that its assessment methodology has resulted in consideration of important climate change issues being omitted altogether.
- 8.12. This may have come about partly through the fact that in Table 5.3 on page 37 of the original January 2017 Sustainability Appraisal Scoping Report there was an under-reporting of the conflict between SO2 (encouraging economic growth) and SO3 (providing more housing), and other objectives. It is likely that both SO2 and SO3 as promoted by Shropshire Council through this Local Plan Review, would encourage increased use of cars, and that therefore both of these objectives would conflict with SO5 (encouraging use of sustainable

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<sup>6</sup> See page 7, paragraph 2.12 of the SA

transport), SO6 (reducing the need to travel by car), SO11 (air quality), SO12 (reducing CO<sub>2</sub> emissions), SO13 (mitigating climate change) and SO15 (conserving heritage), as well as the conflicts actually identified in Table 5.3.

- 8.13. It is also noteworthy that Appendix A to the Sustainability Appraisal fails to record the Oswestry & District Civic Society's cogent criticisms of the Sustainability Appraisal at the previous stage of consultation.
- 8.14. Our comments on Sustainability Appraisals at the two preceding stages of the LPR are reproduced in Appendix 10, section C.

## **9. Hierarchy of Settlements methodology**

- 9.1. Officers are fully aware of the criticisms levelled by people at the detail of their scoring methodology, within the Hierarchy of Settlements document, as used in identifying proposed Hub villages. We gave a detailed critique at the last round of consultation (at Annex 4 to our previous submission). This essentially argued that the scoring system should employ graduated scores according to the level of service offered, rather than using, as it does, a binary, all or nothing, scoring system.
- 9.2. We are pleased to see that the detailed scores have been amended in the light of better factual information about the presence or absence of particular services in particular locations. However, the above general criticism remains pertinent.
- 9.3. We appreciate that hard-pressed officers may not have had the resources to adopt a graduated scoring system, and that in any case the hierarchical order of settlements may have remained roughly the same had they done so.
- 9.4. However, the binary, all or nothing scoring system does produce a misleading comparison of relative overall scores, giving the impression that the lowest-scoring Hub village is roughly half as "sustainable" as the six main Shropshire towns (score of 48 against average of 100). That is of course only because, for instance, a skeletal bus service to a village has been given the same score as Shrewsbury or Oswestry with their busy dedicated bus stations, which is a plain nonsense.
- 9.5. In reality, most villages are hugely less "sustainable" than the towns.
- 9.6. That fact is pertinent when considering where the cut-off point has been drawn for inclusion or exclusion as a Hub. Previously there was a convenient 3-point gap between the scores of 48 and 45, which allowed the Council to designate a conveniently "suitable" number (40) of Hub villages. The 3-point gap has disappeared under the present updated scores, yet the cut-off has continued to be drawn at the arbitrary level of 48 points. The reason given is that

that is the officers' professional judgment as to whether the settlement can meet its day-to-day needs<sup>7</sup>.

- 9.7. There also remains doubt as to whether all of the proposed Hub villages satisfy the actual proposed policies for Hubs. Table 2 on page 4 of the HoS document says that a Community Hub is considered to provide (1) a combination of services and facilities, AND (2) public transport links (often operating regularly through peak travel times), AND (3) significant employment opportunities, AND (4) high speed broadband, all generally considered sufficient to meet the day-to-day needs of their resident communities.
- 9.8. Eighteen of the proposed Hubs do not satisfy the requirement to provide both significant employment opportunities and public transport links. A further three of those do not provide public transport links that operate regularly through peak travel times.
- 9.9. Table 1 on page 3 of the HoS document lists seven primary services that are "*essential to everyday life*". These are presumably the combination of services and facilities that officers should consider to be essential on a day-to-day basis. If that were so, only Shawbury would now qualify as a Hub. Even if the list of primary services was restricted to just a school (whether nursery or primary) and a convenience shop, only twenty of the proposed 40 Hubs (including Cosford) would meet the criteria for Hubs as stated in the above definition.
- 9.10. This is not just semantics; there is a genuine inconsistency here. The scoring system has identified that many of the proposed Hubs lack vital ingredients of sustainability. Either the Council should recognise this and remove those settlements from the proposals for Hubs, or it should "loosen" its definitions to continue to allow these "unsustainable" settlements to qualify for Hub status.
- 9.11. As things stand at the moment we are forced to conclude that, notwithstanding their overall scores, twenty of the proposed Hubs should not be accorded Hub status (and should be re-classified as "Other Rural Settlements"), because they lack certain services or facilities which are stated to be essential on a day-to-day basis. They either lack the necessary employment for the "balance" between housing and employment that the Council is promoting, or they lack decent public transport links, or they lack either any school, or a shop.
- 9.12. Those twenty proposed Hubs should presumably each instead become part of a suitable Cluster.
- 9.13. We therefore conclude that the Hierarchy of Settlements methodology, and the choosing of the Hub villages, is not yet a sufficiently sound process.
- 9.14. For the record we include at Appendix 9 a summary of the Hierarchy of Settlements information, along with the proposed allocations (and related information) for each

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<sup>7</sup> Hierarchy of Settlements, November 2018, page 18, paragraphs 5.38 and 5.41

settlement. The schedule also identifies which proposed Hubs fail to meet the criteria outlined at paragraphs 9.7 to 9.11 above.

## 10. Infrastructure and design

10.1. The frequent cry from Shropshire's resident population is that development is allowed without providing adequate infrastructure to properly support it. Under the present planning system development often appears to be "plonked down" by developers whose primary motivation seems to be profit, not the provision of holistically planned "places" for people to live.

10.2. This is the essential theme of the Shrewsbury Growing Forward group, and improving design generally, of places and of houses, is part of that thinking.

10.3. Paragraph 20 of the new NPPF states:

*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

10.4. This Local Plan Review to date has consulted on making provision for housing and employment, under a) above, but has not yet consulted about making provision for b), c) or d). The list of ten strategic objectives on page 7 of the consultation document includes three objectives (at paragraphs viii, ix and x) which cover some of this policy area.

10.5. It is vital that these areas are brought into the Local Plan in a way that gives them real teeth and the prospect of implementation.

10.6. As well as the need for better provision, within new development, of community facilities, such as medical care and education, there is still a gap in the existing provision of super-fast broadband, and even ordinary broadband, in many places in the county, and rural public transport is often skeletal or non-existent.

10.7. Planning should aspire to a higher level than just being satisfied if sufficient houses and industrial estates are built to satisfy the land supply numbers. There should be some form of master plan, if resources would allow.

- 10.8. For Shrewsbury, the Big Town Plan is attempting to provide some overall infrastructure but it is not yet enshrined in this Review. It is acknowledged however that the development strategy for Shrewsbury provides flexibility to deliver some of the aspirations of the Big Town Plan.
- 10.9. We know that Shropshire Council is developing its own guidelines, which seek to improve design of developments and the houses on them. The Big Town Plan talks of the “Shrewsbury Test” for design standards. The NPPF (paragraph 129) refers to Building for Life. Design is a difficult subject but some synthesis of these various guidelines and minimum standards should be built into the Local Plan, to bring about better quality design of places and the buildings within them.
- 10.10. The Local Plan should also include a properly integrated transport plan, which is currently being worked on separately to the Local Plan process.
- 10.11. It is unfortunate, as far as the provision of adequate infrastructure is concerned, that the money for infrastructure that comes in from the Community Infrastructure Levy (CIL) has such a long time-lag between the building of houses and the spending of the money.

## 11. Overall strategy

- 11.1. Taking all of the above into account we reproduce below Shropshire Council’s stated strategy (as on pages 5 and 6 of the consultation document) along with our summarised comments on each aspect of it.

| Shropshire Council's Preferred Development Strategy   | CPRE comments  |
|---|--|
| <p>The preferred development strategy seeks to make the best use of the strategic advantages of Shropshire's geographic location to support a sustainable pattern of future growth over the period 2016-36 and to support the growth aspirations of neighbouring areas, particularly in the north and east of the County. The preferred strategy will help support the 'step change' in economic productivity and quality of employment which is set out in our new Economic Growth Strategy.</p> <p>The key proposals are:</p> | <p>The over-development as proposed will incrementally threaten those aspects of the County's countryside that are such an attraction of its geographic location.</p> <p>No formal agreements of support for neighbouring areas' growth aspirations have been revealed in the consultation papers.</p> <p>The employment land needed for a step change in the Economic Growth Strategy appears to be significantly overstated.</p> |
| <p><b>Shropshire Council proposal</b></p>   |  |
| <p>'High' housing growth of 28,750 dwellings, equivalent to an average delivery rate of 1,430 dwellings per year for the whole of Shropshire</p>  | <p>The target is well above demographic need, is above the Government's minimum requirement under the Standard Methodology, and is opposed by public opinion. A target of 26,250 would be more appropriate.</p>  |
| <p>Existing housing completions, commitments and allocations amount to around 18,500 dwellings, so the net additional housing now required is around 10,250 dwellings</p>   | <p>Supply is understated, so the proposed allocations could be significantly less.</p>   |
| <p>Balanced employment growth to deliver around 300 hectares of employment development at an average rate of 15 hectares of employment land per year</p>  | <p>The concept of balanced growth is based on badly flawed calculations. Employment land to satisfy "balance" and the EGS may be as little as 141Ha.</p>   |
| <p>The existing employment land supply amounts to 223ha, giving a net requirement for around 80ha of new employment land. However, this is a minimum requirement and some additional land over and above this minimum is likely to be needed</p>  | <p>The existing employment land supply of 223Ha is therefore adequate, although it is not evenly spread for "balance" and will therefore encourage yet further commuting by car.</p>   |
| <p>An 'Urban Focused' distribution of development:</p> <ul style="list-style-type: none"> <li>• Shrewsbury – around 30%</li> <li>• Principal Centres – around 24.5%</li> <li>• Key Centres – around 18%</li> <li>• Rural Areas – around 27.5%</li> </ul>  | <p>For true sustainability, fewer houses should be built in the countryside. The arguments of Oswestry &amp; District Civic Society should be given weight in this matter.</p>   |

| <b>Shropshire Council's Preferred Development Strategy (continued)</b>  | <b>CPRE comments (continued)</b>   |
|---|--|
| Development at strategic sites such as Ironbridge Power Station and Clive Barracks, and potential new Garden Village settlements in strategic locations                                       | Such development should be taken to contribute to the preferred housing target, in the absence of any formal agreements of support for neighbouring areas' growth aspirations.   |
| Potential release of Green Belt land to support our long term sustainability  | The necessary "exceptional circumstances" for releasing Green Belt land do not appear to exist.  |
| Identify named Community Hubs with individual development guidelines and boundaries and site allocation where appropriate   | The HoS scoring system is flawed and some Hubs identified do not meet the policy as drafted.   |
| Maintain existing and create new Community Clusters where Parish Councils have chosen to 'opt-in'. Apply criteria-based policies to manage development in Community Clusters                  | This is a sensible policy.   |
| Continue to strictly control new market housing in the countryside whilst supporting new affordable housing for local needs and small scale employment opportunities in appropriate locations | This is acceptable in principle but the cross-subsidy idea may create conflict. Exception sites for affordable housing would be best located on urban fringes as a general rule. |

## 12. Detailed comments for the questionnaire

- 12.1. As noted in paragraph 1.1, we have also completed the Council's Preferred Sites Questionnaire, which this document elaborates on. We submit both documents as a single combined response.
- 12.2. For clarity, we have repeated below all the questions from the questionnaire. Narrative comments have been entered below rather than in the boxes on the questionnaire. Not all questions have been answered, through lack of resources within CPRE to address all areas of the County.

### Delivering local housing needs

**Q3. *Do you think Shropshire Council should introduce a cross-subsidy exception site policy, allowing an element of open market housing to support the delivery of affordable housing?***

Yes, but only where 100% affordable housing sites under the existing SPD have been demonstrated to be impractical at that location.

Any policy that increases the proportion of affordable houses, or houses that local people can afford, is to be welcomed, provided it is not used to artificially increase overall housing provision.

However, the existing Type and Affordability of Housing Supplementary Planning Document (SPD) of 12 September 2012, at paragraph 5.1, already makes provision for granting permission to rural exception sites of 100% affordable housing for local people, usually of sites between 2 and 25 dwellings.

The cross-subsidy idea (emanating from paragraph 77 of the new NPPF) appears to be predicated on the idea that, if an allocation has not been made for a site, the underlying land may be available more cheaply, because it will not automatically carry the hope value associated with allocated land.

It also necessarily means that each such site would be an "exception" site. That may mean that sites become available on an ad-hoc basis, resulting in site-specific planning arguments over the merits of each site, which is unsatisfactory.

That potential free-for-all may be overcome if the Council's Housing Enablement team proactively target suitable sites, based on a housing needs survey for that location. That would be preferable.

There should therefore be a sequential test before permitting a cross-subsidy site to be developed. It should be demonstrated, with full financial figures, why a 100% affordable site under the existing SPD is not a viable proposition instead.

It is also our view that cross-subsidy sites would be best placed on urban fringes, because towns are more sustainable locations than villages. See our argument at paragraphs 9.4 and 9.5 above in this respect.



**Q4. Which option would be preferred (subject to viability assessment):**

***Development mix to be assessed on a site by site basis; OR A set development mix (comprising rented/low cost home ownership, secured as affordable in perpetuity and sufficient open market housing to cross-subsidise these properties).***

As noted in our answer to Q3 there should be a sequential test to rule out the possibility of 100% affordable housing on the site before contemplating a cross-subsidy scheme.

If a cross-subsidy scheme is all that is possible, while there will always be exceptions, a set development mix would generally be preferable, rather than a free-for-all over each site.

At the moment, affordable housing contributions are set at three separate fixed percentages (10%, 15% and 20%) according to geographic area, and based on viability studies.

The aim of the cross-subsidy policy is to help achieve a significantly higher proportion of affordable houses across the county. There is therefore little point in adopting the policy if the proportion of affordable houses on such sites is not going to be dramatically higher than at present.

It would therefore be preferable if the percentage of affordable houses on such cross-subsidy sites is set at at least 90%. Any new viability studies produced in support of arriving at such percentage figures should include publication of full financial figures.

## **Windfall development**

**Q5. Do you consider that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline?**

Yes.

Historically the housing requirement has been met by significant amounts of windfall development. Little has changed to suggest that this might not continue. Indeed, there seems likely to be more windfall housing available than the SLAA includes (see Appendix 7, section 3.1). The potential cross-subsidy sites will also be a further source of windfalls

The windfall allowance can only be calculated across the whole County for the simple reason that one cannot predict where windfalls will occur. They may be more likely to come forward in larger settlements, for example. So, while a windfall allowance by settlement may be useful to set the baseline allocation requirement, it should not be set in stone, or become a tool that can be used to increase development in a settlement beyond that established requirement if, as is inevitable, the pattern of windfalls does not match the theoretical plan assessment.

**Q6. Do you consider that this is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline?**

No.

Employment land should relate to jobs needed around that settlement and it is not appropriate to rely on windfall sites in setting targets. It is another matter if such sites do become available, however, and it is appropriate to reduce the County-wide employment land need if there is evidence of windfall supply.

## Albrighton Place Plan Area

### **Q7. Albrighton:**

#### **a) Do you agree with the preferred housing and employment guidelines for Albrighton?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Albrighton should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Albrighton might be as little as 2Ha compared to the Council's calculation of 5Ha ( $500 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

However, making any decision now about Albrighton's housing and employment guidelines and allocations is premature when it is known that there is to be further consultation later this year about "strategic" sites, which is likely to include significant nearby sites. Decisions about Albrighton should be made only when the information surrounding that consultation becomes available.

#### **b) Do you agree with the proposed development boundary for Albrighton?**

No.

In view of what we have said at Q7.a) above it is premature to make any decision now about Albrighton's development boundary.

#### **c) Do you agree with the preferred housing allocation ALB017 in Albrighton?**

No.

In view of what we have said at Q7.a) above it is premature to make any decision now about Albrighton's housing allocation.

#### **d) Do you agree with the preferred housing allocation ALB021 in Albrighton?**

No.

In view of what we have said at Q7.a) above it is premature to make any decision now about Albrighton's housing allocation.

#### **e) Do you agree with the preferred area(s) of safeguarded land in Albrighton?**

No.

In view of what we have said at Q7.a) above it is premature to make any decision now about Albrighton's safeguarded land.

Also, no cogent reason has yet been put forward as to what exceptional reasons exist, under NPPF paragraph 136, for the release of Green Belt land at Albrighton.

## **Bishop's Castle Place Plan Area**

### **Q8. Bishop's Castle:**

**a) Do you agree with the preferred housing and employment guidelines for Bishop's Castle?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Bishop's Castle should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Bishop's Castle might be only 1Ha compared to the Council's calculation of 2Ha ( $150 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

**b) Do you agree with the proposed development boundary for Bishop's Castle?**

**c) Do you agree with the preferred housing allocation BIS028 in Bishop's Castle?**

### **Q9. Bucknell:**

**a) Do you agree with the identification of Bucknell as a Community Hub?**

Yes

**b) Do you agree with the preferred housing guideline for Bucknell?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Bucknell should be scaled back by around 10%.

- c) Do you agree with the proposed development boundary for Bucknell?**
- d) Do you agree with the preferred housing allocation BKL008a in Bucknell?**

**Q10. Chirbury:**

- a) Do you agree with the identification of Chirbury as a Community Hub?**

No.

Chirbury has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

- b) Do you agree with the preferred housing guideline for Chirbury?**

No.

It follows from our answer at 10.a) above that Chirbury should not have any housing guideline.

- c) Do you agree with the proposed development boundary for Chirbury?**

No.

It follows from our answer at 10.a) above that Chirbury should not have any development boundary.

- d) Do you agree with the preferred housing allocation CHR001 in Chirbury?**

No.

It follows from our answer at 10.a) above that Chirbury should not have any housing allocation.

- e) Do you agree with the preferred housing allocation CHR002 in Chirbury?**

No.

It follows from our answer at 10.a) above that Chirbury should not have any housing allocation.

**Q11. Clun:**

- a) Do you agree with the identification of Clun as a Community Hub?**

Yes

- b) Do you agree with the preferred housing guideline for Clun?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Clun should be scaled back by around 10%.

- c) Do you agree with the proposed development boundary for Clun?**
- d) Do you agree with the preferred housing allocation CLU005 in Clun?**

**Q12. Worthen and Brockton:**

- a) Do you agree with the identification of Worthen and Brockton as a joint Community Hub?**

No.

Both Worthen with Brockton and Brockton (Worthen with Shelve) have been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. They also lack certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding their overall HoS scores, they should therefore not be accorded Hub status (and should be re-classified as "Other Rural Settlements"), because they lack certain services or facilities which are stated to be essential on a day-to-day basis, and are therefore currently not a sufficiently sustainable location for further significant rural development.

- b) Do you agree with the preferred housing guideline for Worthen and Brockton?**

No.

It follows from our answer at 12.a) above that Worthen and Brockton should not have any housing guideline.

- c) Do you agree with the proposed development boundaries for Worthen and Brockton?**

No.

It follows from our answer at 12.a) above that Worthen and Brockton should not have any development boundaries.

- d) Do you agree with the preferred housing allocation WBR007/WBR008 in the Worthen and Brockton joint Hub?**

No.

It follows from our answer at 12.a) above that Worthen and Brockton should not have any housing allocation.

## Bridgnorth Place Plan Area

### **Q13. Bridgnorth:**

#### **a) Do you agree with the preferred housing and employment guidelines for Bridgnorth?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Bridgnorth should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Bridgnorth (excluding any additional provision to address local circumstances) might be only 6Ha compared to the Council's calculation of 16Ha (based on  $1,500 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

#### **b) Do you agree with the proposed development boundary for Bridgnorth?**

#### **c) Do you agree with the preferred mixed use allocation P54 (part); P56 (part); P58a; STC002; STC004 (part); STC005; and STC006 in Bridgnorth?**

No.

Development pressure has been present for many years and the concept of the Green Belt was set in place to control it. Under NPPF paragraphs 136 and 137, exceptional circumstances are necessary to justify releasing land from the Green Belt. We do not consider that further development pressure is such an exceptional circumstance; it is a common circumstance. No such exceptional circumstances have yet been fully evidenced and justified by Shropshire Council, as is required by NPPF paragraph 136.

Development pressure emanating from the West Midlands conurbation, which is what is implied to be happening, might best be served by releasing land at the western edge of the Green Belt, not along its eastern edge. It is also relevant that the next planned consultation on the Local Plan Review will be on strategic sites etc, which is scheduled to include consideration of a Garden Village idea within the Green Belt. Any such proposals should clearly be considered alongside these present proposals, in order to get a holistic view. For open consultation, it would also have been instructive for any agreements with neighbouring authorities to have been part of the Evidence Base for this present consultation.

Furthermore, the whole of the site has been given scores under the Sustainability Appraisal of no better than “Fair”, with P54 being rated “Poor”. It might have been expected that only sites with a “Good” sustainability score would have been allowed to go forward in the site assessment process to become allocated sites.

The reason put forward for release of Green Belt land is to accommodate the long-term future of the town. The proposal to create a new community garden settlement at Stanmore would create an entity quite separate from Bridgnorth, with Green Belt land between the two settlements.

Officers will be aware of the mounting opposition to this scheme at Stanmore from the local residents. It is to be hoped that, as required by NPPF paragraph 16.c) there will be *“early, proportionate and effective engagement between plan-makers and communities, local organisations . . . ”* etc before taking plans any further.

**d) Do you agree with the preferred area(s) of safeguarded land in Bridgnorth?**

No.

As well as reasons similar to those expressed above, both P56 and P54 have been given “Poor” sustainability scores. Site P56 is marked as being for residential use on page 52 of the consultation document but appears to have mitigation measures for employment use attached to it on page 32 of the Sustainability Assessment report.

**Q14. Alveley:**

**a) Do you agree with the identification of Alveley as a Community Hub?**

No.

Alveley has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Alveley?**

No.

It follows from our answer at 14.a) above that Alveley should not have any housing guideline.

In any case it is considered that the number of windfalls (at 29) has been underestimated and is more likely to be well into the 40s. That would provide a measure of organic growth for Alveley without the need for a specific housing guideline or for housing allocations.

**c) Do you agree with the proposed development boundary for Alveley?**

No.

It follows from our answer at 14.a) above that Alveley should not have any development boundary.

**d) Do you agree with the preferred housing allocation ALV006/ALV007 in Alveley?**

No.

It follows from our answer at 14.a) above that Alveley should not have any housing allocation.

Paragraph 6.26 of the consultation document states that “*high quality local needs housing development in Alveley is a particular local priority*”. In the absence of a specific housing allocation, such local needs housing might instead be best provided as part of a cross-subsidy scheme, as proposed within this consultation. It is unlikely to be provided by any market scheme. That consideration applies equally to ALV009 below.

**e) Do you agree with the preferred housing allocation ALV009 in Alveley?**

No.

It follows from our answer at 14.a) above that Alveley should not have any housing allocation.

**f) Do you agree with the preferred area(s) of safeguarded land in Alveley?**

No.

It follows from our answer at 14.a) above that Alveley should not have any safeguarded land attached to it.

Development pressure has been present for many years and the concept of the Green Belt was set in place to control it. Under NPPF paragraphs 136 and 137, exceptional circumstances are necessary to justify safeguarding ALV002 for future release from the Green Belt. Yet further development pressure is not considered to be an exceptional circumstance; it is a common circumstance. No such exceptional circumstances have yet been fully evidenced and justified by Shropshire Council, as is required by NPPF paragraph 136.

**Q15. Ditton Priors:**

**a) Do you agree with the identification of Ditton Priors as a Community Hub?**

No.

Ditton Priors has been scored in the Hierarchy of Settlements documents as not having any public transport links. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have such links.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.



- b) Do you agree with the preferred housing guideline for Ditton Priors?**
- No.
- It follows from our answer at 15.a) above that Ditton Priors should not have any housing guideline.
- c) Do you agree with the proposed development boundary for Ditton Priors?**
- No.
- It follows from our answer at 15.a) above that Ditton Priors should not have any development boundary.
- d) Do you agree with the preferred housing allocation DNP009 in Ditton Priors?**
- No.
- It follows from our answer at 15.a) above that Ditton Priors should not have any housing allocations.

## Broseley Place Plan Area

### Q16. Broseley:

- a) Do you agree with the preferred housing and employment guidelines for Broseley?**
- No.
- Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.
- On that basis, the housing guideline for Broseley should be scaled back by around 10%.
- We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.
- Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Broseley might be only 1Ha compared to the Council's calculation of 3Ha (based primarily on  $250 \times 42.25 / 10,000 / 0.4$ ).
- Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.
- b) Do you agree with the proposed development boundary for Broseley?**
- c) Do you agree with the preferred housing allocation BRO012/BRO024 in Broseley?**
- d) Do you agree with the preferred housing allocation BRO040/BRO041 (western field) in Broseley?**

## Church Stretton Place Plan Area

### **Q17. Church Stretton:**

#### **a) Do you agree with the preferred housing and employment guidelines for Church Stretton?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Church Stretton should be scaled back by at least 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Church Stretton might be only 1Ha compared to the Council's calculation of 3Ha ( $250 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

As noted below in the comments on sites, Church Stretton is hemmed in by the hills of the AONB, and is unique within Shropshire in that respect. Footnote 6 to paragraph 11.b)i of the new NPPF gives AONBs special protection. It provides that, for plan-making, that footnote "*provides a strong reason for restricting the overall scale, type or distribution of development in the plan area*" i.e. for Church Stretton

It is therefore not appropriate for Shropshire Council to treat Church Stretton mathematically like other settlements in Shropshire, and require it to "take its fair share" of development.

#### **b) Do you agree with the proposed development boundary for Church Stretton?**

No.

In view of what we say at 17.a) above and 17.c) and 17.d) below, the development boundary should remain unchanged.

#### **c) Do you agree with the preferred housing allocation CST020 (part) in Church Stretton?**

No.

We emphasise that Church Stretton is the centre of the South Shropshire tourist area, with the Long Mynd on one side of the valley, and Helmuth Hill and Caer Caradoc amongst other prominent hills on the other side. It is in an iconic setting in the AONB

and is quite unsuitable for large housing estates, particularly on the hillsides. Both of the proposed allocated sites are unsuitable for development for these reasons and smaller infilling sites in the town would be far more suitable. The town should grow organically over the next 20 years, not in large blocks. Because of its position in the AONB and its topography, Church Stretton should not be required to fulfil an arbitrary quota.

We understand that the Shropshire Hills AONB Partnership is objecting to the allocation of this site, and due weight should be given to that objection.

**d) *Do you agree with the preferred housing allocation CST021 in Church Stretton?***

No.

We emphasise that Church Stretton is the centre of the South Shropshire tourist area, with the Long Mynd on one side of the valley, and Helmuth Hill and Caer Caradoc amongst other prominent hills on the other side. It is in an iconic setting in the AONB and is quite unsuitable for large housing estates, particularly on the hillsides. Both of the proposed allocated sites are unsuitable for development for these reasons and smaller infilling sites in the town would be far more suitable. The town should grow organically over the next 20 years, not in large blocks. Because of its position in the AONB and its topography, Church Stretton should not be required to fulfil an arbitrary quota.

We understand that the Shropshire Hills AONB Partnership is objecting to the allocation of this site, and due weight should be given to that objection.

## **Cleobury Mortimer Place Plan Area**

### **Q18. Cleobury Mortimer:**

**a) *Do you agree with the preferred housing and employment guidelines for Cleobury Mortimer?***

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Cleobury Mortimer should be scaled back by at least 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Cleobury Mortimer might be only 1Ha compared to the Council's calculation of 2Ha ( $200 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

## Craven Arms Place Plan Area

### 19. Craven Arms:

#### a) *Do you agree with the preferred housing and employment guidelines for Craven Arms?*

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Craven Arms should be scaled back by at least 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Craven Arms might be only 2Ha compared to the Council's calculation of 5Ha ( $500 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

#### b) *Do you agree with the proposed development boundary for Craven Arms?*

## Ellesmere Place Plan Area

### Q20. Ellesmere:

#### a) *Do you agree with the preferred housing and employment guidelines for Ellesmere?*

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Ellesmere should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy “balance” and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Ellesmere might be only 3Ha compared to the Council’s calculation of 8Ha ( $800 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

- b) Do you agree with the proposed development boundary for Ellesmere?**
- c) Do you agree with the preferred housing allocation ELL005 in Ellesmere?**
- d) Do you agree with the preferred housing allocation ELL008 in Ellesmere?**

## Highley Place Plan Area

### Q21. Highley:

- a) Do you agree with the preferred housing and employment guidelines for Highley?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government’s minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Highley should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy “balance” and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Highley might be only 1Ha compared to the Council’s calculation of 2Ha ( $250 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

- b) Do you agree with the proposed development boundary for Highley?**
- c) Do you agree with the preferred housing allocation HNN016 in Highley?**

## Ludlow Place Plan Area

### **Q22. Ludlow:**

- a) Do you agree with the preferred housing and employment guidelines for Ludlow?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Ludlow should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Ludlow might be only 4 Ha compared to the Council's calculation of 11Ha ( $1,000 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

- b) Do you agree with the proposed development boundary for Ludlow?**  
**c) Do you agree with the preferred housing allocation LUD056 in Ludlow?**  
**d) Do you agree with the preferred housing allocation LUD057 in Ludlow?**  
**e) Do you agree with the preferred employment allocation LUD052 in Ludlow?**

### **Q23. Burford:**

- a) Do you agree with the identification of Burford as a Community Hub?**

Yes

- b) Do you agree with the preferred housing guideline for Burford?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Burford should be scaled back by around 10%.

**Q24. Clee Hill:**

- a) Do you agree with the identification of Clee Hill as a Community Hub?**

Yes

- b) Do you agree with the preferred housing guideline for Clee Hill?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Clee Hill should be scaled back by around 10%.

- c) Do you agree with the proposed development boundary for Clee Hill?**  
**d) Do you agree with the preferred housing allocation CHK002 in Clee Hill?**

## **Market Drayton Place Plan Area**

**Q25. Market Drayton:**

- a) Do you agree with the preferred housing and employment guidelines for Market Drayton?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Market Drayton should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Market Drayton might be only 5Ha compared to the Council's calculation of 13Ha ( $1,200 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

- b) Do you agree with the proposed development boundary for Market Drayton?**  
**c) Do you agree with the preferred housing allocation MDR012 in Market Drayton?**

- d) ***Do you agree with the preferred housing allocation MDR034 in Market Drayton?***
- e) ***Do you agree with the preferred housing allocation MDR039/MDR043 in Market Drayton?***
- f) ***Do you agree with the preferred housing allocation MDR006 in Market Drayton?***

**Q26. Hinstock:**

- a) ***Do you agree with the identification of Hinstock as a Community Hub?***

Yes

- b) ***Do you agree with the preferred housing guideline for Hinstock?***

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Hinstock should be scaled back by around 10%.

However, the proposed guideline of 155 new houses is also disproportionately high in comparison with its existing 314 houses. There are already commitments of 106 dwellings against the SAMDev guideline of 60 dwellings. No reason is given as to why Hinstock should be required to take yet more new housing.

- c) ***Do you agree with the proposed development boundary for Hinstock?***

No, in view of what is said above and below.

- d) ***Do you agree with the preferred housing allocation HKW009 in Hinstock?***

No

In view of what is said at 26.a) a housing allocation of the scale proposed is not appropriate for Hinstock.

**Q27. Hodnet:**

- a) ***Do you agree with the identification of Hodnet as a Community Hub?***

No.

Hodnet has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as "Other Rural Settlements"), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.



**b) Do you agree with the preferred housing guideline for Hodnet?**

No.

It follows from our answer at 27.a) above that Hodnet should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Hodnet?**

No.

It follows from our answer at 27.a) above that Hodnet should not have any development boundary.

**d) Do you agree with the preferred housing allocation HHH001/HHH014 in Hodnet?**

It follows from our answer at 27.a) above that Hodnet should not have any housing allocation.

**Q28. Woore, Irelands Cross and Pipe Gate:**

**a) Do you agree with the identification of Woore, Irelands Cross and Pipe Gate as a Community Hub?**

Yes

## **Minsterley and Pontesbury Place Plan Area**

**Q29. Minsterley:**

**a) Do you agree with the identification of Minsterley as a Community Hub?**

Yes

**b) Do you agree with the preferred housing guideline for Minsterley?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Minsterley should be scaled back by around 10%.

**c) Do you agree with the proposed development boundary for Minsterley?**

**d) Do you agree with the preferred housing allocation MIN018 in Minsterley?**

**Q30. Pontesbury:**

**a) Do you agree with the identification of Pontesbury as a Community Hub?**

Yes

**b) Do you agree with the preferred housing guideline for Pontesbury?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Pontesbury should be scaled back by around 10%.

- c) ***Do you agree with the proposed development boundary for Pontesbury?***
- d) ***Do you agree with the preferred housing allocation PON008, PON017 and PON030 in Pontesbury?***

## **Much Wenlock Place Plan Area**

### **Q31. Much Wenlock:**

- a) ***Do you agree with the preferred housing and employment guidelines for Much Wenlock?***

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Much Wenlock should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Much Wenlock might be only 1Ha compared to the Council's calculation of 2Ha ( $150 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

- b) ***Do you agree with the proposed development boundary for Much Wenlock?***
- c) ***Do you agree with the preferred housing allocation MUW012 in Much Wenlock?***

### **Q32. Cressage:**

- a) ***Do you agree with the identification of Cressage as a Community Hub?***

No.

Cressage has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of

the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Cressage?**

It follows from our answer at 32.a) above that Cressage should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Cressage?**

It follows from our answer at 32.a) above that Cressage should not have any development boundary.

**d) Do you agree with the preferred housing allocation CES005 in Cressage?**

It follows from our answer at 32.a) above that Cressage should not have any housing allocation.

**e) Do you agree with the preferred housing allocation CES006 in Cressage?**

It follows from our answer at 32.a) above that Cressage should not have any housing allocation.

## Oswestry Place Plan Area

### Q33. Oswestry:

**a) Do you agree with the preferred housing and employment guidelines for Oswestry?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government’s minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Oswestry should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy “balance” and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Oswestry might be only 8Ha compared to the Council’s calculation of 19Ha ( $1,800 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines. Oswestry has existing commitments and allocations of employment land of 57Ha. Under the Council's calculations for "balanced growth" this would support some 5,400 new houses, which are clearly not planned to be built in Oswestry. Workers will clearly be commuting to Oswestry, so the "balance" should come from those other locations, reducing the need for employment land at those other locations.

Paragraph 17.13 of the consultation document proposes to reduce the allowance for commitments by 100 because, of the 900 homes provided under SAMDev for the Eastern SUE, outline permissions have been granted for only 750. It is our understanding that the "missing" 150 houses are represented by land owned by Shropshire Council (under Title Number SL168760). In the absence of information about the Council's intentions for any alternative use for this land it is uncertain why this deduction of 100 is being proposed. Without this deduction, the need for further allocated land for Oswestry is clearly also much less than is being proposed.

**b) *Do you agree with the proposed development boundary for Oswestry?***

No.

Under the proposal at 33.a) above the further proposed allocation would not be required, so an extension to the existing development boundary to take in OSW017 would not be needed.

**c) *Do you agree with the preferred housing allocation OSW017 in Oswestry?***

No

Under the proposal at 33.a) above the allocation of 40 dwellings would not be required.

**d) *Do you agree with the preferred housing allocation PKH002; PKH007 (part); PKH031 in Oswestry?***

No.

We have answered "No" because aspects of this proposal appear to be problematical.

Paragraph 17.16 of the consultation document says that this proposed allocation 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 RJA 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.

**Q34. Gobowen:**

- a) Do you agree with the identification of Gobowen as a Community Hub?**

Yes

- b) Do you agree with the preferred housing guideline for Gobowen?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Gobowen should be scaled back by around 10%.

- c) Do you agree with the proposed development boundary for Gobowen?**  
**d) Do you agree with the preferred housing allocation GWR009 in Gobowen?**  
**e) Do you agree with the preferred housing allocation GWR023 in Gobowen?**

**Q35. Kinnerley:**

- a) Do you agree with the identification of Kinnerley as a Community Hub?**

Yes

- b) Do you agree with the preferred housing guideline for Kinnerley?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Kinnerley should be scaled back by at least 10%. The Parish Council suggested that a proportionate housing guideline would be 37 dwellings but received no response.

Kinnerley is not a large village, as stated incorrectly as the opening remark about it in paragraph 17.28 of the consultation document (page 141). It is one of the smallest of the villages proposed as Hubs, with only about 150 houses in the village.

Furthermore, it has recently grown significantly and has commitments for a yet further significant increase. It should not therefore be required to take yet further development on the scale proposed.

- b) Do you agree with the proposed development boundary for Kinnerley?**

Yes

**Q36. Knockin:**

**a) Do you agree with the identification of Knockin as a Community Hub?**

No.

Knockin has been scored in the Hierarchy of Settlements documents as not having any nursery or primary schools. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have certain primary services stated to be essential on a day-to-day basis. Schools are one of those primary services. It also lacks a convenience store and a petrol station.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

Knockin is the very smallest of the villages proposed as hubs, with an estimate by the Council of only 77 dwellings. It has recently lost its shop and functional Post Office, and is struggling to maintain its community hall (Knockin Assembly Rooms). The building of more houses will not reverse that.

**b) Do you agree with the preferred housing guideline for Knockin?**

No.

It follows from our answer at 36.a) above that Knockin should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Knockin?**

No.

It follows from our answer at 36.a) above that Knockin should not have any development boundary.

**d) Do you agree with the preferred housing allocation KCK009 in Knockin?**

No.

It follows from our answer at 36.a) above that Knockin should not have any housing allocation.

**Q37. Llanymynech:**

**a) Do you agree with the identification of Llanymynech as a Community Hub?**

No.

Llanymynech has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”),

because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Llanymynech?**

It follows from our answer at 37.a) above that Llanymynech should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Llanymynech?**

It follows from our answer at 37.a) above that Llanymynech should not have any development boundary.

**d) Do you agree with the preferred housing allocation LYH007 in Llanymynech?**

It follows from our answer at 37.a) above that Llanymynech should not have any housing allocation.

Paragraph 17.38 of the consultation document acknowledges that Station Road is already congested. Development on the proposed site would have to use the existing access onto Station Road, which would only exacerbate this problem and problems at the sub-standard cross-roads at the very busy A 483. Development of this site would also further cut off part of the open aspect and green corridor between the playing field and the heritage canal

**Q38. Pant:**

**a) Do you agree with the identification of Pant as a Community Hub?**

Yes

**b) Do you agree with the preferred housing guideline for Pant?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Pant should be scaled back by around 10%.

**c) Do you agree with the proposed development boundary for Pant?**

No, because of our reasoning below.

**d) Do you agree with the preferred housing allocation PYC021 in Pant?**

No

The site is a relatively narrow field that fronts onto the busy A483. It would be better to find a site away from the A483, where occupants would not be at such direct risk of pollution from the road.

The site also has been given a very low absolute sustainability score of minus 12, although it was rated "Fair" in comparison to other Pant sites.

**Q39. Ruyton XI Towns:**

- a) ***Do you agree with the identification of Ruyton XI Towns as a Community Hub?***

Yes

- b) ***Do you agree with the preferred housing guideline for Ruyton XI Towns?***

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Ruyton XI Towns should be scaled back by around 10%.

- c) ***Do you agree with the proposed development boundary for Ruyton XI Towns?***
- d) ***Do you agree with the preferred housing allocation RUY019 in Ruyton XI Towns?***

**Q40. St Martins:**

- a) ***Do you agree with the identification of St Martins as a Community Hub?***

Yes

- b) ***Do you agree with the preferred housing guideline for St Martins?***

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for St Martins should be scaled back by around 10%.

- c) ***Do you agree with the proposed development boundary for St Martins?***
- d) ***Do you agree with the preferred housing allocation SMH031 in St Martins?***
- e) ***Do you agree with the preferred housing allocation SMH038 in St Martins?***

**Q41. Trefonen:**

- a) ***Do you agree with the identification of Trefonen as a Community Hub?***

No.

Trefonen has been scored in the Hierarchy of Settlements documents as not having employment opportunities, and not having a regular peak time public transport link. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have both of these. It also lacks certain primary services stated to be essential on a day-to-day basis.



As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Trefonen?**

It follows from our answer at 41.a) above that Trefonen should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Trefonen?**

It follows from our answer at 41.a) above that Trefonen should not have any development boundary.

**Q42. West Felton:**

**a) Do you agree with the identification of West Felton as a Community Hub?**

No.

West Felton has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for West Felton?**

It follows from our answer at 42.a) above that West Felton should not have any housing guideline.

**c) Do you agree with the proposed development boundary for West Felton?**

It follows from our answer at 42.a) above that West Felton should not have any development boundary.

**d) Do you agree with the preferred housing allocation WEF025 in West Felton?**

It follows from our answer at 42.a) above that West Felton should not have any housing allocation.

**Q43. Weston Rhyn:**

**a) Do you agree with the identification of Weston Rhyn as a Community Hub?**

No.

Weston Rhyn has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant

employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Weston Rhyn?**

It follows from our answer at 43.a) above that Weston Rhyn should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Weston Rhyn?**

It follows from our answer at 43.a) above that Weston Rhyn should not have any development boundary.

**d) Do you agree with the preferred housing allocation WRP017 in Weston Rhyn?**

It follows from our answer at 43.a) above that Weston Rhyn should not have any housing allocation.

**e) Do you agree with the preferred housing allocation WRP001 (western part) in Weston Rhyn?**

It follows from our answer at 43.a) above that Weston Rhyn should not have any housing allocation.

**Q44. Whittington:**

**a) Do you agree with the identification of Whittington as a Community Hub?**

No.

Whittington has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Whittington?**

It follows from our answer at 44.a) above that Whittington should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Whittington?**

It follows from our answer at 44.a) above that Whittington should not have any development boundary.

**d) Do you agree with the preferred housing allocation WHN024 in Whittington?**

It follows from our answer at 44.a) above that Whittington should not have any housing allocation.

## **Shifnal Place Plan Area**

**Q45. Shifnal:**

**a) Do you agree with the preferred housing and employment guidelines for Shifnal?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Shifnal should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Shifnal (excluding any additional provision to address local circumstances) might be only 6Ha compared to the Council's calculation of 16Ha (based on  $1,500 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

Shifnal has, with existing completions and commitments, already nearly met its SAMDev housing guideline of 1,250, with about seven years of the SAMDev plan period still left to run. Some of that is acknowledged to have come about through unplanned development at a time when Shropshire Council fell short of a proven 5-year supply of housing land. Shifnal residents should not be required to suffer yet further expansion of their town because of this past expansion. As it is, the proposed guideline would be an expansion of the town by some 47% ( $1,500/3,215$ ) which is a disproportionately large increase.

Under Shropshire Council's Balanced Growth scenario their calculation is that 1,500 houses will "balance" with 16Ha of employment land, as above. There is absolutely no indication of how the proposed figure of 40Ha of employment land (as in paragraph 18.19 of the consultation report) has been arrived at.

**b) Do you agree with the proposed development boundary for Shifnal?**

**c) Do you agree with the preferred housing allocation SHF022 and part SHR023 in Shifnal?**

**d) Do you agree with the preferred housing allocation SHF032 in Shifnal?**

**e) Do you agree with the preferred employment allocation SHF018b and SHF018d in Shifnal?**

No.

As noted at 45.a) above, there may be no need for this amount of employment land. It is isolated from the town by Green Belt land, which is undesirable. One part of the site (SHF018b) had a very low sustainability appraisal score of minus 11, and a rating of "Poor". The other part (SHF018d) was not assessed at all. It is therefore questionable why the site was allowed to go forward through the site selection process to become a proposed allocated site. No mitigation has been proposed for the site to counter this "Poor" rating.

**f) Do you agree with the preferred area(s) of safeguarded land in Shifnal?**

No.

Development pressure has been present for many years and the concept of the Green Belt was set in place to control it. Under NPPF paragraphs 136 and 137, exceptional circumstances are necessary to justify releasing land from the Green Belt. We do not consider that further development pressure is such an exceptional circumstance; it is a common circumstance. No such exceptional circumstances have yet been fully evidenced and justified by Shropshire Council, as is required by NPPF paragraph 136.

Development pressure emanating from the West Midlands conurbation might best be served by releasing land at the western edge of the Green Belt, not around Shifnal. It is also relevant that the next planned consultation on the Local Plan Review will be on strategic sites etc, which is scheduled to include consideration of a Garden Village idea within the Green Belt. Any such proposals should clearly be considered alongside these present proposals, in order to get a holistic view. For open consultation, it would also have been instructive for any agreements with neighbouring authorities to have been part of the Evidence Base for this present consultation.

Part of the proposed safeguarded land is between Shifnal and Telford, and releasing it from the Green Belt would further erode the relatively narrow tract of Green Belt land between the two towns.

Part of the proposed safeguarded land (P15b west) has been given a sustainability score of minus 11 and rated "Poor", yet it has still been allowed through the site selection process, whilst no mitigation measures have been proposed.

## **Shrewsbury Place Plan Area**

**Q46. Shrewsbury:**

**a) Do you agree with the preferred housing and employment guidelines for Shrewsbury?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Shrewsbury should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy “balance” and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Shrewsbury might be as little as 36Ha compared to the Council’s calculation of 91Ha ( $8,625 \times 42.25 / 10,000 / 0.4$ ). Its existing employment land supply of 41Ha is therefore likely to be adequate, in which case no further allocations of employment land are necessary.

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

**b) *Do you agree with the proposed development boundary for Shrewsbury?***

No.

If housing and employment guidelines are scaled back as above then not all allocations will be required. The development boundary should encompass only those that are required.

**c) *Do you agree with the preferred mixed-use allocation SHR158/SHR060/SHR161 in Shrewsbury?***

No, but a simple Yes/No response does not cover all the possibilities for this site.

If housing and employment guidelines are scaled back as above then not all of the site may be required. Furthermore, some of Shropshire’s housing and employment need may be met from strategic sites which have not yet been consulted on.

The table on page 176 of the consultation document indicates that considerable work has already gone on in the background in connection with planning out this site. If, as required by NPPF paragraph 16.c) there has already been “*early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees*”, then it would have been helpful for an understanding of the site had the results of that consultation been made available within the consultation documents.

Clearly a site of this size does require master-planning and integration with the Big Town Plan as proposed on page 176. It may also provide greater variety in housing if the site is broken up, rather than being developed by only one or two developers, as seems to be the present case with SUEs.

**d) *Do you agree with the preferred housing allocation SHR057 (part)/SHR177 in Shrewsbury?***

Yes, subject to master planning and integration with the Big Town Plan, as proposed.

**e) *Do you agree with the preferred housing allocation SHR216 in Shrewsbury?***

No.

The site has been scored as the least sustainable of those proposed for allocation. It is no longer needed to help fund the North West Relief Road.

If the housing guideline is scaled back as above, it will not be required.

**f) Do you agree with the preferred housing allocation SHR145 in Shrewsbury?**

Yes, subject to solving the congestion problems at Hereford Way.

**g) Do you agree with the preferred ~~housing~~ [employment] allocation SHR166 in Shrewsbury?**

No.

The site is across the river from the rest of the town. Without a new bridge, it will be accessible only by taking a much longer route via the bypass.

If the employment land guideline is scaled back as above, it will not be required.

**Q47. Baschurch:**

**a) Do you agree with the identification of Baschurch as a Community Hub?**

No.

Baschurch has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Baschurch?**

No.

It follows from our answer at 47.a) above that Baschurch should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Baschurch?**

No.

It follows from our answer at 47.a) above that Baschurch should not have any development boundary.

**d) Do you agree with the preferred housing allocation BNP024 in Baschurch?**

No.

It follows from our answer at 47.a) above that Baschurch should not have any housing allocation.

**e) Do you agree with the preferred housing allocation BNP035 in Baschurch?**

No.

It follows from our answer at 47.a) above that Baschurch should not have any housing guideline

**Q48. Bayston Hill:**

- a) ***Do you agree with the identification of Bayston Hill as a Community Hub?***

Yes

- b) ***Do you agree with the preferred housing guideline for Bayston Hill?***

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Bayston Hill should be scaled back by around 10%.

- c) ***Do you agree with the proposed development boundary for Bayston Hill?***  
d) ***Do you agree with the preferred housing allocation BAY039 in Bayston Hill?***  
e) ***Do you agree with the preferred housing allocation BAY050 in Bayston Hill?***

**Q49. Bicton:**

- a) ***Do you agree with the identification of Bicton as a Community Hub?***

Yes

- b) ***Do you agree with the preferred housing guideline for Bicton?***

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Bicton should be scaled back by around 10%.

- c) ***Do you agree with the proposed development boundary for Bicton?***  
d) ***Do you agree with the preferred housing allocation BIT022 in Bicton?***

**Q50. Bomere Heath:**

- a) ***Do you agree with the identification of Bomere Heath as a Community Hub?***

No.

Bomere Heath has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as "Other Rural Settlements"),

because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Bomere Heath?**

No.

It follows from our answer at 50.a) above that Bomere Heath should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Bomere Heath?**

No.

It follows from our answer at 50.a) above that Bomere Heath should not have any development boundary.

**d) Do you agree with the preferred housing allocation BOM019 in Bomere Heath?**

No.

It follows from our answer at 50.a) above that Bomere Heath should not have any housing allocation.

**e) Do you agree with the preferred housing allocation BOM020 in Bomere Heath?**

No.

It follows from our answer at 50.a) above that Bomere Heath should not have any housing allocation.

**Q51. Cross Houses:**

**a) Do you agree with the identification of Cross Houses as a Community Hub?**

No.

Cross Houses has been scored in the Hierarchy of Settlements documents as not having any nursery or primary schools. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have certain primary services stated to be essential on a day-to-day basis. Schools are one of those primary services. It also lacks a GP surgery.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Cross Houses?**

No.

It follows from our answer at 51.a) above that Cross Houses should not have any housing guideline.



**c) Do you agree with the proposed development boundary for Cross Houses?**

No.

It follows from our answer at 51.a) above that Cross Houses should not have any development boundary.

**d) Do you agree with the preferred housing allocation CSH004 in Cross Houses?**

No.

It follows from our answer at 51.a) above that Cross Houses should not have any housing allocation.

**Q52. Dorrington:**

**a) Do you agree with the identification of Dorrington as a Community Hub?**

Yes

**b) Do you agree with the preferred housing guideline for Dorrington?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Dorrington should be scaled back by around 10%.

**Q53. Ford:**

**a) Do you agree with the identification of Ford as a Community Hub?**

No.

Ford has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as "Other Rural Settlements"), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Ford?**

No.

It follows from our answer at 53.a) above that Ford should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Ford?**

No.

It follows from our answer at 53.a) above that Ford should not have any development boundary.

**d) Do you agree with the preferred housing allocation FRD011 in Ford?**

No.

It follows from our answer at 53.a) above that Ford should not have any housing allocation.

**Q54. Hanwood:**

**a) Do you agree with the identification of Hanwood as a Community Hub?**

No.

Hanwood has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Hanwood?**

No.

It follows from our answer at 54.a) above that Hanwood should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Hanwood?**

No.

It follows from our answer at 54.a) above that Hanwood should not have any development boundary.

**Q55. Longden:**

**a) Do you agree with the identification of Longden as a Community Hub?**

No.

Longden has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Longden?**

No.

It follows from our answer at 55.a) above that Longden should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Longden?**

No.

It follows from our answer at 55.a) above that Longden should not have any development boundary.

**Q56. Nesscliffe:**

**a) Do you agree with the identification of Nesscliffe as a Community Hub?**

Yes.

**b) Do you agree with the preferred housing guideline for Nesscliffe?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government’s minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Nesscliffe should be scaled back by around 10%.

**c) Do you agree with the proposed development boundary for Nesscliffe?**

## Wem Place Plan Area

**Q57. Wem:**

**a) Do you agree with the preferred housing and employment guidelines for Wem?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government’s minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Wem should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy “balance” and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing

guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Wem might be only 3Ha compared to the Council's calculation of 6Ha (based on  $600 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

- b) Do you agree with the proposed development boundary for Wem?**
- c) Do you agree with the preferred housing allocation WEM010 in Wem?**
- d) Do you agree with the preferred housing allocation WEM025 in Wem?**
- e) Do you agree with the preferred housing allocation WEM033 in Wem?**

**Q58. Clive:**

- a) Do you agree with the identification of Clive as a Community Hub?**

No.

Clive has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as "Other Rural Settlements"), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

- b) Do you agree with the preferred housing guideline for Clive?**

No.

It follows from our answer at 58.a) above that Clive should not have any housing guideline.

- c) Do you agree with the proposed development boundary for Clive?**

No.

It follows from our answer at 58.a) above that Clive should not have any development boundary.

- d) Do you agree with the preferred housing allocation CLV010 in Clive?**

No.

It follows from our answer at 58.a) above that Clive should not have any housing allocation.

**Q59. Hadnall:**

**a) Do you agree with the identification of Hadnall as a Community Hub?**

No.

Hadnall has been scored in the Hierarchy of Settlements documents as not having employment opportunities. The definition of a Hub as given in Table 2 on page 4 of the HoS document says that a Community Hub should have significant employment opportunities. It also lacks certain primary services stated to be essential on a day-to-day basis.

As noted at paragraph 9.11, notwithstanding its overall HoS scores, it should therefore not be accorded Hub status (and should be re-classified as “Other Rural Settlements”), because it lacks certain services or facilities which are stated to be essential on a day-to-day basis, and is therefore currently not a sufficiently sustainable location for further significant rural development.

**b) Do you agree with the preferred housing guideline for Hadnall?**

No.

It follows from our answer at 59.a) above that Hadnall should not have any housing guideline.

**c) Do you agree with the proposed development boundary for Hadnall?**

No.

It follows from our answer at 59.a) above that Hadnall should not have any development boundary.

**d) Do you agree with the preferred housing allocation HDL006 in Hadnall?**

No.

It follows from our answer at 59.a) above that Hadnall should not have any housing allocation.

**Q60. Shawbury:**

**a) Do you agree with the identification of Shawbury as a Community Hub?**

Yes

**b) Do you agree with the preferred housing guideline for Shawbury?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government’s minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Shawbury should be scaled back by around 10%.

**c) Do you agree with the proposed development boundary for Shawbury?**

**d) Do you agree with the preferred housing allocation SHA019 in Shawbury?**

## Whitchurch Place Plan Area

### **Q61. Whitchurch:**

**a) Do you agree with the preferred housing and employment guidelines for Whitchurch?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Whitchurch should be scaled back by around 10%.

We also consider that the concept of balanced housing and economic growth for Shropshire is based on flawed calculations. Employment land to satisfy "balance" and the Economic Growth Strategy may be as little as 141Ha. Under a scaled-back housing guideline as above it may be only 121Ha. The existing employment land supply of 223Ha is therefore likely to be adequate.

Based on the calculation we have set out in sections 4 and 5 above, the balanced employment guideline for Whitchurch might be only 7Ha compared to the Council's calculation of 17Ha ( $1,600 \times 42.25 / 10,000 / 0.4$ ).

Existing imbalances between housing supply and employment land (see paragraph 5.4 above) should also be factored into the calculations of housing and employment guidelines.

**b) Do you agree with the proposed development boundary for Whitchurch?**

**c) Do you agree with the preferred housing allocation WHT037 and WHT044 in Whitchurch?**

**d) Do you agree with the preferred housing allocation WHT014 in Whitchurch?**

**e) Do you agree with the preferred housing allocation WHT042 in Whitchurch?**

### **Q62. Prees:**

**a) Do you agree with the identification of Prees as a Community Hub?**

Yes

**b) Do you agree with the preferred housing guideline for Prees?**

No.

Our argument throughout is that the housing target for Shropshire is well above demographic need, is above the Government's minimum requirement as set out in the Standard Methodology, and is opposed by public opinion. A target of no more than 26,250 would be more appropriate.

On that basis, the housing guideline for Prees should be scaled back by around 10%.

**c) Do you agree with the proposed development boundary for Prees?**

d) *Do you agree with the preferred housing allocation PPW025 in Prees?*

## Further information

**Q63. Do you think any additional 'Community Clusters' to those identified in within the Preferred Sites Consultation Document should be formed? Or any of the existing 'Community Clusters' identified within the Preferred Sites Consultation Document should be removed?**

Yes - added

Those 19 proposed Hubs, which we identify as not meeting the Council's definition of a Hub, should each become part of a Cluster.

**Q64. Please use the space below to make any further comments on this Consultation:**

Please take note of our comments in sections 1 to 11 above, as well as the detailed comments in this section 12 which are in direct response to the questions actually posed.

It would have been helpful throughout the main consultation document if the maps showing the proposed development boundaries had also indicated what the present development boundary is, so that the changes proposed became immediately apparent.

Where we have not entered any response to a question (either above or on the questionnaire) it can be assumed that we have not been able to form an opinion on that question, with the resources available to us, including that of time.

## Appendix 1: Catalogue of Documents published for Preferred Sites consultation

| SHROPSHIRE LOCAL PLAN REVIEW - PREFERRED SITES CONSULTATION 29/11/18 - 31/1/19-8/2/19   |                              |                    |              |                                  |                    |
|---|------------------------------|--------------------|--------------|----------------------------------|--------------------|
| CATALOGUE OF DOCUMENTS  |                              |                    |              |                                  |                    |
| Document  | Notes                        | Mb                 | Pages        |                                  | Consultation event |
|   |                              |                    | Web-based    | In libraries and Council offices |                    |
| The consultation was not announced in the Newsroom, nor is it evident on the Home page, nor on the Planning Policy webpage, nor does it have any prominence even on the Local Plan Partial Review 2016-2036 webpage   |                              |                    |              |                                  |                    |
| <b>For Cabinet meeting on 7/11/18</b><br>Consultation on Preferred Sites for the Shropshire Local Plan Review<br>Shropshire Local Plan Review - Consultation on Preferred Sites<br>Meeting Housing Need in Shropshire   | Summary                      | 0.10               | 5            |                                  |                    |
|   | Detail                       | 21.25              | 225          |                                  |                    |
|   | Of relevance                 | 0.09               | 6            |                                  |                    |
|   |                              | 21.45              | 236          |                                  |                    |
| <b>Yet to be published (at 04/02/19)</b><br>M54 Growth Corridor Study (being prepared by GVA)<br>Phase 1 of SC's Employment Land Review (being prepared by GVA)<br>Visitor Surveys: Colemere and Brown Moss (Link available soon)<br>The last of the 18 Site Assessments summarised by Place Plan Area was published only on Friday 21st December 2018, shortly after 10am<br><a href="http://www.shropshire.gov.uk/get-involved/local-plan-review-preferred-sites-consultation/">http://www.shropshire.gov.uk/get-involved/local-plan-review-preferred-sites-consultation/</a>   |                              |                    |              |                                  |                    |
| <b>Published on 29/11/18 pm for the start of the consultation (or as stated)</b><br><b>On face of webpage for Local Plan Review – Preferred Sites Consultation</b><br><br>Shropshire Local Plan Review - Consultation on Preferred Sites<br>Also published separately: the 19-page introduction, and the individual sections and questionnaires for each of the 18 eg Oswestry consultation document<br>Oswestry questionnaire<br><br>Shropshire Local Plan Review - Preferred Sites Consultation - full questionnaire<br>Shropshire Local Plan Review 'Preferred Sites': Consultation Plan<br><br>Sustainability Appraisal Scoping Report January 2017<br>Sustainability Appraisal Report November 2018<br>Sustainability Appraisal Report - detailed appendix<br>Sustainability Appraisal Summary November 2018<br><br>Shropshire Council Equality and Social Inclusion Impact Assessment (ESIIA)<br><br>Habitats Regulations Assessment - Screening Report - November 2018 - Summary<br>Habitats Regulations Assessment - Screening Report - November 2018<br>Habitats Regulations Assessment Report - appendix 1<br>Habitats Regulations Assessment Report - appendix 4<br>Habitats Regulations Assessment Report - appendix 5<br><br><a href="http://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/evidence-base/">http://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/evidence-base/</a> |                              |                    |              |                                  |                    |
|   | Updated detail               | 23.26              | 225          | 225                              |                    |
|   |                              | [4.073]<br>[0.710] | [29]<br>[13] |                                  |                    |
|   |                              | 1.71               | 53           | 53                               |                    |
|   | Summarises the whole process | 0.21               | 2            | 2                                |                    |
|   |                              | 25.18              | 280          | 280                              |                    |
|   | Previously published         | [2.205]            | [157]        |                                  |                    |
|   |                              | 1.46               | 45           |                                  |                    |
|   |                              | 5.20               | 154          |                                  |                    |
|   |                              | 1.09               | 27           | 27                               |                    |
|   |                              | 7.75               | 226          | 27                               |                    |
|   |                              | 0.47               | 9            | 9                                |                    |
|   |                              | 0.47               | 9            | 9                                |                    |
|   |                              | 1.48               | 7            | 7                                |                    |
|   |                              | 0.50               | 110          |                                  |                    |
|   |                              | 16.42              | 44           |                                  |                    |
|   |                              | 0.50               | 1            |                                  |                    |
|   |                              | 0.81               | 23           |                                  |                    |
|   |                              | 19.70              | 185          | 7                                |                    |
| <b>Evidence Base on supplementary webpage</b>   |                              |                    |              |                                  |                    |

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| SHROPSHIRE LOCAL PLAN REVIEW - PREFERRED SITES CONSULTATION 29/11/18 - 31/1/19-8/2/19   |                                     |                |           |                                  |                    |
|---|-------------------------------------|----------------|-----------|----------------------------------|--------------------|
| CATALOGUE OF DOCUMENTS  |                                     |                |           |                                  |                    |
| Document  | Notes                               | Mb             | Pages     |                                  | Consultation event |
|   |                                     |                | Web-based | In libraries and Council offices |                    |
| <b>Housing</b>  |                                     |                |           |                                  |                    |
| FOAHN 2016 – Full Objectively Assessed Housing Need   | Previously published 4th July 2016  | [3.664]        | [136]     |                                  |                    |
| FOAHN 2017 – Full Objectively Assessed Housing Need   | Previously published October 2017   | [0.316]        | [8]       |                                  |                    |
| Strategic Land Availability Assessment (SLAA) - Published: 29th November 2018   |                                     | 1.13           | 26        |                                  |                    |
| SLAA (2018) Appendix A - Assessment summary in and around Strategic, Principal and Key Centres  |                                     | 8.06           | 284       |                                  |                    |
| SLAA (2018) Appendix B - Assessment summary in and around Community Hubs  |                                     | 6.84           | 234       |                                  |                    |
| SLAA (2018) Appendix C - Assessment summary in the wider countryside  |                                     | 5.23           | 206       |                                  |                    |
| SLAA (2018) Appendix D - Accepted residential sites delivery trajectory   |                                     | 0.48           | 2         |                                  |                    |
| SLAA (2018) Appendix E - Accepted employment sites delivery trajectory  |                                     | 0.44           | 1         |                                  |                    |
| SLAA (2018) Appendix F - Residential Conclusion Map   |                                     | web-based only |           |                                  |                    |
| SLAA (2018) Appendix G - Employment Conclusion Map  |                                     | web-based only |           |                                  |                    |
| Site assessments have been summarised by Place Plan Area for all 18 Place Plans   |                                     |                |           |                                  |                    |
| Albrighton  |                                     | 3.04           | 101       |                                  | Tue 22 Jan         |
| Bishops Castle  |                                     | 6.22           | 171       |                                  | Mon 21 Jan         |
| Bridgnorth  |                                     | 5.92           | 249       |                                  | Thu 17 Jan         |
| Broseley  |                                     | 3.00           | 100       |                                  | Mon 14 Jan         |
| Church Stretton   |                                     | 1.97           | 78        |                                  | Wed 16 Jan         |
| Cleobury Mortimer   |                                     | 2.05           | 26        |                                  |                    |
| Craven Arms   |                                     | 3.03           | 73        |                                  |                    |
| Ellesmere   |                                     | 2.57           | 69        |                                  | Thu 10 Jan         |
| Highley   |                                     | 3.10           | 45        |                                  | Wed 09 Jan         |
| Ludlow  |                                     | 6.27           | 122       |                                  | Mon 14 Jan         |
| Market Drayton  |                                     | 7.55           | 191       |                                  | Tue 08 Jan         |
| Minsterley and Pontesbury   |                                     | 4.78           | 120       |                                  | Wed 09 Jan         |
| Much Wenlock  |                                     | 3.04           | 64        |                                  | Thu 03 Jan         |
| Oswestry  |                                     | 21.71          | 736       |                                  | Tue 15 Jan         |
| Shifnal   |                                     | 2.06           | 95        |                                  | Fri 14 Dec         |
| Shrewsbury  |                                     | 19.64          | 868       |                                  | Wed 16 Jan         |
| Shrewsbury Rural North (Nesscliffe, Baschurch, Bomere Heath, Ford)  |                                     |                |           |                                  | Thu 17 Jan         |
| Shrewsbury Rural South (Hanwood, Bayston Hill, Longden, Cross Houses, Dorrington)   |                                     |                |           |                                  |                    |
| Wem   |                                     | 8.42           | 255       |                                  | Thu 24 Jan         |
| Whitchurch  |                                     | 5.60           | 201       |                                  | Tue 11 Dec         |
|   |                                     | 132.15         | 4,317     |                                  | Fri 11 Jan         |
| <b>Employment</b>   |                                     |                |           |                                  |                    |
| Productivity Growth Forecast - Excel spreadsheet from Oxford Economics  | Previously published                | [0.018]        | [1]       |                                  |                    |
| <i>The dataset provides a summary of the Oxford Economics jobs and economic growth forecasts for Shropshire for the period from 2016 to 2036.</i> |                                     | -              | -         |                                  |                    |
| <b>Green Belt Assessment</b>  |                                     |                |           |                                  |                    |
| Green Belt Assessment   | Previously published September 2017 | [21.288]       | [310]     |                                  |                    |

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| SHROPSHIRE LOCAL PLAN REVIEW - PREFERRED SITES CONSULTATION 29/11/18 - 31/1/19  |                                     |         |           |                                  |                    |
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| CATALOGUE OF DOCUMENTS  |                                     |         |           |                                  |                    |
| Document  | Notes                               | Mb      | Pages     |                                  | Consultation event |
|   |                                     |         | Web-based | In libraries and Council offices |                    |
| Green Belt Assessment Figures 4-1 to 4-5  | Previously published September 2018 | [5.388] | [8]       |                                  |                    |
| <b>Review</b>   |                                     |         |           |                                  |                    |
| Shropshire Green Belt Review: Stage 2 Final Report  | Published shortly after 29/11/18    | 1.89    | 57        |                                  |                    |
| Appendix 1 Albrighton Assessment  | Published shortly after 29/11/18    | 5.04    | 29        |                                  |                    |
| Appendix 2 Alveley Assessment   | Published shortly after 29/11/18    | 5.80    | 40        |                                  |                    |
| Appendix 3 Bridgnorth Assessment  | Published shortly after 29/11/18    | 7.82    | 49        |                                  |                    |
| Appendix 4 Cosford Assessment   | Published shortly after 29/11/18    | 3.79    | 22        |                                  |                    |
| Appendix 5 Junction 3 Assessment  | Published shortly after 29/11/18    | 5.30    | 30        |                                  |                    |
| Appendix 6 Junction 4 Assessment  | Published shortly after 29/11/18    | 2.98    | 18        |                                  |                    |
| Appendix 7 Shifnal Assessment   | Published shortly after 29/11/18    | 5.40    | 30        |                                  |                    |
|   |                                     | 38.02   | 275       |                                  |                    |
| <b>Rural</b>  |                                     |         |           |                                  |                    |
| Updated Hierarchy of Settlements - Published: November 2018   |                                     | 3.31    | 45        |                                  |                    |
|   |                                     | 3.31    | 45        |                                  |                    |
| <b>Gypsies &amp; Travellers</b>   |                                     |         |           |                                  |                    |
| Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2017   | Previously published October 2017   | [1.871] | [114]     |                                  |                    |
| Gypsy and Traveller Call for Sites Site Proforma (November 2018)  |                                     | 0.42    | 3         |                                  |                    |
|   |                                     | 0.42    | 3         |                                  |                    |
| <b>Environment</b>  |                                     |         |           |                                  |                    |
| <b>Flood Risk Assessment</b>  |                                     |         |           |                                  |                    |
| Shropshire Level 1 Strategic Flood Risk Assessment - Final Report October 2018  |                                     | 5.48    | 135       |                                  |                    |
| SFRA Appendix B Cumulative impact maps  |                                     | 5.56    | 19        |                                  |                    |
| <b>Landscape &amp; Visual Sensitivity Assessment</b>  |                                     |         |           |                                  |                    |
| <i>The role of these Landscape assessments is to help "inform" the choice of both preferred sites and exception sites in these locations.</i>             |                                     |         |           |                                  |                    |
| <i>They simply replace similar evidence which was commissioned by each of the predecessor councils in support of the preparation of the Core Strategy</i> |                                     |         |           |                                  |                    |
| Shropshire Landscape & Visual Sensitivity Assessment - Methodology & summary  |                                     | 19.53   | 20        |                                  |                    |
| Albrighton-lvss 07ALB   |                                     | 23.00   | 20        |                                  |                    |
| Alveley-lvss 18ALV  |                                     | 15.96   | 16        |                                  |                    |
| Baschurch-lvss 19BCH  |                                     | 15.73   | 14        |                                  |                    |
| Bayston-Hill-lvss 20 BYH  |                                     | 24.28   | 20        |                                  |                    |
| Bicton-lvss 21BCT   |                                     | 21.15   | 20        |                                  |                    |
| Bishops-Castle-lvss 08BSH   |                                     | 13.83   | 12        |                                  |                    |
| Bomere-Heath-lvss 22BMH   |                                     | 13.53   | 14        |                                  |                    |
| Bridgnorth-lvss-reduced 02BDG   |                                     | 11.20   | 28        |                                  |                    |
| Broseley-lvss 09BRO   |                                     | 22.59   | 26        |                                  |                    |
| Bucknell-lvss 23BNL   |                                     | 17.12   | 14        |                                  |                    |
| Burford-lvss 24BFD  |                                     | 15.68   | 12        |                                  |                    |
| Chirbury-lvss 25CBY   |                                     | 11.44   | 12        |                                  |                    |
| Church-Stretton-lvss 10CST  |                                     | 22.45   | 18        |                                  |                    |
| Clee-Hill-lvss 26CHL  |                                     | 15.12   | 14        |                                  |                    |
| Cleobury-Mortimer-lvss 11CLM  |                                     | 13.47   | 12        |                                  |                    |

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| SHROPSHIRE LOCAL PLAN REVIEW - PREFERRED SITES CONSULTATION 29/11/18 - 31/1/19-8/2/19             |          |          |           |                                  |                    |
|---|----------|----------|-----------|----------------------------------|--------------------|
| CATALOGUE OF DOCUMENTS  |          |          |           |                                  |                    |
| Document  | Notes    | Mb       | Pages     |                                  | Consultation event |
|   |          |          | Web-based | In libraries and Council offices |                    |
| Clive-lvss 27CLE  |          | 11.68    | 12        |                                  |                    |
| Clun-lvss 28CLN   |          | 14.94    | 14        |                                  |                    |
| Craven-Arms-lvss 12CAR  |          | 21.96    | 18        |                                  |                    |
| Cressage-lvss 30CSG   |          | 14.22    | 14        |                                  |                    |
| Cross-Houses-lvss 60CHS   |          | 12.03    | 12        |                                  |                    |
| Ditton-Priors-lvss 31DPS  |          | 13.24    | 14        |                                  |                    |
| Dorrington-lvss 32DRN   |          | 11.82    | 12        |                                  |                    |
| Ellesmere-lvss 13EME  |          | 16.39    | 16        |                                  |                    |
| Ford-lvss 33FRD   |          | 15.72    | 16        |                                  |                    |
| Gobowen-lvss 34GBN  |          | 17.99    | 16        |                                  |                    |
| Hadnall-lvss 35HDL  |          | 13.28    | 12        |                                  |                    |
| Hanwood-lvss 36HWD  |          | 23.19    | 20        |                                  |                    |
| Highley-lvss 14HGH  |          | 19.68    | 16        |                                  |                    |
| Hinstock-lvss 37HTK   |          | 13.71    | 14        |                                  |                    |
| Hodnet-lvss 38HOD   |          | 11.82    | 12        |                                  |                    |
| Ironbridge-lvss 63IBG   |          | 16.41    | 14        |                                  |                    |
| Junction-3-lvss 64JCT   |          | 10.19    | 18        |                                  |                    |
| Kinnerley-lvss 39KNY  |          | 11.60    | 12        |                                  |                    |
| Knockin-lvss 61KNK  |          | 12.40    | 12        |                                  |                    |
| Llanymynech-lvss 40LMY  |          | 11.33    | 12        |                                  |                    |
| Longden-lvss 62LGD  |          | 16.15    | 16        |                                  |                    |
| Ludlow-lvss-reduced 03LUD   |          | 9.10     | 22        |                                  |                    |
| Market-Drayton-lvss 04MKT   |          | 19.36    | 16        |                                  |                    |
| Minsterley-lvss 41MNY   |          | 19.43    | 16        |                                  |                    |
| Much-Wenlock-lvss 15MWN   |          | 17.59    | 16        |                                  |                    |
| Nesscliffe-lvss 44NSC   |          | 16.85    | 16        |                                  |                    |
| Oswestry-lvss 05OSW   |          | 24.33    | 20        |                                  |                    |
| Oswestry-Morda-lvss 42MDA   |          | 16.37    | 14        |                                  |                    |
| Oswestry-Park-Hall-lvss 66PKH   |          | 13.00    | 12        |                                  |                    |
| Pant-lvss 45PNT   |          | 17.42    | 14        |                                  |                    |
| Pontesbury-lvss 46PBY   |          | 17.01    | 14        |                                  |                    |
| Prees-lvss 47PRS  |          | 12.65    | 12        |                                  |                    |
| Ruyton-Xi-Towns-lvss 48RYT  |          | 20.09    | 20        |                                  |                    |
| Shawbury-lvss 49SBY   |          | 16.06    | 18        |                                  |                    |
| Shifnal-lvss 16SHF  |          | 22.38    | 18        |                                  |                    |
| Shrewsbury-lvss-reduced 01SHR   |          | 15.92    | 34        |                                  |                    |
| St-Martins-lvss 50STM   |          | 15.30    | 16        |                                  |                    |
| Tem-Hill-lvss 65TNH   |          | 12.81    | 14        |                                  |                    |
| Trefonen-lvss 51TFN   |          | 13.56    | 14        |                                  |                    |
| Wem-lvss 17WEM  |          | 15.09    | 16        |                                  |                    |
| West-Felton-lvss 52WFN  |          | 16.29    | 16        |                                  |                    |
| Weston-Rhyn-Preesgweene-lvss 54WRN  |          | 16.57    | 14        |                                  |                    |
| Whitchurch-lvss 06WCH   |          | 23.98    | 22        |                                  |                    |
| Whittington-lvss 55WHT  |          | 13.08    | 12        |                                  |                    |
| Woore-Pipe-Gate-lvss 56WRE  |          | 16.85    | 18        |                                  |                    |
| Worthen-Brockton-lvss 57WTN   |          | 16.76    | 18        |                                  |                    |
| <b>Open Space and Recreation Needs Assessment</b>   |          |          |           |                                  |                    |
| Shropshire Open Space and Recreation Needs Assessment - September 2018                            |          | 0.38     | 28        |                                  |                    |
| Appendix A  |          | 4.32     | 56        |                                  |                    |
| Appendix B  |          | 0.40     | 4         |                                  |                    |
| Appendix C  |          | 0.41     | 7         |                                  |                    |
| Appendix D: Current provision Open Spaces and Place Plans 2017                                    |          | 0.28     | 21        |                                  |                    |
| <b>Heritage Assessment of the Shrewsbury Battlefield</b>  |          |          |           |                                  |                    |
| Shrewsbury Battlefield - Heritage Assessment (Setting) - October 2018                             |          | 5.48     | 117       |                                  |                    |
| <b>Visitor surveys</b>  |          |          |           |                                  |                    |
| Visitor Surveys: Colemere and Brown Moss (Link available soon)                                    |          |          |           |                                  |                    |
|   |          | 1,025.91 | 1,381     |                                  |                    |
| <b>Supporting Assessments within webpage for Local Plan Review – Preferred Sites Consultation</b> |          |          |           |                                  |                    |
| Sustainability Appraisal Summary November 2018  | as above | [1.089]  | [27]      |                                  |                    |

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| SHROPSHIRE LOCAL PLAN REVIEW - PREFERRED SITES CONSULTATION 29/11/18 - 31/1/19-<br>8/2/19 |          |          |           |                                  |                    |
|---|----------|----------|-----------|----------------------------------|--------------------|
| CATALOGUE OF DOCUMENTS  |          |          |           |                                  |                    |
| Document  | Notes    | Mb       | Pages     |                                  | Consultation event |
|   |          |          | Web-based | In libraries and Council offices |                    |
| Habitats Regulations Assessment - Screening Report - November 2018 - Summary              | as above | [1.479]  | [7]       |                                  |                    |
| Shropshire Council Equality and Social Inclusion Impact Assessment (ESIIA)                | as above | [0.465]  | [9]       |                                  |                    |
|   |          | -        | -         |                                  |                    |
| Total published for consultation  |          | 1,252.90 | 6,721     | 323                              |                    |

## Appendix 2: Discussion of Consultation Response Analyses

1. In July 2018 we published our Consultation Response Analyses, analysing in detail the responses to the housing numbers questions from the first two Local Plan Review consultations, on Issues and Strategic Options ( early 2017) and on the Preferred Scale and Distribution of Development (late 2017). Shropshire Council had kindly passed to us their raw data from these consultations.
2. Our main conclusions from the report were:
  - i. Members of the Public, Town and Parish Councils and Local and National Interest groups are all overwhelmingly in favour of lower housing targets than those preferred by Shropshire Council. It is only agents as a group (representing landowners and developers) that are in favour of the high targets.
  - ii. Responses from agents, landowners and developers as counted by Shropshire Council, included many duplicate and identical responses.
  - iii. All of the housing options offered by Shropshire Council are in excess of the minimum required by the Government’s new methodology (currently 25,400 dwellings). There therefore appears to be no reason why the Council cannot adopt the lower targets that its electorate overwhelmingly prefers.
  - iv. One conclusion that might be drawn is that the Council seems intent on promoting the higher targets regardless of its electorate’s views, for reasons of promoting its own economic agenda. CPRE argues that the views expressed by the public, local interest groups and town and parish councils are equally as valid as the Council view and may in the long term be more soundly based than those of the Council.
  - v. Another conclusion that might be drawn is that the Council appears to favour the views of agents and developers to the disbenefit of the local population.
  - vi. CPRE Shropshire believes that in electing for the “High Growth” option as its “Preferred Option” Shropshire Council has ignored the clear majority view of those for whom the Consultations should be intended.
  - vii. Shropshire Council should therefore take proper note of the views of its electorate and opt for the lower housing targets that that electorate clearly and demonstrably prefers, rather than persisting with its current high preferred option of 28,750 houses for the period of 2016 – 36.
3. The only response to these conclusions that we have seen is as reported in an article in the Shropshire Star on 14<sup>th</sup> July 2018. We have received no written response from any officers or members. The article stated:

*In response to CPRE's claims, Adrian Cooper, Shropshire Council's planning policy and strategy manager, said: "We note the analysis of representations to the Local Plan Review process which has been completed by CPRE.*

*"As a responsible and democratically representative organisation, we must take into account the wider needs of the entire population and other stakeholders, including those who are not as engaged as those who have already contributed views.*

*"Regarding the specific point that CPRE makes about duplicate responses from planning agents, it is important to recognise that there are a limited number of planning agents in Shropshire and they therefore usually have multiple clients on whose behalf they are responding. It is these clients who are the respondents, rather than the agent submitting the response on their behalf.*

*"At its meeting on October 18, 2017, Shropshire Council's Cabinet considered a range of options for the scale of future housing growth in the county for the period to 2036. Explicit reference was made in the Cabinet report to the fact that a majority supported 'moderate' rather than 'high' growth, but Cabinet nevertheless chose to endorse 'High Growth' as its preferred option to help to deliver the objectives of its adopted Economic Growth Strategy and Corporate Plan, which seek to tackle some of the key challenges which we face, including access to more affordable housing.*

*"This has been published in the documents following the consultation. The nationally-prescribed Local Plan review process provides the most appropriate mechanism for anyone who disagrees with the council's preferred approach to challenge it by making formal representations regarding the 'soundness' of the Plan, and to have such representations considered by an independent planning inspector".*

4. The matter was raised again in a question to Cabinet on 7<sup>th</sup> November 2018. A transcription of the verbal reply given by Councillor Robert Macey, Portfolio Holder for Planning & Housing Development, was:

*Shropshire Council is required to consider consultation responses submitted by the current community including the development industry. We are also required to consider the needs of the wider community who have chosen not to respond to the consultation. The Council's analysis considered all the consultation responses received. Any decision taken using only a proportion of responses received most certainly represents a distortion of reality and would therefore be at risk of challenge through the planning examination process, and potentially a subsequent legal challenge.*

5. Our further responses to these points are:

- i. **"A responsible and democratically representative organisation"**: Whether or not CPRE is a responsible and democratically representative organisation it, and other members of the public and Town and Parish Councils, are entitled to expect Shropshire Council to take proper notice of its arguments. The officers are not democratically elected, and even the full council doesn't have much say in Cabinet decisions (see v below).
- ii. **"We must take into account the wider needs of the entire population and other stakeholders"**: How does the Council and its officers know what these wider needs are except by consultation, and what is the point of such consultation if it does not lead to changes in policy?

- iii. ***“Including those who are not as engaged as those who have already contributed views”***: This seems to be an argument designed to allow Shropshire Council to override the views of those who have taken the trouble to respond to the consultation, without any way of knowing what the views of other non-respondents might be.
- iv. ***“There are a limited number of planning agents in Shropshire and they therefore usually have multiple clients on whose behalf they are responding. It is these clients who are the respondents, rather than the agent submitting the response on their behalf”***: If the clients are the respondents it is strange that so many of them gave identical and near-identical responses. It would be salutary to know if the initiative for making a response came from the agent or from the client, and whether a fee was charged.
- v. ***“Cabinet nevertheless chose to endorse ‘High Growth’ as its preferred option”***: At its meeting on 18 October 2017 (at which CPRE asked a question, and which is on video at <http://shropshire.gov.uk/news/2017/10/cabinet-18-october-2017/> [see from 57:46 to 1:14:50]) no members of Cabinet debated this item, nor was there even a vote on it: it was very much rubber stamped. The conclusion is that Cabinet simply endorses what is in the Officer’s report, unless of course they have previously directed what its gist should be. It was not previously subject to Scrutiny or Overview either.
- vi. ***“Its adopted Economic Growth Strategy and Corporate Plan, which seek to tackle some of the key challenges which we face, including access to more affordable housing”***: It does seem perverse to offer the argument that growth on the scale proposed is necessary, so as to build 80 market houses in order to get 20 affordable houses (or in the case of the Oswestry and Ellesmere areas, Whitchurch, Market Drayton, Wem, north and east Shrewsbury, Craven Arms and Highley, 90 Market houses in order to get 10 affordable houses).
- vii. ***“Anyone who disagrees with the council’s preferred approach to challenge it by making formal representations regarding the ‘soundness’ of the Plan, and to have such representations considered by an independent planning inspector”***: This seems a particularly unhelpful response to consultation. The implication is that consultees who disagree with the Council will not be listened to further by them, but are welcome to try their luck convincing an eventual examining inspector that the Council’s plan really is unsound.



## Appendix 3: Other identified weaknesses in the consultation process

- a) *Poor publicity:* Shropshire Council expects and prefers the consultation to be web-based, yet it received very poor prominence on the Council's website. At the public consultation "roadshow" meetings, complaints were made by members of the public about this lack of publicity.
- b) *Exclusion of those who cannot or do not access the internet:* Some 50% of our CPRE supporters have not opted to be contacted by email, and may be equally averse to accessing the internet. This is indicative of the fact that a very significant proportion of the Shropshire population generally are likely to be disenfranchised by a consultation that is conducted largely on-line. Intermittent internet access and poor broadband speeds in parts of the County are also barriers to access for some people.
- c) *Volume of documentation:* The documentation published only in electronic form alongside this consultation was so extensive, amounting to over 6,700 pages and over 1.25 GB of information, that we felt obliged to construct a catalogue to make sense of it all. This is reproduced as Appendix 1.
- d) *Delay in publication of documentation:* Over half of the pages published were represented by the 18 Site assessments summarised by Place Plan Area. These important assessments were published over a period of time in the first weeks of the consultation. The last one, for Market Drayton, was not published until the morning of 21 December 2018, over three weeks into the consultation period. The consultation period was accordingly extended by 8 days.
- e) *Limited availability of paper copies:* Only a limited amount of documentation (323 pages out of 6,721) was made available in paper form within libraries and at Council offices, as noted in the Catalogue at Appendix 1.



## Appendix 4: Freedom of Information Request: published tables and corrected analysis

### Tables as published in consultation documents for the Preferred Scale and Distribution of Development

**Table 6: Employment Land Requirement from Jobs Growth Forecasts 2016 - 2036**

|                     | Employment Growth 2016 - 2036 (Jobs) | Total Employment Floorspace - Growth* (ha) | Total Employment Floorspace - Loss* (ha) | Total Employment Floorspace Need (ha) | Employment Land Requirement** (ha) |
|---------------------|--------------------------------------|--|--|---------------------------------------|------------------------------------|
| Productivity Growth | 14,900                               | 140  | -25                                      | 115                                   | 288                                |
| Baseline Growth     | 9,300                                | 85   | -30                                      | 55                                    | 138                                |

\*Average of appropriate sector / job densities in Employment Density Guide 3rd Edition (November 2015) Homes and Communities Agency. This comprises an average of 42.25sq.m/job from Offices (aligned with Finance & Professional Services) + 16sq.m/job, Light Industrial = 47sq.m/job, Industrial & Manufacturing = 36sq.m/job and Storage & Distribution - Final Mile = 70sq.m/job.

\*\*Employment land in Shropshire historically delivers floorspace on 40% of the site area

**Table 7: Employment Land Requirement from Housing Growth 2016 - 2036**

|                                   | 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                                |
| Core Strategy 2011)               | 27,500                                 | 27,500   | 42.25                                  | 116                                   | 290                                |
| FOAHN: Current Methodology        | 25,178                                 | 25,178   | 42.25                                  | 106                                   | 266                                |
| FOAHN: Draft Proposed Methodology | 25,400                                 | 25,400   | 42.25                                  | 107                                   | 268                                |

\*Average of appropriate sector / job densities in Employment Density Guide 3rd Edition (November 2015) Homes & Communities Agency. This comprises an average of 42.25sq.m/job from Offices (aligned with Finance & Professional Services) + 16sq.m/job, Light Industrial = 47sq.m/job, Industrial & Manufacturing = 36sq.m/job and Storage & Distribution - Final Mile = 70sq.m/job.

\*\*Employment land in Shropshire historically delivers floorspace on 40% of the site area

**Table 8: Preferred Option and Scenarios**

| Preferred Option and Other Growth Scenarios | Need            |           | Requirement (ha) |
|---|-----------------|-----------|------------------|
|   | Floorspace (ha) | Land (ha) |                  |
| <b>Balanced Growth</b>                      | <b>121</b>      |           | <b>304</b>       |
| Core Strategy (2011)                        | 116             |           | 290              |
| Productivity Growth                         | 115             |           | 288              |
| FOAHN Standard Methodology                  |                 | 268       |                  |
| FOAHN Local Methodology                     |                 | 266       |                  |
| Historical Take Up                          |                 | 222       | 267              |
| Baseline Growth                             | 55              |           | 138              |

## Corrected analysis for Table 6 following Freedom of Information request

| Productivity Growth Scenario as per Fol request CAS-1756500-T9V1C8 CRM:0182114 |   |                              |                              |  |                               |                                   |  |                             |                             |                                 |
|--|---|------------------------------|------------------------------|--|-------------------------------|-----------------------------------|--|-----------------------------|-----------------------------|---------------------------------|
| Information from Oxford Economic Forecast                                      |   |                              |                              | Information from Preferred Scale and Distribution of Development |                               |                                   |  |                             |                             |                                 |
| SIC Code   | Description   | Job Numbers Forecast in 2016 | Job Numbers Forecast in 2036 | Predicted Business Type  | Forecast Jobs Change (number) | Job Density (square metres / job) | Floorspace requirement (square metres) | Land Requirement (hectares) | Land Reduction (hectares)   | Net Land Requirement (hectares) |
|  |   | A                            | B                            |  | C = B - A                     | D                                 | E = C x D                              | F = E (if +) / 10,000 / 0.4 | G = E (if -) / 10,000 / 0.4 | H = F - G                       |
| A  | Agriculture, forestry and fishing                                 | 5,900                        | 4,600                        |  | (1,300)                       |                                   | -                                      |                             | -                           |                                 |
| B  | Mining and quarrying  | 300                          | 200                          |  | (100)                         |                                   | -                                      |                             | -                           |                                 |
| C  | Manufacturing   | 13,529                       | 11,628                       | Manufacturing  | (1,901)                       | 36                                | (68,436)                               |                             | (17)                        |                                 |
| D  | Electricity, gas, steam, & air conditioning supply                | 564                          | 447                          | Steam & air conditioning supply                                  | (117)                         | 70                                | (8,190)                                |                             | (2)                         |                                 |
| E  | Water supply, sewerage, waste management & remediation activities | 1,283                        | 1,065                        | Waste management services and processing                         | (218)                         | 70                                | (15,260)                               |                             | (4)                         |                                 |
| F  | Construction  | 12,200                       | 14,900                       |  | 2,700                         |                                   |  |                             |                             |                                 |
| G  | Wholesale & retail trade, repair of motor vehicles & motorcycles  | 23,912                       | 24,705                       | Wholesale warehousing & car sales, services and repair           | 793                           | 70                                | 55,510                                 | 14                          |                             |                                 |
| H  | Transportation & storage  | 6,271                        | 6,797                        | Transport, storage & distribution and land transport services    | 526                           | 70                                | 36,820                                 | 9                           |                             |                                 |
| I  | Accommodation and food service activities                         | 10,600                       | 11,800                       |  | 1,200                         |                                   |  |                             |                             |                                 |
| J  | Information & communication                                       | 3,416                        | 4,664                        | Publishing   | 1,248                         | 70                                | 87,360                                 | 22                          |                             |                                 |
| K  | Financial & insurance activities                                  | 1,151                        | 1,424                        | Office based financial & insurance services                      | 273                           | 16                                | 4,368                                  | 1                           |                             |                                 |
| L  | Real estate activities  | 2,600                        | 3,100                        |  | 500                           |                                   |  |                             |                             |                                 |
| M  | Professional, scientific & technical activities                   | 8,460                        | 12,565                       | Office based consultancy services & activities                   | 4,105                         | 16                                | 65,680                                 | 16                          |                             |                                 |
| N  | Administrative and support service activities                     | 6,447                        | 9,574                        | Commercial services  | 3,127                         | 70                                | 218,890                                | 55                          |                             |                                 |
| O  | Public administration & defence, compulsory social security       | 7,181                        | 6,671                        | Office based administrative and direct public services           | (510)                         | 16                                | (8,160)                                |                             | (2)                         |                                 |
| P  | Education   | 13,400                       | 13,800                       |  | 400                           |                                   |  |                             |                             |                                 |
| Q  | Human health & social work activities                             | 21,450                       | 23,621                       | Office based administrative and direct care services             | 2,171                         | 16                                | 34,736                                 | 9                           |                             |                                 |
| R  | Arts, entertainment and recreation                                | 4,352                        | 5,706                        | Sport, gaming and arts services                                  | 1,354                         | 16                                | 21,664                                 | 5                           |                             |                                 |
| S  | Other service activities  | 4,441                        | 5,163                        | Commercial support services                                      | 722                           | 47                                | 33,934                                 | 8                           |                             |                                 |
| Total / average  |   | 147,457                      | 162,430                      |  | 14,973                        | 31                                | 458,916                                | 140                         | (25)                        | 115                             |
| Increases  |   |                              |                              |  | 19,119                        | 29                                |  |                             |                             |                                 |
| Decreases  |   |                              |                              |  | (4,146)                       | 24                                |  |                             |                             |                                 |

## Appendix 5: Evidence base: Housing: Full Objectively Assessed Housing Need (FOAHN)

FOAHN 2017 – as calculated by Government and as reproduced by Shropshire Council

|   | 2016    | 2026    | Change        |
|---|---------|---------|---------------|
| 2014-based Subnational <b>population</b> projections                                | 312,400 | 326,200 | 13,800        |
| 2014-based Subnational <b>household</b> projections                                 | 135,511 | 145,844 | 10,333        |
| Average population per household  | 2.305   | 2.237   |               |
| Median house price (Q3 2016)  | 190,000 |         |               |
| Median earnings (2016)  | 24,780  |         |               |
| Affordability ratio   | 7.67    |         |               |
| Excess of affordability ratio above 4.0, x 0.0625 of change in household projection |         |         | 2,370         |
| Total for 10 years 2016 to 2026   |         |         | 12,703        |
| <b>Doubled for 20 years from 2016 to 2036</b>                                       |         |         | <b>25,406</b> |
| <b>Average per year</b>   |         |         | <b>1,270</b>  |

### Elements of the FOAHN 2017

|  |               |
|--|---------------|
| Due to population change: $13,800 \div 2.305 \times 2$   | 11,972        |
| Due to reduction in average population per household: $(326,200 \div 2.237) - (326,200 \div 2.305) \times 2$ | 8,694         |
| Due to affordability ratio: $2,370 \times 2$   | 4,740         |
| <b>Total</b>   | <b>25,406</b> |

**FOAHN 2018 – as calculated in accordance with NPPF using 2016-based projections and latest affordability ratio**

|   | <b>2016</b> | <b>2026</b> | <b>Change</b> |
|---|-------------|-------------|---------------|
| 2016-based Subnational <b>population</b> projections                                | 314,400     | 326,600     | 12,200        |
| 2016-based Subnational <b>household</b> projections                                 | 135,449     | 145,667     | 10,218        |
| Average population per household  | 2.321       | 2.242       |               |
| Median house price (y/e 30/9/17)  | 207,500     |             |               |
| Median earnings (y/e 30/9/17)   | 24,725      |             |               |
| Affordability ratio   | 8.39        |             |               |
| Excess of affordability ratio above 4.0, x 0.0625 of change in household projection |             |             | 2,804         |
| Total for 10 years 2016 to 2026   |             |             | 13,022        |
| <b>Doubled for 20 years from 2016 to 2036</b>                                       |             |             | <b>26,044</b> |
| <b>Average per year</b>   |             |             | <b>1,302</b>  |

**Elements of the FOAHN 2018**

|  |               |
|--|---------------|
| Due to population change: $12,200 \div 2.321 \times 2$   | 10,512        |
| Due to reduction in average population per household: $(326,600 \div 2.242) - (326,600 \div 2.321) \times 2$ | 9,924         |
| Due to affordability ratio: $2,804 \times 2$   | 5,608         |
| <b>Total</b>   | <b>26,044</b> |

## Appendix 6: Existing housing and employment imbalances

### Housing

Taken from page 9 of Market Signals and Housing Affordability Profile – Part II, September 2017

**Table 3: Percentage of Households Who Can and Cannot Afford Housing Costs by Tenure<sup>11</sup>**

| Tenure                    | Shropshire Social Rent <sup>12</sup> |            | Shropshire Affordable Rent <sup>12</sup> |            | Median House Price <sup>13</sup> |            | Lower Quartile House Price <sup>13</sup> |            | Average House Price <sup>13</sup> |            | Starter Home <sup>13</sup> |            | Shropshire Median Private Rent <sup>14</sup> |            | Shropshire Lower Quartile Rent <sup>14</sup> |            | Shropshire Average Private Rent <sup>14</sup> |            |
|---------------------------|--------------------------------------|------------|--|------------|----------------------------------|------------|--|------------|-----------------------------------|------------|----------------------------|------------|--|------------|--|------------|---|------------|
|                           | £17,136                              |            | £25,632                                  |            | £52,971                          |            | £42,686                                  |            | £65,467                           |            | £58,193                    |            | £26,400                                      |            | £22,320                                      |            | £27,504                                       |            |
|                           | Cannot Afford                        | Can Afford | Cannot Afford                            | Can Afford | Cannot Afford                    | Can Afford | Cannot Afford                            | Can Afford | Cannot Afford                     | Can Afford | Cannot Afford              | Can Afford | Cannot Afford                                | Can Afford | Cannot Afford                                | Can Afford | Cannot Afford                                 | Can Afford |
| <b>Housing Costs</b>      | £17,136                              |            | £25,632                                  |            | £52,971                          |            | £42,686                                  |            | £65,467                           |            | £58,193                    |            | £26,400                                      |            | £22,320                                      |            | £27,504                                       |            |
| <b>Place Plan Areas</b>   | Cannot Afford                        | Can Afford | Cannot Afford                            | Can Afford | Cannot Afford                    | Can Afford | Cannot Afford                            | Can Afford | Cannot Afford                     | Can Afford | Cannot Afford              | Can Afford | Cannot Afford                                | Can Afford | Cannot Afford                                | Can Afford | Cannot Afford                                 | Can Afford |
| Albrighton                | 27.7%                                | 72.3%      | 36.3%                                    | 63.7%      | 75.1%                            | 24.9%      | 65.0%                                    | 35.0%      | 82.5%                             | 17.5%      | 79.2%                      | 20.8%      | 44.3%  | 55.7%      | 36.3%  | 63.7%      | 44.3%   | 55.7%      |
| Bishop's Castle           | 31.9%                                | 68.1%      | 41.7%                                    | 58.3%      | 81.9%                            | 18.1%      | 72.3%                                    | 27.7%      | 88.4%                             | 11.6%      | 85.6%                      | 14.4%      | 50.7%  | 49.3%      | 41.7%  | 58.3%      | 50.7%   | 49.3%      |
| Bridgnorth                | 26.1%                                | 73.9%      | 34.5%                                    | 65.5%      | 73.9%                            | 26.1%      | 63.5%                                    | 36.5%      | 81.6%                             | 18.4%      | 78.2%                      | 21.8%      | 42.5%  | 57.5%      | 34.5%  | 65.5%      | 42.5%   | 57.5%      |
| Broseley                  | 35.5%                                | 64.5%      | 44.9%                                    | 55.1%      | 82.5%                            | 17.5%      | 73.5%                                    | 26.5%      | 88.6%                             | 11.4%      | 85.9%                      | 14.1%      | 53.4%  | 46.6%      | 44.9%  | 55.1%      | 53.4%   | 46.6%      |
| Church Stretton           | 28.7%                                | 71.3%      | 37.5%                                    | 62.5%      | 77.0%                            | 23.0%      | 66.9%                                    | 33.1%      | 84.2%                             | 15.8%      | 81.0%                      | 19.0%      | 45.9%  | 54.1%      | 37.5%  | 62.5%      | 45.9%   | 54.1%      |
| Cleobury Mortimer         | 25.7%                                | 74.3%      | 34.5%                                    | 65.5%      | 75.3%                            | 24.7%      | 64.8%                                    | 35.2%      | 83.0%                             | 17.0%      | 79.5%                      | 20.5%      | 42.9%  | 57.1%      | 34.5%  | 65.5%      | 42.9%   | 57.1%      |
| Craven Arms               | 31.4%                                | 68.6%      | 40.8%                                    | 59.2%      | 80.2%                            | 19.8%      | 70.6%                                    | 29.4%      | 86.9%                             | 13.1%      | 83.9%                      | 16.1%      | 49.4%  | 50.6%      | 40.8%  | 59.2%      | 49.4%   | 50.6%      |
| Ellesmere                 | 32.7%                                | 67.3%      | 42.2%                                    | 57.8%      | 81.1%                            | 18.9%      | 71.7%                                    | 28.3%      | 87.5%                             | 12.5%      | 84.6%                      | 15.4%      | 50.8%  | 49.2%      | 42.2%  | 57.8%      | 50.8%   | 49.2%      |
| Highley                   | 39.0%                                | 61.0%      | 49.4%                                    | 50.6%      | 86.4%                            | 13.6%      | 78.4%                                    | 21.6%      | 91.6%                             | 8.4%       | 89.3%                      | 10.7%      | 58.4%  | 41.6%      | 49.4%  | 50.6%      | 58.4%   | 41.6%      |
| Ludlow                    | 37.1%                                | 62.9%      | 46.9%                                    | 53.1%      | 84.0%                            | 16.0%      | 75.5%                                    | 24.5%      | 89.7%                             | 10.3%      | 87.2%                      | 12.8%      | 55.5%  | 44.5%      | 46.9%  | 53.1%      | 55.5%   | 44.5%      |
| Market Drayton            | 31.8%                                | 68.2%      | 41.0%                                    | 59.0%      | 79.4%                            | 20.6%      | 69.9%                                    | 30.1%      | 86.1%                             | 13.9%      | 83.1%                      | 16.9%      | 49.4%  | 50.6%      | 41.0%  | 59.0%      | 49.4%   | 50.6%      |
| Much Wenlock              | 25.5%                                | 74.5%      | 33.8%                                    | 66.2%      | 73.4%                            | 26.6%      | 62.9%                                    | 37.1%      | 81.2%                             | 18.8%      | 77.7%                      | 22.3%      | 41.8%  | 58.2%      | 33.8%  | 66.2%      | 41.8%   | 58.2%      |
| Oswestry                  | 35.0%                                | 65.0%      | 44.7%                                    | 55.3%      | 82.6%                            | 17.4%      | 73.7%                                    | 26.3%      | 88.6%                             | 11.4%      | 86.0%                      | 14.0%      | 53.4%  | 46.6%      | 44.7%  | 55.3%      | 53.4%   | 46.6%      |
| Pontesbury and Minsterley | 31.8%                                | 68.2%      | 40.8%                                    | 59.2%      | 78.9%                            | 21.1%      | 69.4%                                    | 30.6%      | 85.7%                             | 14.3%      | 82.7%                      | 17.3%      | 49.0%  | 51.0%      | 40.8%  | 59.2%      | 49.0%   | 51.0%      |
| Shifnal                   | 31.7%                                | 68.3%      | 40.5%                                    | 59.5%      | 77.9%                            | 22.1%      | 68.6%                                    | 31.4%      | 84.7%                             | 15.3%      | 81.6%                      | 18.4%      | 48.6%  | 51.4%      | 40.5%  | 59.5%      | 48.6%   | 51.4%      |
| Shrewsbury                | 32.5%                                | 67.5%      | 41.7%                                    | 58.3%      | 79.9%                            | 20.1%      | 70.6%                                    | 29.4%      | 86.5%                             | 13.5%      | 83.6%                      | 16.4%      | 50.1%  | 49.9%      | 41.7%  | 58.3%      | 50.1%   | 49.9%      |
| Wem                       | 30.6%                                | 69.4%      | 39.8%                                    | 60.2%      | 79.0%                            | 21.0%      | 69.3%                                    | 30.7%      | 85.8%                             | 14.2%      | 82.8%                      | 17.2%      | 48.4%  | 51.6%      | 39.8%  | 60.2%      | 48.4%   | 51.6%      |
| Whitchurch                | 36.4%                                | 63.6%      | 46.3%                                    | 53.7%      | 84.0%                            | 16.0%      | 75.4%                                    | 24.6%      | 89.7%                             | 10.3%      | 87.2%                      | 12.8%      | 55.1%  | 44.9%      | 46.3%  | 53.7%      | 55.1%   | 44.9%      |

<sup>11</sup> CACI PayCheck Data – Source: © CACI Limited 1996 - 2016 Source: Living Costs and Food survey (LCF), previously known as the Expenditure and Food Survey (EFS), conducted by the Office for National Statistics. The analyses in this report are carried out by CACI and those who carried out the original collection and analysis of the data bear no responsibility for their further analysis or interpretation. © Crown Copyright 2017 Adapted from data from the Open Government Licence v.3.0. Source: CLG Household projections Source.  
[http://www.caci.co.uk/sites/default/files/resources/Paycheck\\_product\\_sheet.pdf](http://www.caci.co.uk/sites/default/files/resources/Paycheck_product_sheet.pdf) (Please note the licence restrictions).

<sup>12</sup> Average Social Rent – Local Authority area level tables: 2015 to 2016 - <https://www.gov.uk/government/statistics/social-housing-lettings-in-england-april-2015-to-march-2016>

<sup>13</sup> DCLG – Land Registry Price Paid Data - <https://www.gov.uk/government/statistical-data-sets/price-paid-data-downloads>

<sup>14</sup> Private Rental Market Statistics – Summary of monthly rents recorded between 1 April 2016 to 31 March 2017 by administrative area for England - <https://www.gov.uk/government/statistics/private-rental-market-summary-statistics-april-2016-to-march-2017>

Information, Intelligence and Insight

Taken from page 50 of Shrewsbury Market Town Profile, Autumn 2017

| Area              | Median Income     | Median House Price | Median Affordability Ratio | Lower Quartile Income | Lower Quartile House Price | Lower Quartile Affordability Ratio |
|-------------------|-------------------|--------------------|----------------------------|-----------------------|----------------------------|------------------------------------|
| Albrighton        | £33,850           | £192,000           | 5.7                        | £18,602               | £150,000                   | 8.1                                |
| Bishop's Castle   | £29,590           | £219,225           | 7.4                        | £16,988               | £143,250                   | 8.4                                |
| Bridgnorth        | £35,022           | £188,250           | 5.4                        | £19,413               | £155,125                   | 8.0                                |
| Broseley          | £27,984           | £209,500           | 7.5                        | £15,339               | £151,875                   | 9.9                                |
| Church Stretton   | £32,714           | £230,000           | 7.0                        | £18,191               | £170,000                   | 9.3                                |
| Cleobury Mortimer | £34,512.21        | £188,750           | 5.5                        | £19,630               | £130,000                   | 6.6                                |
| Craven Arms       | £30,365.87        | £157,000           | 5.2                        | £17,010               | £120,000                   | 7.1                                |
| Ellesmere         | £29,518.61        | £155,000           | 5.3                        | £16,578               | £126,500                   | 7.6                                |
| Highley           | £25,350.87        | £152,500           | 6.0                        | £14,540               | £126,625                   | 8.7                                |
| Ludlow            | £26,811.17        | £183,500           | 6.8                        | £14,899               | £130,000                   | 8.7                                |
| Market Drayton    | £30,432.12        | £158,000           | 5.2                        | £16,805               | £125,625                   | 7.5                                |
| Much Wenlock      | £35,513.95        | £279,000           | 7.9                        | £19,755               | £220,000                   | 11.1                               |
| Oswestry          | £28,067.70        | £147,500           | 5.3                        | £15,662               | £117,988                   | 7.5                                |
| Shifnal           | £30,944.45        | £230,998           | 7.5                        | £16,783               | £169,950                   | 10.1                               |
| <b>Shrewsbury</b> | <b>£29,931.71</b> | <b>£190,000</b>    | <b>6.3</b>                 | <b>£16,540</b>        | <b>£150,000</b>            | <b>9.1</b>                         |
| Wem               | £31,076.24        | £164,000           | 5.3                        | £17,406               | £135,750                   | 7.8                                |
| Whitchurch        | £27,109.93        | £173,500           | 6.4                        | £15,207               | £125,250                   | 8.2                                |
| England           | £30,014.59        | £224,000           | 7.5                        | £16,216               | £145,000                   | 8.9                                |
| Shropshire        | £30,052.83        | £197,998           | 6.6                        | £16,680               | £150,000                   | 9.0                                |

Source: Shropshire/England House Price Figures—ONS House Price Datasets, CACI Paycheck Data, DCLG Land Registry Price Paid Data. Year end 2016

The table shows affordability ratios for housing in Shropshire. The income data relates to Shropshire Place Plan areas which are a slightly broader geography than Market Town, and take account of hinterlands.

The table shows that in Shrewsbury a household with a median household income of (£29,931) would need 6.3 times this income to afford a median priced house (£190,000) as of year end 2016. This is lower than a ratio of 6.6 for Shropshire and 7.5 for England.

Households within the lower quartile household income (£16,540) the affordability ratio for a lower quartile priced house (£150,000) was 9.0, similar to Shropshire as a whole with 9.0 and England, 8.9. The lower quartile ratio in Shrewsbury is the fifth highest in Shropshire.

\*Lower quartile house prices and earnings are used together to indicate how affordable it is for people on low incomes to afford a house in Shropshire.

## Employment

Taken from page 10 of Shrewsbury Market Town Profile, Autumn 2017

| Place             | Working Age as % of population |
|-------------------|--------------------------------|
| Albrighton        | 75.4%                          |
| Bishop's Castle   | 63.5%                          |
| Bridgnorth        | 58.7%                          |
| Broseley          | 57.7%                          |
| Church Stretton   | 43.7%                          |
| Cleobury Mortimer | 73.4%                          |
| Craven Arms       | 61.3%                          |
| Ellesmere         | 54.2%                          |
| Highley           | 49.7%                          |
| Ludlow            | 61.4%                          |
| Market Drayton    | 55.5%                          |
| Much Wenlock      | 58.3%                          |
| Oswestry          | 57.0%                          |
| Shifnal           | 60.9%                          |
| <b>Shrewsbury</b> | <b>62.3%</b>                   |
| Wem               | 61.4%                          |
| Whitchurch        | 60.5%                          |
| Shropshire        | 60.0%                          |
| West Midlands     | 62.3%                          |
| Great Britain     | 63.3%                          |

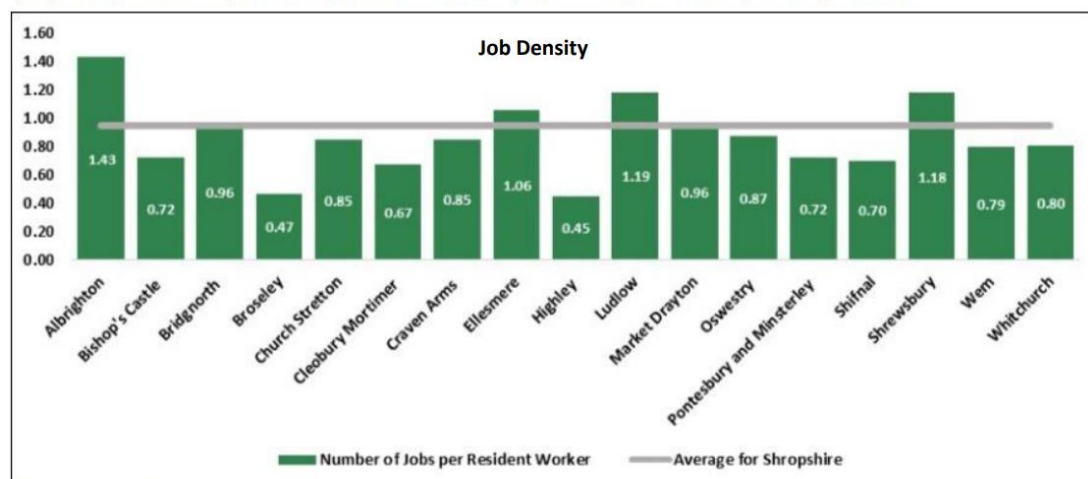
Taken from page 29 of Shrewsbury Market Town Profile, Autumn 2017

(chart also in Shropshire Commuting Patterns and Travel to Work, July 2018, Table 12)

### Commuting Patterns

Shrewsbury (place plan area) supports a higher level of employment self-containment than any other Shropshire town, which given its status as the main employment centre in the County is not surprising. 57.6% of all Shrewsbury jobs are filled by Shrewsbury residents while 67.9% of working people who live in Shrewsbury also work there, which gives an overall level of self-containment of 62.3%. In total, 24,579 people both live and work in Shrewsbury.

Unlike most of Shropshire, there are more jobs than there are resident workers in Shrewsbury. Job density stood at 1.18 compared with the County average of 0.95, as illustrated in the chart below. Net commuting across the Shrewsbury place plan area stands at 3,379. This equates with 4,649 people living in Shrewsbury but working elsewhere and 8,028 people working in Shrewsbury but living elsewhere.



Source: Census 2011

Note: Data relates to Mid Super Output Areas (MSOA) aligned as closely as possible to Shropshire place plan areas



## Report on Housing Supply Issues

### Appendix 7: Report on Housing Supply Issues

Preferred Sites Consultation from Shropshire Council

Report on Housing Supply Issues for the Campaign to Protect Rural England  
(Shropshire Branch)

Gerald Kells

Jan 2019

#### 1. Introduction

1.1 I was asked to provide a brief report to CPRE Shropshire on the preferred sites consultation as part of the partial review of the Shropshire Plan. I was specifically asked to consider whether the supply side figures should be considered robust.

1.2 As well as the assessment provided for each of the Shropshire sub-areas in the consultation document, the consultation is supported by the November 2018 Strategic Land Availability Assessment (SLAA) produced by Shropshire Council. It concludes that there is a total supply of 24,381 homes, as set out in the table on Page 16 (see below) for the period 2016-2036, a shortfall against the Council's preferred housing requirement of 28,750.

| Time Period         | Dwellings    |                                 |                            |                                   |                                  |                                    |                     |                  | Total         |
|---------------------|--------------|---------------------------------|----------------------------|-----------------------------------|----------------------------------|------------------------------------|---------------------|------------------|---------------|
|                     | Completions* | Sites with Planning Permission* | Sites with Prior Approval* | Sites with a Resolution to Grant* | Allocated in current Local Plan* | Emerging affordable housing sites* | Accepted SLAA Sites | Windfall sites** |               |
| 2016/17             | 1,910        | N/A                             | N/A                        | N/A                               | N/A                              | N/A                                | N/A                 | N/A              | 1,910         |
| 2017/18-2021/22     | N/A          | 10,056                          | 140                        | 201                               | 2,155                            | 78                                 | 343                 | 598              | 13,571        |
| 2022/23-2026/27     | N/A          | 1,218                           | 0                          | 16                                | 2,015                            | 0                                  | 697                 | 1,495            | 5,441         |
| 2027/28-2032/33     | N/A          | 51                              | 0                          | 0                                 | 858                              | 0                                  | 158                 | 1,495            | 2,562         |
| 2033/34-2035/36     | N/A          | 0                               | 0                          | 0                                 | 0                                | 0                                  | 0                   | 897              | 897           |
| <b>Total Supply</b> | <b>1,910</b> | <b>11,325</b>                   | <b>140</b>                 | <b>217</b>                        | <b>5,028</b>                     | <b>78</b>                          | <b>1,198</b>        | <b>4,485</b>     | <b>24,381</b> |

\*Information sourced from the Shropshire Council Five Year Housing Land Supply available on the Shropshire Council website at: <https://shropshire.gov.uk/planning-policy/monitoring-and-site-assessment/five-year-housing-land-supply-statement/>. The base date for this information is the 31<sup>st</sup> March 2017.

\*\*To ensure robustness, only a very modest small-scale windfall allowance of 200 dwellings per annum has been applied, significantly less than the average and any individual years rate of delivery during the current Local Plan period. To add further robustness, this has also not been included for the first three years of the trajectory (2017/18 to 2019/2020).

1.3 Previous responses from CPRE, at both the Options and Preferred Options Stage, have questioned the overall need.

1.4 I would endorse their concerns that the need may be being over-estimated, especially given that it was developed before the Government's preferred Standard Methodology was introduced.

1.5 In this report I deal with that issue briefly before considering whether the level of supply may also be being under-stated.

## Report on Housing Supply Issues

1.6 I specifically consider the issues of windfalls and conversions, density and vacant homes, all of which have a bearing on the overall supply both of housing land and of the yield from land that is made available.

1.7 I have not looked at specific sites in detail and am not making comments on the relative merits of overall spatial development options, although clearly a reduction in the overall requirement and an increase in supply would mean that the Council could concentrate more on Urban Brownfield sites and reduce the need for incursions into the countryside.

## 2. Background: Calculation of Need

2.1 The calculation of housing need in local plans relies on future projections of housing need over twenty years, which are by their nature, uncertain. The approach has always been trend-based and has tended to exaggerate the amount of need, both in the approach to migration and to the assumptions that average household size will continue to fall into the future.

2.2 The latest 2016-based housing projections from ONS seek to correct some of these problems, in particular, they defer a projected reduction in average household size, reflecting the fact that the long-term reduction in household size since the 1970s has tailed off in the last decade.

2.3 Those projections may well represent a more realistic (and generally lower) estimate of future household growth (and need). The Government, however, has continued to insist that household need should be calculated based on the 2014-based household projections, and should use a ten-year period from the current year (i.e. 2018).

2.4 CPRE's National Office, in response to the recent consultation on the Government's approach to housing, has been highly critical of this position and I concur with their criticisms.

2.5 The Government's Standard Methodology<sup>8</sup> goes on to add to the initial calculation of need an additional amount of housing to address affordability issues, the percentage being based on local affordability ratios. This again is an approach which I consider questionable given the inelasticity of housing cost when supply is marginally increased.

2.6 Using the Government's preferred methodology the household need for Shropshire from 2016-2036 is 25,260 homes. Taking a 2016 start date it is slightly higher, 26,340, but a calculation based on 2016-2036 (the whole plan period) gives a twenty year need of only 22,999.

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<sup>8</sup> as set out in <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>



## Report on Housing Supply Issues

2.7 In Shropshire's case those figures are only very slightly different if one uses the updated 2016 household projections<sup>9</sup>.

2.8 25,260 is very close to the figure given in the Council's 2017 Full Objectively Assessed Housing Need (FOAHN) update, 25,400, which was based on the draft methodology then in discussion and used a 10 Year timeframe.

2.9 Because of the affordability calculation, 25,260 homes includes a 27% increase above the demographic need for the county and also, because the calculation is based on a ten-year period, it also does not account for the demographic tail off evident if one considers a twenty-year time frame.

2.10 25,260 would, however, tally with the housing the Council's own assessment says is needed to meet the economic needs of the county, as set out by Oxford Economics in the 2016 FOAHN (an assessment which has not been repeated as far as I can tell).

2.11 In justification of their preferred housing requirement figure of 28,750 Shropshire Council claim additional housing is being sought because they are seeking a growth strategy that requires additional population. This is, of course, something other councils are also doing and a simple point is that they can't all be right.

2.12 I addressed in my earlier report on the Options Consultation why I am more broadly not convinced by the Council's justification for their particular claim to extra growth, so I do not repeat it here.

2.13 Sufficient to say that it would appear that an overall need figure of 25,260 represents sufficient housing for the county, including for realistic levels of economic development, and that the decision by the Council to exceed that level of need and, thereby to increase its impact on the countryside (as well as threatening to undermine urban regeneration and increase commuting both within and out of the county) is neither required by Government.

2.14 The higher figure is also not in line with the views of residents of Shropshire, as expressed in previous consultations.

2.15 A lower level of assumed need would, in my view, be more appropriate for the county especially if it were accompanied by policies to ensure affordable housing was prioritised for those in most need and in the most sustainable locations.

## 3. Supply Side Issues

3.1 In seeking to assess the supply side of the housing equation the Council has produced its 2018 SLAA. This cannot be read on its own, as it only deals in detail with new sites which the council has assessed and now considers available

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<sup>9</sup> see Annex 1 which includes standard methodology calculations

## Report on Housing Supply Issues

development. A series of assumptions lie behind it which are based on previous work.

3.2 I have seen further more detailed assessments for Kinnerley, so I think I understand how sites have been sifted. There is, inevitably, some value judgment in that, especially in relation to a particular site's availability which may change over time.

3.3 I am not in a position to check each site so assume the Council has correctly discounted sites but this may be an area where local knowledge could demonstrate additional levels of supply.

3.4 In terms of the overall quantum of supply the Table on Page 16 of the SLAA includes 24,381 homes, of which 1,198 are included in the SLAA sites allocations. The total number of allocations in the SLAA site lists amounts to 7,394 dwellings according to the local Housing Guidance lists in the Consultation Document (I also note CPRE Shropshire have done some calculations to suggest this should be 7,440, but this is a minor discrepancy).

3.5 This means that if all the SLAA allocations were accepted, on the Council's own analysis, they would be allowing for 30,577 dwellings, 1,827 above their own preferred housing requirement of 28,750, a figure which is also significantly above the Council's own current calculation of need in the 2017 FOAHN, i.e. 25,400.

3.6 The table of Proposed Housing Guidelines (PHG) 2016-36 in the consultation only adds up to 25,783 dwellings. I understand from officers that the additional 4,794 dwellings are sites in rural areas not included in the Guidelines table and this will be partly account for by existing sites. I assume it will also partly be accounted for by additional windfalls (there are 2,880 approximately in the PHG table and 4,485 in the SLAA, a difference of 2,205).

3.7 It would have been helpful if the differences had been explained by a note in the consultation so the PHG Table clearly tallied with the Table on Page 16 of the SLAA but in effect this means that the 30,577 represents the correct total, assuming there are no additional allocations in rural areas, which have not been considered in this consultation.

3.8 In its 5 Year Land Supply calculations, I note that the Council discounts the total housing supply by 10%.

3.9 I am not sure such an approach is as applicable at this level. This is firstly because delivery of sites may be delayed beyond 5 years (particularly in uncertain economic conditions) rather than not happen at all and, secondly, because the reliance on larger allocated sites means delivery failure is less likely to be an issue.

3.10 But I note, at this stage, that it would need at least a 6% discount rate to get back to the 28,750 figure in the plan.

## Report on Housing Supply Issues

3.11 Further to those comments, there are three other areas where I believe the potential supply may be being under-estimated and I consider those in detail below: windfalls, densities and vacancies.

### 3.1 Windfalls

3.1.1 The SLAA includes a table of small-scale windfalls (under 5 houses) since 2006. It is unclear to me if this includes development on back gardens, since the advice under the previous NPPF was not to include them and that advice was only rescinded in the revised (2018) NPPF.

3.1.2 Of course, in some cases, back garden development is undesirable and the NPPF acknowledges that, but permission will still be granted on appropriate sites and, if this happens, they become, by definition, part of the supply.

3.1.3 For the purposes of this analysis I will assume Back Garden developments are included, but clearly, if not, that is a further source of windfall sites that can now be added on.

3.1.4 The average small windfall figure since 2006 is 382 dwellings per annum (dpa). The last year 2016/17 saw 330 dwellings. However, it is noticeable from the table that the level of windfalls for 2006-2009 and from 2014-16 was substantially higher than the years in-between, suggesting windfalls were (as one would expect) suppressed by the recession. If one excludes 2009-14 the average is 436.5 dpa.

| Year           | Total dwellings completed on windfall sites of less than 5 dwellings |
|----------------|--|
| 2006/07        | 493  |
| 2007/08        | 558  |
| 2008/09        | 404  |
| 2009/10        | 330  |
| 2010/11        | 345  |
| 2011/12        | 308  |
| 2012/13        | 312  |
| 2013/14        | 293  |
| 2014/15        | 433  |
| 2015/16        | 401  |
| 2016/17        | 330  |
| <b>Average</b> | <b>382</b>   |

3.1.5 It is, therefore, somewhat surprising to me that Shropshire Council has not assumed their average windfall level, nor even the last year windfall level, but a level of 299 dpa, which is lower than any year in the last decade apart from 2013-14. Based on a 15 years supply (it is being assumed any windfalls in years 1-5 of the Plan are already in the system) this gives the Council a windfall figure of 4,485. This would rise to 4,950 based on 330 dpa and 5,730 based on 382 dpa.

3.1.6 The latter would lead to an additional 1,245 homes over the plan period and is probably still conservative given the impact of the recession on past figures. It is noteworthy that while Shropshire Council assumes a very buoyant future economy that is not reflected in its windfall assumptions.

## Report on Housing Supply Issues

3.1.7 There may also, of course, be some larger windfall sites and there is no evidence presented as to the contribution of larger windfall sites. It is, presumably, assumed that larger developments will all be on allocated sites. However, by definition, we cannot know whether additional land, currently used by industry, leisure or retail, will become available for housing development above 5 dwellings, let alone any cross-subsidy exception sites which the Council supports.

3.1.8 We do know that there are likely to be significant further changes in the retail environment, both on the High Street and for Retail Parks/Supermarkets. How this will play out is unclear but it would seem reasonable to assume that some retail sites may well become surplus to requirements or be redeveloped as mixed-used sites, including an element of housing.

3.1.9 A further reason to believe future windfalls will continue to deliver significant levels of housing is the changes in the requirements and incentives in relation to conversions and change of use. The Government has significantly relaxed the hurdles to converting business premises into housing, something further underpinned in the 2018 Budget.

3.1.10 I cannot find any details on the quantum of conversions/change of use in the 2018 SLAA or any consideration of whether these have risen in response to Government incentives, but the DCLG Live Table 123 shows between 200 and 300 a year since 2013 which should give further reassurance about future windfall provision.

3.1.11 In conclusion, the assessment in the SLAA seems to be based on an unrealistically low level of windfall provision. Taking the 11-year average would give a figure of 382 dpa, or 5,730 dwellings over the plan period. This remains a conservative figure because of:

- a. the impact of the recession,
- b. uncertainty that it includes back garden developments,
- c. potential for larger windfalls, particularly from retail change and
- d. the potential for more conversions/change of use.

3.1.12 I note one other peculiarity in the approach to windfalls, which is the mathematical division of them between the Place Plan Areas. I assume this is done purely for the mathematics of the calculation and that is reasonable.

3.1.13 In practice, designated sites can be directed to different areas to create a balance of development (although Shropshire CPRE may have views on that balance) but windfalls, by definition, arise where they arise. So, while I understand the approach from a mathematical point of view, I would be concerned if it was used as a development control tool, i.e. failure to meet a notional windfall number in a particular area, led to additional development there.

## Report on Housing Supply Issues

### 3.2 Density

3.2.1 The current Shropshire Plan does not include a specific density target, either for the County or for specific types of development (e.g. urban, suburban, rural). Policy CS6 refers to ensuring that all development:

*‘Protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character, having regard to national and local design guidance, landscape character assessments and ecological strategies where appropriate.’*

3.2.2 The SLAA assessment assumes, we are told in Para 4.5, a figure of 30 dwellings per hectare (dph) for each of the sites assessed (although it is not explained if this is gross or not). However, in reality, that figure appears to only have been used for some sites and many others have individual assessments, some with much lower densities.

3.2.3 While 30 dph may be considered a suitable proxy in rural areas, it remains a relatively low level of development in a suburban or urban context. This is discussed in some detail, for example, in the GL Hearn Study of housing in the Greater Birmingham Housing Market Area (GBHMA). They suggest higher suburban figures and examine in detail the impact that would have on overall supply<sup>10</sup>. This is something Shropshire Council should consider.

3.2.4 It may also be appropriate to adopt higher densities for some development sites within town or village boundaries where the surrounding development is itself higher density.

3.2.5 The provision of a greater amount of higher density housing in the plan (not necessarily flats, but also smaller homes and terraced housing provision), could help meet specific demographic needs, such as the elderly and first-time buyers. It could also help Shropshire meet carbon and sustainability goals by reducing the distance people travel and the car-dependency of development patterns.

3.2.6 There is a particular question about how density should be approached on sites at the edge of the urban area, particularly large urban extensions. These are in the countryside but will become suburban estates. There is, therefore, a case that these should be considered as suburban sites and higher densities sought.

3.2.7 Even if that is not accepted, there is clearly a trade-off between lower densities on urban extensions and the amount of countryside that needs to be taken for the Plan. That dilemma has not been put as a question in this consultation, nor has the council provided figures to show the potential additional supply an alternative approach could provide.

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<sup>10</sup> See Extract in Annex 3

## Report on Housing Supply Issues

3.2.8 My Annex 2 includes a list of sites above 1 hectare from the Preferred Sites Consultation. It gives the number of sites on each site in the plan and compares that with 30 dph, 35 dph and 40 dph calculations. These are necessarily crude and theoretical calculations and it is not intended that these should be seen as individual site assessments where there may be particular constraints.

3.2.9 A final column is added where the plan figure is rounded up to 30 dph for sites where the yield appears to have been simply rounded down, rather than reduced because of specific constraints. I have then taken a figure of 35 dph for the larger urban extensions.

3.2.10 Again the approach is crude and could be further refined by the Council. However, it shows the low level of density being proposed in the county, rarely even 30 dph (averaging only 21.67), and the potential for additional housing if a moderately higher density level was adopted on some of the larger sites.

3.2.11 The total capacity of those sites according to the Council is 6,769 dwellings. Even with a modest increase in density on larger sites to 35 dph, this rises to 7,947, an additional 1,178 dwellings.

3.2.12 Nor does my Annex include sites already allocated in the plan (some large allocations) which have not yet got planning permission (currently identified as providing 5,028 dwellings in the SLAA table on Page 16). These are sites where density levels could also be reviewed.

3.2.13 I understand the Council is confident that its density predictions are reliable predictors of actual densities, but this is to an extent self-fulfilling, especially on larger sites where there are more options for development approach.

3.2.14 Were the Council to put more specific density advice in its plan, one might expect developers to bring forward higher density proposals.

3.2.15 Clearly much more detailed analysis would be required to verify the situation, but on the face of it the Council's approach to Density seems lenient. There may well be opportunities to increase density without compromising design and this is something which the Council should review so that there is clear evidence on which consultees can comment.

## 3.3. Vacant Properties

3.3.1 The final area where further progress might be made is in regards to Vacancy Rates. This was an issue which I advised CPRE on at the Options Stage of the Plan. However, since then I cannot find any further evidence from the Council within the Plan Process. The 2016 FOAHN used a Vacancy Rate of 4.4% from the 2011 Census, which it says is above the National Average of 2.6%.

3.3.2 An Article in the Shropshire Star (Nov 16, 2018) gives a figure of 3,388 empty properties, of which 1,654 are long term vacant homes (more than six months).

## Report on Housing Supply Issues

3.3.3 I have looked at the relevant DCLG Live Table 161, and the figures for Shropshire for 2017 are 4,375 (3.07% of the total Shropshire properties: 142,430) of which 1,555 are long term vacancies.

3.3.4 It is hard to be definitive about progress that could be made and how many additional homes could be freed up if Vacancy Rates were reduced. But it may be a further source of some supply.

## 4. Conclusions

4.1 The table below sets out some of some key figures from this report. They are necessarily crude, but do suggest the Council has more than sufficient land to meet the housing requirement resulting from the Standard Methodology calculation, which is itself above demographic need.

4.2 It also suggests that assumptions, particularly about windfalls and density may be being unnecessarily downplayed and that the overall capacity (including existing sites and proposed sites) is probably higher.

|   |          |         |
|---|----------|---------|
| Standard  | 25,260   |         |
| Methodology Need                                |          |         |
| Shropshire Plan                                 | 28,750   |         |
| Total Allocations from Preferred Sites Material | 30,577   |         |
| Remove Over-allocation                          |          | 1,827   |
| Current SLAA Allocations (Council)              | 24,381   |         |
| Current Preferred Sites Allocations (Council)   | 25,783   |         |
| Windfalls Underestimate                         |          | 1,245   |
| Increased Densities                             |          | 1,178 + |
| Current Allocations (Recalculation)             | 26,809 + |         |

4.3 In particular the options for higher densities on larger sites should be investigated before additional countryside is released.

4.4 There is a particular requirement in relation to Green Belt releases which is set out in Para 137 of the NPPF.

## Report on Housing Supply Issues

*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

4.5 The lack of minimum density standards within the Plan as it stands may also need to be addressed to fulfil this requirement before Green Belt releases can properly be considered.

4.6 In my view, further work to address the issues and options relating to housing need and supply is needed before additional green field land allocations, and particularly on Green Belt sites, can be considered acceptable in Shropshire.



## Report on Housing Supply Issues

## Annex 1: Standard Methodology Table for Shropshire

|          |  | 2016   | 2018      | 2026   | 2028      | 2036   | 18-28     | 16-26 | 16-36     |  | Affordability Ratio |
|----------|--|--------|-----------|--------|-----------|--------|-----------|-------|-----------|--|---------------------|
| 2014 ONS |  | 135511 | 137727    | 145844 | 147635    | 153558 | 9908      | 10333 | 18047     |  | 8.39                |
| 2016 ONS |  | 135449 | 137592    | 145667 | 147477    | 153511 | 9885      | 10218 | 18062     |  | 8.39                |
|          |  |        |           |        |           |        |           |       |           |  |                     |
|          |  |        | 18-28 adj |        | 16-26 adj |        | 16-36 adj |       | 16-36 OAN |  | Adjustment          |
| 2014 ONS |  | 12627  | 12627     | 13168  | 13168     | 22999  | 22999     |       | 28750     |  | 0.274375            |
| 2016 ONS |  | 12597  | 12597     | 13022  | 13022     | 23018  | 23018     |       | 28750     |  | 0.274375            |
|          |  |        |           |        |           |        |           |       |           |  |                     |
|          |  |        | 18-28 dpa |        | 16-26 dpa |        | 16-36 dpa |       | OANs dpa  |  |                     |
| 2014 ONS |  | 1262.7 | 1,263     | 1316.8 | 1,317     | 1150   | 1150      | 1438  | 1,430     |  |                     |
| 2016 ONS |  | 1259.7 | 1,260     | 1302.2 | 1,302     | 1151   | 1151      | 1438  | 1,430     |  |                     |
|          |  |        |           |        |           |        |           |       |           |  |                     |
|          |  |        | 20 Year   |        | 20 Year   |        | 20 Year   |       | 20 Year   |  |                     |
| 2014 ONS |  |        | 25260     |        | 26340     |        | 22999     |       | 28750     |  |                     |
| 2016 ONS |  |        | 25200     |        | 26040     |        | 23018     |       | 28750     |  |                     |

## Report on Housing Supply Issues

## Annex 2: Theoretical Density Adjustments for sites over 1 hectare.

| Area              | Development Number | Size  | Plan Houses | dph   | 30dph  | 35dph   | 40dph   |                     | Estimate |
|-------------------|--------------------|-------|-------------|-------|--------|---------|---------|---------------------|----------|
| Albrighton        | ALB017             | 5.49  | 165.00      | 30.05 | 164.70 | 192.15  | 219.60  |                     | 165      |
|                   | ALB021             | 1.04  | 30.00       | 28.85 | 31.20  | 36.40   | 41.60   |                     | 31       |
| Bishops Castle    | BIS028             | 4.11  | 70.00       | 17.03 | 123.30 | 143.85  | 164.40  |                     | 70       |
|                   | CLU05              | 1.00  | 80.00       | 20.00 | 80.00  | 93.33   | 106.67  | 20 but full site 80 | 80       |
|                   | WBR007/8           | 1.30  | 25.00       | 19.03 | 39.00  | 45.50   | 52.00   |                     | 25       |
| Bridgnorth        | P54etc...          | 29.00 | 850.00      | 29.31 | 870.00 | 1015.00 | 1160.00 |                     | 1015     |
|                   | ALV006/7           | 2.50  | 35.00       | 14.00 | 75.00  | 87.50   | 100.00  |                     | 35       |
|                   | ALV009             | 1.40  | 35.00       | 25.00 | 42.00  | 49.00   | 56.00   |                     | 42       |
|                   | DNP009             | 2.00  | 40.00       | 20.00 | 60.00  | 70.00   | 80.00   |                     | 40       |
|                   | BR0040/42          | 2.99  | 45.00       | 15.05 | 89.70  | 104.65  | 119.60  |                     | 45       |
|                   | CST020             | 2.39  | 40.00       | 16.74 | 71.70  | 83.65   | 95.60   |                     | 40       |
|                   | CST021             | 4.29  | 70.00       | 16.32 | 128.70 | 150.15  | 171.60  |                     | 70       |
| Cleobury Mortimer |                    |       |             |       |        |         |         |                     |          |
| Craven Arms       |                    |       |             |       |        |         |         |                     |          |
| Ellesmere         | ELL005             | 7.00  | 150.00      | 21.43 | 210.00 | 245.00  | 280.00  |                     | 150      |
|                   | ELL008             | 1.33  | 10.00       | 7.52  | 39.90  | 46.55   | 53.20   |                     | 10       |
| Highley           | HNN016             | 5.42  | 70.00       | 12.92 | 70.00  | 81.67   | 93.33   | plus 50 extra care  | 70       |
| Ludlow            | LUD056             | 2.10  | 74.00       | 35.24 | 63.00  | 73.50   | 84.00   |                     | 74       |
| Market Drayton    | MDR012             | 2.90  | 70.00       | 24.14 | 87.00  | 101.50  | 116.00  |                     | 70       |
|                   | MDR034             | 5.67  | 120.00      | 21.16 | 170.10 | 198.45  | 226.80  |                     | 120      |
|                   | MDR039/043         | 6.96  | 150.00      | 21.55 | 208.80 | 243.60  | 278.40  |                     | 150      |
|                   | MDR006             | 4.55  | 125.00      | 27.47 | 136.50 | 159.25  | 182.00  |                     | 125      |
|                   | HKW009             | 1.80  | 35.00       | 19.44 | 54.00  | 63.00   | 72.00   |                     | 35       |
|                   | HHH001/014         | 3.13  | 40.00       | 12.78 | 93.90  | 109.55  | 125.20  |                     | 40       |

## Report on Housing Supply Issues

| Area         | Development Number | Size | Plan Houses | dph   | 30dph  | 35dph  | 40dph  |                | Estimate |
|--------------|--------------------|------|-------------|-------|--------|--------|--------|----------------|----------|
| Minsterley   | MIN018             | 1.10 | 20.00       | 18.18 | 33.00  | 38.50  | 44.00  |                | 20       |
|              | PON008 etc...      | 2.70 | 40.00       | 14.81 | 81.00  | 94.50  | 108.00 |                | 40       |
| Much Wenlock | MUW012             | 3.80 | 80.00       | 21.05 | 114.00 | 133.00 | 152.00 |                | 80       |
|              | CES005             | 2.40 | 60.00       | 25.00 | 72.00  | 84.00  | 96.00  |                | 60       |
| Oswestry     | OSW017             | 1.47 | 40.00       | 27.21 | 44.10  | 51.45  | 58.80  |                | 44       |
|              | PKH002 etc..       | 8.00 | 160.00      | 20.00 | 160.00 | 186.67 | 213.33 | Incl mixed use | 160      |
|              | GWR009             | 2.37 | 25.00       | 10.55 | 71.10  | 82.95  | 94.80  |                | 25       |
|              | GWR023             | 2.50 | 75.00       | 30.00 | 75.00  | 87.50  | 100.00 |                | 75       |
|              | LYH007             | 1.85 | 50.00       | 27.03 | 55.50  | 64.75  | 74.00  |                | 55       |
|              | PYC021             | 1.89 | 45.00       | 23.81 | 56.70  | 66.15  | 75.60  |                | 45       |
|              | RY019              | 2.26 | 65.00       | 28.76 | 67.80  | 79.10  | 90.40  |                | 67       |
|              | SMH031             | 2.00 | 60.00       | 30.00 | 60.00  | 70.00  | 80.00  |                | 60       |
|              | SMH038             | 1.49 | 35.00       | 23.49 | 44.70  | 52.15  | 59.60  |                | 35       |
|              | WEF025             | 2.00 | 60.00       | 30.00 | 60.00  | 70.00  | 80.00  |                | 60       |
|              | WRP017             | 1.40 | 40.00       | 28.57 | 42.00  | 49.00  | 56.00  |                | 42       |
|              | WRP001             | 2.00 | 60.00       | 30.00 | 60.00  | 70.00  | 80.00  |                | 60       |
|              | WHN024             | 2.50 | 70.00       | 28.00 | 75.00  | 87.50  | 100.00 |                | 75       |
| Shifnal      | SHF022/23          | 3.50 | 100.00      | 28.57 | 105.00 | 122.50 | 140.00 |                | 105      |
|              | SHF032             | 2.80 | 80.00       | 28.57 | 84.00  | 98.00  | 112.00 |                | 84       |

## Report on Housing Supply Issues

| Area         | Development Number | Size  | Plan Houses    | dph          | 30dph          | 35dph          | 40dph           |                      | Estimate    |
|--------------|--------------------|-------|----------------|--------------|----------------|----------------|-----------------|----------------------|-------------|
| Shrewsbury   | SHR<br>158/160/161 | 40.00 | 1200.00        | 30.00        | 1200.00        | 1400.00        | 1600.00         |                      | 1400        |
|              | SHR057/177         | 25.00 | 500.00         | 20.00        | 750.00         | 875.00         | 1000.00         |                      | 875         |
|              | SHR216             | 23.00 | 300.00         | 13.04        | 300.00         | 350.00         | 400.00          | Incl employment land | 350         |
|              | SHR145             | 6.00  | 150.00         | 25.00        | 180.00         | 210.00         | 240.00          |                      | 210         |
|              | BNP024             | 3.10  | 35.00          | 11.29        | 93.00          | 108.50         | 124.00          |                      | 35          |
|              | BNP035             | 1.20  | 20.00          | 16.67        | 36.00          | 42.00          | 48.00           |                      | 20          |
|              | BAY039             | 6.09  | 100.00         | 16.42        | 182.70         | 213.15         | 243.60          |                      | 100         |
|              | BAY050             | 3.10  | 50-60          | 19.35        | 93.00          | 108.50         | 124.00          |                      | 60          |
|              | BIT022             | 1.80  | 15.00          | 8.33         | 54.00          | 63.00          | 72.00           |                      | 15          |
|              | BOM019             | 2.00  | 40.00          | 20.00        | 60.00          | 70.00          | 80.00           |                      | 40          |
|              | CSH004             | 1.80  | 40.00          | 22.22        | 54.00          | 63.00          | 72.00           |                      | 40          |
|              | FRD011             | 4.10  | 50.00          | 12.20        | 123.00         | 143.50         | 164.00          |                      | 50          |
| Wem          | WEM010             | 4.20  | 120.00         | 28.57        | 126.00         | 147.00         | 168.00          |                      | 126         |
|              | WEM025             | 1.30  | 30.00          | 23.08        | 39.00          | 45.50          | 52.00           |                      | 30          |
|              | WEM033             | 3.00  | 60.00          | 20.00        | 90.00          | 105.00         | 120.00          |                      | 60          |
|              | CLV010             | 2.00  | 20.00          | 10.00        | 60.00          | 70.00          | 80.00           |                      | 20          |
|              | HDL006             | 1.70  | 40.00          | 23.53        | 51.00          | 59.50          | 68.00           |                      | 40          |
|              | SHA019             | 5.20  | 80.00          | 15.38        | 156.00         | 182.00         | 208.00          |                      | 182         |
| Whitchurch   | WHT037/044         | 8.57  | 190.00         | 22.17        | 257.10         | 299.95         | 342.80          |                      | 200         |
|              | WHT014             | 2.23  | 70.00          | 31.39        | 66.90          | 78.05          | 89.20           |                      | 78          |
|              | WHT042             | 8.20  | 180.00         | 21.95        | 246.00         | 287.00         | 328.00          |                      | 287         |
|              | PPW025             | 1.74  | 35.00          | 20.11        | 52.20          | 60.90          | 69.60           |                      | 35          |
|              |                    |       |                |              |                |                |                 |                      |             |
| <b>Total</b> |                    |       | <b>6769.00</b> | <b>21.58</b> | <b>8539.30</b> | <b>9962.52</b> | <b>11385.73</b> |                      | <b>7947</b> |

## Report on Housing Supply Issues

|   |
|---|
|   |
| <b>Notes</b>  |
|   |
| Based on new sites (ignored a few under 1 hectare)  |
| Column B and C from assessments   |
| Column D = Column B/C   |
| Column E notional 30 dph except where the site has other uses identified                  |
| Column F notional 35 dph  |
| Column G notional 40 dph  |
| Column J = Column B but with 35 dph on larger red sites and 30 dph where minor adjustment |
| Totals includes average for densities from plan   |
| Does not include density reassessment on existing allocated sites                         |

## Report on Housing Supply Issues

## Annex 3: Extract from GL Hearn Report: Greater Birmingham HMA Strategic Growth Study, February 2018

- 6.30 The current density assumptions used in land supply evidence are shown in Table 31. The highest density assumptions are made in Birmingham City Centre (100 dwellings per hectare, dph). Assumptions in town centres vary from 35-70 dph; in suburban locations from 30-50 dph; and in rural locations from 15-35 dph.

Table 31: Greater Birmingham &amp; Black Country - Current Density Assumptions (dph)

| Local Authority     | Rural | Suburban | Centre | City Centre |
|---------------------|-------|----------|--------|-------------|
| Birmingham City     | -     | 40       | 50     | 100         |
| Bromsgrove          | -     | 30       | 50     | -           |
| Cannock Chase       | 15-20 | 30       | 50     | -           |
| Dudley              | 15-20 | 35-45    | 50     | -           |
| Lichfield           | 30    | 40       | 50     | -           |
| North Warwickshire  | 30    | 30       | 50     | -           |
| Redditch            | 30    | 50       | 70     | -           |
| Sandwell            | -     | 35       | 35     | -           |
| Solihull            | 36    | 36       | 36     | -           |
| South Staffordshire | 30    | -        | -      | -           |
| Stratford           | 30    | -        | -      | -           |
| Tamworth            | -     | 30       | 40     | -           |
| Walsall             | -     | 35       | 60     | -           |
| Wolverhampton       | -     | 35       | -      | -           |

- 6.31 In order to consider and quantify the potential impact of increasing densities, we have first identified thresholds which can subsequently be applied as minimum thresholds or "floor" thresholds. These have been based on the average density assumptions currently being planned for across the HMA for rural, suburban and urban areas (based on Table 23 above). These are as follows:

- Rural Areas: 30 dwellings per hectare
- Suburban Locations: 40 dph
- Town and District Centres: 50 dph
- Birmingham City Centre: 100 dph

## Appendix 8: Proposed allocations and sustainability scores

## Shropshire Council Preferred Sites Consultation: Proposed Allocations

| Place plan area         | Settlement                       | Sustainability appraisal |              | Housing allocations    |       |             | Employment etc. land allocations |                         | Safeguarded land |                  |
|-------------------------|----------------------------------|--------------------------|--------------|------------------------|-------|-------------|----------------------------------|-------------------------|------------------|------------------|
|                         |                                  | Score                    | Conclusion   | Site ref               | Ha    | Plan Houses | Site ref                         | Ha                      | Site ref         | Ha               |
| Albrighton              | Albrighton                       | -7                       | Fair         | ALB017                 | 5.49  | 165         |                                  |                         |                  |                  |
| Albrighton              | Albrighton                       | -9                       | Poor         | ALB021                 | 1.04  | 30          |                                  |                         |                  |                  |
| Albrighton              | Albrighton                       | -5 / -4                  | Fair         |                        |       |             |                                  |                         | P36              | 6.98 Residential |
| Albrighton              | Albrighton                       | -6                       | Fair         |                        |       |             |                                  |                         | P35              | 6.56 Residential |
| Albrighton              | Albrighton                       | -4                       | Fair         |                        |       |             |                                  |                         | P32a             | 6.32 Employment  |
| Bishops Castle          | Bishops Castle                   | -5                       | Fair         | BIS028                 | 4.11  | 70          |                                  |                         |                  |                  |
| Bishops Castle          | Bucknell                         | -12                      | not given    | BKL008a                | 0.80  | 20          |                                  |                         |                  |                  |
| Bishops Castle          | Chirbury                         | -6                       | not given    | CHR001                 | 0.30  | 7           |                                  |                         |                  |                  |
| Bishops Castle          | Chirbury                         | -5                       | not given    | CHR002                 | 0.30  | 7           |                                  |                         |                  |                  |
| Bishops Castle          | Clun                             | not assessed             | not assessed | CLU005                 | 1.00  | 20          |                                  |                         |                  |                  |
| Bishops Castle          | Worthen and Brockton             | -8 / -8                  | not given    | WBR007/008             | 1.30  | 25          |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              |                          |              | P54/56etc...           | 29.00 | 850         |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -11                      | Poor         | P54                    |       |             |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -9                       | Fair         | P56                    |       |             |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -5                       | Fair         | P58a                   |       |             |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -6                       | Fair         | STC002                 |       |             |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -6                       | Fair         | STC004                 |       |             |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -9                       | Fair         | STC005                 |       |             |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -9                       | Fair         | STC006                 |       |             |                                  |                         |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | as above                 | Fair         |                        |       |             | STC002/4/5/6                     | 16 Employment           |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | as above                 | Fair         |                        |       |             | STC002/4/5/6                     | 5 Local centre          |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | as above                 | Fair         |                        |       |             | STC002/4/5/6                     | 36 Green infrastructure |                  |                  |
| Bridgnorth              | Bridgnorth/Stammore              | -10                      | Poor         |                        |       |             |                                  |                         | P56              | 32 Residential   |
| Bridgnorth              | Bridgnorth/Stammore              | -12                      | Poor         |                        |       |             |                                  |                         | P54              | 48 Employment    |
| Bridgnorth              | Alveley                          | -4 / -4                  | Good         | ALV006/007             | 2.50  | 35          |                                  |                         |                  |                  |
| Bridgnorth              | Alveley                          | -4                       | Good         | ALV009                 | 1.40  | 35          |                                  |                         |                  |                  |
| Bridgnorth              | Alveley                          | -5                       | Good         |                        |       |             |                                  |                         | ALV002           | 3 Residential    |
| Bridgnorth              | Dittton Priors                   | -3                       | not given    | DN P009                | 2.00  | 40          |                                  |                         |                  |                  |
| Broseley                | Broseley                         | -4 / -3                  | Fair         | BRO012/024             | 0.86  | 10          |                                  |                         |                  |                  |
| Broseley                | Broseley                         | -1 / 0                   | Good         | BRO040/041             | 2.99  | 45          |                                  |                         |                  |                  |
| Church Stretton         | Church Stretton                  | -16                      | Poor         | CST020                 | 2.39  | 40          |                                  |                         |                  |                  |
| Church Stretton         | Church Stretton                  | -6                       | Fair         | CST021                 | 4.29  | 70          |                                  |                         |                  |                  |
| Clebury Mortimer        |                                  |                          |              | by NP                  |       | 138         |                                  |                         |                  |                  |
| Craven Arms             |                                  |                          |              |                        |       | 0           |                                  |                         |                  |                  |
| Ellesmere               | Ellesmere                        | -4                       | Fair         | ELL005                 | 7.00  | 150         |                                  |                         |                  |                  |
| Ellesmere               | Ellesmere                        | -3                       | Fair         | ELL008                 | 1.33  | 10          |                                  |                         |                  |                  |
| Highley                 | Highley                          | 3                        | Good         | HNN016                 | 5.42  | 120         |                                  |                         |                  |                  |
| Ludlow                  | Ludlow                           | ass'd only to LUD055     | not assessed | LUD056                 | 2.10  | 74          |                                  |                         |                  |                  |
| Ludlow                  | Ludlow                           | not assessed             | not assessed | LUD057                 | 0.45  | 10          |                                  |                         |                  |                  |
| Ludlow                  | Ludlow                           | -10                      | Poor         |                        |       |             | LUD052                           | 1.94 Employment         |                  |                  |
| Ludlow                  | Burford                          |                          |              | to be considered later |       | 96          |                                  |                         |                  |                  |
| Ludlow                  | Clee Hill                        | -4                       | not given    | CHK002                 | 0.95  | 20          |                                  |                         |                  |                  |
| Market Drayton          | Market Drayton                   | -5                       | Fair         | MDR012                 | 2.90  | 70          |                                  |                         |                  |                  |
| Market Drayton          | Market Drayton                   | -2                       | Fair         | MDR034                 | 5.67  | 120         |                                  |                         |                  |                  |
| Market Drayton          | Market Drayton                   | -9 / -9                  | Poor         | MDR039/043             | 6.96  | 150         |                                  |                         |                  |                  |
| Market Drayton          | Market Drayton                   | -3                       | Fair         | MDR006                 | 4.55  | 125         |                                  |                         |                  |                  |
| Market Drayton          | Market Drayton                   |                          |              | further in MDNP Marina |       | 160         |                                  |                         |                  |                  |
| Market Drayton          | Hinstock                         | -4                       | not given    | HKW009                 | 1.80  | 35          |                                  |                         |                  |                  |
| Market Drayton          | Hodnet                           | -9 / not assessed        | not given    | HHH001/014             | 3.13  | 40          |                                  |                         |                  |                  |
| Market Drayton          | Woore, Irelands Cross & Pipegate |                          |              | by NP                  |       | 30          |                                  |                         |                  |                  |
| Minsterley & Pontesbury | Minsterley                       | -9                       | not given    | MIN018                 | 1.10  | 20          |                                  |                         |                  |                  |
| Minsterley & Pontesbury | Pontesbury                       | -11 / -10 / -9           | Poor         | PON008/017/030         | 2.70  | 40          |                                  |                         |                  |                  |
| Much Wenlock            | Much Wenlock                     | -5                       | Fair         | MUW012                 | 3.80  | 80          |                                  |                         |                  |                  |
| Much Wenlock            | Cressage                         | -3                       | not given    | CES005                 | 2.40  | 60          |                                  |                         |                  |                  |
| Much Wenlock            | Cressage                         | -1                       | not given    | CES006                 | 0.20  | 5           |                                  |                         |                  |                  |
| Oswestry                | Oswestry                         | -4                       | Fair         | OSW017                 | 1.47  | 40          |                                  |                         |                  |                  |
| Oswestry                | Oswestry                         | -3 / -5 / not assessed   | Fair         | PKH002/007/031         | 8.00  | 160         |                                  |                         |                  |                  |

## Shropshire Council Preferred Sites Consultation: Proposed Allocations

| Place plan area | Settlement      | Sustainability appraisal |                | Housing allocations |       |             | Employment etc land allocations             |        | Safeguarded land    |        |
|-----------------|-----------------|--------------------------|----------------|---------------------|-------|-------------|---|--------|---------------------|--------|
|                 |                 | Score                    | Conclusion     | Site ref            | Ha    | Plan Houses | Site ref                                    | Ha     | Site ref            | Ha     |
| Oswestry        | Gobowen         | -2                       | not given      | GWR009              | 2.37  | 25          |   |        |                     |        |
| Oswestry        | Gobowen         | -8                       | not given      | GWR023              | 2.50  | 75          |   |        |                     |        |
| Oswestry        | Knockin         | -8                       | not given      | KCK009              | 0.91  | 25          |   |        |                     |        |
| Oswestry        | Llanymynech     | -8                       | not given      | LYH007              | 1.85  | 50          |   |        |                     |        |
| Oswestry        | Pant            | -12                      | Fair           | PYC021              | 1.89  | 45          |   |        |                     |        |
| Oswestry        | Ruyton XI Towns | -1                       | Good           | RUW019              | 2.26  | 65          |   |        |                     |        |
| Oswestry        | St Martins      | -7                       | Fair           | SMH031              | 2.00  | 60          |   |        |                     |        |
| Oswestry        | St Martins      | -5                       | Fair           | SMH038              | 1.49  | 35          |   |        |                     |        |
| Oswestry        | West Felton     | -6                       | Fair           | WEF025              | 2.00  | 60          |   |        |                     |        |
| Oswestry        | Weston Rhyn     | -8                       | not given      | WRP017              | 1.40  | 40          |   |        |                     |        |
| Oswestry        | Weston Rhyn     | -6                       | not given      | WRP001              | 2.00  | 60          |   |        |                     |        |
| Oswestry        | Whittington     | -5                       | Good           | WHN024              | 2.50  | 70          |   |        |                     |        |
| Shifnal         | Shifnal         | -8 / -8                  | Fair           | SHF022/23           | 3.50  | 100         |   |        |                     |        |
| Shifnal         | Shifnal         | -3                       | Good           | SHF032              | 2.80  | 80          |   |        |                     |        |
| Shifnal         | Shifnal         | -11 / not assessed       | Poor / n/a     |                     |       |             | SHF018b/018d                                | 15     | Employment          |        |
| Shifnal         | Shifnal         | -4                       | Good           |                     |       |             |   |        | SHF019              | 10.00  |
| Shifnal         | Shifnal         | -11                      | Poor           |                     |       |             |   |        | P15b west           | 3.00   |
| Shifnal         | Shifnal         | -6                       | Fair           |                     |       |             |   |        | SHF17               | 36.00  |
| Shifnal         | Shifnal         | -8                       | Fair           |                     |       |             |   |        | P17a                | 3.00   |
| Shifnal         | Shifnal         | -7                       | Fair           |                     |       |             |   |        | SHF018a             | 4.50   |
| Shifnal         | Shifnal         | not assessed             | not assessed   |                     |       |             |   |        | P14                 | 10.00  |
| Shrewsbury      | Shrewsbury      | -9 / -1 / -5             | Poor/Good/Fair | SHR 158/060/161     | 40.00 | 1,200       |   |        |                     |        |
| Shrewsbury      | Shrewsbury      | -7 / -1 / -5             | Fair/Good/Fair |                     |       |             | SHR 158/060/161                             | 35     | Green space, comm'y |        |
| Shrewsbury      | Shrewsbury      | -3 / 1                   | Fair/Good      | SHR057/177          | 25.00 | 500         |   |        |                     |        |
| Shrewsbury      | Shrewsbury      | -14                      | Poor           | SHR216              | 23.00 | 300         |   |        |                     |        |
| Shrewsbury      | Shrewsbury      | -3                       | Fair           | SHR145              | 6.00  | 150         |   |        |                     |        |
| Shrewsbury      | Shrewsbury      | -6                       | Fair           |                     |       |             | SHR166                                      | 18     | Employment          |        |
| Shrewsbury      | Baschurch       | -3                       | Good           | BNP024              | 3.10  | 35          |   |        |                     |        |
| Shrewsbury      | Baschurch       | -5                       | Fair           | BNP035              | 1.20  | 20          |   |        |                     |        |
| Shrewsbury      | Bayston Hill    | -3                       | Fair           | BAV039              | 6.09  | 100         |   |        |                     |        |
| Shrewsbury      | Bayston Hill    | not assessed             | not assessed   | BAV050              | 3.10  | 60          |   |        |                     |        |
| Shrewsbury      | Bicton          | -6                       | Good           | BIT022              | 1.80  | 15          |   |        |                     |        |
| Shrewsbury      | Bomere Heath    | -1                       | Good           | BOM019              | 2.00  | 40          |   |        |                     |        |
| Shrewsbury      | Bomere Heath    | -3                       | Good           | BOM020              | 0.80  | 15          |   |        |                     |        |
| Shrewsbury      | Cross Houses    | -8                       | not given      | CSH004              | 1.80  | 40          |   |        |                     |        |
| Shrewsbury      | Dorrington      |                          |                | by Condover NP      |       | 73          |   |        |                     |        |
| Shrewsbury      | Ford            | -5                       | not given      | FRD011              | 4.10  | 50          |   |        |                     |        |
| Wem             | Wem             | 0                        | Good           | WEM010              | 4.20  | 120         |   |        |                     |        |
| Wem             | Wem             | -2                       | Fair           | WEM025              | 1.30  | 30          |   |        |                     |        |
| Wem             | Wem             | -7                       | Poor           | WEM033              | 3.00  | 60          |   |        |                     |        |
| Wem             | Clive           | -4                       | Fair           | CLV010              | 2.00  | 25          | allocation 20, document 25                  |        |                     |        |
| Wem             | Hadnall         | -2                       | not given      | HDL006              | 1.70  | 40          |   |        |                     |        |
| Wem             | Shawbury        | -3                       | not given      | SHA019              | 5.20  | 80          |   |        |                     |        |
| Whitchurch      | Whitchurch      | -8 / -6                  | Fair           | WHT037/044          | 8.57  | 190         |   |        |                     |        |
| Whitchurch      | Whitchurch      | -6                       | Fair           | WHT014              | 2.23  | 70          |   |        |                     |        |
| Whitchurch      | Whitchurch      | -3                       | Fair           | WHT042              | 8.20  | 180         |   |        |                     |        |
| Whitchurch      | Prees           | -4                       | Good           | PPW025              | 1.74  | 35          |   |        |                     |        |
| Total           |                 |                          | 115            | 93                  |       | 7,440       | 10  | 146.94 | 12                  | 169.36 |
|                 |                 | Good                     | 20             |                     |       |             | Assumption/adjustment made to agree numbers |        |                     |        |
|                 |                 | Fair                     | 49             |                     |       |             | Site is within the existing Green Belt      |        |                     |        |
|                 |                 | Poor                     | 16             |                     |       |             |   |        |                     |        |
|                 |                 | not given                | 23             |                     |       |             |   |        |                     |        |
|                 |                 | not assessed             | 7              |                     |       |             |   |        |                     |        |



## Appendix 9: Hierarchy of Settlements information and allocations

[illegible]

## General concerns about the Local Plan Review process

### Appendix 10: General concerns about the Local Plan Review process

#### General concerns

1. This appendix repeats both the Summary and the Detail of our general concerns about the Local Plan Review process, as expressed at the last round of consultation on it. We have updated it where appropriate, and have also revised the paragraph numbering.

#### Summary

2. In this section we attempt to summarise our previous comments, and to bring out key points.
3. General concerns
  - A. Out of date and incomplete information
    - i) An up-to-date Strategic Housing Market Assessment (SHMA) is still needed in order to be able to properly assess the impact of the housing strategy.
  - B. The lack of information relating to types of housing
    - i) There should be information on types of housing, particularly housing for older people, in order to form a judgment on amounts of housing and their allocation.
  - C. The Sustainability Appraisal
    - i) We are not convinced that the SA provides a sound enough rationale for the assessment of the options and allocations. This view is corroborated by the work of the Oswestry & District Civic Society.
  - D. The future economy of the County
    - i) We continue to be sceptical about the possible spin-off benefits to Shropshire of development areas outside its borders. Such areas may compete against Shropshire, rather than benefiting it.
    - ii) Our view is that a prosperous future for Shropshire will probably rely on a targeted approach to higher productivity growth, which benefits from Shropshire's attractiveness, along with support for the rural and environmental industries which the area is best suited to attract.
  - E. Consultation
    - i) The "moving target" nature of the consultation process has enabled the Council to introduce new evidence in a way that is not completely clear.
    - ii) The Council seems to have adopted inconsistent stances about (1) Government targets, (2) affordable housing, (3) competition with neighbours and (4) the over-65 population.



## General concerns about the Local Plan Review process

### Detail

#### A. Out of date and incomplete information

4. The new SLAA has now replaced the previously out of date 2014 version. A new Strategic Housing Market Assessment (SHMA) is expected in due course though not in time for this consultation. Both are implicitly part of what is required to develop a plan under paragraph 23 of the new NPPF.
5. The FOAHNs of July 2016 and October 2017 sought to establish the quantum of development but not, and critically, the type of housing development actually needed. We commented on their weaknesses in section 3 at the last round of consultation.
6. We continue to think that the Council has set far too high a housing target. It is against public opinion. It is well ahead of its own so-called “objective assessment of need” and even further ahead of any genuine need. It is aspirational, based partly on the ambitious targets of the Economic Growth Strategy. Furthermore, such ambitious targets have not been deliverable in the past, so will make it harder for the Council to prove it has a five-year supply of housing. Failure to prove this leaves it prey to unplanned development by developers, just as it was before SAMDev was finally adopted.
7. This means there is still no real explanation as to:
  - a. The reasoning behind the choice of those quanta of housing;
  - b. The impact that might have on other policy areas;
  - c. The impact that might have on the type of housing provided;
  - d. The realism of the economic growth projections; and
  - e. The justification for claims relating to the HS2 and other external factors.
8. Without that analysis by the Local Authority it is inevitably harder for external bodies to critically assess the Local Plan Review to this stage of the consultation process.

#### B. The lack of information relating to types of housing

9. CPRE does understand that this is a partial review. However we are concerned that it does not yet, at this stage of the consultation process, include options for the type of housing to be provided or how affordable housing will be prioritised.
10. Paragraph 61 of the new NPPF states:

*Within this context [of a housing need assessment], the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).*

## General concerns about the Local Plan Review process

11. The SHMA for SAMDev demonstrated the need for particular types of housing and, most obviously, to accommodate the ageing population in the County, which is projected to continue whatever policies are pursued, not just because of the current retired population in the County but because of the bulge of 45-65 year olds in the demographic profile and the attractiveness of the County to retiring in-migrants.
12. It is an issue we specifically raised with the Council when we met officers in July 2016. The NPPG in relation to Housing Needs Assessment (Paragraph: 021 Reference ID: 2a-021-20160401) is clear on this point.

*'Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities should therefore identify particular types of general housing as part of their assessment.'*

13. We still would like Shropshire Council to take the lead in seeking to develop policies in this review that will ensure housing is provided which is appropriate to older people. This will also help free up larger homes for the rest of the market. At the same time it could help to ensure the emerging plan remains consistent and up to date with policy in this area.
14. To help achieve this goal it will be essential that the updated SHMA includes some detailed analysis of the need for specific types of housing (as is being done in some other areas), including housing with additional provision for older people and housing that is wheelchair accessible, and that this evidence is used to inform specific policies and targets in the plan which goes for examination.

### C. The Sustainability Appraisal

15. Firstly, in paragraphs 15 to 22 below, we repeat verbatim the comments we made at paragraphs 1.19 to 1.26 of our consultation response at the Issues and Strategic Options stage. Although these comments were clearly made under the heading "Sustainability Appraisal", for some reason they were not captured in Appendix 1 of the SA for the Preferred Options stage, which listed only four consultation responses, but not ours. There is therefore doubt as to whether they were taken into account at that stage. For greater clarity, we indent these comments.
16. The consultation is accompanied by a Sustainability Appraisal, based on a Scoping Exercise in Dec 2016. Not surprisingly the Sustainability Appraisal is fairly broad in its comments given the lack of detail on development proposals at the Options Stage. However, it seems to us flawed in how it addresses the baseline data.
17. While useful information is supplied in the Scoping Study, the Appraisal seems to assume that the baseline is (by default) an extrapolation of current policies. NPPG (016 Reference ID: 11-016-20140306) says that:

## General concerns about the Local Plan Review process

*‘The term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan and their likely evolution without implementation of new policies.’*

18. The interpretation in the SA leads, for example, to the conclusion that Option 2 for Housing has no adverse effects in many categories because it continues the current housing trajectory. This does not seem to allow the Sustainability Appraisal to consider the cumulative impacts of such an approach (as is required by Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004) or whether environmental limits would be breached as would be required if the Plan is to achieve: *‘the objective of contributing to the achievement of sustainable development’* (NPPG: 001 Reference ID: 11-001-20140306.)
19. It is almost inevitable when considering Urban Extensions, for example, that the first ones given planning permission will be on less sensitive locations. So a continuation of Urban Extensions at the same location will be likely to increase the environmental impact in a non-linear way and have cumulative impacts alongside the other extensions.
20. It is also difficult to consider the Options for Distribution discretely to the overall numbers, not least because some areas of the County are more environmentally sensitive than others.
21. A further problem is the way mitigation is treated in the SA. Lack of development, for example, is seen as prohibiting investment in Public Transport. However, during recent years of significant development there have been many cut backs in public transport and experience suggests that however much Public Transport investment is put in place it will not compensate for the choice of a less sustainable, more car dependent location. [We now add that: The evidence of transport planning is straightforward. The best way to get sustainable transport is to start with sustainable places. Indeed, a greater threat to public transport up-take, in our view, is the pursuit by the council of large-scale road schemes, such as the Shrewsbury North West Relief Road].
22. Lastly, the SA only considers the options set out in the document. It seems reasonable to us that an option equivalent to the Council’s FOAHN, and a figure significantly below it, should both also have been included.
23. For all these reasons we are not convinced the SA, as it stands, provides a sound enough rationale for the comparison of all reasonable options.
24. These comments still remain relevant at this consultation stage.
25. In addition, we understand that, in answer to questions from the Oswestry & District Civic Society about the SA at the Preferred Options stage, the Council responded in connection with many sections of it that *“The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic”*.

## General concerns about the Local Plan Review process

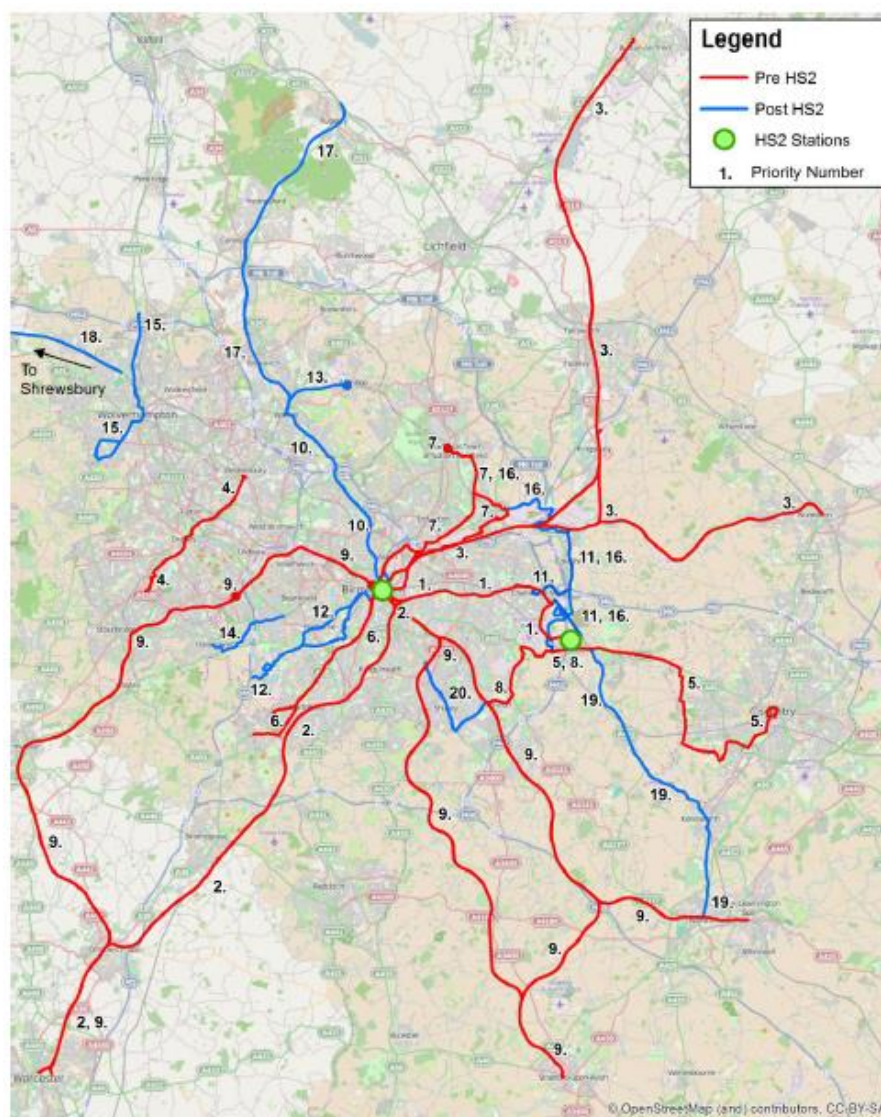
26. We also understand that the Oswestry and District Civic Society undertook a reappraisal of the SA at the Preferred Options stage using the professional judgment of its own professionally qualified expert. That reappraisal concluded that overall the SA gave a negative assessment rather than the positive one claimed by Shropshire Council. The conclusion is consistent with our view that the Preferred Options Strategy does not represent sustainable development.
27. Again, as stated above on page 13, paragraph 8.13, these comments were not captured in Appendix A to the present SA.

### D. Economic background, and assumptions made about the future economy of the County

28. We continue to favour a more targeted approach to the future economy of Shropshire that would encourage the development of newer and more innovative industries. We therefore believe it appropriate to repeat the arguments we made for the consultation on the Issues & Strategic Options Stage, and for the consultation on the Economic Growth Strategy, particularly in the light of our analysis from pages 4 to 8 above.
29. Firstly then, in paragraphs 29 to 42 below, we repeat verbatim the comments we made at paragraphs 1.30 to 1.43 of our consultation response at the Issues and Strategic Options stage. Again, for greater clarity, we indent these paragraphs.
  30. Para 154 of the NPPF says '*Local Plans should be aspirational but realistic*'. Local Authorities have been warned in the past against the use of predictions in LEP Bidding Documents, for example. The Options paper cites three key elements which it sees as supporting a bullish approach to future economic growth.
    - i. The West Midlands Combined Authority (and Midlands Engine)
    - ii. The Northern Powerhouse
    - iii. The Northern Gateway.
  31. The paper does not seem to offer any specific clear reason why these should benefit Shropshire apart from their relative proximity, which may also mean they compete against Shropshire, especially if significant amounts of land and housing are released nearby.
    - i. ***The West Midlands Combined Authority (WMCA)***
      32. The WMCA is based around the West Midlands Conurbation. Telford and Wrekin are associate members but not Shropshire. In terms of the promotion of economic development their aim appears to be concentrated mainly on the conurbation and surrounding districts. A significant amount of their effort is based around the new HS2 Stations in Solihull and Birmingham and how to link those to other parts of the conurbation. It is true that they have identified development opportunities in areas closer to Shropshire but we see no reason to believe these are being prioritised.

## General concerns about the Local Plan Review process

33. The Midlands Engine and Midlands Connect further dilute any possible benefits because their main impact is to improve connectivity between the WM conurbation and the East Midlands.
34. If one examines specifically the HS2 Connectivity Package they are involved in, it includes a large number of schemes for development prior to HS2 which would enhance connectedness around the conurbation and in the East Midlands, but only one scheme benefiting Shropshire (the electrification from Wolverhampton to Shrewsbury), to be considered after HS2 is in place.



Source: AECOM

35. The same scheme is identified by Midlands Connect for development work to commence between 2025 and 2030, with actual work in the longer term period of 2030 onwards.

### ii. *The Northern Powerhouse*

36. It is hard to see how the Northern Powerhouse, which aims to enhance development across the North, would impact significantly on Shropshire.

## General concerns about the Local Plan Review process

### iii. *The Northern Gateway*

37. The Northern Gateway is much closer and would create a major investment strategy around the new HS2 Crewe Station. It aims to provide 100,000 new jobs and 120,000 new homes around Crewe and North Staffordshire. It does not include Shropshire in its prospectus.
38. Immediately next to the HS2 station at Crewe the Cheshire East High Growth area includes nearly 340 hectares (Ha) of land.
39. The Northern Gateway Development Zone (NGDZ) prospectus also promotes a further 30 Ha at Winsford, 140 Ha in the Ceramics Valley Enterprise Zone, 34 Ha at Meaford, 152 Ha at Keele University, and 47 Ha at Blythe Valley.
40. While the HS2 station would have a 40 minute rail link to Shrewsbury it would also have similarly close links to Stoke, Stafford, Chester, Liverpool and Manchester. Within the Northern Gateway proposals, improvements are supported on the A500 from Crewe to Stoke and a new rail connection from the HS2 Station to the Stoke/Derby route which would further cement the economic gain to competing districts around the HS2 hub rather than to Shropshire.
41. Given such a dramatic change it is hard to do more than speculate about how the Gateway might benefit a peripheral County such as Shropshire, but previous history, both nationally and internationally, would suggest that improvements to transport infrastructure largely benefit those areas very close by whilst other areas only gain significantly if there are additional infrastructure investments.
42. It is not surprising that Shropshire wishes to promote itself on the back of HS2, but with so much land likely to become available more closely linked to the station it would seem that the greatest way Shropshire is likely to benefit is from attracting specific higher value economic activity drawn in by the environment and quality of the area.
43. It would also suggest that a higher level of housing, rather than supporting the County's economy, could simply create increased commuting to new sites in Crewe and elsewhere in the Northern Gateway (as well as allowing people to retire from surrounding areas). For this reason alone the optimum distribution of housing in Shropshire (between the three options) may vary depending on how much housing is proposed.
44. These comments still remain relevant at this consultation stage.
45. In our response to the consultation on the Economic Growth Strategy we referred to our above comments for the consultation on the Issues and Strategic Options stage of this Local Plan Review and went on to say (again indenting the relevant paragraphs for clarity):
46. In summary, we argued [at the I&SO stage] that developments elsewhere within the West Midlands Combined Authority (and Midlands Engine), the Northern Powerhouse



## General concerns about the Local Plan Review process

and the Northern Gateway would not clearly benefit Shropshire apart from their relative proximity. That proximity may also mean that they compete against Shropshire, especially if significant amounts of land and housing are released nearby.

47. The I&SO consultation made only passing reference to the Marches LEP which is now also brought forward to support the Council's bullish ambition for economic growth. The NPPF requirement at paragraph 154 that 'Local Plans should be aspirational but realistic' does not justify an overly bullish approach, nor 'a step change in . . . economic productivity', nor an aim 'to achieve maximum economic productivity'.
48. As to our responses to the detailed I&SO consultation questions 6 to 9, our view is that a prosperous future for Shropshire will probably rely on a targeted approach to higher productivity growth, which benefits from Shropshire's attractiveness, along with support for the rural and environmental industries which the area is best suited to attract. The provision of good quality broadband and smaller units, for example starter units, may be as important as large scale sites.
49. If Shropshire is to benefit from developments such as HS2 it needs to create its own particular offer, especially as there may be an excess of high-quality sites coming on stream closer to HS2, rather than replicating what is available at better locations near the HS2 Northern Gateway station.
50. In general terms we would support Option 3: Productivity Growth, because a more targeted approach seems the most appropriate. The approach of Option 3 is, in our view, more appropriate to Shropshire and would encourage the development of newer and more innovative industries. It appears to us that Option 3, with some flexibility for review, is likely to be the most forward looking approach.
51. There is no need for Shropshire to compete with neighbouring authorities for employment opportunities. The approach to the economy should be a collaborative one.
52. Again, we believe these comments remain valid, particularly in view of our conclusion above that the Council's calculations are in error, and that they do not support an employment land need as high as the Preferred Option of 305 hectares.
53. We bring together here our previous responses to the consultation on the I&SO and the EGS for another reason, too. As the Council is aware, we have pointed out that the consultation on the EGS was launched before the consultation on the I&SO had finished. There therefore remains doubt as to whether these two sets of consultation responses had been considered together.

### E. Concerns about the consultation process

54. We begin our comments on the consultation process by repeating what we said in our similar comments of April 2017 on the Draft Economic Growth Strategy, namely:

## General concerns about the Local Plan Review process

It is our understanding that the legal principles relating to “consultation” mean that a consultation process must satisfy the requirements of fairness.

- i) The essence of consultation is:
    - (a) That it must be undertaken at a time when the proposals are at a formative stage;
    - (b) It must include sufficient reasons for the particular proposals to allow those consulted to give intelligent consideration and an intelligent response;
    - (c) It must give adequate time to allow those consulted to give intelligent consideration and an intelligent response;
    - (d) The product of consultation must be conscientiously taken into account when the ultimate decision is taken.
  - ii) Consultation axiomatically requires the candid disclosure of the reasons for what is proposed.
55. The latest stage of the ongoing “conversation” about consultation is set out above in Section 2 on page 2 and in Appendix 2. Our concerns about the consultation process surrounding the Economic Growth Strategy combined with the Issues and Strategic Options stage of the Local Plan Review also remains pertinent.
56. We recognise that Shropshire Council’s reasons for its treatment of the results of the previous consultations are that (1) a consultation is not a referendum, (2) responses to consultations do not stand alone, but that headline preferences expressed by a proportion of respondents are weighed both against (3) specific comments made, and (4) against existing and emerging evidence.
57. We continue to contend that the impression left is that the consultation process is a moving target, and a mechanism for Shropshire Council to seek views which support the direction in which it has already decided to go, and not to take on board views which run counter to that, even when those views are in the majority, and are supported by valid evidence. That does not represent open consultation as set out at paragraph 54 above.

### **F. Matters affecting the consultation, but not consulted on**

#### ***Constraints within the policy team and fear about becoming out-of-date***

58. We acknowledge that Shropshire Council’s planning policy team is small and is under-resourced; we acknowledge that the exercise involved in building up the Hierarchy of Settlements document was a considerable one, albeit largely a desk-top exercise; and we acknowledge that Shropshire Council is committed to a demanding programme for the Local Plan Review and is therefore reluctant to contemplate any change in its preferred course which might cause delay and increase the risk that developers or their agents will challenge the Local Plan for being out-of-date, as the latter stages of this Review process approach.

## General concerns about the Local Plan Review process

59. However, none of that should be a reason not to take on board, or to deflect, justifiable concerns about any aspect of this Local Plan Review.

### *Strategic Goals*

60. Paragraph 1.7 of the main Preferred Scale and Distribution of Growth consultation document proposes ten strategic objectives for the Local Plan Review, which we summarise as follows:
- i) Provide an appropriate development strategy for 2016-2036.
  - ii) Secure a five-year land supply for housing and employment development.
  - iii) Support the development of sustainable communities, ensuring access for all to affordable homes etc.
  - iv) Develop the roles of Shrewsbury, Principal and Key centres.
  - v) Support rural communities through the delivery of local housing and employment opportunities.
  - vi) Promote sustainable economic development and growth.
  - vii) Support development of sustainable tourism, the rural economy, broadband connectivity and agriculture.
  - viii) Promote high quality design and locally attractive places.
  - ix) Protect Shropshire's diverse and high-quality environment.
  - x) Improve outdoor space and recreation facilities for health and well-being.
61. The first seven of these are essentially as set out at the Issues and Strategic Options stage, but the last three were new additions at the Preferred Options stage.
62. Most of these strategic objectives are commendable, though we comment below on some inconsistencies between them and the Council's approach within the Preferred Options. But we do question why comments on them were not specifically being sought in the consultation questionnaire, particularly in view of the changes made since the Issues and Strategic Options stage.
63. The first inconsistency we point up is within objective ii) above. The higher the targets the greater is the chance of failing Government tests of delivery. Surely then it would have been more prudent to have set lower, more realistically achievable development targets?
64. The second inconsistency is within objective iii) above in connection with the delivery of affordable housing. Core Strategy policy CS11 set an initial target of 33% affordable houses. Delivery up to March 2017 was only about 21%<sup>11</sup>.
65. It is a constant and justifiable concern that there are insufficient affordable houses for local people. It is a greater proportion of affordable houses that is needed. Relying on developers to provide those affordable houses is never going to provide the desired proportion of these affordable houses.

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<sup>11</sup> Authority's Monitoring Report (AMR), March 2018: figures on page 33, compared with total completions on page 28 for the same seven year period, show an average of 21.1%

## General concerns about the Local Plan Review process

66. At paragraph 2.6 of the consultation document at the previous stage it is stated that *“Achieving the proposed ‘high’ level of growth at 28,750 dwellings . . . provides an opportunity to . . . increase the delivery of . . . affordable housing”*. It is not sensible to adopt a policy that requires four market, demand-led, houses to be built for the delivery of every one affordable dwelling.
67. It is therefore to be welcomed that the Council is adopting measures to achieve a greater proportion of affordable homes.

### *Unpublicised background thinking*

68. At the Cabinet meeting of 18 October 2017, when the Preferred Options papers were tabled for approval, some key aspects of the thinking behind the Local Plan Review were aired that were not publicised within the consultation papers. Those views, that colour the Council’s strategy, were not offered by the Council for consultation.
69. We believe that the remarks made at that Cabinet meeting did shine an instructive light on background thinking that has not made overt in the consultation papers.

### *Competition*

70. Remarks made about increasing competition in order to attract employment were particularly striking as new thinking, and not mentioned anywhere in the other papers. This implies that Shropshire Council is intending to enter a game of competitive leapfrog with its 11 neighbouring Local Authorities, each of them trying to outdo its neighbours to attract employees by building houses and creating employment sites. It is instructive to note that Telford & Wrekin Council, for example, had its 20-year housing target of 17,280 new dwellings confirmed, compared to its new Government OAN figure of only 11,100. On that score, Telford & Wrekin already aspires to be 56% ahead of “need”, compared with Shropshire Council, whose Preferred Option is 13% ahead of the Government OAN figure. Telford & Wrekin is therefore already well ahead in this competition of aspiration.
71. We think that to act competitively in this Authority-centric way is to enter a misguided war of escalation. It would be better to co-operate with neighbouring Local Authorities rather than to compete with them (see paragraph 51 above). In fact, paragraph 27 of the new NPPF states:  
  
*In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency*
72. One of the Council’s top-line strategies (see page 15 above) is *“to support the growth aspirations of neighbouring areas, particularly in the north and east of the County”*. Yet it has yet to *make publicly available* any statements of common ground (or even Duty to Co-

## General concerns about the Local Plan Review process

operate Protocols) as part of this Review process *to provide transparency* in the required way.

73. Such statements may perhaps be published at the next stage of consultation on “strategic sites”. Their absence at present makes for lack of transparency at this stage, particularly as regards sites within the Green Belt, and highlights the “moving target” nature of the consultation process.

### Ageing population

74. Concern was also expressed about Shropshire’s ageing population in that the latest ONS population projections estimate that Shropshire’s 65 and over population will grow by 56%, making up 33% of our entire population by 2036, which is well above the national average.
75. We have interrogated these latest ONS population projections<sup>12</sup>, as used by Government in calculating the new housing need figures. Although it is true that the projections indicate that Shropshire’s 65 and over population will make up 33% of the population by 2036, Shropshire is only carrying on the national trend of an increasing proportion of over 65s, but starting from a higher base. The projected increase from 2016 to 2036 is 50%, not 56%.
76. We see no conceivable circumstance in which Shropshire would become unattractive to retirees. Its tranquillity and beauty suggest that it will remain a place to which people will continue to want to retire. We cannot imagine a strategic aim in the plan that could change that, which would not at the same time be detrimental to the quality of life of people living in the County.
77. As we said above in paragraph 13, there is a pressing need to provide particular types of housing and, most obviously, to accommodate the ageing population in the County, which is projected to continue whatever policies are pursued, not just because of the current retired population in the County but because of the bulge of 45-65 year olds in the demographic profile and the attractiveness of the County to retiring in-migrants.

### Top-down influence

78. There is a genuine concern that the Preferred Options have been arrived at, not bottom-up from evidence, but top-down. A corollary is our fear that, whatever arguments are produced by local residents, they will fail because the Council’s position is already deeply entrenched.
79. A document that does provide some useful background, and a wider context to the Local Plan Review, is the Council’s Corporate Plan 2016/17<sup>13</sup>, although it is not mentioned in the consultation documents.

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<sup>12</sup> 2014-based Subnational population projections, Table 2: Local authorities and higher administrative areas within England, 5 year age groups, Persons,  
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>13</sup> Available at <https://shropshire.gov.uk/shropshire-council/corporate-plan/> , dated 21.11.16