

## CPRE Shropshire's Guide for responding to Shropshire Council's Consultation on Preferred Sites

*This is an important consultation which affects all local areas around the county – please consider responding to it.*

The relevant documents can be accessed from:

- [the main Preferred Sites Consultation page](#) and from
- [the Evidence base page](#)

Our [Catalogue](#) lists all the 6,000+ pages of documents (though only 323 pages are deposited as hard copies in the libraries), but you only need to read a small part of those documents.

### **1) Read what is proposed for your own area**

- Go to [the main consultation page](#), scroll down, and find and download the Preferred Sites Consultation and the Preferred Sites Questionnaire for your own Place Plan Area. Those have all the detail for your local towns and Hub villages, without you having to wade through the [full 225-page, 23MB document](#) (for the whole county).
- First of all, see what you think of what is proposed for your own patch. To help you put your patch in perspective, we have summarised all the proposals in a [Table](#), (which you may need to enlarge!) which also shows the scores used by the Council in deciding which villages should be Hubs. It is taken as read that all the towns should get further development, and they have also been given allocations of employment land.
- If you want to look in more detail at some of the background assessments, we suggest:
  1. The [19-page introduction section](#) to the main consultation document
  2. The **Sustainability Appraisal Reports** at the foot of [the main Preferred Sites Consultation page](#). The [Appendices](#) list the scores awarded to each promoted site, on criteria that have some overlap with the Hierarchy of Settlements scores used to choose the Hubs. However, a criticism that has emerged is that these appendices omit any consideration of the main factors relating to carbon emissions, which are potential car usage and proximity to employment and supermarkets etc. It can be argued that, when carbon saving should be enshrined in policy, no rural settlement is

sustainable, because most people living there commute by car to work and to the shops.

3. The [Landscape and Visual Sensitivity Assessments](#) for each settlement. These were last prepared before we went Unitary. Their role is to help "inform" the choice of both preferred sites and potential exception sites in each location. The reference number of each assessment is shown on our above [Table](#). Again, if you do have the inclination to look at these for your patch, you may disagree with the "professional judgement" given, which after all, is only an opinion.
4. The Site assessments by Place Plan area, which tell us how each promoted site was assessed by the Council, before they chose the ones they propose to allocate. These lengthy documents account for half of the overall documentation, and two of them (for Market Drayton and Whitchurch) have still not appeared, nearly three weeks into the consultation. They can be found at the bottom of the Housing section of the [Evidence base](#) page.

## **2) If you are in the Green Belt, read the Green Belt Review for your area:**

Shropshire Council wants to release Green Belt land for development and has commissioned a Green Belt Review (available on the [Green Belt tab of the Evidence base page](#)). There are separate assessments for Albrighton, Alveley, Bridgnorth, Cosford, Junctions 3 and 4 of the M54, and Shifnal, which can be found at the bottom of that Green Belt tab.

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 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.*

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.

Shropshire Council is proposing to "safeguard land for future development" in Albrighton, Alveley, Bridgnorth and Shifnal. That means that the land is not released for development in this plan period of 2016-36, but that it will be released after 2036.

No plans are presently announced for release of any land around Junctions 3 and 4 of the M54, and any plans around Cosford will be announced in late Spring 2019, which is when there will be another round of consultation on the so called "strategic sites" (Ironbridge Power Station, Tern Hill, Garden Villages around Tong etc, Cosford etc).

There is pressure on Shropshire Council to take some of the unmet housing need from the West Midlands/Black Country. That will no doubt figure in their thinking for the Green Belt, and for the Strategic Sites that are expected to be consulted on in late Spring 2019.

## **3) Go along to the consultation event for your area**

Shropshire Council do not have the manpower to go to every affected settlement so they are holding events by Place Plan area. The dates are noted on our Table and on our Catalogue, but are listed in detail under the [Consultation events tab on the main Preferred Sites Consultation page](#). Most events are in January at 7pm, but check the exact details for your own area. The events for the Shifnal and Wem areas have already happened.

#### **4) Fill out the questionnaire for your patch**

Shropshire Council prefers responses to be sent electronically, using the interactive pdf questionnaire. However, don't be afraid to expand your views beyond the questions asked and, if necessary, to send in longer responses using a separate document.

The Council questionnaire asks, of each Hub village location:

*a) Do you agree it should be a Hub?*

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

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

*d) Then, in more detail, do you agree with each allocated site, where an allocation has been proposed?*

*e) For settlements in the Green Belt, there is also the question: Do you agree with the preferred area(s) of safeguarded land?*

In considering question b) consider whether you think the allocation is fair, bearing in mind that across the county, the average growth for each settlement is set to be about 25%. Our above [Table](#) shows the proposed % increases.

For instance, you may not agree with the scores awarded by Shropshire Council in picking the Hub villages. Some villages are contending them vigorously. The document we have summarised in our table is chiefly the Council's [updated Hierarchy of Settlements report](#), showing the revised scores.

#### **5) Consider also answering the four general questions at the front of each questionnaire and the one right at the end.**

**These are:**

##### **Delivering Local Housing Needs**

3 *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?*

(The "cross subsidy" idea is that developers will be able to buy land more cheaply on a non-allocated site, and can then get planning permission by offering a higher proportion than normal of affordable housing. See [pages 13-14 of the main consultation document](#).)

4 *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). This mix will be geographically defined and subject to findings of a viability assessment undertaken as part of the Local Plan Review.*

(At the moment, affordable housing contributions vary across the county. They are only 10% around Oswestry and Ellesmere and in some other towns, are 20% in most of the south of the county, and are 15% elsewhere. The Council are offering a choice: a defined percentage of affordable housing, along the present lines but presumably significantly higher, or a negotiation on every cross-subsidy site.)

## **Windfall Development**

*The Local Plan supports appropriate windfall development where it complies with the policies within the Local Plan. As such, Shropshire has historically always had high levels of residential and employment windfall development.*

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

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

(“Windfall” sites tend to be smaller sites, often infill sites. As stated, there have historically always been high levels of these.)

## **Further Information**

*63. Do you think any additional ‘Community Clusters’ to those identified 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?*

(You may have views on whether there should or should not be Clusters in your patch. The proposed policy is that Clusters will have only infill development.)

There is also box 64 in which you can make any further comments on the Consultation.

***As stated above, do not be afraid to expand your views beyond the questions asked and, if necessary, to send in longer responses using a separate document.***

***Thank you for taking part in the consultation!***

***(20th December 2018)***