

# Shropshire Local Plan Review

## Preferred Scale and Distribution of Development Consultation Response Summary

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# Shropshire Local Plan Review - Issues and Strategic Options

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## Introduction

Following approval from Cabinet on the 18<sup>th</sup> October 2017, consultation documents for this second stage of the Local Plan Review were published on 27<sup>th</sup> October 2017 for a period of eight weeks.

This stage of consultation sought views from all parties on the Preferred Scale and Distribution of Development in Shropshire for the period 2016-36. The consultation:

- a. Set out the preferred scale of housing and employment development in Shropshire 2016-36;
- b. Set out the preferred distribution of this growth;
- c. Identified housing and employment growth guidelines for the strategic centre and each principal and key centre;
- d. Confirmed the methodology which Shropshire Council has adopted to identify a settlement hierarchy in Shropshire and to facilitate the creation of new Community Clusters where communities choose to 'opt in';
- e. Listed the settlements which form part of this hierarchy, including those that are proposed to be identified as Community Hubs and those that will be maintained as Community Clusters;
- f. Proposed draft policies for the management of development within Community Hubs and Community Clusters;
- g. Identified other development requirements which may need to be addressed as part of the Local Plan Review.

During this Preferred Scale and Distribution of Development consultation, a total of 591 unique respondents commented. Respondents included individuals; businesses; landowners; Town and Parish Councils; representatives of the development industry; organisations; neighbouring Authorities; and statutory consultees. These responses will be used to inform the preparation of the further development of the Local Plan Review which will focus on site allocations and detailed planning policies.

This document summarises the key issues raised by respondents to the consultation.

## Level of Future Growth

### *Housing Requirement*

**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 31<sup>st</sup> March 2017: 11,465 dwellings
- SAMDev Allocations without planning permission at 31<sup>st</sup> 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.

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.
- 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.

### ***Employment Land Requirement***

**Question 4** sought views on the concept of ‘balanced’ employment and housing growth as means of achieving sustainable development and whether the preferred employment land requirement of 305 hectares (15.25 hectares per year) was appropriate for Shropshire.

The key issues raised by those respondents that agreed with/supported the concept of balanced growth and the employment land requirement of 305 hectares were:

- Shropshire’s Economic Growth Strategy is an effective guide for planned development for the County to 2036. The Local Plan must ensure a sufficient supply of housing, support for an increase in the workforce and a balanced and sustainable rate of economic growth.
- Balanced growth with a minimum requirement for 300 hectares of employment development is supported. Shropshire should also set and monitor a ‘jobs’ target.
- The focus on principal urban centres and investment opportunities in strategic corridors will help to improve our economic growth rate and our productivity particularly by attracting higher quality employment uses. This will help to boost labour supply.
- The employment land offer should provide a broad range, choice and distribution of readily available sites. This offer should support new investment and business expansion and meet the needs of urban and rural communities across Shropshire.
- The aspirations for ‘balanced growth’ in rural Shropshire and the delivery of a further 72ha of rural economic development (above commitments) requires a deeper understanding of the economic potential of rural Shropshire and a flexible approach to the ‘scale’ of rural employment development. This must also sustain a ‘viable’ rural economy.

The key issues raised by those respondents that did not agree with/support the concept of balanced growth and the employment land requirement of 305 hectares were:

- To be truly sustainable, our economic strategy must have positive environmental effects.
- Shropshire’s economic fortune is subject to our national economic performance and the effects of ‘Brexit’ on our global trading relations.
- Economic aspirations must be supported with infrastructure investments to increase the capacity of the County and its settlements to accommodate new development.
- Important to consider whether factors like pursuing a more realistic housing strategy, embracing a wider range of ‘employment’ generating uses, flexible working and delivering better electronic communications might reduce the need for more employment land.
- The Local Plan must interpret the Council’s preferred strategy to deliver the objectives of the Economic Growth Strategy and deliver a ‘step change’ in our economic growth.
- The employment land requirement might be greater than 300 hectares to balance past under performance, different urban and rural needs and demands from new types of ‘employment’ like the evolving ‘care’ industry to serve an increasing, elderly population.

Both respondents that agreed with/supported and did not agree with/support the concept of balanced growth and the employment land requirement of 305 hectares made comments to the effect that:

- An economic needs assessment and updated Employment Land Review are required.

- Development requirements should be informed by planned regional / national economic and infrastructure requirements and by alternative forecasting or trend analysis.
- Employment sites both existing and currently allocated should be reviewed in accordance with national policy to ensure that employment land remains viable and can be delivered.
- Existing and proposed employment sites should be supported by new housing on the edge of larger sustainable settlements to reduce unemployment and out-commuting.
- The Local Plan should give further consideration to the detailed needs and opportunities of the Market Towns of Shrewsbury, Market Drayton, Ludlow; the Key Centres of Bishop's Castle, Broseley, Highley, Much Wenlock, Shifnal, Wem and the smaller settlements of Baschurch, Bayston Hill, Bicton, Clive, Pant, Morda, Moreton Say, Woore to ensure these settlements may properly serve their extensive rural hinterlands.

## Distribution of Future Growth

### *Distribution of Future Growth*

**Question 5** sought views on the preferred 'urban focussed' spatial distribution of the proposed housing and employment requirements which responds directly to the County's Economic Growth Strategy and specifically reflects the objective to prioritise investment along strategic corridors and growth zones.

The preferred approach seeks to broadly distribute development across the County as follows: Strategic Centre (Shrewsbury) - around 30%; Principal Centres - around 24.5%; Key Centres - around 18%; Rural Areas - around 27.5%.

A majority of those who responded supported the preferred approach. The key issues raised by those respondents that supported the preferred approach were:

- The preferred approach is considered consistent with the findings of earlier public consultation and current national planning policy.
- Larger, more sustainable settlements provide for sustainable access to facilities and employment and will benefit from economies of scale to maximise efficiency of these services and facilities.
- The focus of growth in Shrewsbury appropriately reflects the fact that Shrewsbury has the greatest level of employment and infrastructure within Shropshire and is therefore the best opportunity to deliver further sustainable growth.
- Directing development towards market towns means that development and investment would be distributed throughout the Local Plan area in the most sustainable locations while protecting the environmental and aesthetic qualities of the rural area from unsustainable development.
- The proposed distribution is likely to benefit economically from major strategic developments such as HS2 and the Midlands Engine. Allowing some settlements in East Shropshire to grow by removing land from the Green Belt will help to meet NPPF requirement to promote sustainable patterns of development and boost the delivery of affordable housing to meet needs across Shropshire.

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

- Whilst many respondents supported the overall approach of focussing on urban areas, they argued for different (and conflicting) distributions between individual settlements and classes of settlements.
- Many respondents considered that Balanced Growth (less in rural area / more in Principal and Key market towns) was preferable, since the preferred approach still required unsustainable levels of development in the rural area, where access to infrastructure and employment is often impaired.
- By contrast, many others considered that more development is needed in rural areas and the existing Rural Rebalance approach should be maintained. Some respondents

considered that the benefits of Rural Rebalance have yet to be realised and that a more urban focus will place further pressure on infrastructure and may constrain delivery in urban areas.

- The preferred approach is considered to neglect Shropshire's rural economy in a way which is inconsistent with the Council's recently adopted Economic Growth Strategy and restricting growth in Community Hubs or Clusters will result in the unsustainable stagnation of these rural settlements since it will reduce options to increase rural sustainability.
- Other respondents commented that brownfield land should be developed first, before considering greenfield allocations and that the proposed approach would threaten the distinctiveness of the County's market towns, burdening them with excessive growth. There was concern that focussing on 'growth corridors' could create corridor conurbations along strategic roads, with the prospect of settlements losing their identifiable boundaries to urban sprawl.

Other comments about the preferred approach included:

- It is unclear how individual settlement guidelines have been derived and on what evidence they are based. Suggest that the proportion of growth in urban centres should be examined to see if these reflect the size of the settlement and the level of facilities, services and employment opportunity.
- An explanation of the status and contribution of 'strategic sites' such as Ironbridge Power Station and any 'Garden Villages' is required, in particular whether housing and employment provided on these sites will be part of, or in addition to the levels for the rural area.
- The proposed re-allocation of Pontesbury and Minsterley from being a joint 'Key Centre' to being rural 'Community Hubs' should not reduce the housing and employment supply for the rest of the rural area.
- Support strong focus on green belt as an economically attractive option and the M54 economic corridor as part of an established growth zone due to its close proximity to the West Midlands and relative ease of attracting external investment. However, this will disadvantage established settlements like Ludlow, which lack major transport links, strong employment opportunities or the ability to attract significant external investment.

### **Settlement Strategies**

**Question 6** sought views on the settlement strategies provided for the Strategic Centre of Shrewsbury; the Principal Centres of Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch; and the Key Centres of Albrighton, Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem.

A summary of the main planning issues expressed across many of the settlements with strategies is provided below:

- The need for settlements to be planned for holistically.
- Guidelines must reflect physical, heritage and environmental constraints (and where relevant Green Belt).
- Scale, distribution and design of proposed development should reflect local character.
- Guidelines must reflect the ability of existing infrastructure to support new development.
- The need to identify (through a robust and up-to-date evidence base) and deliver necessary supporting infrastructure.
- Ensure the deliverability of current and future housing and employment allocations.
- The quality of development is a key consideration.
- There is a need to provide affordable housing.
- Brownfield sites and empty homes should be brought forward before greenfield sites.
- Developers commenting on settlement strategies generally indicated a preference for higher housing guidelines, whilst individuals generally indicated a preference for lower housing guidelines.

## **Strategic Centre of Shrewsbury**

A summary of the main planning issues raised in the comments on the Shrewsbury settlement strategy is provided below:

- Shrewsbury offers a good range of services and facilities, employment and infrastructure. It is appropriate to identify Shrewsbury as the Strategic Centre and the focus for development.
- Many supported the proposed housing and employment land requirement identified. Although as in general across all settlements, some respondents also supported higher guidelines and others lower guidelines.
- There is a need to identify a range of site allocations – varying locations and scales across the town, which would support early and then continued delivery over the plan period. Alternatively, others felt that development should be concentrated in a small number of SUEs.
- The north-west relief road is a key priority for the town.
- The Registered Battlefield to the north of the town is identified as a key heritage consideration.

## **Principal Centres:**

### **Bridgnorth**

A summary of the main planning issues raised in the comments on the Bridgnorth settlement strategy is provided below:

- The settlement is a sustainable growth location due to its role as a Principal Centre; proximity to Telford, Shrewsbury, Kidderminster and the West Midlands; and its competitive local housing market.
- Need to address: lack of local employment; opportunities for expansion of existing employers/employment sites; and the current perceived mismatch between housing and employment.
- The impact of the imbalance in the growth between the east and west of the town requires careful consideration. Some respondents considered that land west of Bridgnorth is unconstrained, accessible and development could deliver adequate infrastructure.

### **Ludlow**

A summary of the main planning issues raised in the comments on the Ludlow settlement strategy is provided below:

- The focus on urban centres to deliver sustainable development is supported but in Ludlow, development has placed a huge strain on the existing services (e.g. schools, medical facilities, car parking) and critical infrastructure (e.g. utilities, public transport services, recreation facilities, green infrastructure) of the town.
- Ludlow still has a generous supply of committed development sites and the principal objective must be to secure the delivery of this new housing, employment and infrastructure. The delay in delivering existing, larger sites on the edge of Ludlow has focused development interest onto small scale, infill sites in the centre of town, affecting its historic core.
- The continuing growth of Ludlow town, extending into the Parish of Ludford, has delivered significant and unsympathetic development that has a detrimental effect on the character and appearance of this important, historic town and its landscape setting.
- The town now also has a generous supply of centrally located housing for the elderly but insufficient affordable housing for the next generation.



## **Market Drayton**

A summary of the main planning issues raised in the comments on the Market Drayton settlement strategy is provided below:

- Market Drayton is a sustainable location for development offering a broad range of services and facilities which will support development. It is also well located to take advantage of opportunities associated with the Midlands Engine; Northern Powerhouse; and the Investment Zone created at Crewe resulting from HS2.
- Development in Market Drayton offers an opportunity to revitalise the town.
- Appropriate development to the north of the A53 and at Clive Barracks are particular opportunities in and around Market Drayton.
- Public transport links to and within Market Drayton and Clive Barracks require significant improvement to support future development.

## **Oswestry**

A summary of the main planning issues raised in the comments on the Oswestry settlement strategy is provided below:

- Transport infrastructure in and around the town needs improvement. This includes both road networks and the potential reinstatement of the railway line between Gobowen and Oswestry.
- Road infrastructure in the town is crucial as a number of Community Hubs access services in the town.
- Gaps need to be maintained between Oswestry and settlements in surrounding rural parishes.
- Support for the de-allocation of OSW004. The views expressed was that is an 'oversupply' of housing and development of the site will impact on the Old Oswestry Hillfort.

## **Whitchurch**

A summary of the main planning issues raised in the comments on the Whitchurch settlement strategy is provided below:

- A recognition that the town is relatively unconstrained. Although some were concerned that it is proposed that Whitchurch will take more housing than other Shropshire market towns.
- A recognition that greenfield sites would be needed but also a desire to use brownfield preferentially.
- More employment allocations will not necessarily lead to more people working in the town.

## **Key Centres:**

### **Albrighton**

A summary of the main planning issues raised in the comments on the Albrighton settlement strategy is provided below:

- Key advantages of the settlement include its location close to the West Midlands (potential to help address the Black Country's housing capacity constraints); and good public transport and strategic highway network connections.
- The key constraint to development is the settlements location in the Green Belt. Green Belt review and release was identified as required to support the projected levels of growth.
- Increasing housing delivery in eastern Shropshire would respond to demand; the evidenced strength of the housing market in this area; and national policy requirements (Paragraph 17, NPPF).

- Operational defence requirements of RAF Cosford are restricted by its Green Belt status. A Green Belt review provides an opportunity for appropriate removal.
- Albrighton has the potential to accommodate new housing development to help meet an increase in MOD and civilian personnel numbers from the nearby RAF Cosford.

### **Bishop's Castle**

A summary of the main planning issues raised in the comments on the Bishop's Castle settlement strategy is provided below:

- The need to manage traffic within the town, particularly to reduce congestion and provide parking facilities.
- Concern that sufficient employment opportunities could be provided.

### **Broseley**

A summary of the main planning issues raised in the comments on the Broseley settlement strategy is provided below:

- Broseley is subject to constraints associated with landscape, landform, access, former mining activity and ground instability. There is a need to demonstrate where housing can be achieved.
- The potential impact of the redevelopment of the Ironbridge Power Station site on Broseley, in particular the possible reduction of demand for employment land;
- The potential role of Benthall as a development location either with Broseley or as a separate settlement should be explored.

### **Church Stretton**

A summary of the main planning issues raised in the comments on the Church Stretton settlement strategy is provided below:

- Church Stretton should not be classed as a Key Centre: this implies an urban character whereas Church Stretton is rural in nature and development should be more widely distributed across the Place Plan area.
- Church Stretton is heavily constrained by its unique location within the AONB and other environmental designations. It is therefore not possible to accommodate more development in the town.
- There is no need to provide more employment land: this is based on the assumption that all jobs require land. The town's economy is based on tourism which does not need new sites and development would adversely affect the visitor economy.

### **Cleobury Mortimer**

A summary of the main planning issues raised in the comments on the Cleobury Mortimer settlement strategy is provided below:

- The capacity of the A49 (south) and roads to Birmingham required consideration.
- Public transport links to and within Cleobury Mortimer require significant improvement to support future development.

### **Craven Arms**

A summary of the main planning issues raised in the comments on the Craven Arms settlement strategy is provided below:

- The proposals represent a sensible strategy for Craven Arms as an important centre for employment and services. The town has the capacity to deliver the proposed scale of development but requires continuing investment in the capacity of the A49 and appropriate protection for the AONB adjoining the town.
- Development should deliver infrastructure investment to meet the needs of the community including improved medical services, leisure and recreation facilities, new green infrastructure and sustainable public transport services.

- Development in Craven Arms must not affect the safety of the Long Lane level crossing for rail passengers, vehicular traffic and pedestrians. An alternative solution is to bridge the rail line to create a new northern highway access and lorry route into the town.

### **Ellesmere**

A summary of the main planning issues raised in the comments on the Ellesmere settlement strategy is provided below:

- Past levels of delivery in the town are good and support the settlements status as a Key Centre. This would also support increasing the guideline for the town. Although concern was expressed about the impact of growth on the character of the town.
- The guideline is higher than comparable settlements.

### **Highley**

A summary of the main planning issues raised in the comments on the Highley settlement strategy is provided below:

- Highley is in an isolated location with poor road access.
- Public transport links to and within Highley require significant improvement to support future development.
- Past levels of delivery in the town are good and support the settlements status as a Key Centre. This would also support increasing the guideline for the town.

### **Much Wenlock**

A summary of the main planning issues raised in the comments on the Much Wenlock settlement strategy is provided below:

- There is a lack of local employment opportunities but a demand for small units for specialist manufacturing and office space. Therefore more appropriate employment allocations than identified are required.
- Proposals need to better reflect adopted Neighbourhood Plan. This gives priority to small scale developments with appropriate housing mix including smaller properties, social housing and housing for the elderly and disabled. It also identifies appropriate numbers.
- Much Wenlock has particular physical and environmental constraints including proximity to the AONB.
- Small-scale development would be most in keeping with the towns character.
- Need to avoid development which encourages commuting.

### **Shifnal**

A summary of the main planning issues raised in the comments on the Shifnal settlement strategy is provided below:

- Shifnal is a sustainable settlement with a strong housing market. Key advantages of the settlement include its location close to the West Midlands; and good public transport and strategic highway network connections.
- Shifnal has had unprecedented, unplanned housing development which has had a significant impact on the towns character. There is a need to ensure that appropriate employment opportunities are delivered to balance this housing and necessary infrastructure provided to support it. To allow this balanced delivery, any further housing should be phased post 2026.
- Proposals need to reflect the adopted Neighbourhood Plan including housing type and tenures.
- Concern expressed about proposals for a garden village in the strategic corridor around the town due to Green Belt loss and additional pressure on strained infrastructure.
- Existing safeguarded land is unlikely to have sufficient capacity for proposed growth, therefore Green Belt release/safeguarding is required. Various locations were identified as most appropriate for this release/safeguarding and similarly various locations

considered unsuitable for release were identified. Employment needs and opportunities represent exceptional circumstances for removal of Green Belt land.

- Comments were made about the methodology and results of the assessment of specific parcels of land in the Green Belt Assessment Report.

## **Wem**

A summary of the main planning issues raised in the comments on the Wem settlement strategy is provided below:

- General support for provision of an additional 2 hectares of employment land.
- Some respondents considered that Wem could deliver higher level of development than that proposed to reflect its strategic location; tackle local affordable housing need; reflect its accessibility, available services, facilities and employment; and reflect the affordability of the housing market.
- Others felt that any housing provision must be supported by prior provision of necessary infrastructure. Particularly if figures are to increase above that currently proposed.
- There is widespread concern about infrastructure capacity in the town, particularly traffic congestion which is considered to be a serious constraint on the town's capacity for further expansion.
- There are particular concerns about the railway level crossing which is acknowledged as one of the most dangerous in the country. Network Rail indicated development which would affect the rail crossing should be refused unless safety will not be compromised, or mitigation measures can be incorporated to prevent any increased safety risk.
- Other respondents suggested that the focus of new development should be to the south of the town to avoid impacts on the railway crossing.

## **Development in Rural Areas**

### ***Proposed Community Hubs***

**Question 7** sought views on the proposed 'Community Hubs'. Specifically, it sought views on the suitability of the 'Community Hubs' proposed; the way in which the approved Hierarchy of Settlements assessment has been applied to identify the thresholds for 'Community Hubs'; and any factual inaccuracies about local services and facilities, broadband, employment or public transport links available within a settlement.

The key issues raised by those respondents that agreed with/supported the proposed 'Community Hubs' were:

- The use of the standard methodology is a robust and objective way of identifying 'Community Hubs'.
- The approach will ensure that sustainable rural settlements are identified as 'Community Hubs'.
- Many of the respondents supported the proposed identification of specific settlements as 'Community Hubs', with particular reference made to the services and facilities available within the referenced settlement and its overall sustainability credentials.
- 'Community Hub' status includes the provision of both housing and employment. Provision of both is important for the long-term sustainability of these settlements.
- It is crucial to ensure that necessary supporting infrastructure is also provided within 'Community Hubs'.
- Some respondents felt that more 'Community Hubs' should be identified, particularly in the south of the County; that all large villages should have development; there should be a mechanism for the allocation of new 'Community Hubs' if a settlement's score increases during the Plan period; or that communities within settlements not identified as 'Community Hubs' but with aspirations of becoming more sustainable should be offered the opportunity to 'opt-in'.

The key issues raised by those respondents that did not agree with/support the proposed 'Community Hubs' were:

- The decision as to whether a settlement is or is not a 'Community Hub' should rest with the local community and not be determined through application of the Hierarchy of Settlements Assessment.
- The application of the Hierarchy of Settlements Assessment should form part of the consultation; its threshold is arbitrary and the services and facilities, significant employment opportunities, broadband provision, and public transport links available within settlements need to be re-considered.
- Conversely, some supported the use of the Hierarchy of Settlements Assessment to identify 'Community Hubs' but felt that further explanation/refinement was required.
- Many of the respondents opposed the proposed identification of specific settlements as 'Community Hubs', with particular reference made to the services and facilities available within the referenced settlement and its overall sustainability credentials.
- Similarly, some opposed the exclusion of specific settlements from the list of proposed 'Community Hubs', with particular reference made to the services and facilities available within the referenced settlement and its overall sustainability credentials.

Both respondents that agreed with/supported and did not agree with/support the proposed 'Community Hubs' provided comments on the methodology used to identify the proposed 'Community Hubs'. Comments included:

- All proposed 'Community Hubs' should have a significant local employer and a regular public transport service during peak travel times.
- A qualitative element should be included within the consideration of services and facilities; significant employment opportunities; and public transport services available.
- Infrastructure constraints present within a settlement and other unique settlement characteristics should be reflected within the assessment.
- The population of the settlement should be considered.
- The assessment could be simplified to specify that all settlements with a school represent a 'Community Hub'.

### ***Management of development within Community Hubs***

**Question 8** sought views on the proposed policy for managing development in 'Community Hubs'. The policy aims to achieve appropriate and sustainable development within 'Community Hubs'. It sets out eight criteria, all of which must be met for development to be considered acceptable. In order to provide greater certainty on the scale and location of development in each 'Community Hub' these settlements will have a development boundary and residential development guideline. Furthermore, where appropriate, sites will also be allocated for development within 'Community Hubs'.

The key issues raised by those respondents that agreed with/supported the proposed 'Community Hubs' policy were:

- Support for the approach to housing numbers and for the criterion allowing development on sites outside the development boundary.
- Support for the proposed approach of maintaining gaps between settlements; requiring development to complement the character of the settlement; and avoiding harm to the built and natural environment.
- Support for development boundaries, as it was felt they provided more certainty about future development.
- Some respondents sought clarification on how the policy would work with reference to the local housing market; how the development boundary will be defined; and how proposals outside the development boundary would be assessed.
- There were also suggestions that:
  - Affordable housing should be a priority;

- Reasonable and necessary development should not be blocked; and
- The policy wording implies a cap on development that is contrary to national policy.

The key issues raised by those respondents that did not agree with/support the proposed 'Community Hubs' were:

- A request for clarification of key terms to enable better judgement of whether the policy is met.
- The five dwelling threshold referenced is inappropriate as it triggers a requirement for affordable housing.
- The policy should include additional criteria to protect existing sports and recreational facilities.
- The 31<sup>st</sup> March 2016 date for assessing cumulative impact is inappropriate as this would not take account of the large amount of development which has taken place since 31<sup>st</sup> March 2006.
- Some felt that development boundaries are an unnecessary constraint to development.
- Conversely, others felt that development boundaries should be drawn up in consultation with the Parish Council.
- Development in 'Community Hubs' should respect Parish Plans and/or local opinion; be restricted to local needs; and should be managed by the Parish Council.
- Some respondents did not support development in 'Community Hubs' at all, stating that it was against community wishes.
- Suggestions that a housing needs survey should inform the mix; numbers; tenure; and affordability of housing.
- The development guideline should not act a cap on development and the presumption in favour of sustainable development should apply.
- The guideline should include a short assessment of the character of the settlement concerned to help promote sympathetic development.

The key issues raised by those respondents who either expressed no opinion or didn't know were:

- The policy should reflect local character and opportunities.
- There is a need to avoid restrictions on development, whether this be through development guidelines, development boundaries, or the policy itself.

### ***Proposed Community Clusters***

**Question 9** sought views on the proposed 'Community Clusters'. Specifically, it asked whether any additional 'Community Clusters' should be identified or whether any of the proposed 'Community Clusters' should be removed. Respondents were also asked to identify any community support they were aware of for their proposal.

The identification of Community Clusters will primarily be based on the aspirations of those communities, as expressed by their Town or Parish Council/Meeting. Town or Parish Council/Meetings suggested the following amendments to the propose 'Community Clusters' identified:

Town or Parish Council/Meeting	Proposed Amendment
Condover Parish Council	<ul style="list-style-type: none"> <li>● Removal of the proposed 'Community Cluster' of Condover and Stapleton.</li> </ul>
Ellesmere Rural Parish Council	<ul style="list-style-type: none"> <li>● Removal of the proposed 'Community Clusters' in their area.</li> <li>● Formation of a new 'Community Cluster' consisting of Welsh Frankton, Dudleston Heath and Elson.</li> </ul>
Lydbury North Parish Council	<ul style="list-style-type: none"> <li>● Formation of a new 'Community Cluster' consisting of Lydbury North.</li> </ul>

Town or Parish Council/Meeting	Proposed Amendment
Morton Say Parish Council	<ul style="list-style-type: none"> <li>• Merge the two proposed 'Community Clusters' of:               <ul style="list-style-type: none"> <li>- Bletchley, Longford, Longslow and Moreton Say; and</li> <li>- Adderley, Moreton Say and Norton in Hales</li> </ul> </li> </ul>
Wem Rural Parish Council	<ul style="list-style-type: none"> <li>• Formation of a new 'Community Cluster' consisting of Edstaston, Quina Brook, Northwood, Newtown, Tilley and Aston.</li> </ul>

Further comments were made by Town or Parish Council/Meetings supporting the proposed 'Community Clusters' or the decision not to include specific settlements within the proposed 'Community Clusters'.

A significant number of proposals were made by other groups and individuals regarding the potential to:

- Add settlements to the proposed 'Community Clusters';
- Form additional 'Community Clusters';
- Remove settlements from the proposed 'Community Clusters'; or
- Remove entire 'Community Clusters'.

However, in the majority, these proposals did not provide an indication of community support for their proposals.

Respondents also used this question as an opportunity to make general comments on 'Community Clusters'. Key comments included:

- Observations on the method of identifying potential 'Community Clusters'.
  - Many felt that only the relevant Town or Parish Council is suitably placed to specify whether a settlement or group of settlements are suitable for identification as a 'Community Cluster'.
  - Conversely others felt that it would be more appropriate for Shropshire Council to identify 'Community Clusters' using a methodology similar to that employed to identify Community Hubs. Or alternatively that all settlements not identified as a Strategic/Principal/Key Centre should be identified within a 'Community Cluster'.
  - Some queried why settlements screened-out of the Hierarchy of Settlements were included within Community Clusters.
- It is difficult to determine whether communities should 'opt-in' without further information on the implications, particularly with regard to policies to manage development and likelihood of allocations.

### ***Management of development within Community Clusters***

**Question 10** sought views on the proposed policy for managing development in 'Community Clusters'. The policy aims to encourage development in 'Community Clusters' on sites already allocated within the SAMDev Plan; suitable small-scale infill sites; or through the conversion of existing buildings within or immediately adjoining the built form of the settlement. It sets out eight criteria, all of which must be met for development to be considered acceptable. Reflecting the types of development that are likely to be consistent with these criteria, it is not considered necessary to identify development boundaries; development guidelines; or to allocate sites in the Community Cluster settlements.

The key issues raised by those respondents that agreed with/supported the proposed 'Community Clusters' policy were:

- Support for the definition of infill provided, although some felt that it was not needed and appropriate development should be assessed through the Development Management process.

- Support was expressed for key elements of the policy, particularly the requirement for sufficient infrastructure to be available and the need for compliance with policies MD12 and MD13 on the built and natural environment.
- The need to reflect the diverse nature of 'Community Cluster' settlements and a desire to maintain the character of each settlement.

The key issues raised by those respondents that did not agree with/support the proposed 'Community Clusters' were:

- Development in Community Clusters should reflect Parish Plans and/or Village Design Statements.
- There were contrasting views on the proposed definition of infill housing. Some felt the requirement should be reduced to development on one side, whilst others suggested increasing it to development on three sides.
- Clarity was sought on how phrases such as 'sustainable development' and 'cumulative impact' would be interpreted.
- Concern was expressed that the policy would not provide enough control over development.
- Criteria are too complicated and/or weighting is wrong e.g. there should be more emphasis on visual impact.
- Recreational facilities should be protected.
- The 31<sup>st</sup> March 2016 date for assessing cumulative impact is inappropriate as this would not take account of the large amount of development which has taken place since 31<sup>st</sup> March 2006.
- Many Community Clusters are expensive places to live and have poor infrastructure therefore they are not appropriate locations for affordable housing.

Both amongst those respondents that agreed with/supported the proposed 'Community Clusters' policy and those that did not agree with/support the proposed 'Community Clusters' policy, key issues raised included:

- Contrasting views were expressed about suitable locations for development:
  - Some respondents suggested the definition of appropriate sites should be expanded to include sites on the edge of 'Community Clusters' and/or on larger sites.
  - Conversely, others supported forms of development specified in the policy and felt that large sites are inappropriate in 'Community Clusters'.
  - Still others felt that the forms of development proposed were themselves too large.
- Development boundaries should be provided.

The key issues raised by those respondents who either expressed no opinion or didn't know were:

- A designation based on the views of the Parish Council is problematic.
- Development boundaries should be retained.

### ***Managing development in the countryside***

**Question 11** sought views on the proposed approach to managing both residential and non-residential development in the wider countryside, including the Green Belt.

The key issues raised by respondents were:

- Countryside protection and guardianship for the future is paramount with a need to protect and prevent development impacting on the AONB, Green Belt and high quality agricultural land.
- Support for retention of the current policy approach which tightly controls development in open countryside.
- The lack of rural infrastructure, services and employment to support development and the challenges of an increasingly older rural population are identified.



- Need to view the rural area positively and provide a less restrictive, more flexible and facilitating approach to new housing and employment development in the countryside with aim of improving rural sustainability and achieving innovative development.
- Approach too urban, not adequately reflecting Shropshire requirements. Need to develop a more individual, area based approach reflecting community views and allowing more individual consideration of development on its merits.
- A more holistic approach to countryside management and development needed as they are interdependent.
- Need to recognise and support the requirements for agricultural diversification and farm related development and facilitate the increasing need for agricultural businesses to adapt and modernise.
- Control the impacts of large scale rural development such as solar farms, poultry units and other intensive livestock production, particularly on the AONB and other designated sites.
- Continuing enablement of sympathetic residential conversions, particularly of redundant buildings supported. It was suggested that the current policy approach for residential conversions is in conflict with NPPF and that open market residential conversions should be facilitated.
- Policy support for rural business, including diversification, tourism and new employment was generally welcomed. Specific endorsement of allowing small scale employment sites outside settlements.
- Encouragement of additional rural employment sites and opportunities, including live/work units and alternatives to traditional rural sectors, outside settlements where the sustainability balance weighs in favour.
- Control of potential impacts of rural employment uses in particular associated with vehicular movements required.
- Support for rural affordable housing provision on (small scale and single plot) 100 % affordable exception sites delivering sustainably located and appropriately designed exception dwellings catering for evidenced, local need. Some clarification required of the role, concept and criteria for single plot exceptions.
- Prevention of open market residential outside identified settlements is insufficiently flexible to support rural sustainability and enable housing delivery throughout whole rural area.
- Opportunities to enhance the environment and provide housing on previously developed sites were highlighted.
- Need for conformity with national policy to include all provisions for dwellings in the countryside and development on previously developed green belt.
- Greater local involvement in policy development and decision-making versus view that policy should primarily reflect Shropshire Council's decision making role.
- Policy should specifically address MOD operational requirements.

## Further Comments

The key issues raised by respondents were:

- There is a need to protect Shropshire's landscape, with a particular focus on that within the AONB and Green Belt.
- A minimal amount of Green Belt land should be released.
- There was concern over the level of housing proposed and the need to balance this with economic growth – both across Shropshire and on a settlement by settlement basis.
- More appropriate housing is required, in particular affordable housing; housing for the elderly; and housing for first time buyers.
- Concerns were raised over the ecological and environmental impacts of development.
- Brownfield land should be explored/developed in the first instance.
- Numerous sites were promoted for consideration as part of the Local Plan Review.

## Appendix 1: Respondent Statistics

**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.

**Question 4** sought views on the preferred employment land requirement proposed for Shropshire of 305 hectares between 2016 and 2036 (15.25 hectares of employment land a year), based on the concept of 'balanced' employment and housing growth

Of the unique respondents that completed this question:

40% agreed with the proposed employment land guideline.

38% disagreed with the proposed employment land guideline.

22% did not know/had no opinion on the proposed employment land guideline.

**Question 5** sought views on the preferred spatial distribution of the proposed housing and employment requirements, which has an 'urban focus'. 'Urban Focus' responds directly to the County's Economic Growth Strategy and specifically reflects the objective to prioritise investment along strategic corridors and growth zones, utilising existing road and rail connections. It seeks to broadly distribute development across the County in the following manner: Strategic Centre (Shrewsbury) - around 30%; Principal Centres - around 24.5%; Key Centres - around 18%; Rural Areas - around 27.5%. (These centres are listed in Q6).

Of the unique respondents that completed this question:

46% agreed with the proposed spatial distribution of development.

42% disagreed with the proposed spatial distribution of development.

12% did not know/had no opinion on the proposed spatial distribution of development.

**Question 7** sought views on the proposed 'Community Hubs'

Of the unique respondents that completed this question:

39% agreed with the proposed 'Community Hubs'.

36% disagreed with the proposed 'Community Hubs'.

24% did not know/had no opinion on the proposed 'Community Hubs'.

**Question 8** sought views on the proposed policy for managing development in 'Community Hubs'.

Of the unique respondents that completed this question:

43% agreed with the proposed policy for managing development within 'Community Hubs'.

30% disagreed with the proposed policy for managing development within 'Community Hubs'.

27% did not know/had no opinion on the proposed policy for managing development within 'Community Hubs'.

**Question 9** sought views on the proposed list of Community Clusters and whether any additional Community Clusters should be formed.

Of the unique respondents that completed this question:

30% did not consider that any additional 'Community Clusters' should be identified or any of the existing identified 'Community Clusters' removed.

19% felt that additional 'Community Clusters' should be identified.

13% felt that one or more of the identified 'Community Clusters' should be removed.

38% did not know/had no opinion.

**Question 10** sought views on the proposed policy for managing development in 'Community Clusters'.

Of the unique respondents that completed this question:

32% agreed with the proposed policy for managing development within 'Community Clusters'.

41% disagreed with the proposed policy for managing development within 'Community Clusters'.

27% did not know/had no opinion on the proposed policy for managing development within 'Community Clusters'.

**Question 11** sought views on the proposed approaches to managing residential and non-residential development in the wider Countryside.

Of the unique respondents that completed this question:

52% agreed with the proposed approaches to managing residential and non-residential development in the wider Countryside.

22% disagreed with the proposed approaches to managing residential and non-residential development in the wider Countryside.

26% did not know/had no opinion on the proposed approaches to managing residential and non-residential development in the wider Countryside.