



# The countryside charity Shropshire

## **Consultation on Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038**

**Response from CPRE Shropshire**

**February 2021**

## Contents

	Page
1. Introduction .....	4
2. Consultation .....	7
Details .....	7
Modification(s) considered necessary .....	9
3. Sustainability Appraisal.....	10
Details .....	10
Modification(s) considered necessary .....	11
4. SP1 The Shropshire Test (and Spatial Vision) .....	12
Details .....	12
Modification(s) considered necessary .....	12
5. SP2 Strategic Approach and the Climate Emergency.....	14
Details .....	14
The climate emergency and carbon footprints .....	19
The housing numbers .....	21
The employment numbers.....	23
Employment density .....	25
The equation between houses and jobs .....	27
Other inconsistencies in the employment figures .....	28
Duty to Co-operate .....	29
Hierarchy of Settlements and the designation of Community Hubs .....	29
Modification(s) considered necessary to SP2 as a whole .....	32
6. SP3 Climate Change.....	34
Details .....	34
Modification(s) considered necessary .....	37
7. SP7 Managing Housing Development.....	38
Details .....	38
The right home in the right place .....	38
Modification(s) considered necessary .....	39
8. SP11 Green Belt and Safeguarded Land .....	40
Details .....	40
Modification(s) considered necessary .....	41
9. SP12 Shropshire Economic Growth Strategy .....	42
Details .....	42
Modification(s) considered necessary .....	43
10. SP15 Whole Estate Plans .....	44

<b>Details .....</b>	<b>44</b>
<b>Modification(s) considered necessary .....</b>	<b>44</b>
<b>11. DP11 Minimising Carbon Emissions.....</b>	<b>45</b>
<b>Details .....</b>	<b>45</b>
<b>Modification(s) considered necessary .....</b>	<b>45</b>
<b>12. DP23 Conserving and Enhancing the Historic Environment.....</b>	<b>47</b>
<b>Details .....</b>	<b>47</b>
<b>Modification(s) considered necessary .....</b>	<b>47</b>
<b>13. DP24 Shropshire Hills Area of Outstanding Natural Beauty .....</b>	<b>48</b>
<b>Details .....</b>	<b>48</b>
<b>Modification(s) considered necessary .....</b>	<b>48</b>
<b>14. DP26 Strategic, Renewable and Low Carbon Infrastructure.....</b>	<b>49</b>
<b>Details .....</b>	<b>49</b>
<b>Modification(s) considered necessary .....</b>	<b>49</b>
<b>15. DP28 Communications and Transport.....</b>	<b>50</b>
<b>Details .....</b>	<b>50</b>
<b>Modification(s) considered necessary .....</b>	<b>51</b>
<b>Settlement policies .....</b>	<b>52</b>
<b>16. S3 Bridgnorth Place Plan area .....</b>	<b>52</b>
<b>Details .....</b>	<b>52</b>
<b>Modification(s) considered necessary .....</b>	<b>53</b>
<b>17. S11 Market Drayton Place Plan area .....</b>	<b>54</b>
<b>Details .....</b>	<b>54</b>
<b>Modification(s) considered necessary .....</b>	<b>54</b>
<b>18. S14 Oswestry Place Plan area.....</b>	<b>55</b>
<b>Details .....</b>	<b>55</b>
<b>Modification(s) considered necessary .....</b>	<b>56</b>
<b>19. S15 Shifnal Place Plan area.....</b>	<b>57</b>
<b>Details .....</b>	<b>57</b>
<b>Modification(s) considered necessary .....</b>	<b>58</b>
<b>Appendix 1 : Consultation response to Draft Statement of Community Involvement .....</b>	<b>59</b>
<b>Appendix 2 : Consultation Response Analyses .....</b>	<b>72</b>
<b>Appendix 3 : Catalogue of Evidence Base .....</b>	<b>92</b>

## 1. Introduction

- 1.1 This response addresses multiple issues and rather than submit multiple separate Part B response forms, we reproduce in our text below replicas of the relevant parts of the form for each such instance, in the form as below. We have included only the pertinent boxes in each case.

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph

Policy

Site

Policy map

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

A. Legally compliant

Yes:

No:

B. Sound

Yes:

No:

C. Compliant with the Duty to Co-operate

Yes:

No:

#### Q4. Please give *details* of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. We deal with this under "*Details*"

#### Q5. Please set out the *modification(s) you consider necessary* to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above. We deal with this under "*Modification(s) considered necessary*"

- 1.2 CPRE Shropshire is a registered charity run by volunteers, with one part-time employee, and which currently has around 400 registered members throughout the ceremonial county of Shropshire.
- 1.3 We have engaged with Shropshire Council at all consultation stages of the Local Plan Review process and its related Economic Growth Strategy, which have been:

	Stage	Consultation dates	Duration
a)	Issues and Strategic Options	Monday 23 January 2017 – Monday 20 March 2017	8 weeks
b)	Draft Economic Growth Strategy	Monday 13 March 2017 – Friday 28 April 2017	7 weeks, overlapping
c)	Preferred Scale and Distribution of Development	Friday 27 October 2017 – Friday 22 December 2017	8 weeks
d)	Preferred Sites	Thursday 29 November 2018 – Friday 8th February (extended from Thursday 31 January 2019)	10 weeks
e)	Strategic Sites	Monday 1st July 2019 – Monday 9th September 2019	10 weeks
f)	Regulation 18 Pre-submission Draft Plan	Monday 3rd August 2020 – Wednesday 30th September 2020 (extended to 9th October in some cases)	8/10 weeks

- 1.4 Throughout the consultation process we have consistently put forward detailed arguments in support of our position, which can be summarised as that the plan:
- i) has a flawed consultation process, which is undemocratic
  - ii) seeks growth well in excess of demographic need, which is not truly sustainable, because it is at odds with both the climate emergency and the ecological emergency;
  - iii) has targets for both housing and employment land that are unreasonably high, based on figures that are questionable; and
  - iv) won't get the right sort of houses, particularly affordable houses, built in the right places.
- 1.5 Shropshire Council has not accepted our arguments and has advised that if we disagreed with its position we could argue the case in front of an Inspector.
- 1.6 This submission is therefore primarily addressed to the Examining Inspector, in the expectation that Shropshire Council will, at this stage of the process, not make amendments to its Plan as a result of our arguments. We therefore repeat and elaborate on the matters where we consider the Plan to be not legally compliant, unsound or not compliant with the Duty to Co-operate.
- 1.7 Our understanding is that Inspectors test the Plan solely against legislation and the tests of soundness in NPPF paragraphs 35 and 36, as follows:

### **Examining plans**

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

36. These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

- 1.8 We are aware that, at Examination in Public, Inspectors have to apply this statutory focus, but we think there is merit also in laying out some related facts. As well as believing that the plan is incompatible with climate change goals, there are other elements within it where evidence is in conflict. Several of the policies are therefore not 'justified' by proportionate evidence.

- 1.9 We do endorse many of the policies within the Plan, but in this submission we necessarily concentrate on the policies that we consider to be unsound.
- 1.10 We recognise the huge effort made by the limited number of officers involved, particularly under the Covid19 restrictions, although there are signs that some parts of the documentation have been hurriedly put together and not properly checked.
- 1.11 We now elaborate further. We begin with matters affecting the whole plan, namely Consultation and Sustainability, but the core of our objection to the plan revolves around policy SP2: Strategic Approach.

## 2. Consultation

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  Whole Draft Plan particularly SP2

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant  
B. Sound

Yes:  No:   
Yes:  No:

### Details

- 2.1 We submit, in summary, that consultation has not been carried out in conformity with:
- i) an up-to-date and adopted Statement of Community Involvement (SCI), because such an SCI did not exist at the time of this consultation, and
  - ii) the Gunning principles of consultation.
- Statement of Community Involvement*
- 2.2 Shropshire Council's Statement of Community Involvement, dated 2011, had become out of date from 6 April 2018 by virtue of regulation 10A of TCP (Local Planning) (England) (Amendment) Regulations 2017/1244 requiring it to be reviewed. In recognition of this a new draft has been prepared by officers and was consulted on in parallel with the present Regulation 19 consultation. We include our response to this consultation as Appendix 1.
- 2.3 The summary on the last page of Appendix 1 includes the following
- i) The update of the DSCI should have been carried out some time ago, rather than being left to the last minute in order to tie in with the statutory requirements connected with the Regulation 19 consultation on the Draft Plan.
  - ii) The general principles of consultation in the Gunning principles and in the seven Criteria within Government's own Code of Practice on Consultation should be spelt out within the DSCI.
  - iii) Consultations should be for a minimum of 12 weeks, as recommended by Government. Some Parish Councils do not meet often enough to be able to give due formal consideration to a consultation that is for only 6 weeks.
  - iv) Consultations should, as far as possible, avoid holiday periods, or be for a significantly extended period if they do straddle a holiday period.
  - v) If a direct choice between multiple options is offered in a consultation the Council should ensure that its policies reflect the results of the poll on those options.
  - vi) Reports on consultations should explain how the Council has arrived at its conclusions from those consultations.

### *Gunning principles*

- 2.4 The Gunning principles are that:
- i) Consultation must take place when the proposal is still at a formative stage
  - ii) Sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response
  - iii) Adequate time must be given for consideration and response
  - iv) The product of consultation must be conscientiously taken into account
- 2.5 Our analysis of consultation responses from the first two consultations showed that people and Town & Parish Councils were overwhelmingly against the high targets; it is only developers and the council itself that want them<sup>1</sup>. The council's response to this evidence was, essentially, that a consultation is not a referendum, that although there was a majority for lower options, there was a good level of support for the highest option, that they knew what was best for most people, that what they were really looking for was good arguments, and that if we disagreed we could argue the case in front of an Inspector.
- 2.6 Our case is that the Council has therefore not conscientiously taken into account the product of consultation in a proper manner.
- 2.7 During the latest Pre-Submission consultation, we queried with the Council the fact that some evidence documents, stated within Appendix 3 of the Draft Plan to be Key, had not actually been published, because they weren't ready. The Council's response was essentially that that was alright, as long as the missing documents were produced for the Regulation 19 stage of consultation. Now, at the Regulation 19 stage, some of those supposedly Key documents are still missing from the evidence base. The most glaring omission is an up-to-date Annual/Authority Monitoring Report; the latest published AMR, for the year to 31 March 2017, is now well over three years out of date. Without it, there is no up to date evidence as to how the Council has actually performed in the first four years of the Plan period (i.e. 2016 to 2020, within the overall Plan period of 2016 to 2038).
- 2.8 Our case is that, without such evidence of how things have actually panned out in the first four years of the Plan, consultees do not have before them sufficient reasons to allow them to intelligently consider whether the Plan is likely to achieve its goals within the remaining 18 years of its Plan period.
- 2.9 The Draft Plan itself is 359 pages long, but its supporting Evidence Base contains approaching 17,000 pages of evidence, about 2,600 pages of which are new for this Regulation 19 stage of consultation. This represents quite a paper chase. In order better to

---

<sup>1</sup> See Appendix 2 to this submission

understand what is in the Evidence Base, and the relative sizes of documents (which is not indicated at all within the Evidence Base webpages) we compiled a full catalogue of it, which is reproduced as Appendix 3. Because of this volume of evidence, including the volume of new evidence, we made repeated representations to the Council (via questions to Cabinet) that the original seven weeks set for this Regulation 19 consultation was not adequate time for intelligent consideration and response. It is therefore welcomed that the present consultation was extended to 10 weeks, although the reason given for the extension was the additional challenges presented by the current COVID-19 crisis. As noted in paragraph 2.3 iii) above, we submit that there are good reasons why consultations of this nature should be for at least 12 weeks.

### ***Modification(s) considered necessary***

- 2.10 For the reasons stated above, we consider that the consultation for this Regulation 19 stage has not been conducted properly. It should be rerun when all Key evidence has been published.
- 2.11 The Draft Plan should be amended in line with the fact that Members of the Public, Town and Parish Councils and Local and National Interest groups are all overwhelmingly in favour of lower housing targets.

### 3. Sustainability Appraisal

#### Part B: Response

##### Q1. To which document does this response relate?

Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  All

##### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant  
B. Sound

Yes:  No:   
Yes:  No:

#### Details

- 3.1 In our response at the Pre-Submission Draft consultation we summarised the points we raised in connection with the Sustainability Assessment as follows:
- i) In paragraph 2.19, the reference to SO1 needs changing to SO3.
  - ii) In Table 2.8, Criteria 6, as actually used in the detailed Excel spreadsheets, needs to be added in.
  - iii) Development will occur not just at the boundary of a site; for Criteria 6, the measurement of 480m should have been taken from the centre of the site, not from its boundary. The same applies to Criteria 5.
  - iv) The detailed criteria listed against Criteria 4/5 and 6 should have a better match with those listed in Table 1 of the HoS document.
  - v) The scoring system used in the stage 2a Excel spreadsheets should use absolute scores, not scores that are relative only to other sites in that particular settlement.
  - vi) In order to assess the CO<sub>2</sub> emissions saving potential of a site, it seems insufficient only to consider the items within Criteria 4/5 and 6. Other factors could have included the propensity of the site for solar gain (e.g. north facing or south facing), or the distance from a supermarket.
  - vii) The whole methodology as summarised in Diagram 1.1 at page 5 of the SA is undermined when it is possible to override a highly negative sustainability score, as is the case with the Ironbridge site, by proposing mitigation measures. The implication is that the site has been allocated for other reasons than sustainability, and in spite of the sustainability appraisal process.
- 3.2 All points except ii) above still stand.
- 3.3 As referred to in iv) above, the simplistic, binary scoring criteria used in the SA do not match the sustainability criteria used in the Hierarchy of Settlements assessment of villages to determine their suitability as Hubs. There is no similar weighting of the relative importance of each criteria.

- 3.4 As referred to in v) above, the scoring is also relative only to other sites within the same settlement; the implication is that the best sites within a settlement are picked out, with little reference as to how they fit in to a county-wide standard.
- 3.5 Little thought has gone into how well a site might help achieve carbon saving goals.

***Modification(s) considered necessary***

- 3.6 The SA is not a reliable guide to the true sustainability of any one site and should not be relied on as a determinant of allocated sites.

## 4. SP1 The Shropshire Test (and Spatial Vision)

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  SP1

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

- 4.1 The overwhelming importance of climate change considerations was recognised by Shropshire Council by its declaration of a climate emergency in May 2019. Surprisingly, this declaration is mentioned only twice in the whole Draft Plan<sup>2</sup>. There is therefore little sense of emergency within the Draft Plan.
- 4.2 Shropshire Council, in order to lead by example, was also one of the founders of the Shropshire Climate Action Partnership (SCAP) and has strongly supported SCAP's collective work to develop its Zero Carbon Shropshire (ZCS) Plan<sup>3</sup> in a very fast-moving area of work. Again, there is no sense of the importance of this drive within the Spatial Vision at paragraph 2.31 or within the text of Policy SP1.
- 4.3 To that extent, policy SP1 is unsound. We suggest that the Spatial Vision is incorporated within SP1 and that the text is amended to better reflect the over-riding importance of the climate emergency.

### Modification(s) considered necessary

- 4.4 We provide suggested amendments to policy SP1 as follows:

---

<sup>2</sup> Paragraph 4.106 under DP11: Minimising Carbon Emissions and paragraph 4.183 under DP20: Water Management

<sup>3</sup> See [Zero Carbon Shropshire Plan | Zero Carbon Shropshire](#)

## **SP1. The Shropshire Test**

The Spatial Vision for Shropshire is that: In 2038, communities will be safe and healthy after Shropshire has moved to a zero carbon economy by 2030; all residents will be able to access well-designed, decent, zero carbon and affordable homes in the right location; economic productivity will be optimised consistent with zero carbon aims through greater investment; and the County's historic and natural environmental assets will be protected and enhanced.

In line with this Vision:

1. Development will contribute to meeting local needs and making its settlements more sustainable, providing the right mix of new housing, employment and other types of development which:
  - a. Supports the health, well-being and safety of communities;
  - b. Supports cohesive communities;
  - c. Addresses the causes and mitigates the impacts of climate change, including the need for all new development to be zero carbon by 2030;
  - d. Conserves and enhances the high-quality natural environment and provides opportunities to optimise green and blue networks;
  - e. Raises design standards and enhances the area's character and historic environment;
  - f. Makes efficient use of land; and
  - g. Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.
2. In addition, and where appropriate, proposals should seek to reflect relevant considerations of Shropshire Council's objectives for zero carbon Shropshire by 2030 (including those within Shropshire Climate Action Partnership's Zero Carbon Shropshire Plan), and other strategies, including its Community Led Plans, Local Economic Growth Strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, and the Public Health Strategy.

## 5. SP2 Strategic Approach and the Climate Emergency

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy

SP2

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

A. Legally compliant

Yes:

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

No:

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

B. Sound

Yes:

No:

C. Compliant with the Duty to Co-operate

Yes:

No:

### Details

- 5.1 Our case is that the climate emergency and the intimately associated ecological emergency, are of such overriding consideration that mankind has to change course. Growth, and exploitation of resources, should be optimised in line with these considerations, not maximised. In the planning balance, that means keeping growth to minimal levels consistent with other needs.
- 5.2 At our local level, Shropshire Council should therefore seek to optimise necessary growth, not to maximise it. At the moment, almost all new development increases net greenhouse gas emissions. The current policies in the Draft Plan will do little to alter that. Until zero carbon building is achieved (if it ever is), each piece of development will continue to make the problem worse, not better. The aim for growth, or even business as usual, is therefore contrary to the Council's own Climate Change policies. What is needed is a 'step-change' in thinking, not a 'step-change' in economic performance.
- 5.3 The headline figures in SP2 over the plan period from 2016 to 2038 are to deliver:
  - around 30,800 new dwellings (this incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan)
  - around 300 hectares of employment land (this incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan).
- 5.4 Appendix 5 to the Draft Plan sets out the Residential Development Guidelines and Residential Supply for each relevant settlement. However, no totals are shown so it not easy to see how the individual figures relate to the overall guideline of 30,800 dwellings.
- 5.5 Appendix 6 to the Draft Plan is headed Employment Development Guidelines and Employment Land Supply. It again sets out figures for the individual settlements, but in a completely different order (by geography, roughly north-west to south-east) and including,

for some unexplained reason, selected figures for Hubs, Clusters and the Countryside. More importantly, despite its title, it does not include the settlement guidelines. Again, no totals are shown.

- 5.6 In order better to understand the overall picture we have produced our own summary of these two Appendices which we set out below, in summary and then in detail, first for the non-Hub settlements, then for the Hubs.

Table 4.1: Residential and Employment Development Guidelines and Supply - Summary

	Shropshire Pre-Submission Draft Local Plan 2016 - 2038: summary of guidelines and allocations for housing and employment land																																																			
	Estimated dwellings from Hierarchy of Settlements		% increase in houses		Residential Development Guideline Competitions		With planning permission		Existing commitments and allocations		Local plan allocations		Windfall Allowance		"Balanced" employment from housing		Employment Land Guideline		Completed Development 2016-2019		Existing Employment areas		Committed Sites		Saved Allocations		New Allocations		Strategic Land Supply 2016 - 2038																							
	Housing														Employment land																																					
	From Appendix 5														From Appendix 6																																					
Shrewsbury	33,597	26%	8,625	1,743	3,019	798	2,560	505	91	100	5.3	1.5	38.4	17.0	50.0	112.2																																				
Principal centres	30,387	25%	7,500	815	2,178	1,687	2,185	635	79	172	7.6	2.6	18.0	84.7	32.4	145.3																																				
Key centres	20,658	25%	5,150	1,190	1,519	549	1,010	882	54	91	2.5	1.4	4.92	35.5	39.0	83.3																																				
Strategic sites	107		1,750	-	-	-	1,750	-	18	12	-	-	-	-	-	12.0	12.0																																			
ABCA (Black Country)			[1,500]							[30]																																										
Community Hubs	19,343	26%	5,018	952	1,289	530	1,605	660	-	-	-	-	0.5	0.1	-	0.6																																				
Community Clusters											-	-	0.1	-	1.7	-	-	1.8																																		
Countryside											-	-	13.6	14.7	9.6	0.3	-	38.2																																		
Totals	104,092	27%	28,043	4,700	8,005	3,564	9,110	2,682	243	375	29.1	20.2	73.12	137.6	133.4	393.42																																				
Other identified rural settlements	14,890																																																			
Total on Hierarchy of Settlements sheets	118,875																																																			
Therefore unidentified / balance	16,636	17%	2,757								- 75																																									
Total guidelines in Draft Local Plan policy SP2			30,800								300																																									
Total dwellings (2014-based projections for 2016)	135,511	23%																																																		

5.7 As well as summarising the figures in Appendices 5 and 6 of the Draft Plan, our tables also show the estimated dwellings as derived from the Hierarchy of Settlements tables; the percentage increase on those HoS figures that the residential guideline for each settlement would represent; and a calculation of "balanced" employment land which is explained later on. The detailed tables below also indicate, in the "check" column, where figures in Appendix 5 for particular settlements do not cross-cast. We have also highlighted the development guidelines and the allocations within the Draft Plan. The ABCA figures have been excluded from the totals because they are proposed to be absorbed.

Table 4.2: Residential and Employment Development Guidelines and Supply – Settlements other than Hubs

Shropshire Pre-Submission Draft Local Plan 2016 - 2038: summary of guidelines and allocations for housing and employment land																																		
Place Plan		Strategic Land Supply 2016 - 2038																																
		Estimated dwellings from Hierarchy of Settlements		% increase in houses		Residential Development Guideline		Completions		With planning permission		Existing commitments and allocations		Local plan allocations		Windfall Allowance Check		"Balanced" employment from housing		Employment Land Guideline		Completed Development 2016-2019		Existing Employment Areas		Committed Sites		Saved Allocations		New Allocations				
<b>Housing</b>																																		
<b>From Appendix 5</b>																																		
Shrewsbury	Shrewsbury	33,597	26%	8,625	1,743	3,019	798	2,560	505	-	91	100	5.3	1.5	38.4	17.0	50.0	112.2																
Oswestry	Oswestry	8,797	22%	1,900	312	116	1,127	240	105	-	20	57	2.1	0.9	0.5	39.0	-	42.5																
Bridgnorth	Bridgnorth	6,189	29%	1,800	52	38	500	1,050	160	-	19	49	0.4	1.3	0.3	8.2	27.4	37.6																
Market Drayton	Market Drayton	5,449	22%	1,200	85	474	0	435	206	-	13	35	4.6	-	12.6	12.0	-	29.2																
Ludlow	Ludlow	5,404	19%	1,000	106	802	0	10	82	-	11	11	0.4	0.4	0.9	6.0	5.0	12.7																
Whitchurch	Whitchurch	4,548	35%	1,600	260	748	60	450	82	-	17	20	0.1	-	3.7	19.5	-	23.3																
		30,387	25%	7,500	815	2,178	1,687	2,185	635	-	79	172	7.6	2.6	18.0	84.7	32.4	145.3																
Shifnal	Shifnal	3,215	47%	1,500	605	573	0	230	92	-	16	41	0.2	-	0.3	2.0	39.0	41.5																
Wem	Wem	2,879	21%	600	129	72	100	210	89	-	6	6	0.3	1.2	2.7	4.0	-	8.2																
Broseley	Broseley	2,416	10%	250	128	72	0	0	50	-	3	3	-	-	-	1.3	-	1.3																
Albrighton	Albrighton	2,205	23%	500	24	171	77	180	48	-	5	5	-	-	0.02	-	-	0.02																
Church Stretton	Church Stretton	1,987	10%	200	17	62	0	0	121	-	2	2	0.1	-	-	1.3	-	1.4																
Ellesmere	Ellesmere	1,930	41%	800	112	348	0	170	170	-	8	9	-	-	0.3	9.2	-	9.5																
Highley	Highley	1,462	17%	250	72	47	0	100	31	-	3	3	-	-	1.0	-	-	1.0																
Cleobury Mortimer	Cleobury Mortimer	1,306	15%	200	30	43	7	0	120	-	2	2	0.1	-	0.1	0.5	-	0.7																
Craven Arms	Craven Arms	1,210	41%	500	33	48	325	0	94	-	5	15	-	-	0.3	14.0	-	14.3																
Much Wenlock	Much Wenlock	1,118	18%	200	32	21	0	120	27	-	2	2	0.8	0.2	-	0.6	-	1.6																
Bishop's Castle	Bishops Castle	930	16%	150	8	62	40	0	40	-	2	3	1.0	-	0.2	2.6	-	3.8																
		20,658	25%	5,150	1,190	1,519	549	1,010	882	-	54	91	2.5	1.4	4.9	35.5	39.0	83.3																
Tern Hill - Clive Barracks	Market Drayton	107		750				750			8	6	-	-	-	6.0	6.0																	
Ironbridge Former Power Station	Much Wenlock			1,000				1,000			11	6	-	-	-	6.0	6.0																	
RAF Cosford	Albrighton			n/a								n/a																						
		107		1,750	-	-	-	1,750	0	-	18	12	-	-	-	-	12.0	12.0																

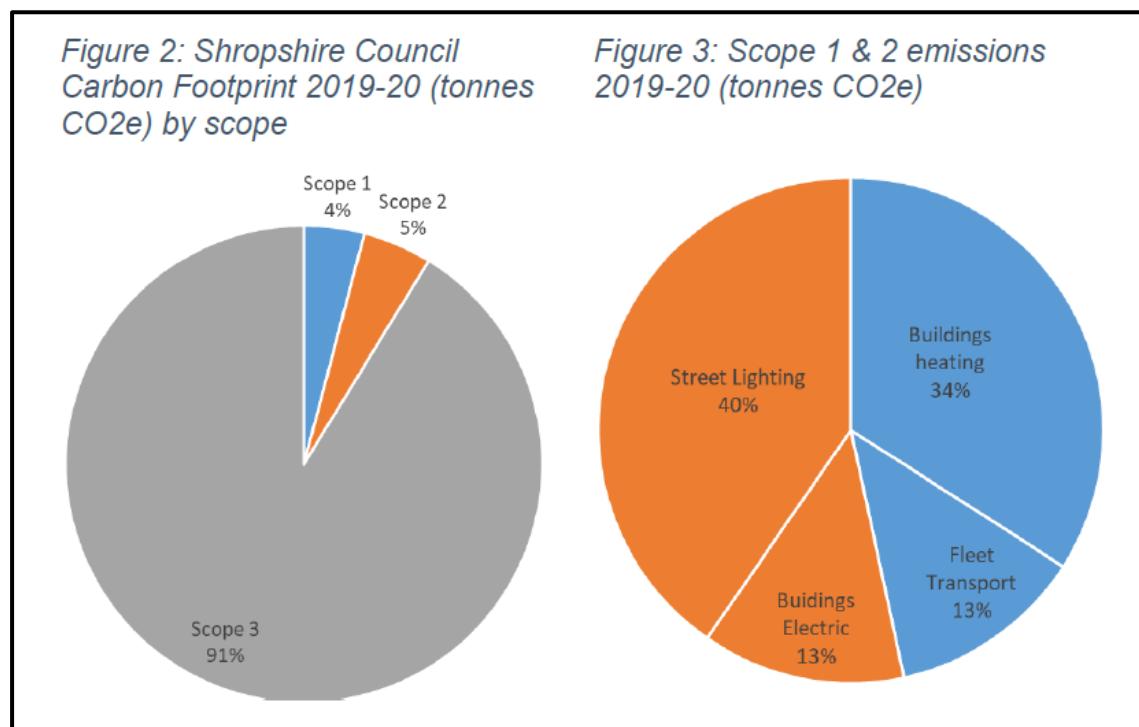
**Table 4.3: Residential and Employment Development Guidelines and Supply – Hubs**

Shropshire Pre-Submission Draft Local Plan 2016 - 2038: summary of guidelines and allocations for housing and employment land																	
Place Plan	Strategic Land Supply 2016 - 2038																
	Estimated dwellings from Housing by Settlers % increase in houses	Residential/Developments Guide line	Completions	With planning permission	Existing commitments and allocations	Local plan allocations	Windfall Allowance	Check	Balanced employment from housing	Employment Land Guide line	Completed Developments 2016-2019	Existing Employment areas	Commited Sites	Saved Allocations	New Allocations		
<b>Housing</b>																	
	<b>From Appendix 5</b>																
Cosford/Donington	Albrighton	423									-					-	
Bucknell	Bishops Castle	368	30%	110	5	7	70	20	8	-						-	
Chirbury	Bishops Castle	92	49%	45	0	0	30	14	1	-						-	
Clun	Bishops Castle	393	24%	95	5	2	60	20	8	-						-	
Worthen and Brockton (joint)	Bishops Castle	148	37%	55	2	4	0	45	4	-						-	
Alveley	Bridgnorth	718	18%	130	12	26	0	70	22	-						-	
Dinton Priors	Bridgnorth	342	19%	65	2	23	0	40	0	-						-	
Dudleston Heath	Ellesmere	205	29%	60	8	4	29	0	19	-						-	
Burford	Ludlow	517	37%	190	2	2	0	140	46	-						-	
Clee Hill	Ludlow	403	19%	75	27	25	0	20	3	-						-	
Hinstock	Market Drayton	314	49%	155	60	45	0	35	15	-						-	
Hodnet	Market Drayton	274	38%	105	2	52	0	40	11	-						-	
Woorrellands Cross	Market Drayton	342	26%	88	21	29	0	0	38	-						-	
Minsterley	Minsterley & Pontesbury	670	23%	155	67	49	14	20	5	-				0.5	0.1	0.6	
Pontesbury	Minsterley & Pontesbury	850	21%	175	25	108	0	40	2	-						-	
Cressage	Much Wenlock	336	24%	80	8	0	0	64	8	-						-	
Gobowen	Oswestry	1,361	26%	360	68	134	117	25	16	-						-	
Kinnerley	Oswestry	146	41%	60	7	32	0	0	21	-						-	
Knockin	Oswestry	77	71%	55	0	25	0	25	5	-						-	
Llanymynech	Oswestry	228	55%	125	24	19	32	50	0	-						-	
Pant	Oswestry	533	9%	50	6	7	0	25	12	-						-	
Ruyton XI Towns	Oswestry	385	32%	125	8	18	0	65	34	-						-	
St Martins	Oswestry	971	37%	355	123	101	0	95	36	-						-	
Trefonen	Oswestry	324	17%	55	2	3	0	0	50	-						-	
West Felton	Oswestry	300	43%	130	39	25	0	60	6	-						-	
Weston Rhyn	Oswestry	779	20%	155	19	41	0	100	0	-5						-	
Whittington	Oswestry	649	31%	200	23	6	86	70	15	-						-	
Baschurch	Shrewsbury	686	52%	360	135	130	0	55	40	-						-	
Baiston Hill	Shrewsbury	2,204	9%	200	27	12	0	147	14	-						-	
Bicton	Shrewsbury	128	23%	30	1	2	0	15	12	-						-	
Bomere Heath	Shrewsbury	592	19%	110	13	43	0	55	0	-1						-	
Cross Houses	Shrewsbury	328	27%	90	18	63	0	0	9	-						-	
Dorrington	Shrewsbury	291	52%	150	33	16	30	0	71	-						-	
Ford	Shrewsbury	307	41%	125	3	36	0	75	11	-						-	
Hanwood	Shrewsbury	506	10%	50	1	30	0	0	19	-						-	
Longden	Shrewsbury	135	37%	50	20	3	0	0	27	-						-	
Nesscliffe	Shrewsbury	83	139%	115	11	91	0	0	13	-						-	
Clive	Wem	237	17%	40	0	2	0	20	18	-						-	
Hadnall	Wem	269	46%	125	54	19	0	40	12	-						-	
Shawbury	Wem	877	17%	150	59	23	0	80	0	-12						-	
Prees	Whitchurch	426	40%	170	12	32	62	35	29	-						-	
		19,343	26%	5,018	952	1,283	530	1,605	660	-18	0	-	-	-	0.5	0.1	0.6

- 5.8 In order fully to set out our case it is necessary first to elaborate further on the climate emergency, on housing numbers, and on employment land numbers.

### ***The climate emergency and carbon footprints***

- 5.9 The overwhelming importance of climate change considerations was recognised by Shropshire Council by its declaration of a climate emergency in May 2019. Surprisingly, this declaration is not mentioned at all within policy SP3: Climate Change; it is mentioned only twice in the whole Draft Plan<sup>4</sup>. There is therefore little sense of emergency within the Draft Plan.
- 5.10 The Shropshire Climate Change Strategy Framework as posted within the Evidence Base is dated 19 December 2019 and its effect has recently been updated. A new document, “Shropshire Council - Towards Net-Zero Carbon - *Corporate Climate Strategy*”, dated November 2020 was adopted by Full Council on 17 December 2020<sup>5</sup>. At the time of writing this CPRE response, this latest document has yet to be posted to the Evidence Base, or to the Council’s webpage for Climate Change Strategy<sup>6</sup>. On its page 3 it shows Shropshire Council’s own carbon footprint to be as follows:



<sup>4</sup> Paragraph 4.106 under DP11: Minimising Carbon Emissions and paragraph 4.183 under DP20: Water Management

<sup>5</sup> See [Agenda for Council on Thursday, 17th December, 2020, 10.00 am — Shropshire Council](#), agenda item 9. The minutes of the meeting record that it was resolved “To approve the Corporate Climate Emergency Strategy, Action Plan and Project Pipeline 2020 (Appendices 1 and 2)”

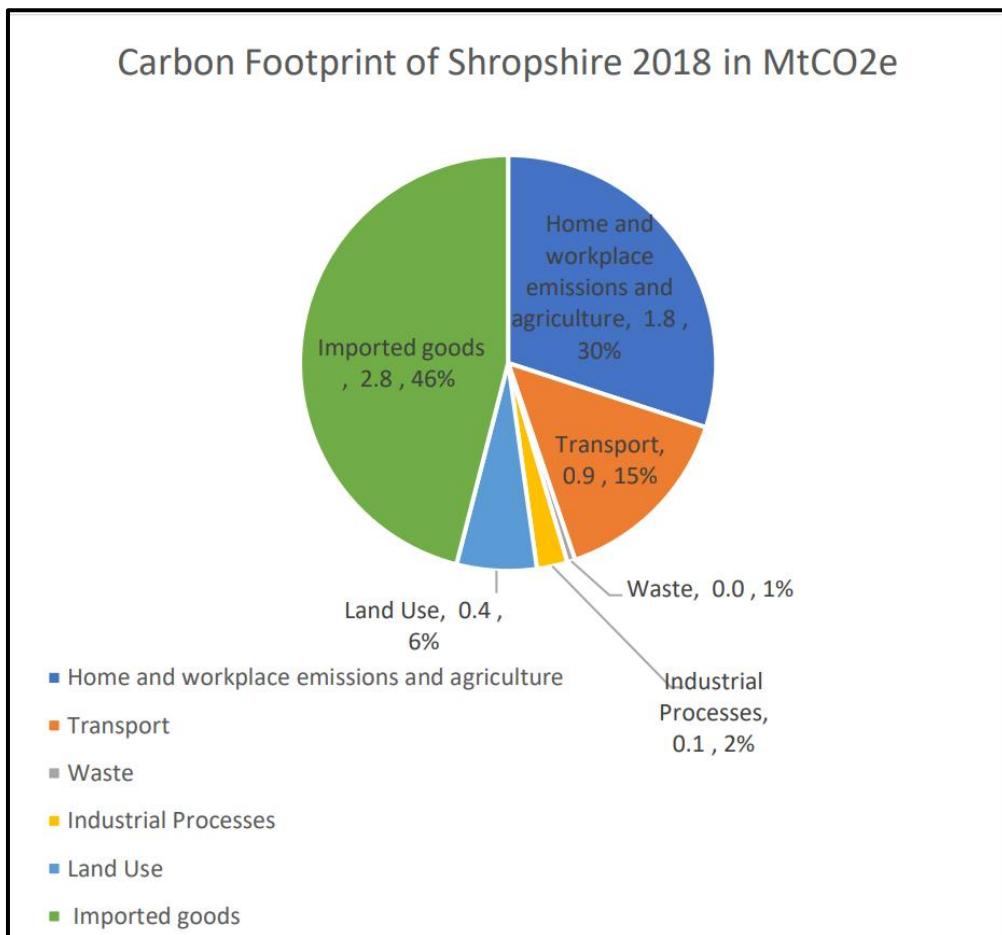
<sup>6</sup> See [Climate Change Strategy | Shropshire Council](#)

- 5.11 Paragraph 2.3 of this latest report states that “*the Council’s footprint represents only around 1% of Shropshire’s total carbon footprint*”. Shropshire Council’s approach to the other 99% of Shropshire’s emissions is to lead by example. In paragraph 1.3 it says that “*placing the initial focus on our corporate performance allows the Council to ‘lead by example’, using its direct and indirect influence to foster a positive response to the challenge of the Climate Emergency by other public and private sector organisations*”; and on page 10, under “*Influence the behaviour of others*” it says “*we will lead by example and seek to positively influence the purchasing power or funding allocations of others like the Marches LEP and its members to favour low carbon initiatives and products*”.
- 5.12 The 2019 document (page 7, section 5) had the key objective to: “*Reduce Shropshire Council’s greenhouse gas (GHG) emissions to net carbon zero by 2030 (GHG Scope 1, 2 & 3)*”. The latest 2020 document states in paragraph 1.2: “*Shropshire Council declared a climate emergency in May 2019 and agreed a Strategy Framework in December 2019 which established the objective of net-zero corporate carbon performance by 2030*”. It repeats the same key objective, again on page 7, but now in section 3.
- 5.13 Nowhere in the Draft Plan is there the necessary urgency of policy to achieve this key objective of net carbon zero by 2030, including Scope 3 GHG emissions.
- 5.14 Shropshire Council, in order to lead by example, was also one of the founders of the Shropshire Climate Action Partnership (SCAP) and has strongly supported SCAP’s collective work to develop its Zero Carbon Shropshire (ZCS) Plan<sup>7</sup> in a very fast-moving area of work. Dean Carroll, the portfolio holder for Climate Change, made the following statement when the ZCS plan was launched<sup>8</sup>:
- “This brilliantly ambitious strategy is welcomed by Shropshire Council. It is an excellent example of what can be achieved when we all work together to achieve a common goal and will complement the council’s own corporate climate change strategy and action plan.”*
- 5.15 The bulk of the effort to seek to achieve climate change goals therefore appears to be in the hands of SCAP and its ZCS Plan. SCAP is largely an organisation of volunteers, with no statutory powers.
- 5.16 Page 15 of the current ZCS Plan records the indicative breakdown of Shropshire’s overall carbon footprint, which is estimated at 6.1MtCO<sub>2</sub>e/year, as follows:

---

<sup>7</sup> See [Zero Carbon Shropshire Plan | Zero Carbon Shropshire](#)

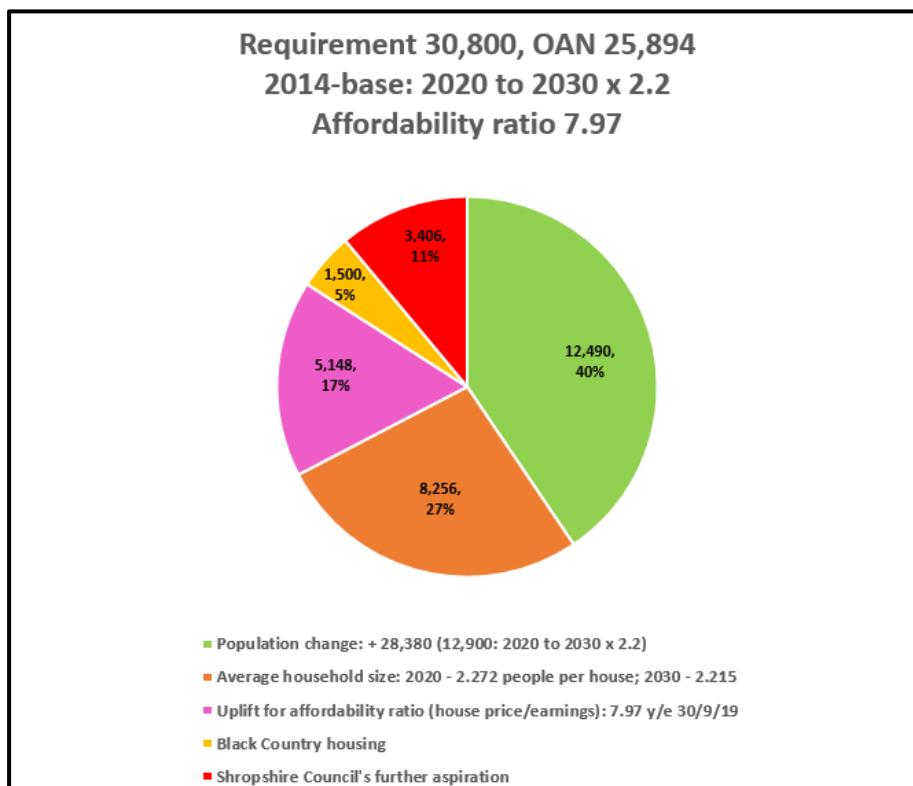
<sup>8</sup> [Shropshire Climate Action Partnership launches Zero Carbon Plan](#)



- 5.17 Roughly 45% of emissions (27 minutes past the hour on the above ‘clock’) comes from people’s everyday activities of being at their homes and work, and travelling around. A further 46% comes from Scope 3 emissions.
- 5.18 This means that buildings, their occupiers, and the activities they engage in continue to be the greatest source of GHG emissions. Every effort should therefore be made to minimise the increase in the numbers of those buildings, for as long as those buildings themselves are not carbon neutral or carbon negative.
- 5.19 We now set out the detail of why we consider policy SP2 to be unsound in this regard, and not supported by proportionate evidence.
- The housing numbers***
- 5.20 The housing target of 30,800 is significantly more than the minimum Objectively Assessed Need figure of 25,894 required by Government, as calculated within the FOAHN, and which was confirmed by MHCLG on 16 December 2020 as the Standard Method that should continue to be applied. We think it is important to recognise the several distinct elements making up these figures, as identified below.

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

5.21 This can also be represented graphically as follows:



5.22 The above table and chart show that:

- i) The projected increase in population (28,380) produces a need for only 12,490 dwellings over the plan period.
- ii) Because of the projections about household formation and average household size, which is projected to fall by only 2.5% in the plan period, there is projected to be a need for another 8,256 dwellings. This is a surprisingly large figure, because the

projected reduction of 2.5% applies to the whole projected population at the end of the period (330,800), not just to the projected increase in population (28,380).

- iii) Step 2 of the Government's Standard Method then requires Shropshire Council to add a further 5,148 dwellings to the Objectively Assessed Need figures, for the affordability adjustment. Nationwide, this affordability adjustment is intended to help remedy the perceived historical shortfall of housing supply, by reference to how expensive houses are relative to incomes in each local authority area. The corollary that this will bring house prices more within the reach of those who most need housing is widely considered to be misguided; the Letwin Review<sup>9</sup> indicates that house builders will continue to "drip-feed" houses to the market because it is not in their interests to cause a reduction in the price of their product.
- iv) On top of the Government's Standard Method total of 25,894 for Shropshire, Shropshire Council is minded to allow a further 1,500 houses to be built to satisfy the Black Country shortfall, and then to allow a further 3,406 houses on top of all that, giving the overall guideline figure of 30,800 dwellings.

- 5.23 Our case is that, when viewed in the round in this way, the high figures are not justified by proportionate evidence. The hard reality is that it is proposed to build 30,800 new dwellings for a population that is projected to increase by only 28,380 during the plan period.
- 5.24 That is why we have argued all along that the guidelines for housing are unreasonably high, based on figures that are questionable.

- 5.25 We further argue that, taking account of the climate emergency (and the ecological emergency), the balance of evidence justifies building no more than the absolute minimum number of dwellings required by Government.

#### *The employment numbers*

- 5.26 The guideline of around 300 Ha of employment land is even more unreasonably high, and is based on figures that are even more questionable, than those for housing. It is not justified by proportionate evidence.
- 5.27 The employment figures are partly founded on the aim of the Economic Growth Strategy to 'maximise our economic potential' (paragraph 3.16 of this Draft Plan). This is contrary to climate change goals.
- 5.28 Shropshire Council's guideline figures for employment land have evolved during the course of the Local Plan Review process. At the Preferred Scale and Distribution of Development consultation stage, the Council's Preferred Strategy, stated and repeated throughout

---

<sup>9</sup> See [Independent review of build out: final report - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

subsequent iterations of the documentation, including within the present Regulation 19 Draft Plan, is for a balance between new housing and local employment.

- 5.29 That is a sensible aim, but we still think that the calculation of the employment land so required has been overstated. The calculation behind the original figures was set out in Table 7 on page 42 of the Preferred Scale and Distribution of Development consultation document:

**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

- 5.30 This calculation of ‘balance’ is derived from the relatively simplistic formula that each house produces one job, each job requires 42.25 sq m on average of work space, and employees’ actual workspace area represents only 40% of an overall employment site. There are 10,000 sq m in a hectare (Ha) so, for example, the original equation for Shrewsbury was:

$$8,625 \times 42.25 / 10,000 / 40\% = 91.1 \text{ Ha, rounded to } 91 \text{ Ha}$$

- 5.31 This figure of 91 Ha of employment land for Shrewsbury was the figure shown for Shrewsbury in Table 2 on page 21 of the Preferred Scale and Distribution of Development consultation document, which we reproduce below:

**Table 2: Proposed Development Distribution 2016-2036**

Settlement	Proposed Housing Guideline 2016-36	Completions in the Plan Period (2016/17)	Existing commitments & allocations (at 31 <sup>st</sup> March 2017)	Additional provision required	Annual build out rate required	Employment Guideline to balance housing 2016-36	Existing commitments and allocations	Additional provision required
<i>Strategic Centre</i>								
Shrewsbury	8,625	733	4,246	3,646	431	91	41	50
<i>Principal Centres</i>								
Bridgnorth	1,500	23	565	912	75	16	12	4
Ludlow	1,000	14	840	146	50	11	7	4
Market Drayton	1,200	20	539	641	60	13	35	-
Oswestry	1,800	47	1,559	194	90	19	57	-
Whitchurch	1,600	90	956	554	80	17	20	-
<b>Sub-Total</b>	<b>7,100</b>	<b>194</b>	<b>4,459</b>	<b>2,447</b>	<b>355</b>	<b>75</b>	<b>131</b>	<b>7</b>
<i>Key Centres</i>								
Albrighton	500	12	247	241	25	5	0	5
Bishop's Castle	150	1	74	75	8	2	3	-
Broseley	250	42	145	63	13	3	1	2
Church Stretton	250	9	110	131	13	3	1	2
Cleobury Mortimer	200	1	61	138	10	2	1	1
Craven Arms	500	32	377	91	25	5	14	-
Ellesmere	800	38	602	160	40	8	9	-
Highley	250	59	69	122	13	3	2	1
Much Wenlock	150	0	45	105	8	2	1.5	0.5
Shifnal	1,500	197	987	316	75	16	2	14
Wem	600	67	281	252	30	6	4	2
<b>Sub-total</b>	<b>5,150</b>	<b>458</b>	<b>2,998</b>	<b>1,694</b>	<b>260</b>	<b>54</b>	<b>39</b>	<b>25</b>
<b>Rural Areas</b>	<b>7,875</b>	<b>525</b>	<b>4,790</b>	<b>2,560</b>	<b>368</b>	<b>83</b>	<b>12</b>	<b>72</b>
<b>Total</b>	<b>28,750</b>	<b>1,910</b>	<b>16,493</b>	<b>10,347</b>	<b>1,414</b>	<b>304</b>	<b>223</b>	<b>155</b>

- 5.32 In the “Balanced employment from housing” column of our table 4.2 above we show the calculation of what this balanced employment land would be, using the above formula, but

now based on the current housing guidelines within this present Draft Plan. It can be seen that not only do many of the figures in our column match those in the Council's Table 2 above, but many of them still match the employment guideline figures within this current Draft Plan, even though the plan period has been extended by 10% since the Preferred Scale and Distribution of Development stage.

- 5.33 The same principle was applied to all five Principal centres at the Preferred Scale and Distribution of Development stage of the LPR. However at the Preferred Sites stage, the guideline employment land figures for Bridgnorth and Shifnal, which were previously identical at 16 Ha each, were increased to 28 Ha for Bridgnorth and to 40 Ha for Shifnal, to take account of largely unspecified "local circumstances". The guideline figure has now been increased to 49 Ha for Bridgnorth.
- 5.34 The guideline figures for some other settlements have also subsequently been "tweaked" beyond this equation of balance, most notably for Shrewsbury, Oswestry, Market Drayton and Craven Arms. The question arises as to whether proportionate evidence has been put forward to justify all these figures.
- 5.35 Overall, there are two main elements as to whether the equation of balance used to derive the employment land figures is based on proportionate evidence, and we elaborate further on each:
  - i) Whether an appropriately justified employment density has been adopted.
  - ii) Whether each new dwelling is likely to require a new job.

#### ***Employment density***

- 5.36 A major aim of the Shropshire Economic Growth Strategy is to increase productivity<sup>10</sup>. A consequential aim is that of improving median earnings, which also entails higher-skilled jobs. This is at odds with the assumption that each job requires 42.25 sq m on average, because this was based on a weighting which included 25% of warehouse-type jobs, as in the table below<sup>11</sup>.

Sector	Density in sq m/job	Use Class
Offices (aligned with Finance & Professional Services)	16	A2
Light Industrial	47	B2
Industrial & Manufacturing	36	B2
Storage & Distribution	70	B8
Simple average	42.25	

---

<sup>10</sup> Paragraph 3.109, and others, of SP12: Shropshire Economic Growth Strategy

<sup>11</sup> As derived from the footnote to Table 7 on page 42 of the Preferred Scale and Distribution of Development document

- 5.37 As a result of our querying of the figures in Table 6 on page 40 of the Preferred Scale and Distribution of Development document, Shropshire Council's response of July 2019 to a Freedom of Information request revealed that the final figures in Table 6 (which is reproduced below) had been wrong. Somebody within the Council had divided by 40% twice, instead of only once (as set out in paragraph 5.30 above) and the resultant incorrect figures, overstated by 250%, had been misleadingly included in the consultation document without having been properly checked.

**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

- 5.38 The correct analysis of the figures that should have been shown in Table 6, as set out in the answer to the FoI request, is reproduced below. The figure of 115 Ha described above as Total Employment Floorspace Need was actually the overall Net Land Requirement (i.e. the Employment Land Requirement as above).

Productivity Growth Scenario as per FoI 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				

- 5.39 The detailed figures within the table immediately above (i.e. the Productivity Growth Scenario) were derived from the Oxford Economics Productivity Growth Forecast

spreadsheet, within the Evidence Base<sup>12</sup>. This Oxford Economics work was also a foundation of the Economic Growth Strategy itself<sup>13</sup>.

- 5.40 The point of this section on employment density is to demonstrate that, within the Council's evidence base, there is evidence that alternative and more productive employment densities than the 42.25 sq m per job that has generally been adopted, have been applied elsewhere within the Local Plan process.
- 5.41 As can be seen from the figures in the table at paragraph 5.38 above, the weighted employment density derived from the Oxford Economics Forecast is 31 sq m per job.

#### ***The equation between houses and jobs***

- 5.42 By breaking down the housing numbers, as above, into the elements making them up it can be demonstrated that elements of the Council's calculations of 'balanced' housing and employment growth are not founded on proportionate evidence.
- 5.43 The relatively simplistic formula that each house produces one job (see paragraph 5.30 above) can be questioned on several scores:
- i) not all occupants of new houses will have jobs which require employment land;
  - ii) some occupants will already have jobs;
  - iii) many occupants will be beyond working age; and
  - iv) not all jobs require dedicated employment sites.
- 5.44 For instance, Mark Barrow has reported that "*our research with local agents has revealed that some new housing sites in Shrewsbury have been sold exclusively to affluent downsizers*". This remark, in response to a question as to who it is who comes to live in the new houses being built, highlights the need for hard evidence of the employment status of occupiers of new houses. That is the sort of information that might be available in the three years' worth of missing Authority Monitoring Reports (see paragraph 2.7 above).
- 5.45 It does therefore seem likely that each house will produce less than one job requiring employment land. This inevitably ought to decrease the calculation of the requirement for employment land.
- 5.46 In our previous submissions we have attempted to put into figures how the above considerations might affect the calculations. Applying the several elements of the breakdown of the housing figures, as laid out in the housing numbers section above, we

---

<sup>12</sup> See under "P" in the Evidence Base at [Evidence base | Shropshire Council](#)

<sup>13</sup> See pages 3 and 6 of the Economic Growth Forecast under "E" in the Evidence Base at [Evidence base | Shropshire Council](#)

repeat below the specimen calculation we set out in our response to the Regulation 18 Pre-Submission stage of consultation.

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

- 5.47 If the employment density of 31 sq m per job is applied (as in paragraph 5.41 above) then 19,970 new jobs would require only 155 Ha of new employment land ( $19,970 \times 31 / 10,000 / 40\% = 154.8$  Ha, rounded to 155 Ha). This is only 52% of the stated guideline of around 300 Ha.

#### ***Other inconsistencies in the employment figures***

- 5.48 As well as the above evidence that the need for employment land might be only 155 Ha rather than 300 Ha there are two other inconsistencies in the employment figures.
- 5.49 First, there is the evidence of the Economic Development Needs Assessment (EDNA) dated December 2020, which has been newly published for this Regulation 19 consultation (it was listed as Key evidence at the Regulation 18 stage but was not produced for that earlier consultation). Its conclusion (page 129, paragraph 10.2) is that “*it is recommended that Shropshire’s employment land OAN should comprise a range of between 132 ha to 234 ha between 2016 to 2038 (including flexibility)*”. This range is a long way short of the stated guideline of 300 Ha.
- 5.50 Even more inconsistently, as demonstrated in our table 4.1 above, the guidelines for the individual settlements in policies S1-S21 actually adds up to 375 Ha. This is wholly inconsistent with a stated overall guideline of around 300 Ha of new employment land.
- 5.51 Our overall case on employment land is that, when viewed in the round in this way, the high figures are not justified by proportionate evidence, are not justified by comparison with other evidence within the documentation, and are internally inconsistent. That is why we

have argued all along that the guidelines for employment are unreasonably high, based on figures that are questionable.

- 5.52 We further argue that, taking account of the climate emergency (and the ecological emergency), the balance of evidence justifies providing only the optimum amount of employment land, rather than going for maximal growth.

#### ***Duty to Co-operate***

- 5.53 The overall guideline of 30,800 dwellings includes 1,500 houses from the Association of Black Country Authorities (ABCA) and the overall guideline of around 300 Ha of employment land includes 30 Ha of employment land from ABCA.
- 5.54 The Duty to Co-operate between Shropshire and ABCA should not be isolated from the equivalent Duties to Co-operate of all local authorities within the West Midlands Combined Authority (WMCA).
- 5.55 First, before any ABCA unmet need is accepted by Shropshire Council there should be a Statement of Common Ground between Shropshire Council and ABCA, which there does not appear to be<sup>14</sup>.
- 5.56 Second, to ensure a proper Regional strategy, there should be Statements of Common Ground for all local authorities within WMCA. Shropshire is an outlier geographically within the WMCA and within the West Midlands Green Belt, and should not be expected to take unmet need that is disproportionate to its geographical distance from ABCA, nor is disproportionate to what other local authorities are accepting under their own Duties to Co-operate with ABCA.
- 5.57 In view of the lack of such evidence to justify accepting any ABCA need, and also because of the current stage of the ABCA plan, it is considered premature at this stage for Shropshire Council to accept any unmet need from ABCA, either for housing or for employment land.

#### ***Hierarchy of Settlements and the designation of Community Hubs***

- 5.58 The evidence for designating the Community Hubs listed in Schedule SP2.2 on page 15 of the Draft Plan has been provided by the methodology and scoring system within the Hierarchy of Settlements document within the Evidence Base. This exercise was an attempt by Shropshire Council to use an ‘objective’ system of designation, rather than allowing each village to opt for Hub status, as happened during the previous Core Strategy/SAMDev process.

---

<sup>14</sup> See NPPF paragraph 35.c)

5.59 The Hierarchy of Settlements methodology can be criticised on two main principles:

- i) The scoring system used is over-simplistic. It attributes the same scores to villages as it does to towns, for a range of services/facilities where towns have those services/facilities to a much greater degree. The disparity seems particularly preposterous for:
  - a) Library: villages that have a library bus only once a fortnight for less than one hour are awarded the same number of points as towns with a permanent public library open at all the usual times.
  - b) Public transport: villages with rudimentary bus services are given the same score as the market towns which have much more extensive bus services and in some cases dedicated bus stations.
  - c) Employment: some villages with relatively limited employment options are awarded the same number of points as Shrewsbury and market towns, with their huge number and variety of jobs.
- ii) The scoring system does not give any special weighting to the more important services/facilities. The eventual total score for a settlement is ‘blind’ as to how that score is made up and whether it misses out those services that are more vital to the sustainability of a settlement, such as a school or a decent bus service.

5.60 It may be that if the first point were addressed with a more nuanced scoring system, the relative scores amongst villages, rather than the towns, would produce a similar hierarchy.

5.61 The second point, however, is more fundamental to the question as to whether all those settlements listed in Schedule SP2.2 are truly sustainable. There is a valid argument, put cogently by, for example, the Oswestry and District Civic Society, that building in rural locations is fundamentally less sustainable than building in urban locations because it is not consistent with policies designed to reduce the impact of climate change and to move to a low carbon economy, as enshrined in international, national and local law and policy, including within this plan and in the SCAP ZCS plan.

5.62 The HoS scores themselves indicate that some of the proposed Community Hubs do not satisfy the Council’s own definition of what facilities a Hub should have. On the next page we set out our own summary of the scores for the proposed Community Hub settlements, as derived from the HoS document. It is presented in descending order of total HoS score.

**Table 4.4: Summary of Hierarchy of Settlement scores**

- 5.63 In Table 1 on pages 3-4 of the HoS document, services/facilities are divided into primary services, secondary services and other categories, namely broadband, employment and public transport. We have grouped the scores into those three sections in our Table 4.4 above, although the presentation of these HoS scores on pages 35 – 43 of the HoS document itself does not do this.
- 5.64 What constitutes a Community Hub is defined in Table 2 on page 4 of the HoS document as:
- Community hub settlements** – Whilst the exact combination varies, the settlements within this category are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities*
- 5.65 In our above Table 4.4 we have highlighted in yellow where there are zero scores for schools or for public transport. We have highlighted in orange where there are zero scores for employment.
- 5.66 This demonstrates that there are several proposed Hub villages that do not have any schools and do not have any public transport service, let alone the rudimentary service that most villages have. It also demonstrates that there are many proposed Hub villages that have no employment opportunities.
- 5.67 In reality, most people of working age living in villages commute elsewhere for employment. That is one reason why it is argued that rural villages per se are unsustainable locations for further development. However, the lack of a school and public transport indicates a further level of unsustainability.
- 5.68 The balance of evidence set out above would indicate that some of the proposed Hub villages do not satisfy the Council's own internal definition of sustainability, let alone any further objective definition of sustainability. These are Ditton Priors, Cross Houses, Woore/Irelands Cross, and Knockin. There is also doubt about Clun, Hinstock, Cosford, and Trefonen.

### ***Modification(s) considered necessary to SP2 as a whole***

- 5.69 The housing guideline figure should be reduced from 30,800 to no more than the Government minimum requirement of 25,894 dwellings.
- 5.70 The guideline for employment land should be reduced from around 300 Ha to the lower end of the EDNA range of 132 ha to 234 Ha. Our own figure is around 155 Ha.

- 5.71 The settlement guidelines for employment land in policies S1-S21 should be amended so that they agree in total to the overall guideline for employment land.
- 5.72 Appendix 6 should be amended into the same format as Appendix 5. Both should show totals.
- 5.73 The incorporation, under the Duty to Co-operate, of 1,500 dwellings and up to 30 Ha of employment land to support the housing needs of the emerging Black Country Plan should be removed from the Plan until such time as the Black Country Plan is mature, and Shropshire's proposed share of Black Country unmet need can be justifiably evidenced to be proportionate to the equivalent Duties of Local Authority areas with a closer functional relationship to ABCA.
- 5.74 The settlements of Ditton Priors, Cross Houses, Woore/Irelands Cross, and Knockin should be removed from the list of Community Hubs in Schedule SP2.2.

## 6. SP3 Climate Change

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  SP3

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant  
B. Sound

Yes:  No:   
Yes:  No:

### Details

- 6.1 Our case is that the climate emergency and the intimately associated ecological emergency, are of such overriding consideration that mankind has to change course. Growth, and exploitation of resources, should be kept to an optimum level, not maximised. This is corroborated both by planning legislation and by planning policy.
- 6.2 Planning legislation: Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by Section 182 of the Planning Act 2008<sup>15</sup> states: '*Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change*'.
- 6.3 Planning policy: NPPF paragraphs 148-149 require that "*the planning system . . . should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures . . . in line with the objectives and provisions of the Climate Change Act 2008*". Detailed interpretation of these NPPF requirements is given in the online PPG guidance at paragraphs 1 and 7.
- 6.4 In their new Corporate Climate Strategy, Shropshire Council has set a carbon budget, for Shropshire Council Corporate carbon emissions only, as follows<sup>16</sup>:

<sup>15</sup> <https://www.legislation.gov.uk/ukpga/2008/29/section/182>

<sup>16</sup> Page 12 of Shropshire Council - Towards Net-Zero Carbon - *Corporate Climate Strategy*", dated November 2020

*Table 2: Indicative Annual Carbon Budget 2020 – 2030 (tonnes CO<sub>2</sub>e)*

Service Areas	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Adult Services	18,720	16,848	15,163	13,647	12,282	11,054	9,948	9,153	8,420	7,747	7,127	6,557
Childrens Services	18,720	16,848	15,163	13,647	12,282	11,054	9,948	9,153	8,420	7,747	7,127	6,557
Place and Enterprise	33,484	30,136	27,122	24,410	21,969	19,772	17,795	16,371	15,062	13,857	12,748	11,728
Public Health	1,621	1,459	1,313	1,182	1,063	957	861	792	729	671	617	568
Resources & Support	3,595	3,235	2,912	2,620	2,358	2,123	1,910	1,757	1,617	1,488	1,369	1,259
<b>TOTAL</b>	<b>76,139</b>	<b>68,525</b>	<b>61,673</b>	<b>55,505</b>	<b>49,955</b>	<b>44,959</b>	<b>40,463</b>	<b>37,226</b>	<b>34,248</b>	<b>31,508</b>	<b>28,988</b>	<b>26,669</b>
Carbon Credits	-2,000	-2,200	-2,400	-2,600	-2,800	-3,000	-3,200	-3,400	-3,600	-3,800	-3,900	-3,939
Recycling	-22,730	-22,730	-22,730	-22,730	-22,730	-22,730	-22,730	-22,730	-22,730	-22,730	-22,730	-22,730
<b>Net Carbon Footprint</b>	<b>51,409</b>	<b>43,595</b>	<b>36,543</b>	<b>30,175</b>	<b>24,425</b>	<b>19,229</b>	<b>14,533</b>	<b>11,096</b>	<b>7,918</b>	<b>4,978</b>	<b>2,358</b>	<b>0</b>

- 6.5 SCAP's ZCS Plan has set out a carbon budget as follows for the ceremonial county of Shropshire (Shropshire Council area and Telford & Wrekin Council area)<sup>17</sup>:

Shropshire Carbon Budget. First estimate for 2021 to 2030													Totals
	Mt CO <sub>2</sub> equivalent												
<b>Shropshire county total footprint</b>	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	
Consumption Footprint	6.1	5.5	5.0	4.4	3.9	3.3	2.8	2.2	1.7	1.1	0.6	0	36.5
Remaining Budget at year end	17.2	11.7	6.7	2.3	-1.6	-4.9	-7.7	-9.9	-11.6	-12.7	-13.2	-13.2	
Carbon capture required in addition to emission reductions, to remain within Paris limits					-1.6	-3.3	-2.8	-2.2	-1.7	-1.1	-0.6	0.0	-13.2
Shropshire compliance with Paris Agreement limits	17.2	11.7	6.7	2.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Shropshire resident individual footprint</b>	t CO <sub>2</sub> equivalent												
Shropshire resident consumption footprint	12.6	11.5	10.3	9.2	8.0	6.9	5.7	4.6	3.4	2.3	1.1	0.0	
Shropshire resident additional capture required to keep within Paris Agreement limits								-3.33	-6.87	-5.73	-4.58	-3.44	-2.29
								-1.15	0	-27.4			

- 6.6 It can be seen that Shropshire Council's Corporate carbon footprint of 76,139 tonnes CO<sub>2</sub>e is indeed very roughly 1% of the total carbon footprint of 6,100,000 tonnes CO<sub>2</sub>e for the whole of Shropshire as applied by SCAP in their ZCS plan.
- 6.7 In order for the present regulation 19 Draft Plan to be sound as to its Climate Change policy it, or its Evidence Base, should set out a carbon budget for the whole Shropshire Council area, consistent with the updated Climate Change Act, and a strategy as to how to achieve it. The Plan is required to demonstrate how its policies are in line with the legally binding carbon emission reduction targets in the Climate Change Act. In summary, the Draft Plan should:
- i) Take into account baseline emissions
  - ii) Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios

<sup>17</sup> Page 16 of the ZCS plan

- iii) Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act which requires a 100% reduction by 2050.
- 6.8 The carbon budget should show baseline emissions and the impact of development and mitigating policies on this emission curve. The policies should aim to secure radical carbon reductions in line with a trajectory for the Plan area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal. To the greatest extent possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years.
- 6.9 This has not been done within the Draft Plan. References to reducing carbon emissions are general rather than objectively measurable as required. That means that the Plan is not legally sound in terms of its climate change mitigation policies and duties.
- 6.10 The statement is made in paragraph 3.29 of the plan that "*the widespread and potentially devastating impacts of climate change place a responsibility on us all to minimise our carbon emissions, and this must be seen as an essential component of all development*". However, the actual policies within the plan do not bear out that sense of urgency.
- 6.11 For instance, the very first policy in SP3 is 1a which aims to reduce carbon emissions by:
- "Minimising the need to travel and maximising the ability to make trips by sustainable modes of transport, including through the urban approach to development identified within Policy SP2"*
- 6.12 This policy is weak to the point of being unsound because (1) there is no sense of how much this will contribute to reducing emissions; (2) a large part of development is still proposed for rural settlements which rely on the private motor car for transport; and (3) there is no integrated active travel plan to actually promote sustainable modes of transport and to make them the dominant form of transport.
- 6.13 Other examples are
- i) Clause 1g: promoting fabric energy efficiency retrofits of existing buildings. This is constructive as a general, high level statement, but its aim should be spelt out within policy DP23 Conserving and Enhancing the Historic Environment. This is the main policy covering conservation and listed buildings, of which there are a great many in Shropshire, yet it makes no mention of energy efficiency retrofitting.
  - ii) Clause 2d: supports community energy proposals, but this is not taken up or elaborated upon in policy DP26

- iii) Clause 3: is about maximising carbon sequestration, but this could be better integrated with policies DP14, Green Infrastructure and DP16, Landscaping of New Development, neither of which make any further mention of sequestration.
  - iv) Clause 4: this makes good mention of climate change adaptation, but it would benefit from having more detail on how new development is to integrate climate adaptation measures. Policy DP14, Green Infrastructure, does however cross refer to this policy.
- 6.14 The conclusion from other Local Authorities is that it would be very difficult to achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. There will also therefore need to be very ambitious planning policies around building performance.

### ***Modification(s) considered necessary***

- 6.15 The Draft Plan must include a carbon budget and a strategy for achieving it.
- 6.16 The intentions within policy SP3 must be cascaded to the development management policies in a more concrete manner.

## 7. SP7 Managing Housing Development

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph

Policy

SP7

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

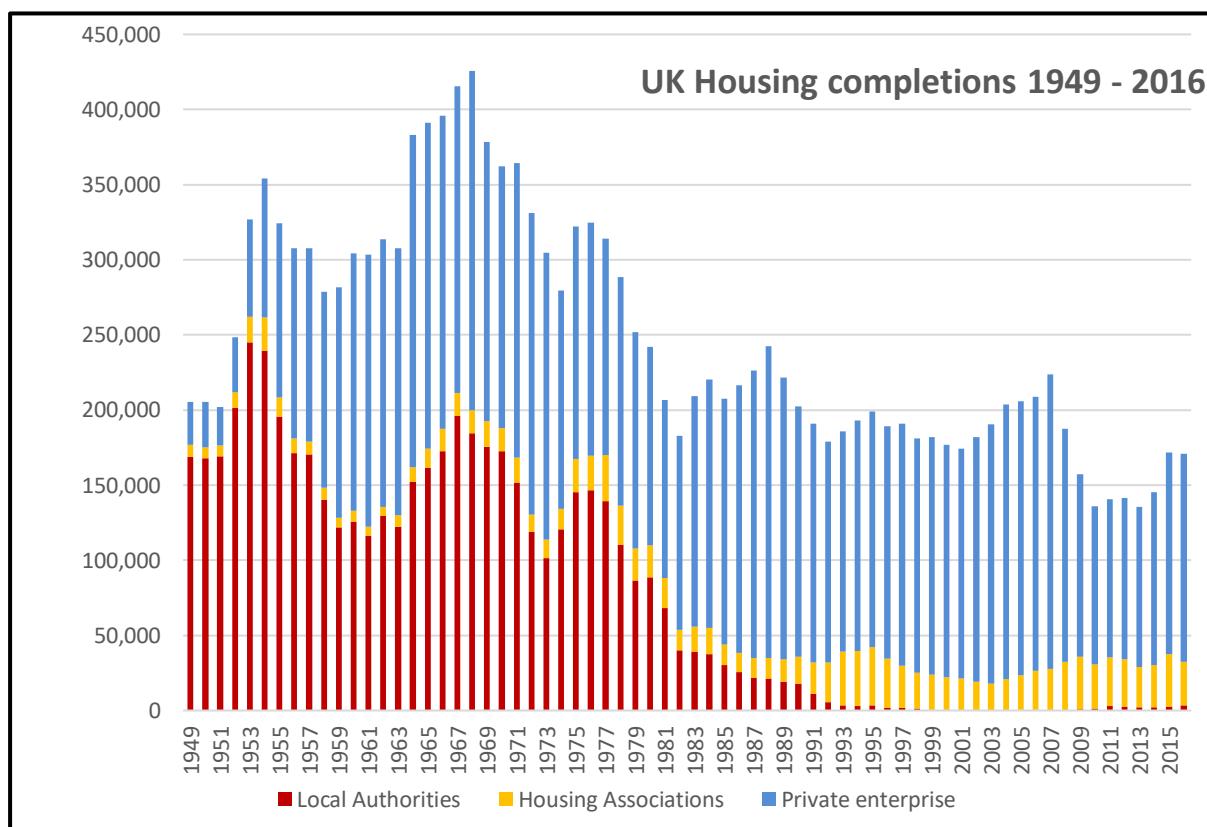
B. Sound

Yes:

### Details

#### *The right home in the right place*

- 7.1 Our arguments are that (1) not enough affordable houses are built, and the policy continues to make things worse not better, and (2) there is no coherent policy to get houses for different need groups into appropriate (i.e. the right) places.
- 7.2 Much greater numbers of affordable houses are needed. A Planning Inspector at a local Shropshire Appeal Hearing caused a jolt by saying that he did not agree with the Government's assessment that the housing crisis could be solved just by building more houses. He pointed to a larger contributory factor being the collapse in council-house building from the early 1980s onwards, as evidenced in the chart below:



- 7.3 In the Shropshire Council area, the Evidence is that there is a need for 17,574 affordable houses, or 799pa<sup>18</sup>. Satisfying such a need would take 57% of the overall guideline figure of 30,800 houses. Yet the Council proposes an overall target of only 25% affordable housing (7,700 of the 30,800), whilst proposing targets of only 10% in the north and 20% in the south<sup>19</sup>. The latest information in the AMR (albeit three years out of date) states that only around 20% affordable housing is achieved<sup>20</sup>.
- 7.4 If the target is for only 10% of houses in the north to be affordable then nine open market houses will be built for every one affordable house built. That will make the problem of the overall inadequate proportion of affordable houses worse, not better.
- 7.5 Part of the problem is that developers say they can't afford to build higher proportions of affordable housing, by reference to viability studies and their requirement to make around 20% profit. The Council could take on more of this challenge instead, via their wholly owned house building company, Cornovii Developments Ltd.
- 7.6 The Shropshire Strategic Housing Market Assessment (SHMA) part 2 is the document that sets out what the housing needs are of the different segments of society. The policies in the Pre-Submission Draft Plan do not really take any significant notice of its evidence.
- 7.7 The Right House Right Place website<sup>21</sup> currently lists 32 parishes that have taken the RHRP housing needs survey, which gives evidence of the need for affordable housing (amongst other things). This is a relatively small percentage of parishes in Shropshire; more of these surveys should be carried out, particularly in urban areas.

### ***Modification(s) considered necessary***

- 7.8 A policy should be included to enable affordable housing developments to be achieved more easily, where housing needs surveys have indicated a particular need for affordable housing.
- 7.9 The policy should be amended to take account of the housing needs of the different segments of society, as evidenced in the Shropshire Strategic Housing Market Assessment (SHMA) part 2.

---

<sup>18</sup> Shropshire Council Strategic Housing Market Assessment Report: Part 2 September 2020, page 50, Table 35

<sup>19</sup> Policy DP3 clause 1a

<sup>20</sup> <https://shropshire.gov.uk/media/7231/amr-2017-18.pdf> - the latest AMR, for 2016/17, page 34

<sup>21</sup> [Right Home Right Place | Identifying Housing Need in Shropshire](#)

## 8. SP11 Green Belt and Safeguarded Land

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  SP11

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

- 8.1 As stated in the opening words of national CPRE's report "*Connecting with local green space: State of the Green Belt 2021*"<sup>22</sup> (published the day before the deadline for this consultation):

*"Green Belt is the countryside next door for 30 million people living in our largest towns and cities. One of the primary roles of the Green Belt is to maintain the openness of the countryside, and it encourages housing to be placed near to where we work and the amenities we need. The countryside near to where people live has never had a greater test of its importance to people's health and wellbeing than during the start of the coronavirus pandemic. However, Green Belt land continues to be threatened by development, decreasing its ability to provide for nature and reduce the impacts of climate change and people's access to green spaces".*

- 8.2 The report catalogues the continued erosion of Green Belt around the country and those continued reasons to keep it.
- 8.3 Quite apart from these considerations, we do not consider that the proposals for release of Green Belt land as set out in Table SP11.1 on page 51 are justified by proportionate evidence or by a sufficient exceptional circumstances case.
- 8.4 An exceptional circumstances case has been put forward in the Evidence Base paper "*Shropshire Council - Green Belt Release Exceptional Circumstances, December 2020*" which is essentially that development pressure, partly emanating from the West Midlands and along the M54 corridor, represents good reason for releasing Green Belt land. Nowhere however, is the extent of that case quantified. It is not justified by proportionate evidence.
- 8.5 Our concern is that, particularly for Shifnal, the Council's figures are simply wrong. We elaborate below within our comments for settlement policy S15 for the Shifnal Place Plan area. Apart from at RAF Cosford, the largest proposed releases of Green Belt are around Shifnal.

<sup>22</sup> [State of the Green Belt 2021 - CPRE](#)

- 8.6 There appears to be no need to release the RAF Cosford land from the Green Belt because existing policies<sup>23</sup> already allow for the type of military-related development being proposed by RAF Cosford. There is certainly no need, justified by proportionate evidence, to release as much land (214.2 Ha, or 529 acres) as is proposed in order to accommodate simply the uses listed on page 97 of the *Green Belt Release Exceptional Circumstances* paper. Again, there may be a case for releasing some land, but no evidence is given to support how the actual area of land being proposed has been calculated.
- 8.7 The above considerations indicate that the quantum of land proposed to be released from the Green Belt, both within this plan period and as safeguarded land, should be re-examined at Examination in Public.
- 8.8 The land required for the Midlands Air Ambulance headquarters is an issue separate from that of the existing RAF Cosford land. Planning permission has already been granted for it, under delegated authority on 19 January 2020 (i.e. during this consultation), under ref 20/04521/FUL. The applicant's case was accepted that the necessary "very special circumstances" existed for release from the Green Belt.
- 8.9 Green Belt land is important not only for the five purposes in NPPF 134 but also for its natural capital value. In presenting a "very special circumstances" case (clause 3b) applicants should be required to quantify:
- i) lost food production value per hectare at current productivity rates, and what that means for UK self-sufficiency;
  - ii) lost carbon absorption in tonnes per hectare; and
  - iii) lost biodiversity value.

### ***Modification(s) considered necessary***

- 8.10 Because of the doubts about the quantum of the proposed releases from the Green Belt, the figures should be re-examined.
- 8.11 Text should be added after clause 3b in line with paragraph 8.9 above.

---

<sup>23</sup> SAMDev policy MD6: Green Belt, clause 2

## 9. SP12 Shropshire Economic Growth Strategy

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph

Policy

SP12

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

- 9.1 Paragraph 3.109 points to the fact that policy SP12 is under-pinned by the Shropshire Economic Growth Strategy 2017 to 2021 (EGS), which is quoted in that paragraph as stating that it seeks:

*"To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high-quality assets"*

- 9.2 Our response to the Preferred Scale and Distribution of Development consultation in December 2017 heavily criticised the underlying report (produced by IPPR North) behind that EGS. That IPPR North report was riddled with errors, many of them typos, but it also included some more fundamental errors. Its promise that "*Shropshire can be a world leading rural economy by 2030*" seemed more marketing hype than realistic policy, based as it was on a meaningless comparison of a largely rural county like Shropshire with the largely metropolitan UK. In any case, the conclusions of the report were based not on evidence, but on round-table discussions, several of which were internal to Shropshire Council itself. It was therefore a subjective report, rather than an objective one. Our conclusion was that the EGS was unsound,
- 9.3 This conclusion about the EGS was underlined by the fact that no Sustainability Appraisal had been carried out for it at the time. A four-paragraph section on the Shropshire Economic Growth Strategy has now been included on page 146 of the current SA (although it is referred to there as SP10 (its number at the previous Regulation 18 Pre-Submission stage), not SP12) but contains the puzzling statement that '*the policy has no effect on the sustainability objectives of . . . reducing carbon emissions and promoting adaption and mitigation to climate change*'.
- 9.4 Our contention is that, until all development becomes provably zero carbon then any development will make the problem worse, not better. To comply with policy SP3 Climate Change, the Council should therefore seek to keep economic development to minimal, optimal levels, not to "*strive to maximise*" things.
- 9.5 This desire to '*be the best*' and to '*maximise our economic potential*' is precisely the sort of thinking that needs to be got away from if climate change objectives are to be met.

- 9.6 The desire to be the best seems a worthy aim, but it is simply fostering competition with other neighbouring local authorities, and Shropshire is unlikely to become a better place to invest than say the West Midlands conurbation. At the moment it is well down in the ‘league tables’ of economic indicators for counties, and is likely to remain so because it contains a high proportion of farm land.
- 9.7 We therefore consider SP12 as drafted to be unsound to the extent that it promotes aims that are not supported by proportionate evidence, particularly the evidence within climate change considerations.
- 9.8 On a more specific point we consider that reference to the Countryside should be removed in paragraph 3.e. For simplicity, the management of development in the countryside should be controlled solely via policy SP10.

### ***Modification(s) considered necessary***

- 9.9 The text of the Policy and the Explanation should replace references to “the best” and “maximum” with words indicating optimum consistent with the declared climate emergency and the aim of zero carbon by 2030.
- 9.10 In paragraph 3.e of the policy wording, remove the words “and the Countryside”.

## 10. SP15 Whole Estate Plans

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  SP15

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes

| No:

### Details

- 10.1 Paragraph 3.151 refers to the central principle of ensuring sustainable land management. As we have emphasised in earlier parts of this response, the overriding concern of current policy for land use should be to mitigate against the effects of both the climate emergency and the ecological emergency. However, that should be achieved by a Whole Shropshire Plan (which should be this entire Draft Shropshire Local Plan) not by separate piecemeal Whole Estate Plans.
- 10.2 If, as is stated at paragraph 3.152, many Estates are engaged in the preparation of Whole Estate plans, then it would have been open to them have presented those plans for consideration as part of the current process.
- 10.3 It is always open to Estates, as it is to any developer, to put in planning applications to be tested against the policies in the Local Plan.
- 10.4 The proposed policy SP15 does not offer any certainty as to what constitutes (1) an “Estate” or (2) “meaningful consultation”.
- 10.5 The Council normally only adopts or endorses as a material consideration documents such as Neighbourhood Plans, which cover a substantial area and which have been subject to statutory consultation.
- 10.6 On the basis of the above points, this policy seems to us not to be justified by reference to other parts of the plan, and is superfluous. It would be better omitted.

### Modification(s) considered necessary

- 10.7 This policy is unnecessary and should be struck out, or else:
  - i) the present wording of its clause 1c *“It has been subject to meaningful public consultation”* should be replaced with the following wording:

*It has been subject to the same level of public consultation as is required for Neighbourhood Plans.*
  - ii) A definition of what minimum size constitutes an Estate should be included in the text.

## 11. DP11 Minimising Carbon Emissions

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  DP11

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

- 11.1 The general aim of this policy is supported, but it does not go far enough. If Shropshire is to achieve zero carbon by 2030, which is its stated aim, or even by 2050, which is the national policy, it must begin now to require new building to be zero carbon.
- 11.2 The Government response to the Future Homes Standard consultation has now been published<sup>24</sup>, confirming the government's resolve to tighten up Building Regulations as follows:
  - i) Interim standards requiring a 31% reduction in carbon emissions above Building Regulations from 2021.
  - ii) Reducing carbon emissions from new homes by at least 75% from 2025.
  - iii) Banning the installation of gas central heating in new homes from 2025.
- 11.3 The interim standards (31% reduction) from 2021 will now act as the "regulatory floor" and we would encourage the council to tighten Policy DP11 to require an overall 35% on-site carbon reduction, via fabric energy efficiency standards, on-site renewables, zero/ low carbon heat, with remaining emissions being offset by contributions into a carbon offset fund, to pay for off-site carbon reduction or sequestration. The wording "strongly encouraging" could be tightened up considerably, along the lines of the London Plan, which states that "major development should be zero carbon".
- 11.4 Clause 4, by allowing reference to "open book" accounting and viability, may in practice offer a get-out clause to any and all development. Ways must be found to make zero carbon building viable.

### Modification(s) considered necessary

- 11.5 Clause 1b should be amended to refer to all proposals (not just for 10 or more dwellings) and to refer throughout to the latest Building regulations as above.

<sup>24</sup> [The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings)

- 11.6 Clause 1d; replace the opening words “strongly encouraging” with “ensuring”.
- 11.7 Clause 2: strike out the words “of 1,000m<sup>2</sup> or more floorspace or with a gross site area of 1ha or more”.
- 11.8 Strike out Clause 4.

## 12. DP23 Conserving and Enhancing the Historic Environment

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  DP23

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

- 12.1 Clause 1(g) of Policy SP3 promotes fabric energy efficiency retrofits of existing buildings yet no support is given for the responsible energy retrofitting of historic and listed buildings within policy DP23.
- 12.2 The predominantly rural area of Shropshire has a large stock of historic buildings, many of which are likely to be poorly insulated. In meeting Climate Emergency requirements, reducing carbon emissions from the existing building stock, particularly leaky historic buildings, is at least as big a challenge as ensuring that new development is zero carbon.
- 12.3 Officers have pointed out that over 80% of the domestic housing which will exist in 2030 already exists and deliverable measures to foster the retrofit of existing property are therefore essential if we are to have any chance of achieving our collective goal.
- 12.4 It would also be beneficial to develop supplementary planning guidance setting out how homeowners could improve the energy efficiency of their own homes without detracting from their heritage significance.

### Modification(s) considered necessary

- 12.5 Text should be added similar to the following:

The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy. The policy will be supported by the Council's Sustainable Construction and Retrofitting Supplementary Planning Document.

## 13. DP24 Shropshire Hills Area of Outstanding Natural Beauty

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  SP11

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

A. Legally compliant

Yes:

No:

B. Sound

Yes:

No:

### Details

- 13.1 The Shropshire Hills Area of Outstanding Natural Beauty<sup>25</sup>, with its iconic landscape and geology, covers almost a quarter of Shropshire. AONBs enjoy special protections under law and planning policy.
- 13.2 We endorse the separate submissions made by the AONB partnership and by the Save Snatchfield Group.

### Modification(s) considered necessary

- 13.3 Text should be amended in line with the suggestions made by the AONB partnership and by the Save Snatchfield Group.

---

<sup>25</sup> See [Shropshire Hills AONB - Area of Outstanding Natural Beauty](#)

## 14. DP26 Strategic, Renewable and Low Carbon Infrastructure

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  DP26

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

- 14.1 The policy is really just a list of negative impacts which renewable energy developments could give rise to, rather than a positive strategy which maximises the potential for renewable development as required by NPPF para 151a.
- 14.2 Shropshire electricity usage is currently about 2,300 GWh per year and SCAP's ZCS Plan estimates that, in line with national projections, this will rise to about 4,800 GWh per year by 2030<sup>26</sup>. Policy DP26 is unrealistic and fails to recognize the scale of renewable energy required for the decarbonisation route from gas to renewable electricity. Neighbourhood Plans would not, indeed could not, produce the renewable potential required to follow the pathway to zero carbon, set in the Climate Change Act 2008, as updated. For this reason the policy is unsound.
- 14.3 Work is required to be done to map and identify the deployable renewable energy resources in Shropshire and to identify areas of search as required by NPPF para 151b and as in Planning practice guidance for renewable and low carbon energy<sup>27</sup>.
- 14.4 There should be encouragement for solar PV to be retro-fitted to the roofs of existing industrial buildings, a requirement to fit it to the roofs of all new industrial buildings, and encouragement of other measures for development to generate renewable electricity on-site, as envisaged by NPPF para 151c.
- 14.5 There should also be specific encouragement for community-led initiatives for renewable and low carbon energy as required by NPPF para 152.
- 14.6 For all these reasons, the policy as drafted is unsound.

### Modification(s) considered necessary

- 14.7 The Plan should be referred back for further consideration and consultation of Policy DP26.

<sup>26</sup> <https://zerocarbonshropshire.org/wp-content/uploads/Zero-Carbon-Shropshire-Plan.pdf> page 22

<sup>27</sup> See

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/25689/Planning\\_Practice\\_Guidance\\_for\\_Renewable\\_and\\_Low\\_Carbon\\_Energy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/25689/Planning_Practice_Guidance_for_Renewable_and_Low_Carbon_Energy.pdf)

## 15. DP28 Communications and Transport

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy  DP28

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

- 15.1 The policy is not ambitious enough in aligning with the Council's declaration of a climate emergency or with carbon reduction goals. A report<sup>28</sup> looking at the scale of modal shift and vehicle mileage reductions needed to achieve net zero emissions in Bristol, found that in order to achieve this objective, a nearly 50% reduction in car miles and 40% reduction in van and lorry miles travelled in the city is necessary. This would be driven by a significant effort to shift travel to public transport, cycling, walking (to a modal split more like Amsterdam) and to reduce demand for vehicle use through behaviour and system change, including freight consolidation and use of cargo and e-bikes, car-clubs and 'mobility as a service' initiatives.
- 15.2 The Committee on Climate Change has come to broadly similar conclusions. They also say<sup>29</sup> that Local Authorities have a key role in reducing emissions and facilitating strategies to deliver decarbonisation and in delivering a modal shift from cars to active and public transport.
- 15.3 There may be less scope for this in a largely rural county like Shropshire but the corollary of that is that development should be weighted more towards the urban centres, with the minimal amount being targeted at rural villages.
- 15.4 A number of excellent transport policy documents have come out from central government in 2020, stressing greater ambitions for cycling and walking, including one that states "*Cycling is or will become mass transit and must be treated as such. Routes must be designed for larger numbers of cyclists, for users of all abilities and disabilities*"<sup>30</sup>.
- 15.5 Such Government documents may not yet have filtered through into the planning system, but are a clear indication of the direction of government policy, and support a much more ambitious approach within Local Plans.

<sup>28</sup> Bristol Net Zero by 2030 | Centre for Sustainable Energy ([cse.org.uk](http://cse.org.uk))

<sup>29</sup> Sector-summary-Surface-transport.pdf ([theccc.org.uk](http://theccc.org.uk)) page 71 (the Sixth Carbon Budget, Surface Transport)

<sup>30</sup> Gear change: a bold vision for cycling and walking ([publishing.service.gov.uk](http://publishing.service.gov.uk)) page 21

15.6 The RTPI<sup>31</sup> have advised that to align with the net zero commitment, local plans should:

- i) set ambitious requirements for trip reduction, mode share targets and 'zero carbon' outcomes
- ii) prioritise urban renewal that enables growth while reducing travel demand.
- iii) maximise the potential for local living so people can meet their needs by walking and cycling
- iv) all new development to be located and designed to generate zero transport emissions

### ***Modification(s) considered necessary***

15.7 Some of this could be immediately deliverable through a minor wording change. Where large strategic developments are being built, with high trip levels of generation, they should include segregated cycle lanes, and planning policies should be explicit that this will be the expectation, with wording similar to the following:

Major development shall incorporate or fund the provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure commensurate with the scale of development and trip generation and designed in accordance with Local Transport Note 1 / 20 - Cycle Infrastructure Design. Cycling is or will become mass transit and must be treated as such.

---

<sup>31</sup> [RTPI | Net Zero Transport: the role of spatial planning and place-based solutions](#)

## Settlement policies

We comment below on some of the more anomalous settlement policies but our limited resources mean that we have necessarily concentrated on the higher level policies. The local campaign groups, several of which we support, are better resourced to comment on their local areas.

As noted in section 4 above, the guideline figures for several individual settlements are anomalous, possibly vastly overpitched, and a long way from ‘balance’, most notably Bridgnorth, Shifnal, Oswestry and Market Drayton.

## 16. S3 Bridgnorth Place Plan area

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph  Policy

S3

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

| No:

### Details

- 16.1 At the Preferred Scale and Distribution of Development stage of consultation Table 2 on page 21 of the consultation document stated the guideline figures for Bridgnorth to be 1,500 for housing and 16 hectares of employment land to balance that housing. Based on Table 7 on page 42 the calculation of this employment land figure would have been::  
$$1,500 \times 42.25 / 10,000 / 40\% = 15.84 \text{ Ha, which rounds to } 16 \text{ Ha.}$$
- 16.2 That 16 Ha is the figure shown in the “‘Balanced’ employment from housing” column of Table 4.2 above.
- 16.3 At the Preferred Sites stage of consultation the housing guideline remained the same but the employment land guideline was increased by 12 ha to 28 Ha, ‘to address local circumstances’.
- 16.4 In this consultation and the previous Regulation 18 Pre-submission Draft Plan stage the housing guideline has been increased by 20% to 1,800, but the employment land guideline has been increased by a further 21 Ha to 49 Ha, which is an increase of more than triple the original figure.
- 16.5 Nowhere in the consultation document itself or in the Bridgnorth section of the Green Belt Release Exceptional Circumstances Statement does there seem to be any quantified justification for this massive proposed increase in the employment land guideline, or for the departure from balance with the housing guideline.

- 16.6 The Council now proposes an allocation of 1,050 houses on the proposed Taylor Wimpey ‘garden village’ sustainable urban extension site at Tasley rather than the previously proposed allocation of 850 houses on the Stanmore site. It is therefore not consistent to continue to propose an employment land allocation at Stanmore, the more so because it is the Green Belt.
- 16.7 We summarised our comments dated 3 June 2020 to the consultation on the Taylor Wimpey proposals at Tasley as follows:
- 16.8 From comments we submitted for the consultation on the Taylor Wimpey proposals at Tasley we emphasise In particular that:
- i) There is no proven need for the scale of the proposals, either for housing numbers or for employment land, and
  - ii) Not enough account has been taken of the climate emergency
- 16.9 For all these reasons we consider that the proposed employment land guidelines for Bridgnorth are unsound, because they are not supported by proportionate evidence.

### ***Modification(s) considered necessary***

- 16.10 The quantum of employment land proposed for Bridgnorth, including that proposed to be released from the Green Belt, needs to be reappraised.

## 17. S11 Market Drayton Place Plan area

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph

Policy

S11

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

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

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

- 17.2 That 13 Ha is the figure shown in the “ ‘Balanced’ employment from housing” column of Table 4.2 above.
- 17.3 At the Preferred Sites stage of consultation the two guideline figures remained the same.
- 17.4 In this consultation and the previous Regulation 18 Pre-submission Draft Plan stage, the housing guideline remains the same, at 1,200. However, the employment land guideline has been increased by 22 Ha to 35 Ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed. No actual quantified justification has been evidenced for this large proposed increase in the employment land guideline, or for the departure from balance with the housing guideline.
- 17.5 This does mean that housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting. To that extent, the employment land guideline is not justified by proportionate evidence.

### Modification(s) considered necessary

- 17.6 The quantum of employment land proposed needs to be reappraised.

## 18. S14 Oswestry Place Plan area

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph	Policy	S14
	Land at Park Hall (PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032)	
Site	Policy map	S14. Oswestry Place Plan Area Inset Maps

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

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

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

- 18.2 That 19 Ha is the equivalent figure to the 20 Ha shown in the “ ‘Balanced’ employment from housing” column of Table 4.2 above. The figure we show in Table 4.2 has increased because the housing guideline has now been increased to 1,900 dwellings.
- 18.3 At the Preferred Sites stage of consultation the two guideline figures remained the same.
- 18.4 In this consultation and the previous Regulation 18 Pre-submission Draft Plan stage, the housing guideline has been increased by 100 to 1,900, but the employment land guideline has been increased by 38 Ha to 57 Ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed. No actual quantified justification has been evidenced for this large proposed increase in the employment land guideline, or for the departure from balance with the housing guideline.
- 18.5 This does mean that housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting. To that extent, the employment land guideline is not justified by proportionate evidence.

- 18.6 As to the proposed allocations at Park Hall:

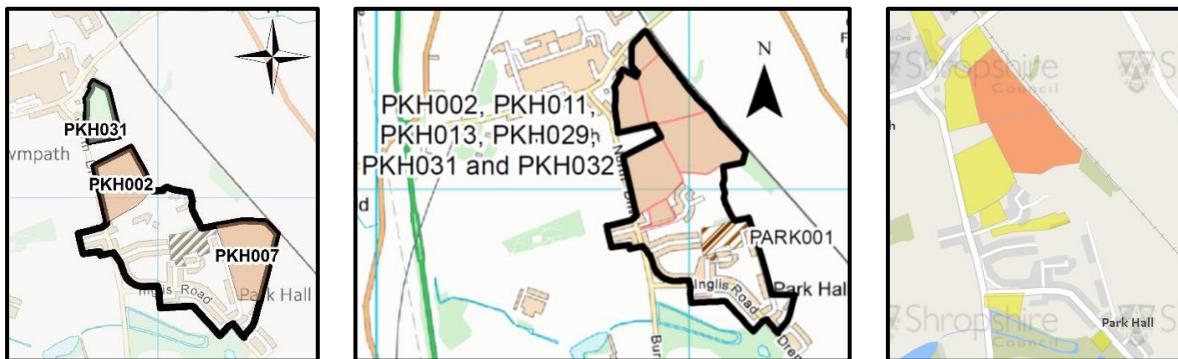
- i) Clause 2 of policy S14 indicates that the Park Hall allocations were in response to the principles outlined in the Oswestry & District Civic Society’s “Oswestry 2050” proposals. That “*Oswestry 2050 Vision and Plan for a Sustainable Future - Looking for the Big Picture*” is not offered in the Council’s Evidence Base. Its 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 these Park Hall allocations in the name of “Oswestry 2050” is to miss the point entirely. Also, there was no mention within that plan of a mixed use ‘garden settlement’.

- ii) The proposal includes provision for key worker housing for the RJAH Hospital and Derwen College, which is to be welcomed. However, no mechanism is proposed to ensure that this comes about, rather than market housing being supplied.
- iii) The site location itself presents conflicts. Although put forward as an allocation for Oswestry, the site itself is some distance from Oswestry, is in Whittington Parish, but will benefit employment sites within Gobowen Parish. The allocation of any resulting CIL monies may therefore be problematic.

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

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



18.9 The Residential Conclusions Map indicates that sites PKH029 and PKH 013 were rejected, so it is surprising that they are now being put forward as allocated sites. Site PKH007 does not appear on the Residential Conclusion Map at all. No mitigation for the rejected sites has been proposed within Table 11.4 on pages 255-260 of the SA.

18.10 Taking the above comments into account it therefore appears that the allocations at Park Hall are not supported by proportionate evidence, and are therefore unsound, because :

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

### ***Modification(s) considered necessary***

18.11 The quantum of employment land proposed, and the allocations at Park Hall, need to be reappraised.

## 19. S15 Shifnal Place Plan area

### Part B: Response

#### Q1. To which document does this response relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

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

Paragraph

Policy

S15

#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound

Yes:

No:

### Details

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

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

- 19.2 That 16 Ha is the figure shown in the “ ‘Balanced’ employment from housing” column of Table 4.2 above.
- 19.3 At the Preferred Sites stage of consultation the housing guideline remained the same but the employment land guideline was increased by 24 ha (or 250%) to 40 Ha, ‘to address local circumstances’.
- 19.4 The guideline figures in this present consultation remain substantially the same, although the employment land guideline is now stated as 41 Ha rather than 40 Ha.
- 19.5 Nowhere in the consultation document itself or in the Shifnal section of the Green Belt Release Exceptional Circumstances Statement does there seem to be any quantified justification for the massive proposed increase in the employment land allocation from 16 Ha to 41 Ha, or for the departure from balance with the housing guideline.
- 19.6 The anomalous nature of the employment figures (in comparison with those for other settlements) is compounded by conflicting and puzzling statements made in the consultation document and in the Green Belt Release Exceptional Circumstances Statement.
- 19.7 First, clause 4 of the policy wording for S15 states “*the town will deliver around 1,500 dwellings and make available around 41 hectares of employment land*”. In contradiction to this, paragraph 5.203 states “*Shifnal is to provide around 1,500 dwellings and at least 16 hectares of employment development*”.
- 19.8 Second, two statements are made which are not repeated for any other settlement. In paragraph 5.212 we have “*employment land is developed to finished floorspace at 40% of the total land area such that around 40 hectares of land will deliver 16 hectares of built development*”. The same statement is repeated in paragraph 8.40 of the Green Belt Release Exceptional Circumstances Statement in a slightly different form, namely “*employment land is developed out to 40% of the total land area . . . in applying this approach, it is considered that about 40 hectares will deliver around 16 hectares of built development*”.

- 19.9 This repeated mixing of 40 Ha and 16 Ha leads us to wonder whether somebody within Shropshire Council has simply got the sums wrong in the same way as was done within Table 6 on page 40 of the Preferred Scale and Distribution of Development consultation document, as explained in paragraph 5.37 above.
- 19.10 As noted above, the fact that '*employment land is developed out to 40% of the total land area*' has already been accounted for in the formula arriving at the initial guideline for Shifnal of 16 Ha of employment land. The Council now seems to be incorrectly grossing up again at 40% for a second time in moving from the 16 Ha to the 40 Ha figure.
- 19.11 We therefore conclude that the proposed allocation of 39 Ha of employment land at SHF018b & SHF018d is not based on proportionate evidence, and is therefore not justified.
- 19.12 By the same logic, and also as explained in the section above on policy SP11, we do not consider that any need has been soundly evidenced for the release from the Green Belt of the amount of safeguarded land proposed. We note that no site references have been given for the land listed in Schedule S15.1(iii), which makes it more difficult to cross-check to other evidence documents.
- Modification(s) considered necessary***
- 19.13 The quantum of employment land proposed to be released from the Green Belt, both now and as safeguarded land, needs to be reappraised.
- 19.14 Site references should be given for the land listed in Schedule S15.1(iii)

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

**Appendix 1 : Consultation response to Draft Statement of Community Involvement**



**The countryside charity  
Shropshire**

**Draft Statement of Community Involvement  
November 2020**

**Consultation response  
from CPRE Shropshire Branch**

**January 2021**

# **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

## **Introduction**

CPRE Shropshire welcomes the opportunity to comment on the Draft Statement of Community Involvement (DSCI) for Shropshire which is out for consultation for 12 weeks from 9 November 2020 to 1 February 2021.

The DSCI was first published for the Cabinet meeting on 7 September 2020 and was released for consultation in an unchanged form (subject to a change of date on the front cover) on 9 November 2020.

It is disappointing, and perhaps an indication of the pressure on the staff tasked with the preparation of the document, that both versions of the DSCI contained a large number of proof-reading errors, including references to outdated legislation. This gives a poor impression of the quality control procedures within Shropshire Council. We are submitting separately a “Track Changes” version of a Word document derived from the published pdf document, which gives an indication of the proof-reading corrections that should have been made prior to either stage of publication.

We emphasise that this “Track Changes” document deals only with proof-reading corrections in the original DSCI as published for consultation. It does not include any of the other further changes that we are suggesting below also be made to the DSCI.

The statutory requirement is that Shropshire Council has an up-to-date and adopted Statement of Community Involvement. The existing SCI was adopted as long ago as March 2011. It is debatable whether the current Regulation 19 consultation on the Local Plan is truly valid without an up-to-date and adopted SCI being in place first.

## **Consultation principles**

The DSCI deals with how Shropshire Council consults its public. CPRE Shropshire responds frequently to such consultations. We have responded at length to the series of consultations on the Local Plan Review and to other policy consultations, and we review planning applications on a weekly basis and respond as appropriate. Our comments below are largely derived from our experience of such consultations.

In regard to consultation issues we have frequently referred to the Gunning principles of consultation as below:

The Gunning principles are that:

Consultation must take place when the proposal is still at a formative stage

Sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response

Adequate time must be given for consideration and response

The product of consultation must be conscientiously taken into account

We suggest that these principles should be incorporated into the final SCI, with a statement that Shropshire Council will abide by them.

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

There is also the Government's own *Code of Practice on Consultation*, published in 2008 (see [Layout 1 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)). Although this refers to Government consultations there seems no reason why its seven consultation criteria should not also be adopted at the local government level. These criteria are:

Criterion 1: *When to consult*: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: *Duration of consultation exercises*: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: *Clarity of scope and impact*: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: *Accessibility of consultation exercises*: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: *The burden of consultation*: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: *Responsiveness of consultation exercises*: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: *Capacity to consult*: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

The Code of Practice states that these criteria should be reproduced in consultation documents.

We suggest that the above Criteria should therefore also be incorporated into the final SCI, again with a statement that Shropshire Council will abide by them.

Some frequently recurring themes in relation to consultation principles are:

### ***Notification***

There are still significant numbers of people who do not engage easily with electronic communication, and/or who are not internet-savvy, and/or who are not aware that a consultation is happening, even though they might well be affected by the outcome. Shropshire Council should not rely wholly on electronic forms of communication but must also continue to engage with its public by traditional means. This is particularly so when decent broadband and mobile coverage is still patchy in all too many parts of the county.

### ***Adequate time***

The periods allowed for consultation have varied considerably, without any reason being stated for how these variable lengths of consultation have been determined. For instance, the time given for the consultation on this DSCI is 12 weeks, for a 27 page document. In

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

stark contrast, the original time given for the Regulation 19 consultation on the Draft Local Plan was only 7 weeks, over the Christmas holidays, during a national Covid-19 lockdown, for a 359 page document backed up by over 16,000 pages of evidence documents, about 2,600 of which were new for this latest stage of the consultation process. This Regulation 19 consultation was therefore disproportionately short. In response to the Covid-19 lockdown restrictions, which came into force on 5 January 2021, the representation period has now been extended by three weeks. That extension was, however, announced only on 26 January 2021, three weeks after the lockdown came into effect and only 10 days before the original close of the consultation period. Some respondents may have rushed a response in before becoming aware that they had another three weeks in which to formulate it more fully.

The Council should set out some principles determining how long a consultation should be, in proportion to what is required “*for intelligent consideration and response*” of “*the reasons put forward for the proposal*”. However, in the majority of cases involving policy, we suggest that the Council should adopt Criterion 2 above so that consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible. As noted, that is, in fact, the sensibly adopted duration of this present consultation on the DSCI, which is in stark contrast to the disproportionately short period originally allowed for the Regulation 19 consultation.

### ***Sufficient reasons***

The ‘sufficient reasons’ referred to in the Gunning Principles will include an Evidence Base where one is put forward to support a consultation, as it has been at each of the six consultation stages of the LPR.

Where Key Evidence documents are listed within the consultation document then they must be made available, with a similar title, in the Evidence Base. This has not been the case at the last two stages of consultation on the Draft Plan, which partially invalidates the consultation process. Considerable time can be lost by consultees in a paper chase, looking for missing documents and frequently checking the Evidence Base to see if they have yet appeared.

It would be better if the Council did not launch a consultation without first ensuring (1) that all stated Evidence (i.e. the “sufficient reasons”) are actually available and (2) that the Evidence Base is easily accessible, logically ordered, and does not involve a ‘paper chase’.

### ***Conscientiously taking responses into account***

During the Local Plan Review process we ‘debated’ with officers whether they had actually taken due note of what was said in responses.

For instance, at the Issues and Options stage of the LPR, in early 2017, the consultation document appeared to offer a choice of three levels of housing growth (question 4 in the survey questionnaire). Analysis of responses indicated that 88% of members of the public, 74% of Town and Parish Councils and 51% of all respondents preferred the lowest option (‘Moderate Growth’). Only 36% of all respondents preferred the highest option (‘High

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

Growth'), of which 88% of landowners, developers and agents preferred that highest option.

Nevertheless, the Council's preference at the next stage of consultation was for the highest ('High Growth') option. In its consultation response summary officers stated, in apparent justification for this stance, that "*whilst there was a slight preference for the 'moderate' growth option, there was also a good level of support for 'high' levels of housing growth*".

In subsequent exchanges between us, officers' justification for the 'High Growth' preference was 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. They also effectively said that they knew what was best for most people, that what they were really looking for was good arguments, and that if we disagreed we could argue the case in front of an Inspector.

We, on the other hand, continue to maintain that if consultees are offered a direct choice between multiple options in a consultation, as they were in Question 4 of the Issues and Strategic Options consultation, then the Council should not simply over-rule the results of the resulting poll.

Where such multiple options are offered in a consultation it should be made clear within that consultation whether or not Shropshire Council will take notice of the numbers preferring each option. To do otherwise is potentially misleading. It would be even better if this policy is spelt out within the final SCI.

### **The COVID-19 crisis**

The current COVID-19 crisis adds further challenges for consultation. In view of the fact that the current DSCI is out for consultation during this crisis, some mention should be made within the final SCI of the amendments to the legislation connected with consultation that have been enacted to take account of the crisis.

One of the above-mentioned Gunning principles of public consultation is that adequate time must be given for consideration and response. The fact that both this DSCI consultation and the Regulation 19 consultation on the Draft Plan are taking place during a full national lockdown that will not end until after both consultations are over casts doubt on whether such adequate time has been given. Despite the amendments to legislation, it remains the case that the lockdown places restrictions, and often increased commitments, on people as well as restricting the ability to view physical documents. Both of these limitations restrict the ability to engage as normal with the consultation process.

The restriction imposed by the current national Covid-19 lockdown on people and their access to information has been recognised in the poster (reproduced in the Annex) which was sent by Shropshire Council to Shropshire Association of Local Councils (SALC) on 20 January 2021 to be circulated by them to Town and Parish Councils. The poster is primarily

# **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

addressed to people who do not have access to the internet, who even now represent a significant section of society. However, this poster gave such people only two weeks' notice before the original close of the consultation, and had been circulated over a fortnight after the national lockdown came into effect, so was not compliant with the timescales in the DCSI.

Also, a similar poster should have been produced at the beginning of this consultation, alerting people without internet access to the start of the consultation. Indeed, the production of this poster at this time highlights the fact that equivalent posters should be produced at the start of all significant consultations.

## **The online survey**

We have not completed the actual online survey (1) because of the extensive nature of our response, (2) in order to keep and disseminate a copy of this response and (3) in order that our responses are not judged solely by which button we click on a computer survey. However, we reproduce below the online survey questions and our responses to them.

We believe that there is enough information in our response to give you the information you seek in the “About you” section of the online survey, most of the questions in which are not in any case relevant to us as an organisation.

### **Section 1: Introduction and background**

**Q1 Do you agree that Shropshire Council should maintain an up to date Statement of Community Involvement that reflects National Planning Policy?**

*Options: Yes; No; If no, please state why.*

Yes, we do agree, but Shropshire Council has failed to do this. Page 4 of the DSCI states that “*This Statement of Community Involvement (SCI), has been reviewed to link in with the review of the Local Plan*”. The SCI should have been updated long ago and it is perplexing that the Council is publishing such an update right at the end of the series of consultations on the Local Plan Review, and for a period that is largely coterminous with the Regulation 19 consultation on that Draft Local Plan. The Council had a statutory duty to update the SCI well before then, which it failed to discharge.

### **Section 2: Statement of Community Involvement and Local Planning**

**Q2 Do you agree that the SCI has considered all of the relevant legislation and regulations?**

*Options: Yes; No; If no, please state which other legislation and regulations should be considered in our SCI*

Yes, we do agree but, again, Shropshire Council has failed to implement fully what is set out in Section 2. At paragraph 2.6 it has failed to provide the required annual updates of the Authority Monitoring Report (AMR), the last version of which on the website is currently that for the year 2016/17. The absence of up-to-date AMRs will, in some consultations, limit the ability to refer to up to date information. At paragraph 2.7, the Local Development

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

Scheme has also been out of date for long periods during the series of consultations on the Draft Plan.

### **Section 3: Community Involvement in the Planning Policy Process – Guiding principles**

**Q3 Do you agree with these guiding principles for consultation and the methods Shropshire Council will use?**

*Options: Yes; No; If no, please provide more details*

Yes, we do agree with the guiding principles, although, as stated above, the Gunning principles of consultation and the seven Criteria from the Government's own *Code of Practice on Consultation* should be explicitly set out within the final SCI and this section would be the best place for that.

We also support the thrust of Shropshire Council's methods, although some detail could be amended, as follows:

Paragraph 3.3, second bullet point (in the middle of page 9): The General Public should not be restricted to just the elements of it as stated here. All members of the general public could potentially be affected by planning policy documents.

Paragraph 3.3, second bullet point (at the bottom of page 9): The stated aim is to "*Provide sufficient information to enable an effective response to any consultation*". As noted above, not all relevant and sufficient information has currently been provided for the current Regulation 19 consultation on the Draft Plan. Consultations should not begin until all stated Key Evidence is available.

Paragraph 3.3, fifth bullet point (at the bottom of page 9): The stated aim is "*all comments will be made publicly available and the council will report on all consultation stages*". The final SCI should spell out in more detail what form the report will take. Such a report should make plain how the Council has taken consultation responses into account in any documents influenced by the consultation. For instance, the "*Summary of Responses to the Consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (Published: December 2020)*" lists the responses from the 2,507 numbered respondents in meticulous detail, which is in accordance with the first aim that "*all comments will be made publicly available*". However, it does not contain any report to indicate how these comments have been taken into account in moving to the Regulation 19 stage. The Council should expand this aim to include reference to such a report providing "clear feedback" on what aspects of consultation responses it has taken on board, in line with Criterion 6 above. For instance, the 2,507 respondents made a total of 5,159 responses. Of these, 17% (859) agreed with part of the Draft Plan, 77% (3,981) disagreed and 6% (319) did not express an opinion; Shropshire Council has nowhere said why it has not changed the Plan in the face of so much disagreement with it.

Paragraph 3.3, sixth bullet point (at the bottom of page 9): The stated aim is to "*hold consultation events at appropriate locations in the borough*". Firstly, "the borough" should presumably be replaced with "the county"; this version of the DSCI is presumably derived

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

from a version used within one of the pre-unitary Shropshire District Councils. Secondly, some reference should be made to the restricted Covid-19 arrangements, which preclude any such consultation events, and also restrict or ban people's ability to view physical documents in libraries etc.

Page 10 of the DSCI moves from paragraph 3.3 directly to paragraph 3.8, with no intervening paragraphs 3.4 to 3.7. The bullet point at the top of page 10 puts an onus on Town and Parish Councils to cascade news of consultation events to the wider local communities. This is not always possible for smaller Councils, which have very limited resources, often restricted to a part-time and overworked parish clerk, and which sometimes do not meet at regular enough intervals to effectively organise such publicity.

However, the recent production by Shropshire Council of the poster reproduced in the Annex below does highlight one way, via SALC and Town and Parish Councils, of helping to inform people who do not have access to the internet about consultations and how to take part in them. Although this particular poster was produced rather late in the process, such posters ought perhaps to be circulated at the start of all significant consultations.

### **Section 4: How Shropshire Council will consult the Community for Plan making and decision taking on planning applications**

#### **Q4 Do you agree with these consultation methods and timescales?**

*Options: Yes; No; If no, please comment on the areas of consultation not covered by the SCI or whether different areas of the Planning process need to be consulted on differently*

No, we do not agree with the timescales shown in the tables under paragraphs 4.1, 4.2 and 4.3. As indicated above, the Council should adopt the recommendation in the Government's *Code of Practice on Consultation*, Criterion 2 and state that consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

The present proposal within the DSCI for consultation periods that are for a "*Minimum of 6 weeks (excluding Bank Holidays)*" can be particularly disadvantageous to some Parish Councils which do not meet often enough to be able to give due formal consideration to a consultation within that short time frame.

Consultations should also, as far as possible, avoid holiday periods, particularly during the summer holiday period and over Christmas/New Year when Council offices are closed. Most people will have restricted time to attend to consultations at those times and many Parish Councils do not hold meetings in August or December. If consultations do straddle a holiday period they should be extended in length by at least a fortnight.

We do not agree with the proposal at the foot of page 17 that planning applications should be notified using only site notices or press notices. As well as that provision, neighbour notifications should continue to be sent out as they are presently. It is unreasonable to expect everybody to patrol the streets, lanes, gates and lampposts on a weekly or daily basis looking for site notices in case there should be a nearby application that might affect them.

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

If a planning application is occurring next to them, it seems reasonable to expect that they should continue to receive direct notification from the Council. It is surprising that there was no consultation question asking specifically whether respondents thought the current neighbour notification procedure should be dropped. The only apparent reference to this proposed change seems to be within the Cabinet report dated 7 September 2020, under the heading "*Proposed revisions to the SCI*". It would have been helpful to respondents if this summary of proposed revisions had also been included in the Get Involved page, as well as a link to the current 43 page 2011 SCI. As it is, respondents have been given no clear way of telling what important provisions in the 2011 SCI have been changed in the current DSCI.

The second paragraph at the top of page 18 suggests that press notices will be issued only for major applications and significant departures from the Development Plan although, four paragraphs further on, unspecified notifications for other types of application are also mentioned. Press notices should continue to be issued for the same range of applications as at present and those should also be specified in that second paragraph at the top of page 18. We monitor planning applications and the press notices on a weekly basis, and we have noticed that relevant planning applications often do not appear in the press notices for some time after validation. Anything that could be done internally to help to capture them in those press notices as soon as possible would be welcome.

Paragraph 4.9 should be expanded to make it clear that, although Parish and Town Councils can indeed trigger a committee referral request, that request is only likely to be implemented under certain limited circumstances, as set out in the Council's Scheme of Delegation for determining planning applications.

Our understanding on this score is that such applications will only go to committee where the Parish Council (1) puts up material planning reasons contrary to the officer's view, (2) the Officers in consultation with the committee chairman or vice chairman and the Local Member agree they are material, and (3) those contrary reasons cannot be overcome by conditions or negotiation. Furthermore, the internal procedure re Parish and Town Council involvement is that a final officer recommendation is made (with report written) and if this is contrary to the Parish or Town Council's comments, then the views of the local member are sought as to whether the decision should remain delegated or be put forward for committee determination. Only then, will the chair and vice chair be made aware of the proposal.

This should be spelt out in the final SCI, rather than giving the false impression that it is within the gift of a Parish or Town Council to obtain a committee referral.

If the Council wishes to be more open, it might be a good idea to include within the final SCI some indication of the small number of planning applications that do go before planning committees.

### **Section 5: Local Consultee Database**

**Q5 Do you agree with the policies Shropshire Council will follow in managing its consultee database?**

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

*Options: Yes; No; If no, please comment on what other factors we need to consider as part of this section of the SCI?*

The Council's planning policy database is presumably continually updated as and when the team becomes aware of any new contacts who have an interest in the planning process. It is a perennial problem that many people simply are not aware of important consultations that could affect them. Is it possible to make use of other databases available to the Council, in order also to notify greater numbers of other harder-to-reach contacts?

### **Section 6: Resources and monitoring**

**Q6 Do you agree with the principle of enhancing electronic communications as part of the planning process?**

*Options: Yes; No; If no please give details of what other factors we need to consider*

Yes and No! For frequent users of the system like ourselves and our members it is hugely helpful to have all information available electronically, as long as it is presented in an easily accessible way. Generally, the Council's systems are very good in this respect and certainly are much more user friendly and complete than the planning websites for the neighbouring local authorities of Telford & Wrekin Council and Powys County Council. Sometimes, however, it can be a bit of a paper chase finding relevant documents. In this respect, it is disappointing that the internal search facility on the Council's home page is abysmal at finding things. It is usually more productive to use a Google search, which often locates documents on the Council's website much more effectively.

However, as stated above at paragraph 2.7 there are still significant numbers of people who do not engage easily with electronic communication, and/or who are not internet-savvy, and/or who are not aware that a consultation is happening, even though they might well be affected by the outcome. Shropshire Council should not rely wholly on electronic forms of communication but must also continue to engage with its public by traditional means. This is particularly so when decent broadband and mobile coverage is still patchy in all too many parts of the county and will remain so until there is universal fast broadband cover throughout Shropshire. Even then, there will still be significant numbers of people, particularly within Shropshire's ageing population, who would not engage with the internet and who would still prefer traditional means of communication. These harder-to-reach people should not be disenfranchised just because it is easier, cheaper and less resource-intensive to adopt wholly electronic communications.

**Q7 Do you agree with the level of monitoring proposed in the SCI and the possible revisions that may be required in the SCI**

*Options: Yes, No, If no, what other areas of monitoring of the SCI do we need to consider*

Yes, we agree that the SCI's implementation should be monitored, particularly to include better ways of engaging with the public and of listening to them. The term "locality working" is unclear and a definition of what is meant by it could be included in the glossary.

# **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

**Q8 Please make any additional comments on this consultation and the Statement of Community Involvement**

## **Summary**

In summary, and in response to Question 8 above, the main points we raise above are:

The DSCI needs to be thoroughly proof-read.

The update of the SCI should have been carried out some time ago, rather than being left to the last minute in order to tie in with the statutory requirements connected with the Regulation 19 consultation on the Draft Plan.

The general principles of consultation in the Gunning principles and in the seven Criteria within Government's own *Code of Practice on Consultation* should be spelt out within the final SCI.

The recent Covid-19 related legislation concerning consultation arrangements should be summarised or referenced in the final SCI.

Consultations should be for a minimum of 12 weeks, as recommended by Government. Some Parish Councils do not meet often enough to be able to give due formal consideration to a consultation that is for only 6 weeks.

Consultations should, as far as possible, avoid holiday periods, or be for a significantly extended period if they do straddle a holiday period.

Consultation material should be mainly in electronic form but should not be wholly so; traditional methods should still be used until the County has complete fast broadband cover.

The Council should not rely on hard pressed Parish and Town Councils to disseminate consultation material. However, a notification poster should be produced before the start of all significant consultations, for circulation to Parish and Town Councils via the SALC network, aimed at informing people who are not on the internet about consultations and how to take part in them.

All supporting documents and evidence referred to in a consultation document must be made available at the start of a consultation.

If a direct choice between multiple options is offered in a consultation the Council should ensure that its policies reflect the results of the poll on those options and the SCI should make that clear.

Reports on consultations should explain how the Council has arrived at its conclusions from those consultations.

Neighbour notifications of planning applications should continue to be issued.

## **Appendix 1 : Consultation response to Draft Statement of Community Involvement**

Press notices should continue to be issued for the same range of applications as now.

The SCI should indicate in the main text of the document (rather than in references to other documents) what proportion of planning applications currently go before committee, and how committee referrals are decided.

We look forward to receiving the Council's feedback on this submission.

## **Annex to Appendix 1**

Text of Shropshire Council poster circulated to Town and Parish Councils via SALC network on 20 January 2021

# **Shropshire Council**

## **Consultation on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 18<sup>th</sup> December 2020 – 5<sup>th</sup> February 2021**

### **Important Information**

As a result of the recent national Lockdown restrictions which came into force on 5<sup>th</sup> January 2021, it is no longer possible to view either a paper copy or digital copy of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan consultation documents in Libraries.

If you wish to view and comment on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan consultation, in the first instance please seek to view the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan and its supporting documents via the dedicated Shropshire Council's webpage at:

<http://shropshire.gov.uk/get-involved/reg-19-pre-submission-draft-local-plan/>

If you do not have access to the internet Shropshire Council can, on request, provide a paper copy of all or part the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan document and two-part representation form in the post. In these circumstances please call the following number:

**0345 678 9004**

*To ensure the best use of resources Shropshire Council will consider requests for paper copies of all or part of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan document and the two-part representation form on a case by case basis and may be required to apply a charge in order to cover costs of printing and postage.*





## **Consultation Response Analyses**

for the

**Issues and Strategic Options, and  
Preferred Scale and Distribution of  
Development**

stages of the

**Shropshire Local Plan Review**

**July 2018**

## **Contents**

<b>Introduction.....</b>	<b>74</b>
<b>Shropshire Council's Consultation Summaries .....</b>	<b>74</b>
<b>CPRE Shropshire further analysis.....</b>	<b>80</b>
<b>Results of CPRE Shropshire further analysis .....</b>	<b>81</b>
<b>Discussion .....</b>	<b>85</b>
<b>Conclusion .....</b>	<b>86</b>
<b>Detailed methodology for further analysis of Consultation Responses.....</b>	<b>88</b>

[For ease of reference, the page numbers above are those within this overall Regulation 19 response, not those within the original Consultation Response Analyses]

## **Appendix 2 : Consultation Response Analyses**

### **Introduction**

- 1 Shropshire Council has twice consulted on its Partial Review of the Local Plan and has twice published summaries of the results of those consultations. Those summaries have stated only the overall figures from all respondents.
- 2 CPRE Shropshire suspected that those overall figures might be heavily skewed by submissions from landowners, developers and agents, and that the figures from members of the public, and from Town and Parish Councils, might paint a very different picture.
- 3 Shropshire Council has very kindly given CPRE Shropshire access to its spreadsheets containing the data from which its Consultation Summaries were derived. CPRE Shropshire has therefore now been able to further analyse that data.
- 4 Our concern is primarily the high housing targets that Shropshire Council prefers, so we have limited our further analysis to the consultation questions dealing with housing numbers.

### **Shropshire Council's Consultation Summaries**

- 5 Shropshire Council consulted on the Issues and Strategic Options stage of its Local Plan Review from 23<sup>rd</sup> January 2017 to 20<sup>th</sup> March 2017. It published a detailed Consultation Response Summary on that consultation on 14<sup>th</sup> July 2017.
- 6 It consulted on the Preferred Scale and Distribution of Development stage of the Local Plan Review from 27<sup>th</sup> October 2017 to 22<sup>nd</sup> December 2017 and released the detailed Consultation Response Summary on that consultation, dated April 2018, for the Cabinet meeting on 2<sup>nd</sup> May 2018.
- 7 Both consultations asked a question about the housing requirement and the Council's Consultation Response Summaries gave summaries of the responses. We reproduce these overleaf.

## Appendix 2 : Consultation Response Analyses

### Issues and Strategic Options

8 For the Issues and Strategic Options the question was:

\*4. Which housing requirement option would you prefer to see used for the Local Plan Review?

- Housing Requirement Option 1: 'Moderate Growth'
- Housing Requirement Option 2: 'Significant Growth'
- Housing Requirement Option 3: 'High Growth'
- Don't know / no opinion

Please use the space below to explain your reasons for your choice.

You can also use this space to let us know if you think there are any other housing requirement options that the Council should consider.

9 Shropshire Council's summary of the responses in its Consultation Response Summary was:

**Question 4** sought views on overall housing requirement options between 2016 and 2036. In total 327 respondents expressed an opinion on this question. Of those who responded 47% favoured the 'Moderate Growth' option equating to 26,250 dwellings over the Plan period; 12% favoured the 'Significant Growth' option equating to 27,500 dwellings; 32% responses favoured the 'High Growth' option equating to 28,750 dwellings; and 9% responding did not choose an option.

Of those favouring 'Moderate Growth' (Option 1):

- A number of responses considered this option most closely equated to current development trends.
- A consistent theme was the need to address local needs, and in particular to support development of affordable and low cost housing in rural areas, ahead of encouraging further in-migration.
- The provision of timely infrastructure was discussed in several responses, with respondents citing the difficulty in delivering new infrastructure, particularly with higher growth options.
- The need for some additional development in the rural area was a feature of several responses, although other responses argued that rural areas lacked sufficient public transport.
- There was also concern expressed about the loss of rural space and the need to protect the environment. Others suggested that making the best use of brownfield sites and existing premises should be prioritised.
- Other respondents questioned the deliverability of higher growth options.

Fewer respondents supported 'Significant Growth' (Option 2) compared with the other two options. Of those who did support this option:

## Appendix 2 : Consultation Response Analyses

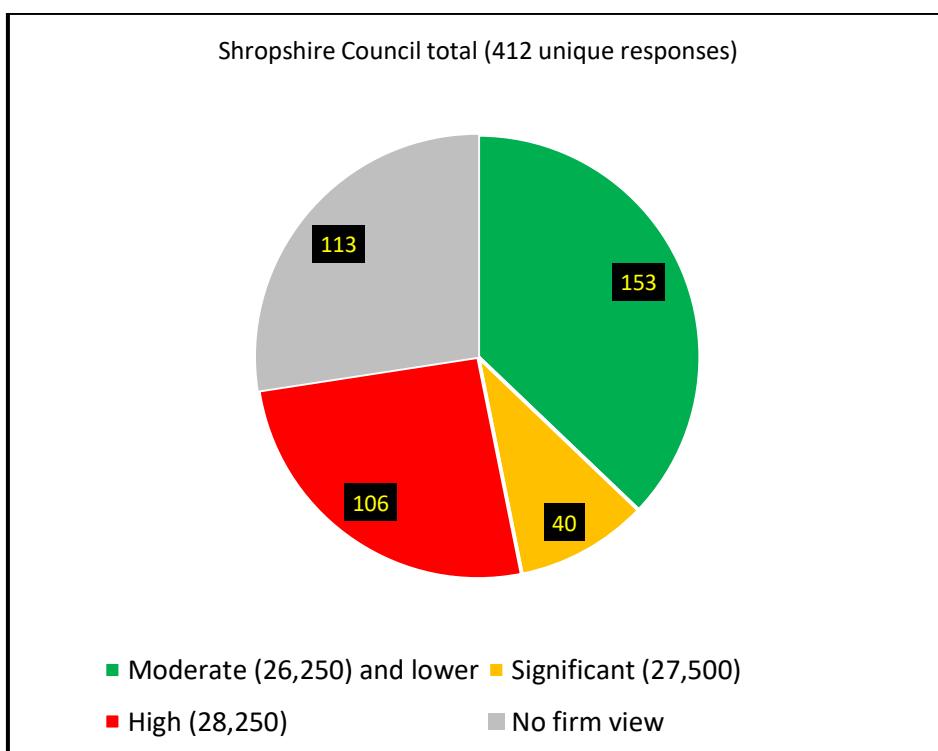
- There was concern expressed about whether the lower housing option (Option 1) would meet needs.
- It was accepted that with this option the proposed requirement would be deliverable and would promote the delivery of towns whilst protecting assets, such as the Shropshire Hills AONB.

Of those respondents who supported 'High Growth' (Option 3):

- A number of respondents pointed out that the proposed annual requirement for this option represented less growth than projected for the second half of the current Core Strategy plan period.
- It was also suggested that expected adjustments in the manner in which the FOAHN is calculated would likely lead to a higher housing need for the County.
- It was argued by several respondents that this option presented the greatest degree of flexibility in providing a range of site allocations and would support inward investment.

A number of other comments provided contrasting views on the validity of all the options, primarily based upon alternative suggestions about the housing need for the area; several thinking there should have been a lower option and several thinking the highest option did not go far enough.

- 10 From this Issues and Strategic Options consultation Shropshire Council identified 412 unique respondents. Of those, 85 made no response at all to Question 4, and 28 responded "Don't know / no opinion". As noted by Shropshire Council, the percentages at paragraph 9 above are based on the 327 respondents who expressed an opinion on Question 4. If instead, the results are based on all 412 unique respondents, then they can be summarised as follows:



In Adrian Cooper's report to Cabinet dated 21<sup>st</sup> June 2017 this result is characterised as : "Whilst there was a slight preference for the 'moderate' growth option, there was also a good level of support for 'high' levels of housing growth".

## Appendix 2 : Consultation Response Analyses

### Preferred Scale and Distribution of Development

11 For the Preferred Scale and Distribution of Development the question was:

3. Do you agree with the preferred housing requirement proposed for Shropshire of 28,750 dwellings between 2016 and 2036 (1,430 dwellings a year), identified in Section 2 of the Consultation Document?

- Yes
- No
- Don't know / no opinion

Please use this space to make any comments about this:

12 Shropshire Council's summary of the responses in its Consultation Response Summary was:

**Question 3** sought views on the preferred 'high growth' housing requirement between 2016 and 2036, equivalent to around 28,750 dwellings over the Plan period. In seeking views the Council provided information on current levels of planning commitments and completions in the first year of the Plan period (2016-2017), and how this would affect the amount of additional housing needing to be planned for and delivered up to 2036.

In summary the preferred housing requirement is made up from the following:

- Overall requirement 2016-2036: around 28,750 dwellings
- Completions 2016/17: 1,910 dwellings
- Undeveloped planning permissions and prior approvals at 31st March 2017: 11,465 dwellings
- SAMDev Allocations without planning permission at 31st March 2017: 5,028 dwellings
- **Number of new dwellings required: 10,347**

The Council received a good mix of views from a variety of respondents, ranging from members of the public, parish and town councils, developers, agents and local interest groups. A small majority of respondents indicated a preference to see a different housing requirement, with the majority of these views expressing a desire to see a lower figure. A significant minority of responses supported the Council's preferred approach.

[In the Cabinet report the summary for Housing Requirement stated:

The Council received a good mix of views. A small majority stated their preference to see a lower housing requirement, whilst others saw greater benefit in supporting the preferred approach, even suggesting a higher requirement. Those respondents supporting the preferred approach noted that it is consistent with the Government's commitment to improving the rate of housing delivery and would provide the greatest opportunity to address housing affordability, together with improvements to economic activity and productivity, increased education opportunities and up-skilling of communities. Other respondents were concerned that the preferred approach did not reflect the views of the majority of respondents to the previous consultation and that there was inadequate infrastructure to meet demand from new development. Some respondents were concerned that it was unclear how individual settlement guidelines have been derived and on what evidence they are based. An explanation of the status and contribution of 'strategic sites' such as Ironbridge Power Station and any 'Garden Villages' was requested, in particular whether housing and

## Appendix 2 : Consultation Response Analyses

*employment provided on these sites will be part of, or in addition to the levels for the rural area.]*

*The key issues raised by those respondents that supported the preferred approach were:*

- *The preferred housing requirement is in line with the National Planning Policy Framework's aim of achieving sustainable development, and in particular the Government's commitment to improving the rate of housing delivery.*
- *The preferred 'high' housing requirement would have the greatest opportunity to address housing affordability, especially for younger families.*
- *The preferred approach will support improvements to economic activity and productivity, supporting an increase to the labour force, increase education opportunities and up-skilling of communities.*

*The key issues raised by those respondents that did not support the proposed preferred approach were:*

- *Concern that the preferred housing requirement was not in line with the view of the majority of respondents at the Issues and Options consultation stage in January 2017, who supported the 'moderate' growth option (26,250 dwellings). This was a consistent message coming from several respondents.*
- *Concern over the ability for infrastructure to meet the demands from new development. This was a consistent message coming from several respondents. Specific comments related to the need to support additional education, health, highway, public transport, rail and sports provision.*
- *Several respondents felt the proposed requirement is unrealistic and felt that a failure to deliver the necessary build-out rates would undermine the ability of the Council to continue to demonstrate a five year housing land supply against the 'high' housing provision.*
- *Concern over the validity of Shropshire's housing need expressed in the Full Objectively Assessed Housing Need (FOAHN). Several respondents felt both the Council's approach and the Government's recently published methodology exaggerate the true 'need' in the County. On a related issue, several respondents queried how the impact of the UK leaving the European Union would have on the availability of jobs and certainty over growth expectations.*
- *Several felt there was insufficient evidence to support the Council's preferred requirement above the defined housing need. Specifically there was also concern that the high completions rates experienced in the County over the last two years are unlikely to be reflective of likely longer term trends. Others felt the expectation of economic growth is unrealistic outside Shrewsbury.*
- *Concern expressed over the potential for adverse environmental impacts resulting from the 'high' growth option. Specific comments also related to the impact this could have on the Shropshire Hill Area of Outstanding Natural Beauty (AONB) and the Green Belt.*
- *Other respondents, who generally favoured the Council's preferred approach, indicated they would like to see a discount applied to some current planning commitments to reflect the potential of non-delivery on some sites. Responses on this matter ranged from suggestion of between 2% and 20% as an appropriate level of discount.*
- *Whilst many respondents who disagreed with the preferred approach suggested a lower figure, others felt that a higher housing requirement would be more sustainable. Across the responses suggested figures ranged from 15,000 to 32,000 dwellings as alternative preferences. Some of those respondents suggesting a higher requirement pointed to the potential opportunity for Shropshire to accommodate 'overspill' housing from the Greater Birmingham and Black Country area, if required. Several respondents argued that the housing requirement should not be treated as a 'ceiling'.*
- *Others raised concern that insufficient thought had been given to securing the right homes in the right places, in particular how the county could attract working age people into the county to support employment opportunities and balanced growth.*

## Appendix 2 : Consultation Response Analyses

- Several respondents suggested the need to prioritise brownfield land, including the potential for infill and ‘above the shop’ living to be utilised to mitigate the need to develop greenfield land.

Other comments about the preferred approach included:

- Important for communities to have a say on the type of housing being planned for in their area.
- Clarification needed on how the identified strategic sites at Tern Hill (Clive Barracks) and the former Ironbridge Power Station site relate to the overall housing requirement.
- Consideration should be given to using empty homes more effectively.
- Better quality amenities are required for future residents.

- 13 “Appendix 1: Respondent Statistics” of the Consultation Summary reported the percentage responses, as follows:

**Question 3** sought views on the preferred housing requirement proposed for Shropshire of 28,750 dwellings between 2016 and 2036 (1,430 dwellings a year).

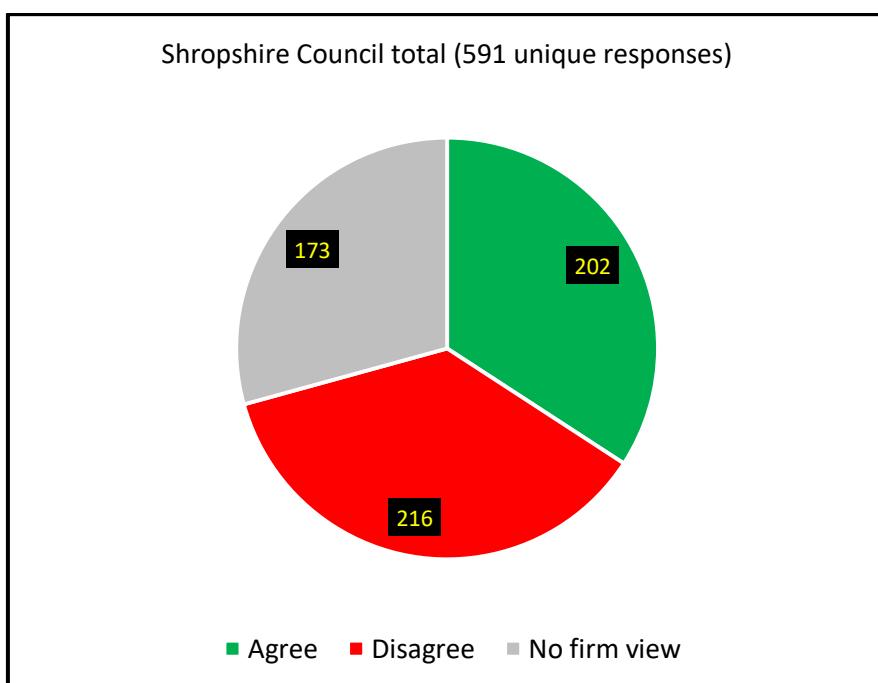
Of the unique respondents that completed this question:

42% agreed with the proposed housing guideline.

45% disagreed with the proposed housing guideline.

13% did not know/had no opinion on the proposed housing guideline.

- 14 From this Preferred Scale and Distribution of Development Consultation Shropshire Council identified 591 unique respondents. Of those, 113 made no response at all to Question 3, and 60 responded “Don’t know / no opinion”. The percentages noted by Shropshire Council at paragraph 13 above are therefore based on the 478 respondents who expressed an opinion on Question 3. If instead, the results are based on all 591 unique respondents, then they can be summarised as follows:



## Appendix 2 : Consultation Response Analyses

### CPRE Shropshire further analysis

- 15 CPRE Shropshire's detailed methodology applied in carrying out its further analysis of the consultation results is recorded at Appendix 1.
- 16 The spreadsheets provided to us by Shropshire Council contained more entries than the number of "unique" respondents reported by the Council. We therefore interrogated the spreadsheets in order to identify the entries not counted by Shropshire Council in its final tally. These seemed mainly to be obvious duplicate entries, where perhaps an individual respondent had entered the Council's computer system more than once, in error. We also interrogated the spreadsheets to identify further entries that were wholly blank, apart from identification details. Those entries that were neither duplicates nor blank we have termed "valid" responses. There was also one entry which stated "*No comments to make throughout*" which we have not included as a valid response. The resulting counts of responses are shown below:

	Issues and Strategic Options	Preferred Scale and Distribution of Development
Rows on spreadsheets	443	623
Shropshire Council – "unique" respondents	412	591
CPRE Shropshire – "valid" responses	382	587

- 17 In the course of interrogating the spreadsheets for duplicate and blank entries it also became apparent that there were many instances of multiple, identical or near-identical entries from agents, on behalf of their different client landowners.
- 18 For the Issues and Strategic Options consultation we counted 121 valid responses from landowners, developers and agents (almost entirely from agents on behalf of their clients), but these were from only 38 separate firms of agents i.e. an average of over 3 responses per firm. One local firm of agents put in 32 separate responses. Three others put in 10 or more responses each. We identified 47 narrative responses that were absolutely identical to other responses from the same agent. A further 11 were almost identical. One agent submitted 25 identical responses. All of these repeat responses favoured the "High" option.
- 19 For the Preferred Scale and Distribution of Development consultation we counted 206 valid responses from landowners, developers and agents (almost entirely from agents on behalf of their clients), but these were from only 54 separate firms of agents i.e. an average of almost 4 responses per firm. One local firm of agents put in 57 separate responses. Four others put in 10 or more responses. 71 separate individuals responded

## Appendix 2 : Consultation Response Analyses

from within these firms of agents. We identified 39 narrative responses that were absolutely identical to other responses from the same person/agent. Several other responses were very nearly identical. All of these repeat responses were “Yes” responses.

- 20 The analysis of the different elements of the total valid responses is as follows:

	Issues and Strategic Options		Preferred Scale and Distribution of Development	
Members of the public	138	36.1%	284	48.4%
Town and Parish Councils	91	23.8%	59	10.0%
Local and National Interest groups	32	8.4%	38	6.5%
Agents, for landowners and developers	121	31.7%	206	35.1%
Total	382	100.0%	587	100.0%

## Results of CPRE Shropshire further analysis

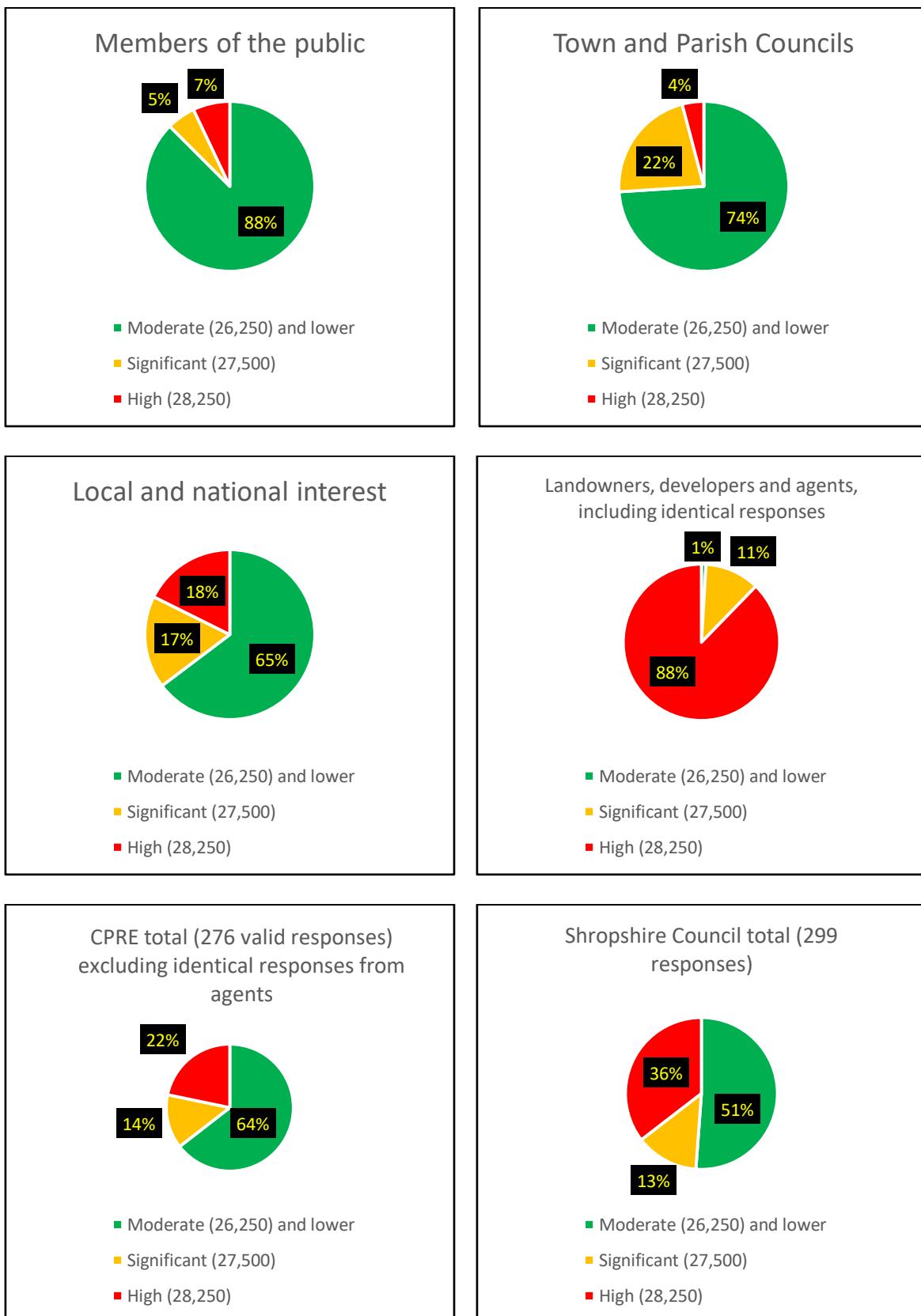
### *Issues and Strategic Options*

- 21 Our further analysis of the responses from respondents expressing a view shows the following:-

	Total	% opting for each option		
		Moderate Growth (26,250 houses) or lower	Significant Growth (27,500 houses)	High Growth (28,750 houses)
Members of the public	128	88	5	7
Town and Parish Councils	73	74	22	4
Local and National Interest groups	17	65	17	18
Agents, for landowners and developers	106	1	11	88
Total – as CPRE	324	55	12	33
Total – as CPRE, excluding identical responses from agents	276	64	14	22
Total – as Shropshire Council	299	51	13	36

## Appendix 2 : Consultation Response Analyses

- 22 These results can be expressed pictorially in the following charts:



- 23 The results are stark. Members of the Public, and Town and Parish Councils represented 62% of all respondents expressing a view. Of these, nearly 5 times as many stated a

## Appendix 2 : Consultation Response Analyses

preference for a low growth option than they did for the two higher options combined. 88% of Members of the Public and 74% of Town and Parish Councils preferred a low growth option. As a group, it was only the agents (acting for landowners and developers) who preferred the highest growth option, to the tune of 88%. Included in our further analysis is the fact that many of those responding did not tick any of the growth options offered in the consultation because they believed that all 3 options were too high; our results take account of these respondents' written views, which Shropshire Council did not.

- 24 Because of the high volume of responses from agents, many of which were duplicate and even identical responses, the average response rates published by Shropshire Council appear to be more evenly spread between those preferring the lower or higher options.
- 25 It is absolutely clear; both the general public, and Town and Parish Councils, want lower growth rates than Shropshire Council is promoting.

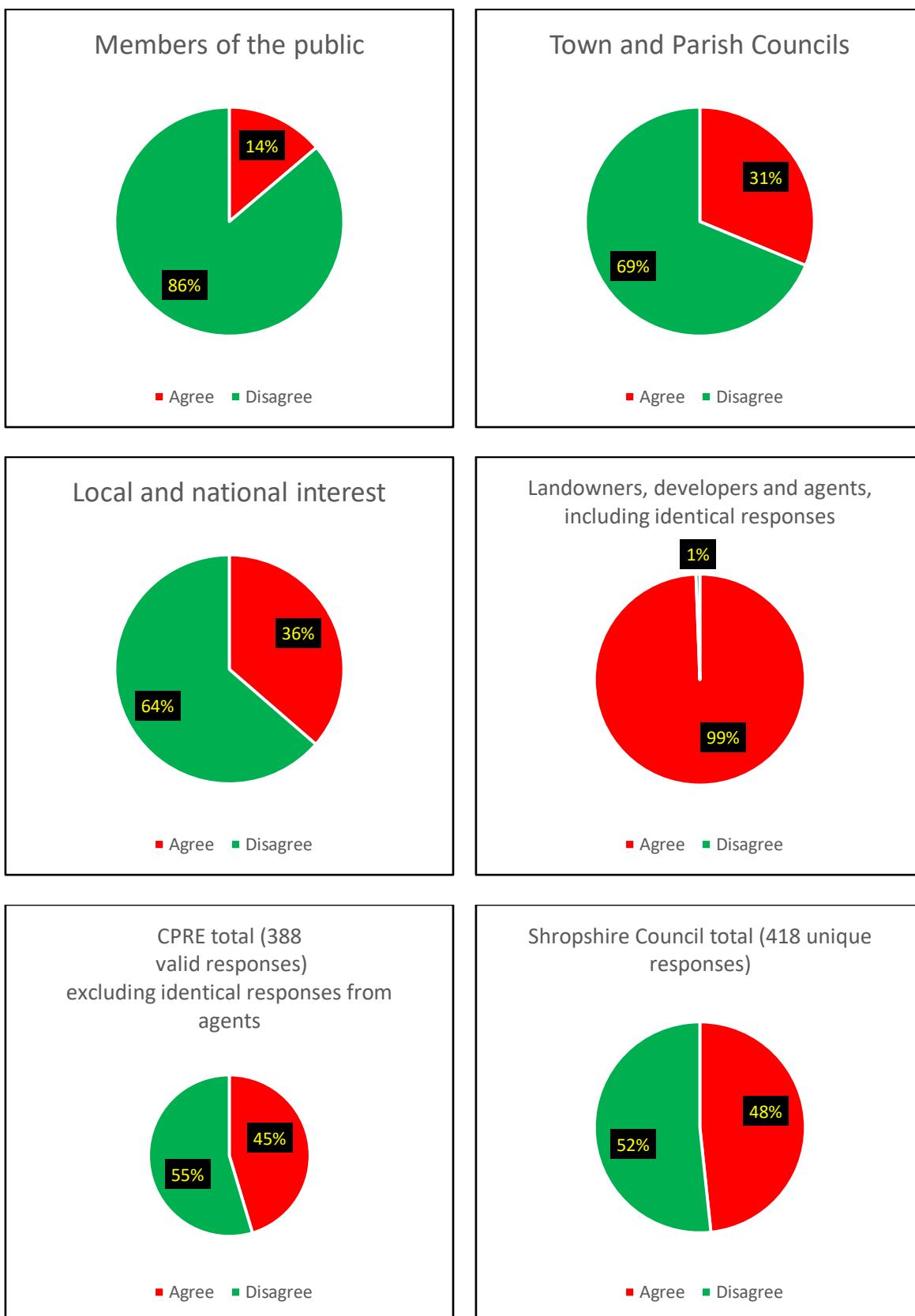
### ***Preferred Scale and Distribution of Development***

- 26 Our further analysis of the responses from respondents expressing a view shows the following:-

	Total	% opting for each option	
		Yes (agree with 28,750)	No (disagree with 28,750)
Members of the public	203	14	86
Town and Parish Councils	32	31	69
Local and National Interest groups	22	36	64
Agents, for landowners and developers	170	99	1
Total – as CPRE	427	50	50
Total – as CPRE, excluding identical responses from agents	388	45	55
Total – as Shropshire Council	418	48	52

- 27 Again, these results can be expressed pictorially in the charts overleaf:

## Appendix 2 : Consultation Response Analyses



- 28 These results are again stark. Members of the Public, and Town and Parish Councils represented 55% of all respondents expressing a view. Of these, over 5 times as many disagreed with the Council's preference for 28,750 houses as those who agreed with it. 86% of Members of the Public and 69% of Town and Parish Councils disagreed with the

## Appendix 2 : Consultation Response Analyses

Council's preference. Unsurprisingly, as a group, it was only the agents (acting for landowners and developers) who agreed with the Council's high preference, to the tune of 99%.

- 29 But again, because of the high volume of responses from agents, many of which were duplicate and even identical responses, the average response rates published by Shropshire Council appear to be more evenly spread between "Yes" and "No" responses.
- 30 It is again absolutely clear; both the general public, and Town and Parish Councils, want lower growth rates than Shropshire Council is promoting, but agents and developers are all for them.

## Discussion

- 31 The interpretation of these results, and whether Shropshire Council should act on them, seems to boil down to what is considered to be the nature of a consultation.
- 32 Ostensibly, the purpose of the Consultation appears to be to find out the views of Shropshire Council's constituency, including those of the general public and of Town and Parish Councils.
- 33 The scope of the consultations as published by Shropshire Council was:  
For the Issues and Strategic Options consultation:  
*"We are seeking views of all parties with an interest in the proposals, so that relevant views and evidence can be taken into account in deciding the best way forward."*  
For the Preferred Scale and Distribution of Development consultation:  
*"We are seeking views of all parties with an interest in the preferred approach to planning for these issues, so that relevant views and evidence can be taken into account in deciding the best way forward."*
- 34 We maintain that the real purpose of the consultation should be to establish the views of the Shropshire electorate as to the best outcome for the town and county, and the answer to this must come from Individuals, representatives of Town and Parish Councils and other interest groups.
- 35 There is little to be gained by seeking the views of agents, landowners and developers; their view is likely to be heavily biased towards maximum growth because it means employment opportunities, growth for their organisations, increased turnover and improved profitability. To some extent this applies to some Local and National Interest Groups as well.
- 36 We queried the consultation process in our submission for the Preferred Options consultation, particularly the fact that after the Issues and Strategic Options stage the

## **Appendix 2 : Consultation Response Analyses**

popular preference for the lowest housing targets had been over-ridden by the Council in favour of the highest option.

- 37 At paragraph 2.54 of our response we recognised that Shropshire Council's reasons for acting in this non-democratic way were 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.
- 38 Shropshire Council continues to proclaim that a consultation is not a referendum. We, on the other hand, maintain that if an electorate is asked a direct multiple-choice question as it was in Question 4 of the Issues and Strategic Options consultation, and in Question 3 of the Preferred Scale and Distribution of Development consultation, then the Council should not simply over-rule the results of the resulting poll.
- 39 That is the more so when the results of those polls are as stark as our further analysis of the consultation results has shown them to be. It is clear that all elements of the Council's electorate are heavily against their high targets, except for that element with a vested interest in the high targets, namely agents, developers and landowners.
- 40 The Council has not made it evident, in over-riding the views of its electorate, how it has weighed those clear dissenting views both (1) against specific comments made, and (2) against existing and emerging evidence. The implication is that it has ignored its electorate's views in favour of those of agents and developers, in order to back up its Economic Growth Strategy and its high targets, which it launched part way through the Issues and Strategic Options consultation.
- 41 It can be argued that landowners are entitled to have their agents submit responses on their behalf, but to have so many identical and similar responses from agents allowed in Shropshire Council's results count seems to us to be a distortion of the consultation response analysis.

## **Conclusion**

- 42 Our further analysis clearly shows that 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.
- 43 Responses from agents, landowners and developers as counted by Shropshire Council, included many duplicate and identical responses. The numbers involved were as follows (on the next page):

## Appendix 2 : Consultation Response Analyses

	Agents' responses as counted by Shropshire Council	Actual number of firms of agents involved
Issues and Strategic Options	121	38
Preferred Scale and Distribution of Development	206	54

- 44 All of the housing options offered by Shropshire Council are in excess of what they claim to be the minimum required by the Government's new methodology (currently 25,400 dwellings), although there are circumstances in which that Government figure can be reduced. There therefore appears to be no reason why the Council cannot adopt the lower targets that its electorate overwhelmingly prefers.
- 45 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.
- 46 Another conclusion that might be drawn is that the Council appears to favour the views of agents and developers to the blatant disregard of the local population.
- 47 CPRE Shropshire believes that in electing for the "High Growth" option as its "Preferred Option" Shropshire Council has deliberately ignored the clear majority view of those for whom the Consultations should be intended.
- 48 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.

## Appendix 2 : Consultation Response Analyses

### Detailed methodology for further analysis of Consultation Responses

#### *Issues and Strategic Options*

Action	Explanation												
Create new Col B and enter a classification of each entry in Col C. Classifications used are: <table border="1"> <tr> <td><b>Shropshire Council</b></td><td><b>CPRE</b></td></tr> <tr> <td>Individuals</td><td>Individuals</td></tr> <tr> <td>Parish Councils</td><td>Local Government</td></tr> <tr> <td>Landowners/developers (many of which were represented by planning agents)</td><td>Landowners, developers and agents</td></tr> <tr> <td></td><td>Local and national interest groups (including Corporate)</td></tr> <tr> <td></td><td>Duplicates, wholly blank entries, and identical narratives for Q4</td></tr> </table>	<b>Shropshire Council</b>	<b>CPRE</b>	Individuals	Individuals	Parish Councils	Local Government	Landowners/developers (many of which were represented by planning agents)	Landowners, developers and agents		Local and national interest groups (including Corporate)		Duplicates, wholly blank entries, and identical narratives for Q4	To categorise the nature of each response, and to identify the duplicate entries.
<b>Shropshire Council</b>	<b>CPRE</b>												
Individuals	Individuals												
Parish Councils	Local Government												
Landowners/developers (many of which were represented by planning agents)	Landowners, developers and agents												
	Local and national interest groups (including Corporate)												
	Duplicates, wholly blank entries, and identical narratives for Q4												
Remove “Wrap text” formatting for ease of viewing data													
Identify any duplicate entries presumably entered in error via the Questionnaire Portal and retained within the spreadsheet	Identify these primarily through sorting by “1. Name”. Cut and paste such rows to the foot of the spreadsheet												
Identify any rows where no data was recorded by the Council as having been entered, other than identification data	Enter a formula in Col BU to identify rows with no entries other than identification data. Again, cut and paste such rows to the foot of the spreadsheet.												
Compare resulting valid entries with Council’s “score”	Having pulled out the rows that were apparently duplicate entries or blank entries our total of valid entries is <b>382</b> , compared with the Council’s figure of <b>412</b> “unique” responses.												
Go through the responses to Q4 (in Col H) and identify any that suggest there should be a lower housing requirement than any of the options offered	Enter “Lower” in Col H												
Sort the data by Col D (2. Agent), then Col C (1. Name)	Primarily to sort the responses from agents into a sensible order												

## Appendix 2 : Consultation Response Analyses

Action	Explanation
Insert rows beneath each category in order to summarise the responses to Q4 by category, and enter summation formulae. Include narrow rows to define the range	Check that the alphabetic sum equals the sum of the numerical sums
Interrogate “Individual” category to identify duplicate/identical entries from the same source: Sort “Individual” by Col H (narrative response to Q4) to identify identical responses	Only one duplicate narrative entry was identified, from Robert and Gill Buckeridge, although the answers to the first part of Q4 were not identical
Interrogate “Local Gov” category to identify duplicate/identical entries from the same source: Sort “Local Gov” by Col H (narrative response to Q4)	No identical responses were found, although there were some blank responses
Interrogate “L, D & A” category to identify duplicate/identical entries from the same source: Count multiple entries from the same agent (having sorted by agent) Count identical narrative responses from the same source (having sorted by Col H)	We counted 121 valid “L, D & A” responses, but from only 38 separate agents i.e. an average of over 3 per agent. One local agent put in 32 separate responses. Three others put in 10 or more responses each. We identified 47 narrative responses that were absolutely identical to other responses from the same agent. A further 11 were almost identical. One agent submitted 25 identical responses. All favoured the “High” option
Create Summary tab and produce relevant Charts	

## Appendix 2 : Consultation Response Analyses

### Preferred Scale and Distribution of Development

Action	Explanation												
Create new Col A and enter sequential numbering of all entries	To enable the original order to be re-created if necessary, after sorting of data												
Create new Col B (spacer col) and new Col C and enter a classification of each entry in Col C. Classifications used are:	To categorise the nature of each response, and to identify the duplicate entries.												
<table border="1"> <tr> <td><b>Shropshire Council</b></td><td><b>CPRE</b></td></tr> <tr> <td>Members of the public</td><td>Individuals</td></tr> <tr> <td>Parish and Town Councils</td><td>Local Government</td></tr> <tr> <td>Developers and agents</td><td>Landowners, developers and agents (L, D &amp; A)</td></tr> <tr> <td>Local interest groups</td><td>Corporate, and Local and national interest groups</td></tr> <tr> <td></td><td>Duplicates, wholly blank entries, and identical narratives for Q3b</td></tr> </table>	<b>Shropshire Council</b>	<b>CPRE</b>	Members of the public	Individuals	Parish and Town Councils	Local Government	Developers and agents	Landowners, developers and agents (L, D & A)	Local interest groups	Corporate, and Local and national interest groups		Duplicates, wholly blank entries, and identical narratives for Q3b	
<b>Shropshire Council</b>	<b>CPRE</b>												
Members of the public	Individuals												
Parish and Town Councils	Local Government												
Developers and agents	Landowners, developers and agents (L, D & A)												
Local interest groups	Corporate, and Local and national interest groups												
	Duplicates, wholly blank entries, and identical narratives for Q3b												
Remove “Wrap text” formatting for ease of viewing data													
Identify any duplicate entries presumably entered in error via the Questionnaire Portal and retained within the spreadsheet	Identify these primarily through sorting by “Respondent Name”. Cut and paste such rows to the foot of the spreadsheet												
Identify any rows where no data was recorded by the Council as having been entered, other than identification data	Enter a formula in Col AP to identify rows with no entries other than identification data. Again, cut and paste such rows to the foot of the spreadsheet.												
Compare the resultant number of valid responses with the Council’s number of “unique” responses	<p>Our total of valid entries is <b>587</b>, compared with the Council’s figure of <b>591</b> “unique” responses.</p> <p>The Council’s highlighting indicates that they recognised a duplication for Peter Cooke, but an original valid response cannot be identified</p> <p>Similarly, the Council’s highlighting indicates that they recognised 2 duplicates for Ludford Parish Council but an original valid response cannot be identified</p>												
Go through the responses to Q3b (now in Col I) and identify anywhere the narrative indicates what the respondent’s opinion <u>actually</u> was, where no preference has been entered in Col H. Adjust Col H response accordingly	Adjusted entries are highlighted in Col I												

## Appendix 2 : Consultation Response Analyses

Action	Explanation
Sort the data by Col C, then Col E (Respondent Organisation), then Col D (Respondent Name), then Col F (Client Name)	Primarily to sort the responses from agents into a sensible order
Insert rows beneath each category in order to summarise the responses to Q3a by category, and enter summation formulae. Include narrow rows to define the range	Check that the alphabetic sum equals the sum of the numerical sums
Interrogate “Individual” category to identify duplicate/identical entries from the same source: Sort “Individual” by Col I (narrative response to Q3b) to identify further identical responses	29 responses which were absolutely identical to another response (all “No”). Orange highlighting
Interrogate “Local Gov” category to identify duplicate/identical entries from the same source: Sort “Local Gov” by Col I (narrative response to Q3b)	Only one possible near duplication of response (Great Hanwood & Ford) despite there being 13 of the 59 PCs with duplicate clerks
Interrogate “L, D & A” category to identify duplicate/identical entries from the same source: Count multiple entries from the same agent (having sorted by agent) Count multiple entries from the same person (having sorted by person) Count identical narrative responses from the same source (having sorted by Col I)	We counted 206 “L, D & A” responses, but from only 54 separate agents i.e. an average of almost 4 per agent. One local agent put in 57 separate responses. Four others put in 10 or more responses. 71 separate individuals responded (including the 5 repeats from Charlene Sussums-Lewis, Carter Jonas) 39 of the responses were absolutely identical to other responses from the same person/agent. All of these were “Yes”. Several others were very nearly identical
Create Summary tab and produce relevant Charts	

# Appendix 3 : Catalogue of Evidence Base

## Appendix 3 : Catalogue of Evidence Base

New for this consultation Document file title	Notes	Mb	Pages
<b>Cabinet on 7/12/20: Agenda item 7 - Shropshire Local Plan - Pre Submission (Regulation 19) version</b> <a href="https://shropshire.gov.uk/committee-services/iListDocuments.aspx?ClId=130&amp;MId=4145&amp;Ver=4">https://shropshire.gov.uk/committee-services/iListDocuments.aspx?ClId=130&amp;MId=4145&amp;Ver=4</a>			
Cabinet report		0.55	15
Appendix 1 Shropshire Local Plan 2016-2038 Regulation 19 Pre-Submission Draft		[9.074]	[360]
Appendix 2 - Bridgnorth Development Options Assessment		[0.454]	[28]
Appendix 2a Bridgnorth Development Options - Landscape and Visual Issues		[0.299]	[16]
Appendix 3 - Local Development Scheme Dec 2020		[0.731]	[22]
Appendix 3 - local-development-scheme-december-2020 - corrected version at https://www.shropshire.gov.uk/media/16808/local-development-scheme-december-2020.pdf	corrected after Cabinet meeting	0.75	22
Appendix 4 - Summary of Responses to the Consultation		6.59	393
		7.88	430
<b>Regulation 19 webpage, via Get Involved</b> <a href="https://www.shropshire.gov.uk/get-involved/reg-19-pre-submission-draft-local-plan/">https://www.shropshire.gov.uk/get-involved/reg-19-pre-submission-draft-local-plan/</a>	3		
<b>Listed within the text</b>			
regulation-19-pre-submission-draft-of-the-shropshire-local-plan		9.44	360
representation-form-guidance-note		0.24	6
sustainability-appraisal-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		1.69	266
habitats-regulations-assessment-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		2.32	178
equality-and-social-inclusion-impact-assessment-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		0.30	12
statement-of-representations-procedure		0.15	2
consultation-statement		0.27	9
consultation-plan		0.24	4
part-a-representation-form pdf		0.21	1
part-a-representation-form doc		0.09	1
part-b-representation-form pdf		0.20	2
part-b-representation-form doc		0.08	2
<b>Documents listed at the foot of the webpage</b>			
regulation-19-pre-submission-draft-of-the-shropshire-local-plan		[9.444]	[360]
Maps - policies and inset - see below		[185.094]	[114]
representation-form-guidance-note		[0.238]	[6]
part-a-representation-form doc		[0.088]	[1]
part-a-representation-form pdf		[0.21]	[1]
part-b-representation-form doc		[0.084]	[2]
part-b-representation-form pdf		[0.204]	[2]
consultation-statement		[0.273]	[9]
consultation-plan		[0.242]	[4]
statement-of-representations-procedure		[0.15]	[2]
sustainability-appraisal-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		[1.694]	[266]
Sustainability Appraisal appendices - see below			
summary-of-the-sustainability-appraisal-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		1.21	20
habitats-regulations-assessment-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		[2.317]	[178]
habitats-regulations-assessment-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan-appendix-1		19.16	44
habitats-regulations-assessment-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan-appendices-4-5-6-7		1.77	56
summary-of-the-habitats-regulations-assessment-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		0.27	7
equality-and-social-inclusion-impact-assessment-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan		[0.296]	[12]
<b>Maps - Overarching policies map and inset maps x 22</b>			
Draft interactive policies map - web only via <a href="https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=9a700832bbf04b1db2179445e624c198">https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=9a700832bbf04b1db2179445e624c198</a>			

Catalogue page 1 of 10

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
Draft interactive mineral safeguarding map - web only via <a href="https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=ad29fdaed74e4c8db7cff437144017f2">https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=ad29fdaed74e4c8db7cff437144017f2</a>		15.66	1
S0. Overarching Policies Map		5.52	3
S1. Albrighton Place Plan Area Inset Maps		8.27	8
S2. Bishops Castle Place Plan Area Inset Maps		8.66	6
S3. Bridgnorth Place Plan Area Inset Maps		6.32	3
S4. Broseley Place Plan Area Inset Maps		12.37	3
S5. Church Stretton Place Plan Area Inset Maps		7.06	5
S6. Cleobury Mortimer Place Plan Area Inset Maps		12.50	3
S7. Craven Arms Place Plan Area Inset Maps		6.66	8
S8. Ellesmere Place Plan Area Inset Maps		6.10	3
S9. Highley Place Plan Area Inset Maps		9.11	6
S10. Ludlow Place Plan Area Inset Maps		7.65	7
S11. Market Drayton Place Plan Area Inset Maps		12.04	4
S12. Minsterley Pontesbury Place Plan Area Inset Maps		7.31	4
S13. Much Wenlock Place Plan Area Inset Maps		10.58	14
S14. Oswestry Place Plan Area Inset Maps		4.78	3
S15. Shifnal Place Plan Area Inset Maps		16.34	14
S16a. Shrewsbury Place Plan Area Inset Maps		10.09	3
S16b. Shrewsbury Town Inset		7.28	6
S17. Wem Place Plan Area Inset Maps		7.07	7
S18. Whitchurch Place Plan Area Inset Maps		0.50	1
S19. Clive Barracks Tern Hill Strategic Settlement Inset Map		1.88	1
S20. Former Ironbridge Power Station Strategic Settlement Inset Map		1.38	1
<b>Sustainability Appraisal appendices</b>			
sustainability-appraisal-appendix-a-policy-assessment-matrices		2.47	137
sustainability-appraisal-appendix-b-albrighton-place-plan-area-site-assessments		3.31	119
sustainability-appraisal-appendix-c-bishops-castle-place-plan-area-site-assessments		5.88	211
sustainability-appraisal-appendix-d-bridgnorth-place-plan-site-assessments		7.55	343
sustainability-appraisal-appendix-e-broseley-place-plan-area-site-assessments		3.90	99
sustainability-appraisal-appendix-f-church-stretton-place-plan-area-site-assessments		2.29	118
sustainability-appraisal-appendix-g-cleobury-mortimer-place-plan-area-site-assessments		1.98	35
sustainability-appraisal-appendix-h-craven-arms-place-plan-area-site-assessments		2.83	84
sustainability-appraisal-appendix-i-ellesmere-place-plan-area-site-assessments		4.16	157
sustainability-appraisal-appendix-j-highley-place-plan-area-site-assessments		3.34	75
sustainability-appraisal-appendix-k-ludlow-place-plan-area-site-assessments		5.54	159
sustainability-appraisal-appendix-l-market-drayton-place-plan-area-site-assessments		6.70	257
sustainability-appraisal-appendix-m-minsterley-and-pontesbury-place-plan-area-site-assessments		4.02	147
sustainability-appraisal-appendix-n-much-wenlock-place-plan-area-site-assessments		3.33	86
sustainability-appraisal-appendix-o-oswestry-place-plan-area-site-assessments		17.37	834
sustainability-appraisal-appendix-p-shifnal-place-plan-area-site-assessments		6.07	175
sustainability-appraisal-appendix-q-shrewsbury-place-plan-area-site-assessments		16.92	997
sustainability-appraisal-appendix-r-wem-place-plan-area-site-assessments-1		4.58	332
sustainability-appraisal-appendix-s-whitchurch-place-plan-area-site-assessments		4.81	249
sustainability-appraisal-appendix-t-strategic-sites-assessments		5.08	134
	63	350.63	6,692

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
<b>Evidence Base webpage</b> <a href="https://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-review/evidence-base/">https://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-review/evidence-base/</a>			
<b>Related information</b> Brownfield Land Register (maps) - see below under 'B' for the actual register <a href="https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=25b8fd6ba2fb4c878775a1aaea210576">https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=25b8fd6ba2fb4c878775a1aaea210576</a>			
Residential conclusion map - Appendix F of SLAA <a href="https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=3fdc4125b78641c2a5c7a1c48d77d504">https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=3fdc4125b78641c2a5c7a1c48d77d504</a>			
Employment conclusion map - Appendix G of SLAA <a href="https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=919ace4dac2a4d27adf1293f8e509417">https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=919ace4dac2a4d27adf1293f8e509417</a>			
Strategic Flood Risk Assessment Level 1 + maps (63 x App A, 18 x App B)	see below	[243.299]	[64]
Strategic Flood Risk Assessment Level 2 maps	see below	[42.249]	[19]
Industrial-strategy-for UK white-paper-web-ready-version	added 7/8/20	8.77	256
Strategic Economic Plan for the West Midlands Combined Authority	added 7/8/20	2.42	58
Marches-Local-Industrial-Strategy-Final-draft-20.12.19	added 7/8/20	1.63	48
The-Marches-LEP-Strategic-Economic-Plan-2019	added 7/8/20	4.39	35
Shropshire Council corporate-plan-2019-20-to-2021-22	added 7/8/20	2.12	24
Shropshire climate-change-strategy-framework	added 7/8/20, out of date from 17/12/20	1.10	16
<b>Further information</b>			
Self-build Register: <a href="https://shropshire.gov.uk/self-build-homes/">https://shropshire.gov.uk/self-build-homes/</a>			
Place Plans: <a href="https://shropshire.gov.uk/place-plans/">https://shropshire.gov.uk/place-plans/</a>			
Right Home Right Place: <a href="https://www.righthomerightplace.co.uk/">https://www.righthomerightplace.co.uk/</a>			
Homepoint: <a href="https://www.shropshirehomepoint.co.uk/Data/ASPPages/1/30.aspx">https://www.shropshirehomepoint.co.uk/Data/ASPPages/1/30.aspx</a>			
Coal Authority Resource Plan: <a href="http://mapapps2.bgs.ac.uk/coalauthority/home.html">http://mapapps2.bgs.ac.uk/coalauthority/home.html</a>			
Strategic Stone Study Database: <a href="https://www.bgs.ac.uk/mineralsUK/buildingStones/StrategicStoneStudy/EH_project.html">https://www.bgs.ac.uk/mineralsUK/buildingStones/StrategicStoneStudy/EH_project.html</a>			
Market Town Profiles x 17 - autumn/winter 2017/18	see below added 7/8/20	[96.89]	[804]
Draft Local Economic Growth Strategies x 5	see below added 7/8/20	[11.55]	[142]
[Appendix 1 -] WMCA Design Charter short form leaflet	added around 13/1/21	0.82	2
<b>Alphabetical</b>			
bridgnorth-development-options-assessment (updated)	dated 26/11/20	0.45	28
bridgnorth-development-options-assessment (updated) appendix 1	dated 26/11/20	0.31	16
brownfield-register-2020-part-1-24-march-2020		0.82	10
building-regulations-part-m-access-to-and-use-of-buildings-2016		1.71	69
business-grow-on-space-report	added 7/8/20	1.78	77
business-survey	added 7/8/20	1.38	56
<b>Core Strategy</b>		4.77	158
Correspondence - Cross Boundary Issues - ABCA and SC			
Correspondence 12-07-2018		0.09	2
Correspondence 08-02-2019		0.20	2
Correspondence 26-04-2019		0.22	2
Correspondence 13-05-2019		0.17	3
Correspondence 30-09-2019		0.29	8
[shropshire]-economic-development-needs-assessment-interim-report-dec-2020	added 18/12/20	4.80	138
economic-growth-strategy-for-shropshire-2017-2021		3.41	32
employment-land-review-report	added 7/8/20	27.17	86
five-year-supply-statement-2019-executive-summary		0.51	4

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
five-year-supply-statement-2019		4.51	156
Green-belt-assessment		21.29	310
Green-belt-assessment-figures-4-1-to-4-5		5.39	8
Green Belt Review		1.89	57
green-belt-review-appendix-1-albrighton		5.04	29
green-belt-review-appendix-2-alveley		5.80	40
green-belt-review-appendix-3-bridgnorth		7.82	49
green-belt-review-appendix-4-cosford		3.79	22
green-belt-review-appendix-5-junction-3		5.30	30
green-belt-review-appendix-6-junction-4		2.98	18
green-belt-review-appendix-7-shifnal		5.40	30
green-belt-revised-exceptional-circumstances-statement-December 2020		2.49	119
green-belt-exceptional-circumstances-statement		[3.092]	[115]
Green Infrastructure Strategy	see below	[201.576]	[432]
gtaa-gypsy-and-traveller-accommodation-assessment-2017		1.87	114
gtaa-update-pdf-final		2.41	113
guide-to-disability-data-2015		0.40	9
hierarchy-of-settlements-assessment-2020		2.39	45
historic-farmsteads-characterisation-project	dated July 2010	18.42	240
historic-landscape-character-assesment	dated July 2010 (SCC)	7.81	149
Housing Strategy (Draft Shropshire), published for separate consultation	launched 5/8/20. <b>Final revised document to Cabinet on 18/1/21, not placed on Evidence Base</b>	3.58	36
indoor-leisure-facilities-strategy-evidence-base	modified 10/12/20	4.62	116
indoor-leisure-facilities-strategy	modified 10/12/20	0.94	54
innovative-workspace-demand-study	added 7/8/20	2.11	114
[shropshire]-local-housing-need-assessment-2020 (1)		0.41	12
Landscape and Visual Sensitivity Study (LVSS) (2018) x 62 docs	see below	[1003.61]	[994]
m54-strategic-options-study		4.49	47
[ev68-]mineral-safeguarding-bgs-2008		0.28	35
minerals-technical-background-report-2020		0.58	14
mod-designated-safeguarding-zones	dated 10/12/20	4.17	2
much-wenlock-neighbourhood-plan	adopted 25/7/14	1.78	44
nationally-described-space-standard-2015		0.33	5
Open Space and Recreation Needs Assessment + 4 appendices		0.38	28
Open Space Needs Assessment - Appendix A		4.32	56
Open Space Needs Assessment - Appendix B		0.40	4
Open Space Needs Assessment - Appendix C		0.41	7
Open Space Needs Assessment - Appendix D: Current provision Open Spaces and Place Plans 2017		0.28	21
playing-pitch-and-outdoor-sports-strategy-action-plan	dated 10/12/20	10.27	218
playing-pitch-and-outdoor-sports-strategy-assessment-report		8.47	210
playing-pitch-and-outdoor-sports-strategy-executive-summary		0.37	8
Productivity Growth Forecast - Excel spreadsheet from Oxford Economics		0.02	1
SAMDev Plan	adopted 17/12/15	2.66	240
sequential-and-exception-test-flood-risk	posted 6/8?	0.54	21

Catalogue page 4 of 10

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
Strategic Flood Risk Assessment shropshire-level-1-sfra-final-report		5.48	135
sfra-1-appendix-b-cumulative-impact-maps		5.56	19
SFRA Level 2 report and detailed site summary tables x 19	see below		
See also further below for SFRA Level 1 and Level 2 maps			
Shifnal Neighbourhood Plan 2014-2026		9.28	76
shma-part-1-2020-strategic-housing-market-assessment-part-1		7.86	112
shma-part-2-2020-strategic-housing-market-assessment-part-2	dated 22/9/20	9.97	195
Shrewsbury Battlefield - Heritage Assessment (Setting) - October 2018		5.48	117
Shrewsbury Big Town Plan		7.24	40
shropshire-telford-local-aggregates-assessment-2019		0.61	15
shropshire-hills-aonb-exceptional-circumstances-statement		0.73	31
shropshire-hills-aonb-management-plan-2019-24		4.42	70
shropshire-landscape-typology	dated 23/8/2006	5.91	78
skills-evidence-base	added 7/8/20	1.34	66
SLAA (Strategic Land Availability Assessment) + 6 appendices + addendum	see below	[22.436]	[756]
sport-england-and-public-health-england-active-design-guidance-10-principles	dated Oct 2015	26.79	104
sport-england-artificial-sports-lighting-update	dated Nov 2012	4.00	61
strategic-infrastructure-implementation-plan		1.24	65
strategic-sites-employment-areas-appendices-phase1-shrewsbury	added 7/8/20	2.17	91
strategic-sites-employment-areas-report-phase-1-shrewsbury	added 7/8/20	1.15	118
strategic-sites-employment-areas-report-phase-2-shropshire	added 7/8/20	5.09	289
town-centres-study-shropshire	dated 3/9/20	6.24	53
transport-statement-for-land-at-snatchfield-farm-church-stretton		[0.49]	[16]
[shropshire] viability-study	repaired 5/8	9.64	242
[shropshire] viability-study-appendices-1-to-10		24.38	212
[shropshire] viability-study-appendices-11-to-18	repaired 5/8	9.30	220
waste-technical-background-report-2020		0.34	12
[shropshire] water-cycle-study		4.80	195
west-midlands-aggregates-working-party-annual-report-2015		0.47	45
Wooore Neighbourhood Plan 2016 - 2036	Referendum version May 2019	2.55	44
Market Town Profiles - Autumn/Winter 2017/18	102	387.69	6,666
albrighton	added 7/8/20	5.93	48
bishops-castle	added 7/8/20	4.85	47
bridgnorth	added 7/8/20	6.30	48
broseley	added 7/8/20	4.93	44
church-stretton	added 7/8/20	5.26	46
cleobury-mortimer2	added 7/8/20	6.03	46
craven-arms	added 7/8/20	5.82	48
ellesmere	added 7/8/20	5.44	45
highley	added 7/8/20	5.55	45
ludlow	added 7/8/20	5.71	48
market-drayton	added 7/8/20	5.26	46
much-wenlock	added 7/8/20	5.57	45
oswestry-final-version-091117	added 7/8/20	6.03	49
shifnal	added 7/8/20	5.81	48

Catalogue page 5 of 10

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
shrewsbury	added 7/8/20	8.52	60
wem-270318	added 7/8/20	4.39	46
whitchurch	added 7/8/20	5.48	45
		96.89	804
<b>Draft Local Economic Growth Strategies</b>	17		
bridgnorth-legs	added 7/8/20	1.90	26
ludlow-legs	added 7/8/20	2.16	25
market-drayton-legs	added 7/8/20	2.69	27
oswestry-legs	added 7/8/20	2.23	35
whitchurch-legs	added 7/8/20	2.57	29
	5	11.55	142
<b>Green Infrastructure Strategy</b>			
green-infrastructure-strategy-main-report		5.94	41
green-infrastructure-strategy-appendix-b		0.20	9
green-infrastructure-strategy-appendix-c_part1-including-open-space-assess		9.87	53
green-infrastructure-strategy-appendix-c_part2		19.09	12
green-infrastructure-strategy-appendix-c_part3		19.71	13
green-infrastructure-strategy-appendix-c_part4		19.08	13
green-infrastructure-strategy-appendix-c_part5		18.70	12
green-infrastructure-strategy-appendix-c_part6		18.97	13
green-infrastructure-strategy-appendix-c_part7		6.59	4
green-infrastructure-strategy-appendix-d-e		0.18	12
green-infrastructure-strategy-strategic-centre-shrewsbury		3.94	18
green-infrastructure-strategy-principal-centre-bridgnorth		3.80	12
green-infrastructure-strategy-principal-centre-ludlow		3.42	12
green-infrastructure-strategy-principal-centre-market-drayton		5.66	14
green-infrastructure-strategy-principal-centre-oswestry		6.24	13
green-infrastructure-strategy-principal-centre-whitchurch		3.53	14
green-infrastructure-strategy-key-centre-albrighton		4.37	13
green-infrastructure-strategy-key-centre-bishops-castle		4.70	11
green-infrastructure-strategy-key-centre-broseley		5.93	12
green-infrastructure-strategy-key-centre-church-stretton		3.52	12
green-infrastructure-strategy-key-centre-cleobury-mortimer		3.12	12
green-infrastructure-strategy-key-centre-craven-arms		3.32	12
green-infrastructure-strategy-key-centre-ellesmere		5.17	13
green-infrastructure-strategy-key-centre-highley		5.22	12
green-infrastructure-strategy-key-centre-much-wenlock		3.37	12
green-infrastructure-strategy-key-centre-shifnal		4.63	12
green-infrastructure-strategy-key-centre-wem		4.67	12
green-infrastructure-strategy-strategic-site-clive-barracks		2.76	11
green-infrastructure-strategy-strategic-site-ironbridge-power-station		3.26	12
green-infrastructure-strategy-strategic-site-raf-cosford		2.63	11
	30	201.576	432
<b>Landscape and Visual Sensitivity Study (LVSS) (2018) x 62 docs</b>			
LVSS - Albrighton	added 7/8/20	23.00	20
LVSS - Alveley		15.96	16
LVSS - Baschurch		15.73	14

Catalogue page 6 of 10

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
LVSS - Bayston Hill		24.28	20
LVSS - Bicton		21.15	20
LVSS - Bishop's Castle		13.83	12
LVSS - Bomere Heath		13.53	14
LVSS - Bridgnorth		11.20	26
LVSS - Broseley		22.59	26
LVSS - Bucknell		17.12	14
LVSS - Burford		15.68	12
LVSS - Chirbury		11.44	12
LVSS - Church Stretton		22.45	18
LVSS - Clee Hill		15.12	14
LVSS - Cleobury Mortimer		13.47	12
LVSS - Clive		11.68	12
LVSS - Clun		14.94	14
LVSS - Craven Arms		21.96	18
LVSS - Cressage		14.22	14
LVSS - Cross Houses		12.03	12
LVSS - Ditton Priors		13.24	14
LVSS - Dorrington		11.82	12
LVSS - Ellesmere		16.39	16
LVSS - Ford		15.72	16
LVSS - Gobowen		17.99	16
LVSS - Hadnall		13.28	12
LVSS - Hanwood		23.19	20
LVSS - Highley		19.68	16
LVSS - Hinstock		13.71	14
LVSS - Hodnet		11.82	12
LVSS - Ironbridge		16.41	14
LVSS - Junction 3		10.19	18
LVSS - Kinnerley		11.60	12
LVSS - Knockin		12.40	12
LVSS - Llanymynech		11.33	12
LVSS - Longden		16.15	16
LVSS - Ludlow		9.10	22
LVSS - Market Drayton		19.36	16
LVSS - Minsterley		19.43	16
LVSS - Much Wenlock		17.59	16
LVSS - Nessdiffe		16.85	16
LVSS - Oswestry		24.33	20
LVSS - Oswestry Morda		16.37	14
LVSS - Oswestry Park Hall		13.00	12
LVSS - Pant		17.42	14
LVSS - Pontesbury		17.01	14
LVSS - Prees		12.65	12
LVSS - Ruyton-XI-Towns		20.09	20
LVSS - Shawbury		16.06	18
LVSS - Shifnal		22.38	18
LVSS - Shrewsbury		15.92	34

Catalogue page 7 of 10

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
LVSS - St. Martin's		15.30	16
LVSS - Tern Hill		12.81	14
LVSS - Trefonen		13.56	14
LVSS - Wem		15.09	16
LVSS - West Felton		16.29	16
LVSS - Weston Rhyn & Preesweene		16.57	14
LVSS - Whitchurch		23.98	22
LVSS - Whittington		13.08	12
LVSS - Woore & Pipe Gate		16.85	18
LVSS - Worthen & Brockton		16.76	18
LVSS (a landscape and visual sensitivity study) (Assessment Methodology & summary)		19.53	20
	62	1,003.61	994
<b>Strategic Flood Risk Assessment &amp; Level 2 Detailed Site Summary Assessment Tables</b>			
shropshire-strategic-flood-risk-assessment-level-2-report		6.35	94
bridgnorth-brd030		0.19	8
church-stretton-cst021		0.20	9
ellesmere-ell005_ell008_ell033		0.20	8
ironbridge-irn001		0.21	10
knockin-kck009		0.19	8
market-drayton-mdr034		0.20	9
minsterley-min018		0.20	9
pant-pyc021		0.19	8
pontesbury-pon008		0.20	9
prees-ppw025		0.19	7
raf-cosford		0.20	9
shifnal-shf013		0.19	8
shrewsbury-shr057		0.21	10
shrewsbury-shr166		0.20	9
shrewsbury-shr173		0.21	10
shrewsbury-shr177		0.21	10
tern-hill-bnt002		0.20	9
wem-wem033		0.19	8
whitchurch-wht042		0.20	8
	20	10.13	260
<b>Strategic Flood Risk Assessment Level 1 maps (63 x App A, 18 x App B)</b>			
sfra-level-1-map-index	added 5/8?	0.08	1
1_a2_locked		4.76	1
1_a3_locked		5.59	1
1_a4_locked		7.96	1
1_a5_locked		10.63	1
1_a6_locked		10.67	1
2_b1_locked		3.89	1
2_b2_locked		3.32	1
2_b3_locked		2.77	1
2_b4_locked		3.00	1
2_b5_locked	Tern Hill	2.93	1
2_b6_locked		2.65	1

Catalogue page 8 of 10

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
3_c1_locked		2.80	1
3_c2_locked	Kinnerley	2.91	1
3_c3_locked		2.83	1
3_c4_locked		2.98	1
3_c5_locked		2.82	1
3_c6_locked		2.94	1
4_d2_locked		2.65	1
4_d3_locked		3.29	1
4_d4_locked		4.06	1
4_d5_locked		3.72	1
4_d6_locked		3.89	1
4_d7_locked	J3	3.18	1
5_e1_locked		3.07	1
5_e2_locked		3.53	1
5_e3_locked		3.88	1
5_e4_locked		3.85	1
5_e5_locked	Ironbridge	3.97	1
5_e6_locked		4.04	1
5_e7_locked	Cosford	3.59	1
6_f1_locked		2.50	1
6_f2_locked		3.10	1
6_f3_locked		3.66	1
6_f4_locked	added c 12/8	3.67	1
6_f5_locked		3.22	1
6_f6_locked	Stanmore	3.52	1
6_f7_locked		3.21	1
7_g1_locked_unlocked		3.58	1
7_g2_locked		3.27	1
7_g3_locked		3.41	1
7_g4_locked		3.43	1
7_g5_locked		3.29	1
7_g6_locked		3.58	1
7_g7_locked		3.31	1
8_h1_locked		2.32	1
8_h2_locked		2.97	1
8_h3_locked		3.44	1
8_h4_locked		3.73	1
8_h5_locked		3.82	1
8_h6_locked		3.65	1
8_h7_locked		2.47	1
albrighton_zoomedin_60		3.86	1
bridgnorth_zoomedin_61		4.06	1
bridgnorth-e_zoomedin_62		3.67	1
ludlow_zoomedin_63		4.65	1
market-drayton_zoomedin_53		3.79	1
oswestry_zoomedin_54		4.41	1
shifnal_zoomedin_59		4.00	1
shrewsbury-nw_zoomedin_55		5.38	1

Catalogue page 9 of 10

## Appendix 3 : Catalogue of Evidence Base

### SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 19 PRE-SUBMISSION CONSULTATION - CATALOGUE OF DOCUMENTS

New for this consultation Document file title	Notes	Mb	Pages
shrewsbury-ne_zoomedin_56		5.32	1
shrewsbury-sw_zoomedin_57		4.81	1
shrewsbury-se_zoomedin_58		4.91	1
whitchurch_zoomedin_52		3.05	1
		64	243.30
<b>Strategic Flood Risk Assessment Level 2 maps</b>			64
bridgnorth-brd030		4.87	1
church-stretton-cst021		1.50	1
ellesmere-ell005_ell008_ell033		0.94	1
ironbridge-irn001		4.43	1
knockin-kck009		0.55	1
market-drayton-mdr034		1.94	1
minsterley-min018		1.61	1
pant-pyc021		0.98	1
pontesbury-pon008		1.82	1
prees-ppw025		1.07	1
raf-costford		4.80	1
shifnal-shf013		1.89	1
shrewsbury-shr057		1.65	1
shrewsbury-shr166		3.75	1
shrewsbury-shr173		3.12	1
shrewsbury-shr177		1.57	1
tern-hill-bnt002		3.42	1
wem-wem033		1.23	1
whitchurch-wht042		1.11	1
	19	42.25	19
<b>SLAA (Strategic Land Availability Assessment) + 6 appendices + addendum</b>			
Strategic Land Availability Assessment (SLAA)	Published Nov 2018	1.13	26
SLAA (2018) Addendum Stage 4 housing trajectory	Published 29/1/19	0.08	1
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) Addendum - Additional Appendix C site	Published 11/1/19	0.16	2
SLAA (2018) Appendix D - Accepted residential sites delivery trajectory		0.48	2
SLAA (2018) Appendix E - Accepted employment sites delivery trajectory		0.44	1
	8	22.436	756
<b>Total</b>	390	2,370.06	16,829
New for this consultation	24	129.98	2,598