



Date: Monday, 7 December 2020

Time: 1.00 pm

Venue: THIS IS A VIRTUAL MEETING - PLEASE USE THE LINK ON THE AGENDA TO LISTEN TO THE MEETING

Contact: Amanda Holyoak, Senior Democratic Services Officer
Tel: 01743 257714
Email: amanda.holyoak@shropshire.gov.uk

CABINET

TO FOLLOW REPORT (S)

7 Shropshire Local Plan - Pre Submission (Regulation 19) version

APPENDIX 4(Pages 1 - 394)

Lead Member – Councillor Robert Macey – Portfolio Holder for Housing and Strategic Planning

Report of Director of Place attached (Appendix 4 is TO FOLLOW)

Contact: Mark Barrow 01743 258916

This page is intentionally left blank

Shropshire Local Plan Review

Summary of Responses to the Consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Published: December 2020

Shropshire Local Plan Review

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

Introduction

Following approval by Shropshire Council's Cabinet, the fifth stage of 'Regulation 18' consultation to inform the Local Plan Review was undertaken from the 3rd August 2020 to the 30th September 2020.

This stage of consultation sought views from all interested parties on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.

The Regulation 18: Pre-Submission Draft of the Shropshire Local Plan identified a draft vision and draft framework for the future development of Shropshire to 2038. This addressed such issues as the needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seeks to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design. It contained:

- Draft strategic policies which set the priorities and framework for the Local Plan
- Draft 'strategic' implementation policies and more 'detailed' draft policies for managing development
- Draft settlement policies which provide draft strategies and draft guidelines for the settlements of Shropshire, including where appropriate identifying draft proposed site allocations
- Draft strategic settlement and draft strategic site policies which identify these draft proposed sites and provide draft strategies and draft guidelines for their development.

To assist in responding to this consultation, a two-part Consultation Form was made available for all interested parties to complete and submit. Part A Consultation Form was for personal details and needed to only be completed once. Part B Consultation Form was for interested parties to provide their response(s). A separate Part B Consultation Form was requested for each comment about a relevant paragraph, policy (including its explanation) or site an interested party wished to make.

Consultation responses could address any of the Supporting Documents and/or Evidence prepared to support the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, by relating them to the resulting paragraph, policy (including its explanation) or site in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.

During the consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan around 2,500 unique respondents commented. Respondents included individuals; businesses; landowners; Town and Parish Councils; representatives of the development industry; organisations; neighbouring Authorities; and statutory consultees. All responses to this consultation and the issues they raise have been considered and have and will continue to inform ongoing the Local Plan Review.

This document provides a summary of the responses received to the consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan. This summary is presented in five columns, these are:

Column 1: The unique reference for the respondent (A reference) and their consultation response(s) (B reference). Please note each individual respondent is registered one (A Reference). However, each respondent may have multiple consultation responses (B references), which are numbered B1, B2, B3 etc.

Column 2: Summarises the response to **Question 1: To which document does this response relate?** of the Part B Consultation Form. The summary indicates a document to which the consultation response relates. It is acknowledged that many responses relate to a number of documents.

Column 3: Summarises the response to **Question 2: To which part of the document does this response relate?** of the Part B Consultation Form. The summary indicates a part of the document to which the consultation response relates, grouped by issue, such as a draft Policy or Place Plan Area. It is acknowledged that many responses relate to numerous draft policies and/or Place Plan Areas.

Column 4: Summarises the response to **Question 3: Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?** of the Part B Consultation Form.

Column 5: Summarises the response to **Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2** of the Part B Consultation Form. The summary identifies key issues raised by respondents. It should be noted that these responses represent the views of the relevant party and are not necessarily shared by Shropshire Council.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0167B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Support the principles laid out within draft policy SP1. It is imperative that these tests are robustly applied in the decision making process, including in relation to applications at SUE West and that the existing businesses and the wider local environment are protected. Development near Oxon Hall Caravan Park must not result in detrimental levels of air, light and noise pollution.
A0268B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		This draft policy essentially characterises what is considered to constitute sustainable development in Shropshire. Please also see comments on proposed allocation SHR197VAR.
A0269B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	The Shropshire Test Support Policy SP1 (2) insofar as Community Led Plans are consistent with the strategic housing allocations and the stated Development Guidelines – see generally SP2 (7)
A0306B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	Proposals should also cross reference the forthcoming Nature Recovery Strategy, and the Climate Strategy.
A0311B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestry, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A0323B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestry, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A0356B02	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestry, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A0398B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Climate change. I note the details in SP3 p20, p6 2.2 how county moves towards zero carbon economy, and DP12 p88 on minimising carbon emissions DP12 4.119 should show Shropshire Council to be proactive e.g. 'We will encourage/require incorporating renewables into new builds, and discourage gas boilers and log burners.' I disagree with the statement 'Opportunities to adapt and mitigate climate change are likely to remain similar to the present'. Shropshire Council can make a difference as above. £5k now buys a 3kW producing 10 photovoltaic panel retrofit with a car charger. Much cheaper for new build and lower output
A0413B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	Part e) should read 'raising standards to a high level of energy efficiency and delivery'.
A0430B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Support the overarching vision of the County set out in this policy. It recognises that development will need to contribute to meeting local needs and make settlements more sustainable with the right mix of housing, employment, and other types of development. It also recognises that proposals should also seek to reflect relevant considerations in community-led plans, local economic growth strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, and the Public Health Strategy.
A0436B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0437B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0438B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0439B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0440B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0441B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0442B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0443B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Support introduction of draft Policy SP1, as it acknowledges and respects the unique and diverse nature of Shropshire. This policy should reiterate the principle of Rural Rebalance, one of the key objectives of Shropshire Council's Core Strategy. It is evident that a range of sustainable facilities are often accommodated across several settlements in rural areas (cluster settlements), therefore flexible development policies to support a range of housing and economic development in rural areas is vital.
A0446B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0501B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0573B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Supports Policy SP1 that identifies material considerations to support growth and its delivery in a sustainable manner:- based on sound principles of making efficient use of land and balancing design, community and natural environment- development Ruckley Estates/Harrow Estates in Shifnal supports this principle, meeting local needs in the right place with the right mix of housing allocation of SHF018b and SHF018d supports this principle by implementing Policy SP1(b) to:- focus employment development in a highly sustainable location- provide greater self-containment for the town, reducing the need to travel- create a cohesive community with its proximity to Shifnal Industrial Estate and the proposed residential allocation of SHF018b & SHF018d also supports the:- design approach in Policy SP1(e) to raise design standards- approach in SP1(f) to make efficient use of land allocation of SHF018c & SHF032 for housing development adhere to objectives and requirements of Shropshire Test by being:- sustainably located within walking distance of the town centre and local services- located on the east side of town in proximity to most of these services and to the new local employment allocation- local movement of residents contributing to the containment of the settlement- providing additional community facilities and green spaces to support cohesive communities in accordance with SP1(b) & (g)
A0642B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The council does not have a Climate Change strategy and there is no indication of by how much the plan mitigates the impacts or how it is addressed.
A0642B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	Para 3.1 What is a gateway policy? There needs to be a formal requirement on developers to show that they have passed the test before submitting an application. If there are to be exclusions then there need to be clear and justified reasons for these.
A0642B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	Para 3.2 What is the point of putting forward aspirations if they are unenforceable?
A0647B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestry, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose.
A0648B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestry, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose.
A0670B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestry, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose.
A0685B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	This policy is supported in its entirety especially the support for sites that have sufficient proven infrastructure.
A0696B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Don't know / no opinion	Part C of the draft policy is far weaker than the proposed 'Vision'. It should read: "Will place the delivery of a zero-carbon economy at the heart of all development".
A0698B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestry, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose.
A0862B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Draft Policy SP1 (The Shropshire Test) requires development which, "makes efficient use of land" and draft Policy SP5 (High-Quality Design) includes a requirement to make, "efficient and effective use of land and topography". Support these sections of Policies SP1 and SP5. SHR054a is 3.86 hectares in size, the proposed guideline figure of only 60 dwellings is equivalent to a density of only 15.5 dwellings per hectare. This is inconsistent with draft Policies SP1 and SP5 as the site is capable of accommodating 116 dwellings at a density of 30 dwellings per hectare. Acknowledge that some of the site will be needed for compensatory car parking for the Shrewsbury Club, however this does not justify a reduction from 116 dwellings to only 60 dwellings. 85 dwellings (net density of 22 dwelling/ha) would be more appropriate.
A0888B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	With regard to draft Policies DP25 (Green Belt and Safeguarded Land) and S21 (Strategic Site RAF Cosford) or S1 (Albrighton Place Plan Area), proposed an amendment to the policies to allow the allocation (or safeguarding) of land at Newport Lane, Cosford which should be removed from the Greenbelt and allocated for housing development to support the strategic growth objectives of RAF Cosford. see wider response.
A0957B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		The new notion of a Shropshire Test is actually an idea that proposes a number of very desirable high level principles to which all developments should aspire. However, the wording only asks developer applicants to show that they have "considered" the principles. Furthermore, the principles are general and can be interpreted in different ways to suit different contexts and therefore need careful appraisal to ascertain their impact in any particular circumstance. Such lack of clarity will be difficult to evaluate by planners and is likely to be unenforceable leading to Appeals that are upheld. The principles are very relevant and desirable but lack any exemplification or benchmarks that could render them useful in practice. Evidence for this comes from: the unused Shropshire Accreditation Scheme; the minimal impact of the WMCA Design Charter stated in the application for a mixed development near Battlefield Roundabout; the vastly optimistic self-evaluation of the application for an estate at Bicton, off the Welshpool Road, using the BfL12 criteria; the Government's own critique of the planning system in "Planning for the Future"; the outcomes of Weir Hill and other mediocre estates even when there are already policies in the previous Local Plan that could be used to ensure high quality design (in all its meanings). This desirable policy has no better chance of making an impact than the other ones concerning the quality of design
A0970B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	Disagree with the draft Policy as it needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. Para 2.1 of the draft Local Plan includes "The pursuit of sustainable development is at the heart of the planning process" and quotes the NPPF which itself quotes the UN General Assembly in defining sustainable development at the strategic level as "meeting the needs of the present without compromising the ability of future generations to meet their own needs". Taken together with para 3.28 of the draft Local Plan: "The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. 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. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'". This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components: 1. Detail in the four key areas necessary for a zero carbon future - Policies to reduce energy demands; Commitment to develop and support far more renewable energy in the county; Guidance to actively promote a low carbon / more plant based diet; and Support and strategies for changes in land use policies. Strategies to support the county's development in these 4 key areas must be the cornerstones to a plan fit to fulfil government legislation to achieve net zero carbon by 2050 (as published on 27th June 2019) not the 80% mentioned in SP3. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose. 2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents.
A0981B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Policy SP1 – The Shropshire Test. Sport England supports part 1a) of the policy that development will support the health, well-being and safety of communities. This is consistent with the guidance in Chapter 8 of the NPPF, which relates to promoting healthy and safe communities. Sport England also supports the reference in part 1g) of the policy to providing sufficient infrastructure. It is recommended to add the words 'to meet identified needs' so that this ties in with the Council's evidence base. The reference to infrastructure should also cross-refer meeting the requirements of policy DP27 as this cross-relates.
A0984B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Support the overarching vision for the County. Recognises that development must contribute to meeting local needs and making settlements more sustainable, with the right mix of housing, employment, and other types of development. Recognises that where appropriate proposals should seek to reflect consideration other Shropshire Council strategic, such as Community Led Plans, Local Economic Growth Strategies, Local Transport Plan and Public Health Strategy.

Page 5

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0997B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Historic England welcomes the inclusion of the historic environment in this strategic policy
A1143B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A1143B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	In section (d) this policy paragraph states: "Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks"; This statement starts off well but becomes ambiguous with the unfinished statement "...provides opportunities provides opportunities for green and blue networks". What opportunities? Net gain, better functioning networks, reversal of fragmentation.
A1152B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Agreement is as far as it goes. Fully endorse the thrust of draft policy SP5, in recognition of the importance of design for creating better places and better buildings within them. Design is notoriously difficult to pin down and there have been the Building for Life standards (mentioned in para 129 of the NPPF), the Shrewsbury Test, and the guidelines developed by Shropshire Council Development Management. Concern is simply that the guidelines in both the West Midlands Design Charter and in the Shropshire Test are perhaps a bit general and possibly bland. Developers might therefore be able to say that they have met those tests whilst still presenting a development that is little better than those that are presently criticised.
A1180B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A1182B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A1634B11	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A1896B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A2150B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A2158B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A2167B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A2180B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	We would have expected something more akin to the aspirations of the Shrewsbury Test, but this doesn't appear to be the case.
A2308B38	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	Appreciate the key focus of the draft Local Plan is meeting local needs, however it should also recognise that need for development may arise to help deliver national requirements. Would like to see explicit support for defence related development within the plan which would be in line with Para 95 of the NPPF. Note specific support is provided within Policy S21 with respect to RAF Cosford, however there are a number of other key defence sites within the County. This draft policy highlights the need for development to support the health, well-being and safety of communities and clearly development undertaken in relation to national defence purposes has a link to this objective.

Page 6

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2321B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	<p>Policy SP1: The Shropshire Test</p> <p>3.1 'The Shropshire Test' provides a series of guiding principles which should assist the Council in being able to identify the most sustainable locations for meeting the identified housing and employment need throughout the plan area.</p> <p>3.2 In the context of this test (and as demonstrated in the table below), Albrighton is a sustainable location for further housing growth given its excellent social, community and transport infrastructure, and the approach advanced in the draft plan to support the growth of RAF Cosford as a strategic employment site with the proposed allocation of some 220.1 ha of land. It is on the edge of the Black Country and wider Greater Birmingham conurbation, with a regular rail service to Wolverhampton, Birmingham City Centre, Telford and Shrewsbury, and is in close proximity to the M54 growth corridor (comprising the employment sites at i54, ROF Featherstone, and the estates on Wobaston Road).</p> <p>3.3 These factors will act to further elevate the demand for nearby housing, and as set out within our response to Policy SP2, the amount of housing growth directed to Albrighton should be increased to reflect the sustainable future growth of the village and ensure it aligns with the draft plan's wider ranging goals of reducing the impact of climate change, and creating truly sustainable development.</p> <p>3.4 As part of recognising the role which Albrighton can play in the delivery of truly sustainable development, Vistry consider that more growth should be directed to the village and land to the east of Newport Road is well placed to facilitate additional growth within the village whilst also aligning with the guiding principles as set out within 'The Shropshire Test'.</p> <p>SP1. The Shropshire Test Our Response 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; As identified within the 'Technical review of the need for new homes in Albrighton' report enclosed at Appendix 2, Albrighton is within walking distance of the wide range of local services and facilities provided within the village centre. It is also within walking distance of Albrighton Train Station which provides access to Shrewsbury, Telford, Cosford, Wolverhampton and Birmingham. b. Supports cohesive communities; The site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community, including policy compliant levels of affordable homes and a range of dwelling sizes. This is particularly important given that the Albrighton Neighbourhood Plan Light (ANPL) identified that 'the community of Albrighton has expressed considerable concern over the ability of young first-time buyers to access the housing market'. Up to date data shows that since the ANPL was published, the prices of entry level and median house prices in Albrighton have rapidly increased faster than the average for Shropshire, further exacerbating the challenges facing young first time buyers and making it even more difficult to stay in or move into Albrighton. The new development would provide policy compliant levels affordable homes and a range of dwelling sizes. c. Addresses and mitigates the impacts of climate change; The Vision Framework (Appendix 1) identifies that there are limited environmental constraints to the delivery of residential development on the site. Moreover, the site is well located, in close proximity to existing services and facilities to allow for the creation of a truly sustainable community within close proximity to existing services and facilities and a significant job growth location at RAF Cosford. d. Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks; New residential development will provide a strong landscape framework comprising new open space provision for formal and informal play and recreation providing opportunities embedded within green infrastructure. Development of the site would include permeable and legible pedestrian and cycle routes, linking through to the adjacent residential areas of Albrighton. e. Raises design standards and enhances the area's The proposed development would be built in accordance with the Future Homes Standard meeting national housing standards as well as seeking to shape the character and historic environment; development so that it reflects the character and style of architecture and responding to designated heritage assets within proximity to the site. f. Makes efficient use of land; and The site is capable of delivering circa 218 homes at a density of up to 35 dwellings per hectare (dph), assisting in the delivery of new market and affordable housing that is capable of addressing local need in terms of type and tenure. The land can be brought forward for development in the short – medium term to make an important contribution towards the housing needs of the village and wider county. g. Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement. As set out in section 1 of these representations, and detailed throughout the Vision Framework (Appendix 1), the site could deliver sufficient infrastructure, services, facilities and where necessary provides opportunities for their enhancement – specifically ecological and biodiversity enhancements.</p>
A2323B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		No specific comments.
A2358B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	<p>In response to:</p> <p>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:</p> <p>a. Supports the health, well-being and safety of communities;</p> <p>30 houses within the first stage, with unknown additional properties following will increase carbon emissions through build and habitation. The village which has no lighting and almost no pavements already encounters high volume of vehicles and therefore hub status levels of development would decrease the safety of residents.</p> <p>b. Supports cohesive communities;</p> <p>Any cohesion and unified spirit that may have once existed in Clive has already started to pack it's bag to leave due to development squabbles and personal agendas.</p> <p>c. Addresses and mitigates the impacts of climate change;</p> <p>d. Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;</p> <p>e. Raises design standards and enhances the area's character and historic environment;</p> <p>f. Makes efficient use of land; and</p> <p>g. Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.</p> <p>Many other Shropshire villages that have encountered similar development to that being proposed for Clive have not had their previously high-quality natural environment, design standards, area's character or historic environment enhanced by the development. Far from it.</p> <p>My worry is that the developers will not always deliver what they promise and with no known final figure for houses that could be built in Clive by 2038 then it is hard to imagine that almost all of the points mentioned in SP1. The Shropshire Test, can be confidently adhered to in order to safeguard the character and community of the village of the environment.</p> <p>If Clive was offered (and subsequently delivered) development that was ground breaking in environmental protection and enhancement through great design and quality build with the support, ongoing assessment and vigilance of Shropshire council, the parish council and the community, then many more 'boxes' are ticked from the council wider objectives list and the positives linked with the above points a-g will be realised.</p> <p>The frequency with which Shropshire council mention 'sustainability', 'zero carbon' and also being '...especially concerned to ensure that new development maintains and enhances the character, appearance and historic interests of the County's settlements and countryside, including its distinctive landscape...' within the plan is extremely reassuring...until you assess recent and ongoing local village developments. Clive will surely suffer the same fate if hub status is approved. The need for fast development and healthy profits for the house builders clashes with the aforementioned positive objectives.</p> <p>I believe increased sustainable self build allocation within all of Shropshire council's proposed development areas will greatly assist with the introduction of long term residents to the communities where they build their homes (more often than not with great passion and love, ohh...and a little bit of blood, sweat and tears). Communities and the environment benefit – long term.</p>
A2365B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	<p>The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components: 1. Detail in the four key areas necessary for a zero carbon future (see below). 2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)</p>
A2372B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	<p>The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. This is why I disagree with this policy. Paragraph 2.1 states: "The pursuit of sustainable development is at the heart of the planning process." The National Planning Policy Framework (NPPF) quotes the United Nations General Assembly in defining what this means at a strategic level: "meeting the needs of the present without compromising the ability of future generations to meet their own needs" Taken together with paragraph 3.28 : "The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. 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. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components: 1. Detail in the four key areas necessary for a zero carbon future (see below). 2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four Key areas for a zero carbon future. 1. Policies to reduce energy demands. Specifically in a) new buildings and in retrofitting existing building and b) in a comprehensive sustainable transport system that gives residents alternatives to private cars. 2. Commitment to develop and support far more renewable energy in the county. Shropshire needs to make full use of its natural resources of hills and wind to produce more electricity. On shore wind projects and more solar energy farms. 3. Council guidance to actively promote a low carbon / more plant based diet. This should be one of the principle aims within Health & Wellbeing strategy. 4. Support and strategies for changes in land use policies. A county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Strategies to support the county's development in these 4 key areas must be the cornerstones to a plan fit to fulfil government legislation to achieve net zero carbon by 2050 (as published on 27th June 2019) not the 80% mentioned in SP3. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose. https://www.cat.org.uk/info-resources/zero-carbon-britain/</p>
A2398B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1		Part 1 of the draft policy emphasises that development will contribute to meeting local needs, making settlements more sustainable and providing the right mix of housing. Whilst this is generally supported, reference to meeting 'local' needs may result in the economic aspirations of the Plan not being met. If Shropshire is to grow, then development should look to meet 'identified' needs and the policy should be amended as such. This would be in line with the part two of the Policy which references the need for development to reflect the Local Economic Growth Strategies.
A2412B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	We support the aspirations of the plan and that it seeks to deliver sustainable development in the appropriate locations providing the right mix of new housing, employment etc.
A2427B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	<p>The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components: 1. Detail in the four key areas necessary for a zero carbon future (see below). 2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2441B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	Shrewsbury is an historic town and more effort should be paid to maintaining and enhancing the historic feel of the town instead of creating modern concrete structures that wouldn't look out of place in Milton Keynes. In particular I really worry for the aesthetic look of Smithfield Road. agree with the policy but have difficulty seeing how it will be delivered affectively given the reverse appears to be the actual implementation: For example: Bicton / Bicton Heath area: a) decreases health, well-being and safety of community - proposed 60 mph NWRP to run through the communities b) destroys cohesive communities - building 200% more houses than current dwellings in Bicton's will destroy the culture and cohesiveness of the communities c) does not address and mitigate the impact of climate change - proposed 60 mph NWRP will increase CO2 emissions, the building materials will also have an impact d) does not enhance the high-quality natural environment - 3 naturalised pools dating back to the glacial period and teaming with wildlife are to be eradicated and houses built on their site. g) removes infrastructure and services - planned removal of Oxon Park and Ride (removal of service) There needs to be tougher strategies and policies in place so that existing communities are not devastated or decimated as the ones above will be
A2469B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A2471B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A2476B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	3.2 This draft policy enshrines the core planning principles that are set out within the Vision for Shropshire for 2038 and is broadly supported. It is considered that the effectiveness of this policy could be improved by cross-referencing, where relevant, other specific policies within the Local Plan. Suggested modification example: a. Supports the health, well-being and safety of communities (See Policy DP30) b. Supports cohesive communities (See Policy DP1) c. Addresses and mitigates the impacts of climate change (See Policies SP3, DP12) 3.3 Doing this would assist those using and implementing the local plan by directing them to individual, specific policies that provide further detail and/or criteria as to how each of the core aims can be met.
A2477B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Agree	Supported
A2489B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A2490B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A2494B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP1	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components:1. Detail in the four key areas necessary for a zero carbon future (see below).2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include; policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose
A0038B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Further comments following the publication of the Draft housing strategy. There is clearly a conflict between the draft plan and the draft housing strategy. Population growth forecast at 17500 till 2041, though a need of 25400 to 2038 but proposes a build of 30800 dwellings? The policy is based on one dwelling per job and assuming a dwelling occupancy of 2.5 would require Shropshire to build just 7000 dwellings. As far as I can see there is no attempt to rationalise this variance so therefore the reasoning behind the LPR is called into question.
A0100B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Approach which seeks that new development is focused towards primary urban areas, specifically Shrewsbury, which will develop and grow in respect of its role as a strategic centre, is supported but will require the ongoing review of land to ensure a continuous supply of suitable sites is available. Accessible and sustainable land such as client's site ((SHR185) north of Dobbie's) should therefore continue to be considered by the Council. The proposed growth options provide the most significant opportunities to deliver a wide range of good quality affordable and family housing. Combined, with the urban focus of development the proposed level of development will promote access to services and support delivery of new infrastructure
A0138B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		Welcome recognition of the need to provide older persons housing Statistics on the level of growth in older people within the Plan do not consider the 2018-based SNHP. The SHMA and associated policies should be updated to consider the 2018-based SNHP. Whilst the Plan indicates it will monitor the number of older person specific dwellings permitted in Shropshire, it is only possible to measure the effectiveness of a policy if there is also a target figure. We strongly encourage the Council to identify and monitor how many older person housing units are needed in each of the four types of housing that it identifies in paragraph 4.36, namely, "a. Age-restricted general market housing; b. Retirement living or sheltered housing; c. Extra care housing or housing-with-care; and d. Residential care homes and nursing homes". As a minimum, the need for each of the above types of housing should be quantified
A0158B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The draft Local Plan is over-estimating the number of new homes needed compared with government figures of 1,270 per annum and 25,400 in total up to 2038. There must be a balance between investment in new housing and investment in supporting infrastructure. This balance has not been achieved in the past and we are not confident it will be achieved in the future.
A0167B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		Policy SP2 makes it clear Shrewsbury is the Key Centre and focus for new development. Do not object to this principle. However, development on the edge of the settlement must not result in severance between the town centre and wider local area. E.g. Safe and suitable pedestrian access must be maintained from Oxon Hall Caravan Park over the NWRP and through SUE West to ensure that visitors to the site can continue to access and support the local economy. Bus routes must also be retained to allow visitors to the Caravan Park access into the town to support the local economy whilst minimising impact on climate change and carbon generation. The policy should also reference acceptability of tourist related development outside development boundaries.
A0205B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Many upper floors in town centres are vacant, but have independent access from the shops below. Measures should be put in place, including grants, to encourage the conversion of such unused or under utilised spaces to provide residential accommodation. Bringing upper floors back into use would help regenerate town centres and provide increased security after business hours. Converting these spaces into residential would reduce the need to build on agricultural land on the outskirts of Bridgnorth.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0238B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Document Reference BTC14;BTC15;BTC16:Para 2 -Insufficient evidence for 30,800 dwellings, around 26,000 more appropriate reflecting Local Housing Need 2020 requirement for 25,894 homes. The optional increase to 30,800 homes, reflecting economic growth aspiration too optimistic. View is evidenced by a review of the ONS 2014 based household and population projections. These indicate projected household growth from 2016 to 2038 for Shropshire of 19,136 and population growth of 25,695 (8.2%) but with ageing population i.e. 'working age' population aged 16-64 years going down by 12,563 and the population aged 65+ going up 39,059. Number of single person households is projected to rise by 8,435, making up 44% of the projected growth in number of households. Whilst a "balanced growth" policy provides sufficient employment land to enable 1 job to be created for each additional home built, the plan does not identify what impact an additional 11,664 homes (above the ONS projected households) would have on Shropshire's population or labour force. Therefore not possible to determine, on the basis of Plan information, whether the "balanced growth" objective realistic. Whilst balanced growth objective is to enable creation of 30,800 jobs this is in context of projected decline of most typically economically active age group (16-64). It is not clear whether Shropshire's population (augmented from the ONS projections by building 11,664 further homes) would have the capacity to provide the 43,363 workers needed. (paragraphs 3.18 and 3.19 refer) Despite concerns regarding achievement of balanced growth, support an ambitious target for the provision of employment land provided that: a. achieved new jobs is monitored and reviewed every 5 years, along with the Local Plan. b. Targets for dwelling provision (across Shropshire and in local areas) are modified in the light of the number of new jobs created, to reflect balanced growth strategy & prevent the development of commuter towns. c. Safeguards are established to ensure that sites approved as employment land cannot be readily granted permission for housing development. Para 3.22- The draft Plan no longer contains an explicit commitment to a balanced growth policy (1 new job for each new dwelling). This should be included if the policy is still being followed. Generally supports this policy and that approval of new housing should be dependent on the achievement of an adequate provision of new jobs. (SP10 refers) Proposals in the Shropshire Economic Growth Strategy and in the Bridgnorth Local Economic Growth Strategy are not sufficiently robust to justify the growth in employment land and population proposed in the draft Local Plan. An approach is required to limit housing growth in areas where anticipated level of job creation is not achieved.
A0240B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Policy SP2: Strategic Approach2.1 Principally, L&Q Estates supports the Council's choice to pursue a higher growth option to deliver around 30,800 new dwellings over the plan period; however, it considers that an increased housing requirement is necessary for a number of reasons.2.2 The DSLP1 confirms the Council has undertaken an assessment of its local housing need ('LHN')using the Standard Methodology, indicating a housing need of 25,894 dwellings over the plan period from 2016 to 2038, as at April 2020. L&Q Estates considers this approach is correct and in line with the requirement of NPPF paragraph 60.2.3 The NPPF and Planning Practice Guidance ('PPG') are clear that the LHN figure generated by standard method is a minimum starting point (i.e. actual housing need may be higher than this figure). It goes on to state that it would be appropriate for a higher figure to be adopted on the basis of employment, infrastructure, unmet housing needs2, or affordable housing.2.4 In this regard, the Council purports that the proposed housing requirement not only meets its local housing need, but incorporates a contribution to the unmet housing shortfall of the neighbouring Black Country4, as well as providing flexibility and an opportunity to: a Respond positively to specific sustainable development opportunities; b Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire; c Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community; d Support the diversification our labour force; and e Support wider aspirations, including increased economic growth and productivity.2.5 It is understood the additional requirement of 4,906 dwellings therefore comprises 1,500dwellings to meet the unmet housing needs of the Black Country, and 3,406 dwellings to provide flexibility in response to the above opportunities (i.e. increased affordable housing, increased specialist housing, and increased economic growth). The table below demonstrates our understanding of the Council's proposed housing need and requirement for the plan period2016-2038. (Table 2.1 Housing need and proposed housing requirement 2016-2038 not included in this summary).2.6 With the proposal to plan for an additional 4,906 dwellings, L&Q Estates welcomes the Council's implicit recognition that its local housing need figure is a minimum starting point.2.7 It is unclear as to how a figure of 3,406 dwellings to provide flexibility has been derived and specifically to what needs it accommodates.2.8 Although paragraph 3.6 of the DSLP confirms the needs to which this provision responds (that being to support the provision of affordable housing and specialist housing, and to support economic growth), no explicit evidence has been provided which robustly demonstrates whether this quantum of uplift is sufficient in addressing said recognised needs.2.9 Moreover, the Council has failed to demonstrate how a contribution of 1,500 dwellings to meet the Black Country shortfall is appropriate or justified, particularly in the absence of any detailed analysis into the functional economic relationship between Shropshire and the Black Country.2.10 Consequently, L&Q Estates considers that further evidence is required to robustly demonstrate whether an uplift of 4,906 dwellings is sufficient to address the following factors:• Unmet housing need (Duty to Cooperate);• Affordable housing; and• Infrastructure.2.11 In addition to the above factors, the Council will also be aware of the Government's recent consultation on 'Changes to the current planning system'6 which proposes a revised standard method to align with its aspirations for the housing market.2.12 For the reasons set out below, L&Q Estates considers a further uplift to the Council's proposed housing requirement is necessary in order to align with the revised standard method which issue to form part of an updated PPG following the outcome of the consultation.2.13 Before these considerations, however, it is worth noting the shortcomings in the SustainabilityAppraisal7 ('SA') underpinning the Council's preferred option for a higher housing growth scenario. Chapter Five confirms that three Housing Requirement Options were assessed against the respective Sustainability Objectives8. The Housing Requirement Options are replicated below. (Table 2.2 Housing Requirement Options assessed through the SA not included in this summary).2.14 Although L&Q Estates supports the sufficient distinction between the reasonable alternatives, as advised by the PPG10, the approach is considered flawed on two grounds.2.15 Firstly, the total number of dwellings tested in the 'Option 3: High Growth' scenario (28,750dwellings) does not reflect the 30,800 dwellings identified in the DSLP, thus resulting in the sustainability implications of the proposed housing requirement not being accuratelyconsidered.2.16 Secondly, the annualised housing requirement for each of the three options suggests a 20-yearplan period has been utilised, as opposed to a 22-year plan period (2016-2038) as proposed in the DSLP. Again, this suggests the sustainability implications of the proposed housing requirement has not being accurately considered.2.17 L&Q Estates therefore recommends that the Council re-run the appraisal of housing growth options through the SA in order to reasonably conclude on a preferred option which has been robustly tested.
A0240B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The PPG is clear that 'an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.' The DSLP proposes to plan for an additional 3,406 dwellings beyond its LHN figure, but it is unclear as to how this additional provision has been derived and to what precise needs it accommodates (i.e. whether this uplift is included to directly meet unmet affordable housing need). In identifying affordable housing need, the DSLP15 defers to the Strategic Housing Market Assessment (September 2020) ('SHMA'), which concludes that 17,574 households will require affordable housing over the plan period 2016-2038, resulting in an estimated need for 799 affordable dwelling per annum16. Such need is significantly greater when compared against recent affordable housing completions: (Table 2.3 Open Market and Affordable Housing Completions in Shropshire not included in this summary). Firstly, it should be noted that the DSLP17 erroneously indicates an estimated need of '799 households per year' as opposed to affordable dwellings per year. It is therefore requested that this is amended accordingly to reflect the need for dwellings and not households. Secondly, wholly disagree with the observations and assertions of the SHMA and subsequently its conclusion to not recommend an uplift to the housing requirement based on acute affordable housing need: <ul style="list-style-type: none"> • 'To deliver the aspirations for affordable housing as identified through the assessment of affordable housing need... total housing development would have to be approximately 83,686 dwellings over the Local Plan period from 2016 to 2038 or 3,804 dwellings per annum, more than 3 times the calculated LHN... This significantly exceeds expected demand and crucially is considered undeliverable and inappropriate within the Shropshire housing market.' (paragraph 4.152) • '...the extent to which the housing requirement would need to exceed the LHN in order to meet aspirations for affordable housing would be undeliverable and inappropriate in a Shropshire context.' (paragraph 4.154) • 'If an adjustment cannot be made that would help to deliver the required number of affordable dwellings, there is a need to consider whether any adjustment is appropriate. Ultimately any such adjustment must not result in the housing requirement becoming undeliverable and be delivered through a plan led approach. As such any decision regarding the housing requirement is a policy consideration.' (paragraph 4.155) Principally, this approach is considered wholly unjust as it prematurely disregards an uplift to the LHN before assessing whether an increased housing requirement would be deliverable in the context of the Plan's deliverability. Moreover, it is considered unreasonable to assert that an uplift to the LHN would render the housing requirement undeliverable when compared against historic annual housing completions: (Table 2.4 Total Housing Completions in Shropshire (2016/17-2018/19 not included here) Given that recent annual housing completions have been, on average (1,876 dpa), approximately 60% greater than the current LHN (1,177 dpa), L&Q Estates consider that an uplift to account for acute affordable housing need is unlikely to render the housing requirement, and thus the Plan as a whole, undeliverable. Conclusively, recommend that the Council affords further consideration to an uplift of its LHN to account for acute affordable housing need, and subsequently adjusts its housing requirement to reflect this.
A0240B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	2.39 The PPG highlights that where there are 'strategic infrastructure improvements that are likely to drive an increase in the homes needed locally'18, it may be appropriate to plan for a higher figure than the standard method indicates. 2.40 The DSLP19 makes clear that the proposed strategic approach 'responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections.' 2.41 In particular, the Economic Growth Strategy for Shropshire ('EGS') identifies a number of strategic corridors and growth zones, most notably the M54/A5 East growth corridor20. It also recognises that the 'delivery of high quality infrastructure to meet the needs of businesses and residents is essential to the implementation of this economic growth strategy for Shropshire'21. 2.42 In this respect, L&Q Estates considers the Council should consider whether an increase in the LHN figure would be required to support such strategic infrastructure improvements, as advised by the PPG. 2.43 By way of example, an increase in the housing requirement could provide the funding required to invest in services and facilities and provide the funding required to improve and support the infrastructure packages identified in the EGS. Notably, the EGS recognises that given the 'ever tightening public purse and the increasingly competitive environment to secure public investment into infrastructure', the Council must 'look at innovative ways to deliver schemes'22. 2.44 Crucially, funding and investment are likely to be seen as significant limitations for delivery of local infrastructure projects. An increase in the delivery of housing, and thus private investment associated with this, can offer the funding necessary to facilitate this. 2.45 Indeed, the Council will be aware of the Government's recent consultation on 'Changes to the current planning system'23 which proposes a revised standard method to align with its aspirations for the housing market. 2.46 In the context of Shropshire, the result of the revised standard method identifies a local housing need of 2,129 dpa, representing an approximately 80% increase on the current local housing need of 1,177 dpa. A calculation of Shropshire's revised local housing need is demonstrated below (Table 2.5 Shropshire's local housing need calculated using revised standard method not included in this summary). 2.47 The Government is aware that any change in the standard method will have an impact on plans that are currently under preparation, and has therefore proposed transitional arrangements for authorities in having regard to their revised standard method need figure. It is proposed that, from the publication date of the revised guidance: <ul style="list-style-type: none"> • Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19) are given 6 months to submit their plan to the Planning Inspectorate for examination; and • Authorities close to publishing their second stage consultation (Regulation 19), should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan and a further 6 months to submit their plan to the Planning Inspectorate. 2.48 It is understood the current consultation of the SDLP was originally to be undertaken as a Regulation 19 consultation; however, Cabinet Members instead sought to resolve on undertaking a further Regulation 18 consultation should the need to make significant changes to the Plan arise24. 2.49 Whilst Officers have confirmed that a revised Local Development Scheme would have to be prepared to reflect this25, it would prove unfeasible for the Council to undertake a Regulation 19 consultation within three months of the revised guidance publication, should the guidance be published any time prior to winter 2020/21. 2.50 Notably, the Government's consultation confirms that the PPG will be updated to incorporate the revised guidance 'following the outcome of this consultation'26, with the consultation closing on 1st October 2020. 2.51 Having regard to these transitional arrangements and the likely timing of a forthcoming Regulation 19 consultation, clearly the Council will need to have regard to the revised standard method figure. It would therefore be prudent for the Council to build in a buffer at this stage and seek to begin assessing a number of sites that could deliver sufficient capacity to meet this increased figure. 2.52 Indeed, the Council will need to assess whether such quantum of development is sustainable when tested against its Sustainability Appraisal, however such an approach would align with NPPF paragraph 11(a) which confirms that plans should seek opportunities to meet the development needs of their area and 'be sufficiently flexible to adapt to rapid change.' 2.53 In this knowledge, considers it entirely appropriate for the existing safeguarded land at Land between Revells Rough, Lamedge Lane and the eastern rail line to be allocated for housing.
A0246B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Welshampton should be considered a Community Cluster within the Local Plan. The village is well provisioned with local amenities, a significant number of dwellings which are reliant on these amenities, located on the A495 close to Ellesmere and is currently a Community Cluster. Welshampton is perfect for small, well-considered infill development.
A0266B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The target numbers for new homes are based on a growth model dating back to the Economic Growth Strategy for Shropshire 2017 – 2021. Since then we have seen a global and local pandemic, Shropshire Council has declared a climate emergency and the government has committed the country to being 'net zero carbon' by 2050. The continued commitment to a high growth strategy for suburban, semi-rural and rural homes can no longer be justified on the basis of the out-of-date growth strategy and is not compatible with the council's own ambitions for a net zero carbon county by 2030. A minor adjustment to the sustainability appraisals that now includes access to existing public transport is not a sufficient response to these developments. (Interestingly though the effect has been to downgrade the sustainability of some sites.) Yet at the same time the council's own assessment of housing need, published after the main consultation document, requires more affordable homes than planned – by almost 10,000. So both the overall target and the proportion of affordable homes target require a complete rewrite. Reference to a local climate change strategy is of little value given the lack of detail and force in the development policies, especially as associated detailed policies in the local climate change strategy are yet to emerge. With specific reference to Shrewsbury the constraints of a medieval 'monocentric' town based on a series of river loops is insufficiently considered when looking for opportunities for growth. Whilst the high level policy S16 shows willing, the aspirations that sustainable infrastructure 'will be expected to [be] explore[d]' is not a robust guarantee that growth will be compatible with the character and natural limits of the town. There is no recognition of the possibility that such a town could reach a saturation point after which the quality of life will decline.
A0268B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		Draft Policy SP2 builds on previous Local Plan Review consultations to present the draft spatial strategy for the County. Please also see comments on proposed allocation SHR197VAR.
A0269B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Strategic Approach Support the provision of 30,800 dwellings for the Plan Period having regard to cross boundary housing needs and families moving in to Shropshire

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0269B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Strategic Approach Support growth to be complimented by new development in Community Hubs, identified in Schedule SP2.2, to include Burford
A0295B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The level of housing growth proposed is too high. The housing requirement should aim to achieve the minimum requirement under the standard methodology for housing need (25,894). It is noted that the NPPF states that the standard methodology 'can' be applied over the plan period, but also allows for a higher or lower figure where there are exceptional circumstances, which will be tested at examination. The NPPF also states a specific supply of deliverable sites should be identified for a five year period a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. Therefore the draft Local Plan only needs to provide reasonable evidence that sites will become available in broad locations and does not need to make specific allocations where there are good reasons for not allocating them at present (such as infrastructure constraints restricting development and no firm plans to resolve them). Consider proposals for an additional 1,500 homes to meet the Association of Black Country Authorities' (ABCA's) projected housing shortfall is unsound. Key issues are: Shropshire is not adjacent to any of the authorities in ABCA. Progress on the ABCA plan has stalled due to Covid-19. The ABCA Urban Capacity study indicates a shortfall of just under 27,000 homes, but the worst shortage is in Sandwell borough making up over half the total, Bridgnorth wouldn't be an obvious place to make up for that shortfall Telford & Wrekin Council rejected ABCA's request in 2019 - indicating lack of evidence.
A0295B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Consider proposals for an additional 1,500 homes to meet the Association of Black Country Authorities' (ABCA's) projected housing shortfall is unsound. Key issues are: Shropshire is not adjacent to any of the authorities in ABCA. Progress on the ABCA plan has stalled due to Covid-19. The ABCA Urban Capacity study indicates a shortfall of just under 27,000 homes, but the worst shortage is in Sandwell borough making up over half the total, Bridgnorth wouldn't be an obvious place to make up for that shortfall. ABCA project a significant employment land shortfall as well, however, South Staffordshire will make a significant contribution to this and the recently approved West Midlands Interchange at Four Ashes (M6/ A5/ A454) is estimated to meet 80 - 100 Ha of the shortfall "based on the travel to work area". Telford & Wrekin Council rejected ABCA's request in 2019 - indicating lack of evidence.
A0299B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support the preferred development strategy which aims to deliver a sustainable pattern of growth and a 'step-change' in economic productivity. Support an 'urban focus' and identification of Shrewsbury as the primary focus for development (this reflects the role of Shrewsbury within the heart of the County and opportunities for growth from initiatives such as the Big Town Plan and University Centre: Shrewsbury). Further housing growth should be considered. Recognise the need to provide sufficient employment land to support housing growth, but there is a need to avoid long-term protection of employment land where there is no reasonable prospect of a site being used for that purpose.
A0306B010	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 3.26 (e) We question the ability for this strategic corridor to deliver true sustainable economic growth.
A0306B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	While we accept the general Strategic Approach, we question the scale of development, both housing and employment land. We have expressed concerns relating to the high level of growth in previous consultations. The insistence on pursuing a level of housing in excess of housing need is not a sustainable approach and reflects the focus on economic growth. This is contrary to section 2 of the NPPF which states that the three overarching objectives of sustainable development (economic, social and environmental) need to be "pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). Not all Principal and Key Centres are equal in their ability to accommodate sustainable growth
A0306B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 3.17 The purpose of the local plan is surely to achieve sustainable development not to achieve the aspirations of the Economic Growth Strategy.
A0306B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 3.26 (b) We question the ability for this strategic corridor to deliver true sustainable economic growth.
A0306B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 3.26 (d) The Wildlife Trusts oppose HS2 at a national level as the environmental costs outweigh any benefits. The identification of a strategic corridor linking to HS2 that is based solely on road transport is an example of the unsustainable results of the scheme and Shropshire Wildlife Trust does not welcome its mention in the Local Plan.
A0310B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Oppose the high housing growth figure (will strain housing delivery targets - Shifnal has already experienced this problem by having unplanned permissions granted) and the addition of 1500 houses to meet Black Country needs (which will exacerbate the problem). Difficulty in ensuring infrastructure is being developed at a level and timescale to support permitted and completed development. This is contrary to several of the Strategic Objectives. There should be a pre-requisite for settlements to be able to develop their infrastructure to meet existing needs before further growth is permitted. Shropshire Council have failed to demonstrate how the increased provision of housing above need will lead to more affordable housing or how employment will be developed to meet the housing growth. Covid has made aspirations unrealistic. No evidence to justify how 1500 houses for the Black Country was arrived at, nor how it assessed whether such housing could be accommodated to meet its sustainable communities objectives. Not aware that a detailed analysis has been carried out by the Black Country to assess the availability of land within the Black Country to meet its own needs. The Green Belt Exceptional Circumstances Statement states that Shifnal will play a key role in meeting this need. This is contrary to Green Belt policy as it will require the removal of Green Belt not to meet essential Shifnal needs and when no alternative locations have been considered. The addition of unmet migrant need from the Black Country would constitute unsustainable development and an unsustainable community, so failing to meet the positively prepared soundness test. Telford would be a better location than a small settlement like Shifnal and the consequential loss of Green Belt. There is 300ha of employment is proposed, but says this is around 15ha a year, but 15ha/year over the 22 year period of the Plan equates to a total of 330ha. Totalling the individual Place Plan Area totals of employment land proposed then gives a total of 376ha, whilst Appendix 6 states that the strategic employment land supply will be 414ha. There is thus nearly a 40% difference in employment land proposed within the Plan. Indeed, para 3.20 also states that Appendix 6 "provides information on the employment completions achieved since the start of the Local Plan period and the various commitments (including allocations) available, which will contribute towards achieving the identified employment land requirement". No reasoning is given as to how if Appendix 6 contributes to the employment land requirement and totals 414ha, the employment land figure in the Plan is stated at 300ha. The employment land figures fail to take into account employment proposed in the Plan for RAF Cosford. This area means that the actual employment land figure proposed is well over 50% more than the 300ha figure quoted. The Economic Growth Strategy will be out of date before the Plan is adopted and fails to consider the long term economic situation up to 2038. There is no recognition in the Plan of the impact that Covid-19 is and will be having on the national and local economy. A much more realistic and conservative estimate of employment land requirements should be undertaken, with a view to the next Plan Review reassessing the economic situation when the full effects of Covid-19 can be assessed. Inconsistency in comments made by Shropshire Council in a meeting with the TC, on the relation between housing and employment figures and the objective of balanced growth. Shropshire Council said the 1500 houses from the Black Country unmet need were incorporated into the Shropshire housing figure, not added on as extra housing. The increase in housing in this plan to 30800 from the previously proposed 28750 was stated to be due to the increase in Plan period from 2036 to 2038. Whilst SC say the new housing figure is solely related to the extra 2 year period of the Plan, they have not similarly amended the employment figure for the extra time period and amended housing.
A0386B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Parish Council confirms that Stoke St Milborough, Hopton Cangeford and Cleedownton will no longer be community clusters as shown by the brown marker on the map on page 19. Figure SP2.1. The PC applied to become Open Countryside in January 2020. The locations were not listed as Community Clusters within the Place Plan area.
A0393B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Please see accompanying letter for full comments. Broad Support for urban focused strategy and identification of Broseley as a Key Centre.
A0406B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The Much Wenlock Neighbourhood Plan specifically rejects the building of large housing estates. By including one of 120 houses in the proposed Shropshire Local Plan the intention was obviously not to support the Neighbourhood Plan for this town.

Page 10

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0407B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		Draft Policy SP2 suggests development in rural areas is required to ensure long-term sustainability of rural communities. This approach is used in the Core Strategy (and earlier) and has turned many villages into dormitory settlements. Whilst sustainability in terms of retention of services may have been enhanced, there has been no systematic gathering of evidence to demonstrate that these policy aspirations have been achieved. Nothing underpins the necessity to carry this policy in to the future beyond political whim. There are severe adverse sustainability characteristics attaching to the policy. The proposed development pattern encourages the use of the private car and fails to minimise carbon emissions. Development in rural areas results in greater transport emissions than development located at towns. It is unsound to locate some 27% of all residential development in Community Hubs and Community Clusters, as this is inconsistent with the zero carbon spatial vision for the County and the Climate Emergency. It conflicts with draft Policy SP3 which supports a transition to a zero carbon economy and fails to meet policies requiring reductions in carbon emissions. There is no evidence that development in rural hubs and clusters, amounting to some 4000 dwellings so far in the plan period has met any significant local need. Strategies which allow for more rural development than necessary to meet local need to serve local employment do not comply with policies requiring development to be sustainable. All options considered within the preparation of the Local Plan involved significant development in rural areas. Draft policy SP3 requires development to reduce carbon emissions by minimising the need to travel and maximising the ability to make trips by sustainable modes of transport. For development to be appropriately located it must meet these two policy requirements. To minimise the need to travel, the location of development and its access to services and facilities is the main consideration. The National Travel survey shows on average a person makes 536 trips a year: 35% for shopping, 27% for commuting, 5% for business, 17% for personal business and 15% for socialising. Analysis of factors which represent nearly 70% of travel shows a household in a rural area (Hubs around Oswestry considered) is likely to produce around 9 times the amount of travel (distance) than one in Oswestry. Rural development and 'rural rebalance' increases the overall amount of distance travelled per household, conflicting with draft Policy SP3 and is unjustified/unevidenced. To maximise the use of sustainable transport need for access at any time of the day to buses, cycling and walking, and for longer distances rail. In locations outside major urban areas it is difficult for public transport to provide services to scattered workplaces. Services from community hubs in the Oswestry area show an inability to serve the employment centres in Oswestry, Shrewsbury and Wrexham. Similarly such locations have little chance of using public transport to access shopping and secondary education. Most minor hubs and clusters are served by a single route providing a single bus in the peak hour in each direction, with services stopping early in the evening. Such services suffer when compared with private vehicles as they: cannot be used for destinations away from the bus route; are slower (in most cases); more costly (even accounting for parking); and do not allow flexible working hours. Car journeys are the likely alternative to use of buses. The NPPF requires "the fullest possible use of...cycling" and draft Policy SP3 requires prioritisation of active travel including cycling. The majority of cycling trips are short distances (80% less than five miles and 40% less than two miles). Risk to cyclists on roads is high. To make fullest use of cycling, patterns of growth must enable the provision of safe facilities and short distances. Accommodating a high proportion of growth in rural areas does not achieve this, in fact it works against this due to distances, the dangerous nature of relevant roads (for instance the A5 and A483), absence of good quality cycle ways; and often gradients of roads. As such this policy again contradicts draft Policy SP3. The NPPF and draft Policy SP3 likewise require active management of growth patterns to favour walking. Development in isolated small communities does not support walking as a means of communication. Walking for leisure in rural areas is open to those that living in rural and urban areas. Whilst villages do offer social facilities which are supported by existing rural development, the towns provide a wider range, particularly for the young. Rural development will lead either to these facilities being denied to young people, with attendant social cost, or lead to parental "taxi" services, again running counter to the intentions of draft policy SP3. Car ownership in Shropshire is high, but those living in rural areas without cars can be isolated and dependent on others/other options, as such rural areas would not be the 'right location' for them. There are preferable means of meeting the needs for development land. For instance, development in the north-west should be focused along the A5 strategic corridor, in accordance with the principles outlined in Oswestry 2050. Major local employers and residential areas should be linked together. Low carbon development could occur. Attractive high frequency, economic and low carbon public transport services and cycle links should be provided. Satellite villages could be formed at Park Hall and Middleton. The A5 may need to be diverted beyond the main urban area. This would be a sustainable means of accommodating all the development proposed in villages, with little adverse effects on rural settlements. This option has not been given serious consideration by the Council.
A0413B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The reviews of the plan should consider the levels of demand for new developments and allow for changes within the time period of the plan and changes to the economy of the UK.
A0430B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Object to the housing requirement figure in SP2(2) which should be kept under review as the plan progresses given the ongoing work which may have implications for the housing requirement such as the statement of common ground on cross-boundary issues with the Black Country and the anticipated publication of the revised standard method for calculating local housing need. SP2(2) proposes a housing requirement of around 30,800 homes over the plan period / 1,400 per annum. It is set out in the supporting text, that this housing requirement has been informed by the current standard method for calculating local housing need at 25,894 homes over the plan period / 1,100 homes per annum, and incorporates an element of flexibility as set out in paragraph 3.6 of the plan, and includes 1,500 homes to support the unmet need of the Black Country. The supporting text in the plan, at paragraph 3.11, suggests that the expected rate of delivery of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery. However, there is no annual trajectory provided within the plan showing how the housing requirement would be achieved year-on-year over the plan period and broken down into settlements. It would be useful if the plan included an annual trajectory and Wallace retain the right to comment on this should one be provided.
A0430B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2(5) with a proposed minor amendment to achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas. Wallace supports this approach as the urban areas are the most sustainable locations within the County and should be afforded the lion share of development. It goes on to set out the pattern of development for the urban areas, saying that development will be focused on the Strategic Centre of Shrewsbury (Part 5a), with significant development at both the Principal and Key Centres (Part 5b), and new sustainable communities at the Strategic Settlements (Part 5c). Wallace support the broad pattern of development set out in Part 5, particularly Part 5b which groups the Principal and Key Centres, as both these categories have settlements where significant development can be accommodated. Schedule SP2.1. Urban Locations lists the settlements under the headings of Strategic Centre, Principal Centres, Key Centres and Strategic Settlements. Wallace consider that the Principal Centres and Key Centres could be grouped together in the schedule under the heading Principal and Key Centres, to be consistent with the grouping and wording at Part 5b of the policy.
A0430B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Object to SP2(6) which recognises the importance of ensuring the long-term sustainability of rural communities, and that growth in urban areas will be complemented by appropriate new development within Community Hubs and Community Clusters to maintain or enhance their sustainability. However, Appendix 5 of the Regulation 18 Local Plan identifies a large proportion of the planned housing growth will be directed to the Community Hubs alone, and no figures are given for the Community Clusters. The proportion of homes to the rural areas could be considered to contradict the complementary nature of these areas and weaken the focus of development to the urban areas
A0433B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The draft policy states 7,700 affordable homes (25% of all housing) will be delivered. It is unclear how this will be achieved given that draft Policy DP3 (affordable housing provision) does not apply to all sites (less than 5) and targets 10% or 20% on-site contributions. Clarity is required. Furthermore 25% of all households per annum equates to 350 dwellings per annum, but the identified need is some 799 households per annum. This means the housing waiting list will continue to increase by around 449 households per annum reaching nearly 15,000 by the end of the plan period, this is a significant deficiency in the plan.
A0436B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0437B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0438B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support the proposal to provide 7,700 affordable dwellings (equating to around 25% of the total housing requirement) during the plan period from 2016 to 2038. Affordable housing is increasingly important as affordability of open market housing is worsened due to their attractiveness to migrants. Providing good quality affordable housing that meets local needs, there is a need to acknowledge complexities around land supply and incentivise landowners.
A0438B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0439B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0440B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0441B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0442B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0443B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered
A0444B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations. However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan.
A0446B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support SP2 and the level of housing and employment development proposed, to support economic and sustainability aspirations However the new proposed standard method of calculating housing need would increase Shropshire's local housing need (need would be some 2,129 dwelling per annum). Whilst it is not expected to affect the Local Plan Review due to transitional arrangements, timescales in which amendments to the standard method may arise are unclear. The Council should be mindful of these changes and their potential impact on the preparation of the Shropshire Council Local Plan. The PPG states that the standard method of calculating housing need set the minimum housing requirement. Plus, ambition support economic growth, deliver affordable housing and unmet needs from other authorities need to be considered

Page 11

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0450B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Comparing paras 3.5 and 3.6 - the housing requirement of 30,800 dwellings is excessive: it exceeds the housing requirement of 25,894 dwellings by 20% and provides too much flexibility in the housing supply. In para 3.7, it is not appropriate to meet part of the Black Country housing needs in Shropshire as this will cause an unnecessary migration from the City and will increase out-commuting from Shropshire.
A0485B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Why does the Plan include 1,500 dwellings to meet Black Country needs? The Mayor of Birmingham has stated that the Black Country can meet its own needs.
A0501B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Paragraph 3.3 Paragraph 3.30 includes the objective to "Support skills investment and business growth which accelerates Shropshire's transition to a low carbon economy and investment in low carbon infrastructure..." Therefore the plan should contain SMART targets to both increase the county's renewable energy supply and plans to skill up our work force so that Shropshire will benefit economically from the increasing growth in this sector. Earlier this year the UK Government announced that onshore wind would be eligible to compete in the fourth Contracts for Difference (CFD) allocation round in 2021, a welcome outcome which will help ensure onshore developments will play a prominent role in the 'green recovery.' There is no mention of onshore wind development in the plan. Opposition to wind farms will exist – just as people must have fought against pylons which as now accepted as a necessary part of the landscape. https://www.energyvoice.com/opinion/266602/onshore-repowering-benefit-economy/We-are-facing-a-once-in-a-lifetime-opportunity-to-improve-climate-resilience . The Committee on Climate Change has said the tragedy of the Covid-19 pandemic can still become "a historic turning point in tackling the global climate crisis", and position the UK as a true leader on environmental policy. A green recovery is the only option to ensure a resilient economy can emerge amid the prospect of the "biggest economic shock for a generation" due to the coronavirus crisis, the government has been told. CCC chair Lord Deben said: "There's no [other] option. We can't return to prosperity unless we build a green economy which works for the whole of the nation." "The steps that the UK takes to rebuild from the Covid-19 pandemic can accelerate the transition to a successful and low-carbon economy and improve our climate resilience. Choices that lock in emissions or climate risks are unacceptable. https://www.independent.co.uk/environment/climate-change-economy-uk-report-2020-green-recovery-coronavirus-environment-a9583941.html These words apply as much to Shropshire as to every part of the UK. The local plans must clearly set out the means by which the county is going to achieve a transition to a low carbon economy – at present this is lacking and the objective of paragraph 2.2 is not embedded within the local plan.
A0504B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	GROWTH PROPOSALS FOR SHROPSHIRE, based upon the work carried out by the Bridgnorth Plan Group, I consider that the aspirational target for growth of the number of dwellings is too high for the whole of Shropshire and particularly the Bridgnorth Place plan area. I consider that meeting the minimum requirement under the Standard Methodology for housing needs assessment (stated in SP2, para 3.5 to be 25,894 dwellings over the plan period) would be sufficient for Shropshire Council to meet its obligations and that at target close to that should be adopted. I would support this figure being reviewed in 5 years time. I note that in reviewing this calculated value, following NPPF guidance that this figure is based upon a baseline value average which has been backdated to 2016 then extrapolated to the end of the plan period. There is no evidence that the calculation accounts for the start date being 2020 for the forward looking need. It is unclear how the overall figure of 30800 has been proposed and I find this to be unsound. The corresponding supporting document is incorrect in stating that the 2014 and 2016 ONS data gives the same baseline projection, this document is Unsound in terms of supporting evidence.
A0508B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Policy SP2 sets out the Council's strategic approach to new development across the County over the Plan Period confirming that 30,800 dwellings and 300 hectares of employment land will be delivered. MPG object to the proposed housing requirement of 30,800 and consider that it is too low and should be increased for the following reasons: 1. Uplift of housing requirement is not sufficient to respond to worsening market signals. 2. Failing to meet the needs of the Black Country with additional allocations so not meeting requirements of duty to cooperate with authorities in the Black Country Greater Birmingham HMA; 3. Standard method of calculating housing fails to take account of current government consultation which suggests national housing growth needs to rise from 241,000 annually to 300,000.
A0513B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Policy SP2 sets out the anticipated levels of growth that will be delivered over the plan period. Criterion 3 relates to the provision of affordable housing indicated that of the total housing requirement approximately 25% (7,700 dwellings) will be provided during the local plan period. It is unclear how this total has been calculated and whether it is realistic given that Policy DP3 – Provision of Affordable Housing seeks a range of 10-20% provision. As a result, the 25% figure quoted in Policy SP2 cannot be justified and should be reduced accordingly. The Site is controlled under a single ownership and as such is immediately available to contribute towards the identified housing need. The Site represents a viable and deliverable option which can be brought forward within the short term (0-5) years.
A0516B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Housing requirement of 30,800 is too high. Seems to be based on a predicted housing boom which is unlikely due to pandemic. Urges Council to reconsider and set a target more realistic for Shropshire
A0549B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Disagree that there is a need to accommodate housing numbers from the Black Country. Shropshire Council is only in it for the money.
A0573B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Support SP2(5) to deliver a sustainable pattern of development and to focus on principal and key centres. Support SP2(2) and para 3.17 to deliver an employment requirement of 300 hectares and to encourage appropriately located and high quality new employment development to achieve the aspirations of the Economic Growth Strategy. This conforms to NPPF para 80 for significant weight to be placed on the need to support economic growth and productivity taking into account local business needs and wider development opportunities. Support the Shropshire Employment Land Review evidence for Shifnal as a significant Key Centre that contributes towards the strategic growth objectives of the east of the County and employment allocations SHF018b & SHF018d reflect this significant role and housing growth must also optimise opportunities for local living, local patterns of live-work. Housing Need - should be viewed in the context of the guidance on the standard methodology in NPPG as a formula to identify the minimum number of homes expected to be planning for. SP2 and para 3.5 identifies the housing need to be 1,177dpa and the housing requirement puts the delivery of housing to 1,400dpa. The draft standard methodology would then put the need figure to 2,129dpa and would exceed the SP2 housing requirement as a minimum figure albeit policy constraints to be applied to the methodology may reduce the revised housing need figure. In the Shropshire Green Belt, there has been no revision to national Green Belt policy and so, to achieve the government objective to significantly boost housing supply, exceptional circumstances must be applied to identify the supply of land to deliver the necessary scale of development land. The Shropshire Local Plan must therefore use the exceptional circumstances to allocate or safeguard a sufficient supply of land for housing development. Black Country Unmet Need - Shropshire represents a preferred location to meet this need because it is undertaking a current local plan review and is physically close to the Black Country unlike many other West Midland authorities. Shropshire will accept 1,500 dwellings of this need as set out in the Shropshire Exceptional Circumstances evidence. Shropshire fails to state where the development will be located but states the settlements of the M54/A5 and to the east of Shropshire will play a key role in the delivery of this housing. Whilst the uncertainty regarding Duty to Co-operate may affect sub-regional planning, housing need in Shropshire will increase and strategically scaled development like Shifnal East will remain important. Shropshire must therefore meet the challenge of providing sufficient land to deliver housing growth of over 2,000dpa with a revised standard methodology. Reliance on Windfalls - The 5 Year Housing Land Supply Statement recognises that windfalls are a significant component of Shropshire's housing supply particularly brownfield sites, infilling and conversions. Changing environmental and economic circumstances will affect the supply of brownfield sites and these may not be located in areas of greatest housing need like Shifnal. The reliance on windfalls can be reduced by allocating site SHF032 and safeguarding site SHF18c which will ensure housing is delivered where it is most needed especially as rural conversions are unlikely in the Green Belt. Covid-19 Impacts - this might affect the short, medium and long term delivery of housing due to the short term impact on construction and the longer term impact on GDP. This impact on the housing pipeline will require greater flexibility and this is noted in some recent appeal decisions. This would suggest a number of risks from Covid-19 including capacity of the construction industry, supply chain issues for developers, access to investment funding likely to affect the delivery of allocations, permissions and the negotiations of S106 commitments. This may affect the ability to conform to delivery tests in the NPPF and require delivery assumptions in Monitoring Reports and 5 Year Housing Land Supply Statement to be revised. Local Plans must maximise housing development in strategic and sustainable locations and account for sufficient flexibility in assumed delivery rates. Site SHF032 in Shifnal is readily available and deliverable when released from the Green Belt and site SHF018c has the potential to be safeguarded and brought early if there is an immediate requirement for housing land.
A0600B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Doesn't agree with the new dwellings target for the plan period. Previous consultations suggest members of the public, Town and Parish Councils and Local and National interest Groups preferred a lower target (CPRE analysis). The public preference for a lower rate should be respected and the lower rate would also be beneficial for the people of Shropshire
A0615B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Don't agree that Shropshire Housing requirement is correct, and should be lower. Accommodating 1500 dwellings from the Black Country should be removed from the plan. The numbers will also be affected by the Covid-19 pandemic will also have significant short term impact on demand and construction. By the next partial review the repercussions of the pandemic will be clearer and a new target can be reviewed then, until then a moderate growth target of 5% above identified need is appropriate
A0616B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Don't agree that Shropshire Housing requirement is correct, and should be lower. Accommodating 1500 dwellings from the Black Country should be removed from the plan. The numbers will also be affected by the Covid-19 pandemic will also have significant short term impact on demand and construction. By the next partial review the repercussions of the pandemic will be clearer and a new target can be reviewed then, until then a moderate growth target of 5% above identified need is appropriate
A0627B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Incorporating 1500 Black Country homes should be closer to that region. The economic fluctuations between now and 2038 means that the Plan will be out of date soon. Covid effects not taken into account - Housing targets should be looked at then - after the affects of the pandemic are clearer. Should be 'Moderate Growth,' not High Growth.
A0633B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	This target is 19% in excess of the identified need of 25,894 for Shropshire. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038. Effect of Covid-19 is unknown. An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A0642B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	We disagree with the adoption of a higher than required level of house building: this is not what the people of Shropshire say that they want when they are consulted. How many of the 30,800 new homes will be located within 200m of a bus stop with a 7 day per week service and what is the likely trip generation by car (trips per day by car per household x 30,800)? We agree that development in town centres should be the main focus as this is the most sustainable way for people to live. However, the plan does not outline how the significant issue of under occupancy should be dealt with. This has significant potential to address the need for housing if addressed strategically. The details of the individual places plans suggest that there will still be very significant amounts of edge of town, car dependent development which, in turn, will worsen traffic congestion and climate change impacts. Point 5b: Not all Principal and Key Centres are equal in their ability to accommodate sustainable growth. Point 7: We welcome this change as our experience to date has been that Shropshire Council has obstructed all attempts to develop such plans. The local plan needs to set out how the council will support such plans - what resources will be made available?
A0642B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 3.17 The purpose of the local plan is surely to achieve sustainable development (as required by NPPF) not to achieve the aspirations of the Economic Growth Strategy.
A0642B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 3.26 (b) We question the ability for this strategic corridor to deliver true sustainable economic growth in the absence of a clear policy of promoting sustainable transport.

Page 12

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0665B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		This objection relates to parts 2 and 5 of Policy SP2. SP2 2: This says the housing requirement for Shropshire is 30,800 dwellings based on an actual need of 25,894 dwellings. In addition 1,500 homes are to be built as part of the Black Country's specific needs. I have two issues with the housing requirement. Firstly, I have read that the shortfall for the Greater Birmingham and Black Country Housing Market Area is now only 2,597 up to 2031, and from what I can gather is likely to disappear completely in the near future because of all the brownfield sites being developed in the conurbation. Although there could be some shortfall post-2031, this will only be known once the new Birmingham and Black Country plans proceed. Therefore there is no justification for Shropshire to take 1,500 dwellings from the Black Country. If there is a small number of homes that need to be taken from the Black Country then it is those councils who neighbour the Black Country that should have them. I do not think it is correct for Shropshire to take any of their houses for the time between 2031 and 2038 either because there is absolutely no way to know today whether the Black Country will have a problem in the future, and if they do, how much of one. Any thoughts of accommodating any of their homes is a job for Shropshire's next local plan. Consequently, as a starting point the local plan should reduce the housing number by 1,500 dwellings to 29,300. Secondly, there is no reason why Shropshire should go above their own need figure of 25,894. I am acutely aware of what might be coming around the corner for Shropshire if the government get their way with changes to the planning system. There will be a massive increase in houses so the council should keep to their own need figure down for the moment rather than over supply now and then end up with a massive increase over the next 20 years as well. Therefore, the housing requirement should be further reduced down from 29,300 to 25,894 dwellings. Aside from the actual housing requirement, if the council are slow with getting on with this current draft plan they might find they get the massive housing increase earlier than they thought. The government has given councils some time to get current draft plans progressed and Shropshire must use this and get it submitted as soon as possible. If not I can only imagine how local people will vote in the next council elections. SP2 5: SP2 5b says Principal Centres will accommodate significant new housing. The policy does not quantify what 'significant' actually means and therefore it is inappropriate to use the word as it is unclear what is meant by it. I note there is no reference to 'significant' in 5c even though those two sites alone are due to deliver 1,750 dwellings.
A0678B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Recognise the sustainable merits of a balanced approach to development, recognising the role of the higher order and most sustainable settlements but also the importance of rural areas and the part these settlement can continue to play in delivering housing and, in turn, providing vitality to communities. Owing to the existing service offer, support identification of St Martins as a Community Hub settlement, under Schedule SP2.2. Also support Bullet 6 of the draft policy which enables sustainable development in Community Hubs.
A0685B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Is supported especially point 6 which properly notes and accepts the fact regarding the 'rurality' of Shropshire and the 'importance of ensuring the long-term sustainability of rural communities' and that 'growth in urban areas will be complemented by appropriate new development within Community Hubs.' Point 7 is also supported as it says: 'The production of formal Neighbourhood Plans will be supported and can identify development opportunities which will complement proposals in this Local Plan. Where appropriate they can also identify additional Community Clusters.'
A0693B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Where possible, Brownfield Sites should be used in order to protect the Green Belt.
A0696B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Don't know / no opinion	Ambitions for Net Zero Carbon emissions (considering all greenhouse gases as carbon equivalent) and a low carbon economy should be clear within the draft policy Part 2 of the draft Policy should include that renewables are considered by Neighbourhood Plans and Local Plans. Those already in place should be reviewed and updated. Details of possible areas for renewables should be provided and Applications for schemes considered inline with National policies should be allowed. Marches LEP Energy Strategy has a target for 50% of electricity demand to be provided by locally produced renewable energy. Welcome the support shown for community energy projects.
A0697B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Do not object to the calculation of Local Housing Need (25,894), however do object to the resultant housing requirement (30,800) as: -The Local Housing Need Assessment is based on the 2014-based sub-national household projections (SNHP) as per national guidance. However, whilst comparison to the 2016-based SNHP is provided no such comparison is provided for the recently published 2018-based SNHP. The 2018-based SNHP protect very different household growth for Shropshire over coming years. Applying the current standard method to the 2018-based SNHP results in a housing need of 2,159 dwellings per annum (47,498 dwellings over the total plan period). This indicates a marked change in household growth in Shropshire not captured in the 2014 or 2016-based SNHP. Recognise the difference (some 21,604 dwellings) should not necessarily be accepted at face value, however increases in dwelling stock since 2014 and figures on housing completions since 2016 would cause higher in-migration/lower out-migration and also indicate a level of future growth in this region should not be considered unreasonable. The 2014-based SNHP applied in the current standard method are based on trends markedly different to those since the beginning of the draft Local Plan period (2016), these are more effectively captured in the 2018-based SNHP. Also, a revised methodology for calculating local housing need was proposed in the Changes to the Planning System consultation. If introduced and applied need in Shropshire would be 2,129 dwellings per annum. Therefore whilst acknowledging that the Council has applied national guidance in calculating housing need, greater recognition/consideration should be given to the 2018-based SNHP when determining an appropriate housing requirement, given they indicate different trends to the 2014-based SNHP and in the context of imminent changes to national guidance. The proposed housing requirement is not supported and does not represent a high growth strategy, it is actually a decline, as it is less than the trend since the start of the draft Local Plan period (1,876 dwellings) and less than need calculated using the 2018-based SNHP. - National guidance states that local housing need is a 'minimum' and is not a requirement. Factors that may justify an adjustment need consideration. - Full consideration of the contribution that the housing requirement makes to addressing affordable housing need has not been undertaken. This need (previously 1,240 dwellings per annum and updated to 799 dwellings (presumably within SHMA Part 2 which could not be located) whilst reduced is high and the Council's approach to addressing the need for affordable housing is insufficient to make any meaningful contribution towards addressing the scale of the problem facing local people in accessing suitable housing that they can afford, as this draft policy states a specific target for affordable housing delivery of some 7,700 dwellings over the plan period (equating to 25% of all housing), however it is unclear how this has been derived or will be achieved and this represents less than half of the stated need of some 799 dwellings per annum (17,578 dwellings total). Additionally, there has been persistent under-delivery of affordable housing between 2010 and 2017 (the average is some 244 dwellings per annum equating to around 30% of affordable need. In this context not enough is being done to address current and future affordable housing need in determining the proposed housing requirement. Suggest this is addressed by increasing the supply of land in locations deemed to be sustainable and on sites that are considered to be deliverable, in particular ALB014. For these reasons the draft housing requirement should be increased and additional sites identified to address local housing need - particularly for affordable housing. Albrighton should be a focus for this additional growth and site ALB014 provides a suitably sustainable location to accommodate additional development within the settlement. This provides further support and justification for release of ALB014 from the Green Belt and its specific allocation for residential development, rather than the current proposal to safeguard the site for consideration beyond 2038. Note that the proposed distribution of growth remains generally consistent with that previously proposed and maintains Albrighton as a Key Centre. However concerned with this approach and the level of development proposed for Albrighton (see comments on Policy S1.1). Particularly concerned regarding emphasis being placed on rural areas where 26% of the total amount of development is proposed to occur, compared to just 18% in Key Centres (including Albrighton) acknowledged as more sustainable locations. This distribution does not fit with an 'urban focused' strategy and is illogical in that it directs development away from settlements accepted as being more sustainable. As a result, the residential guideline proposed for Albrighton is constrained to fit with the proposed strategy distribution, rather than reflecting the opportunities that exist through the Plan to deliver additional growth in the most sustainable parts of the Borough. This is exacerbated by a lack of consistency between the housing and economic strategies underpinning the distribution of growth in Shropshire, with employment distribution addressed in draft Policies SP10 and DP9, which prioritises investment in strategic locations and growth zones along strategic corridors. Such corridors include the Eastern Belt M54/A5/A41/A464/A5 and A454/A458, Albrighton is one of only two settlements located directly within this corridor to the west of the conurbation, alongside Shifnal (which is planned to deliver significantly more growth than Albrighton). Albrighton should therefore be treated differently to the other Key Centres given its strategic location close to the conurbation. The draft strategy proposes to limit growth in Albrighton to meet local needs only, this fails to recognise the contribution Albrighton can make to addressing wider housing and economic priorities and is a missed opportunity. The total supply of housing outlined in Appendix 5 of the Draft Local Plan totals only 28,802 dwellings, meaning a shortfall of around 2,000 dwellings against the housing requirement, which has not been acknowledged or accounted for. To reduce this disparity additional allocations in locations capable of delivering sustainable growth and which fit with the distribution strategy and help deliver the wider economic agenda (such as Albrighton) should be made, rather than relying on unknown windfall. Support the approach of treating strategic sites separate for other supply. Note the Council indicate general support for meeting unmet needs arising in the conurbation. Broadly support this intention. However, whilst reference is made to accepting 1,500 dwellings it is not explained how this will be distributed across Shropshire. Those sites 'assigned' to meet this additional need should be based on a sequential approach favouring sites deemed sustainable and deliverable and in proximity/accessible to the Black Country conurbation by public transport. Sites in east Shropshire and situated along the A41/M54/A5 corridor are considered most appropriate.
A0838B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 3.5 and 3.6: Disagree with number of new dwellings required as being 30,800 as local housing need identified 25,894 requirement. Has housing need been reviewed since 2019 when climate emergency declared. Concern about CO2 production as a result of the increased transport and domestic heating along with the loss of habitats. Concerned about impact on infrastructure. Concerned about patterns of living changing in the light of pandemic and home working, the value of open spaces and wildlife near to home. Asking Shropshire Council to look again the scale of development.
A0853B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Object to the housing requirement of 30,800 dwellings (1,400dwellings/annum) in SP2(2) as this requirement appears to be too low compared to the need for housing in Shropshire under the Government's proposed changes to the standard method. The Government's consultation on proposed changes to the standard method for calculating local housing need results in a significantly higher housing need figure at 2,129dwellings/annum than is currently being taken forward at a rate of 1,400 dwellings/annum. However, given that the Council is at an advanced stage of plan preparation, to await the revised Framework / standard method before proceeding would significantly delay the adoption of the plan and risk suppressing rather than accelerating housing delivery in the County. The only logical option is to proceed to submission and adopt this plan as quickly as possible, and to allocate sites (particularly those which can deliver in the short term) to meet housing needs now. The Local Plan Review may ultimately need to be reviewed soon after adoption to take into account the new methodology and any other changes to national planning policy, as proposed through the recent White Paper. Nevertheless, the plan represents a clear opportunity to boost the supply of housing land in the short term, and any such allocations would contribute to meeting housing needs in the future should they be increased.
A0853B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Object to the use of the word 'around' in SP2(2) that sets a requirement to deliver 'around' 30,800 new dwellings and around 300 hectares of employment land over the plan period from 2016 to 2038. This equates to 'around' 1,400 dwellings and 15ha of employment land per annum. NPPF paragraph 59 sets a requirement to 'boost significantly' the supply of housing land and the housing requirement should be expressed as a minimum. The Draft plan states in paragraph 3.6 that a housing requirement of 30,800 dwellings is necessary to meet housing need and support the long-term sustainability of the County, and to provide flexibility to respond to rapid change as required under the Framework. Paragraph 3.7 clarifies that the requirement also incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan. In this context, and the ongoing policy imperative to boost significantly the supply of housing land, we consider that the housing requirement must be expressed as a minimum figure.
A0853B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Object to the omission of a housing trajectory in the main body of the Plan as part of SP2. Paragraphs 3.10 and 3.11 of the draft plan indicate that housing delivery is likely to be around 1,400 dwellings per annum. However, the trajectories referred to within the supporting text and Appendix 7 of the plan do not appear within the plan itself. In accordance with paragraph 73 of the Framework, a trajectory should be prepared and included within the plan so that performance against the housing requirement can be monitored. Appendices 5 and 7 of the plan provide information on the distribution of housing and the proposed timescales for delivery on the site allocations, but it is not possible to establish a detailed trajectory from this information. Notwithstanding, our overall concern is that the total housing supply identified in Appendix 5 only amounts to approximately 27,750 dwellings. The proposed strategic settlements are identified to deliver a further 1,750 dwellings, however this still leaves a shortfall of approximately 1,300 dwellings (i.e. just under 1 years' worth of supply). Even if this shortfall can be accounted for through other rural windfall completions / windfalls, there does not appear to be any flexibility within the supply to deal with rapid change.
A0853B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Market Drayton is identified as a Principal Centre, alongside Bridgnorth, Ludlow, Oswestry and Whitchurch. This reflects the credentials of Market Drayton as a sustainable location for accommodating growth, and the settlement hierarchy set out at Schedule SP2.1 is clearly justified by the Hierarchy of Settlements report (August 2020). We therefore support the designation of Market Drayton as a Principal Centre. However, we consider that Market Drayton could accommodate a greater proportion of development than is currently proposed in the draft plan.
A0888B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	See wider response.
A0894B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Object to Policy SP2 as the proposed 30,800 dwellings requirement uses the 2014-based household projections predicting 147,635 households in Shropshire. This does not conform to the new standard methodology using the 2018-based household projections predicting 171,876 households in Shropshire requiring a higher housing requirement of at least 46,700 dwellings. If the higher requirement is not used then the Local Plan will have very short lifespan. The methodology uses a higher starting point for households at 135,452 (not 123,886 households) and higher growth (26.9%) over the period to 2038. The standard methodology calculates the housing requirement on annual household growth over a 10 year household projection (1,741 households/year in Shropshire) multiplied by an adjustment factor (1.22). For Shropshire this gives a revised annual requirement of 2.124 dwellings/year compared with the Local Plan requirement of 1,400 dwellings/year. The shortfall in the Plan will be a major concern for the Examining Inspector irrespective of transitional arrangements for the new standard methodology. This will become clear in the proposed new Housing Delivery Test introduced through proposed changes to the planning system to substantially boost the supply of housing in England.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0894B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Object to Policy SP2 on the basis of the evidence for the delivery of the housing requirement in the Local Plan. This requires more land to be allocated in the most viable parts of the County to overcome the evidence that the Local Plan draft policies and CIL obligations render most sites either unviable or marginally viable. [INFORMATION DUPLICATED IN A0894B4 FOR POLICY S7.1 CRAVEN ARMS] The conclusions of the Delivery and Viability Study show the Local Plan cannot pass the effective test of soundness unless the housing supply delivers more smaller greenfield sites that have better viability. These sites also need to be provided in the higher values areas of the Shropshire housing market. This will include Craven Arms with relatively good development values for 3 - 4 bed homes that are higher than Shrewsbury, Bridgnorth, Shifnal and Albrighton and higher than the northern market towns. This will help to focus market attention on greenfield sites in region of 30 dwellings which are more attractive to the market than greenfield sites in the region of 250 dwellings which describes the principal housing allocation in Craven Arms. Craven Arms would also benefit from the allocation of some additional smaller greenfield sites to attract market development interest into the settlement.
A0895B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Fletcher Homes supports the SP2 policy aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" however part 2 of Policy SP2 undermines this in its low aspiration for only 1,400 dwellings per annum. This amounts to a reduction in the amount of housing in the adopted Core Strategy, which plans for 1,530 dwellings per annum from 2021. The figure of 1,400 dwellings per annum is significantly lower than the 2018 based household projections which forecast growth of 1,741 households per annum from 2020 to 2030. We question whether this is sufficient to demonstrate consistency with the Framework and the Duty to Co-operate. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, deleting the current housing target of "around 30,800 dwellings" and replacing it with "at least 46,700 new dwellings" over 22 years 2016-2038. There is a danger that the Plan will fail to be consistent with the National Planning Policy Framework, specifically the requirement in paragraph 60 to determine the minimum number of homes needed using the standard method in national planning guidance. The Government's current consultation proposes changes to the standard method that would apply the 2018-based household projections and apply an affordability adjustment that would increase this figure to 2,124 households per annum. The policy's housing requirement of 1,400 dwellings per annum is only 66% of the housing requirement using the Government's proposed new standard methodology. The Government's 'Planning for the Future' Policy Paper envisages long-term changes to the planning system to substantially boost the delivery of housing. The Housing Delivery Test is expected to play an increasingly significant role and failure to address the latest household projections will leave Shropshire Council vulnerable to falling foul of the Housing Delivery Test. In the short term, the Plan may or may not benefit from transitional arrangements, but these will not protect Shropshire from higher housing requirements over the medium and long term. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Paragraph 60 of the Framework also states, "In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." We note that the Association of Black Country Authorities wrote to Shropshire Council on 9th September 2019 and re-iterated their request that Shropshire's Local Plan help provide for their identified unmet need for 26,000 homes over the period to 2038. In response paragraph 3.7 of the draft Plan attributes 1,500 dwellings of Shropshire's housing target to support the housing needs of the emerging Black Country Plan.
A0896B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Galliers Homes support the aspiration in Policy SP2 to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable". Galliers Homes object to Policy SP2(2) which only seeks a low aspiration for 1,400 dwellings per annum. This is reduction in the housing in the Core Strategy for 1,530 dwellings per annum from 2021. The figure of 1,400 dwellings per annum is also lower than the 2018-based household projections which forecast growth of 1,741 households per annum from 2020 to 2030. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs. The Plan may fail to be consistent with NPPF para 60 that requires Local Plans to determine the minimum number of homes needed using the standard method in NPPG. The Government's current consultation proposes changes to the standard method to apply the 2018-based household projections and apply an affordability adjustment that would increase this local housing need to 2,124 households per annum. The policy's housing requirement of 1,400 dwellings per annum is only 66% of the housing requirement using the Government's proposed new standard methodology. The Government's 'Planning for the Future' Policy Paper envisages long-term changes to the planning system to substantially boost the delivery of housing. The Housing Delivery Test is expected to play an increasingly significant role. In the short term, the Plan may or may not benefit from transitional arrangements but these will not protect Shropshire from higher housing requirements over the medium and long term. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Paragraph 60 of the Framework states, "In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." We note that the Association of Black Country Authorities wrote to Shropshire Council on 9th September 2019 and re-iterated their request that Shropshire's Local Plan help provide for their identified unmet need for 26,000 homes over the period to 2038. In response paragraph 3.7 of the draft Plan attributes 1,500 dwellings of Shropshire's housing target to support the housing needs of the emerging Black Country Plan. We question whether this is sufficient to demonstrate consistency with the Framework and the Duty to Co-operate. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, replacing the current housing target of 30,800 with at least 46,700 new dwellings over 22 years 2016-2038.
A0897B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Support the draft Policy's aspiration to accommodate "investment and new development that contributes to meeting needs and making its settlements more sustainable". However part 2 of the draft Policy undermines this in its low aspiration for only 1,400 dwellings per annum. This amounts to a reduction in the amount of housing in the adopted Core Strategy, which plans for 1,530 dwellings per annum from 2021. 1,400 dwellings per annum is also significantly lower than the 2018-based household projections which forecast growth of 1,741 households per annum from 2020 to 2030. Draft Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs. Risk that the Plan is inconsistent with para 60 of the NPPF on determining the minimum number of homes needed using the standard method in national planning guidance. Government's current consultation proposes changes to the standard method that would apply the 2018-based household projections and apply an affordability adjustment that would increase this local housing need to 2,124 households per annum in Shropshire. The draft policy's housing requirement of 1,400 dwellings per annum is only 66% of the housing requirement using Government's proposed new standard methodology. Government's 'Planning for the Future' Policy Paper envisages long-term changes to the planning system to substantially boost housing delivery. The Housing Delivery Test is expected to play an increasingly significant role. In the short term, the Plan may or may not benefit from transitional arrangements but these will not protect Shropshire from higher housing requirements over the medium and long term. There is a strong case for the Council to reconsider its housing requirement in light of the Government's recent consultations on changes to the NPPF and its direction of travel to increase housing delivery across the country. Para 60 of the NPPF also requires consideration of cross-boundary needs. Note that the Association of Black Country Authorities wrote to Shropshire Council requesting help delivering their identified unmet need for 26,000 homes over the period to 2038. In response para 3.7 of the draft Local Plan attributes 1,500 dwellings of Shropshire's housing target to supporting housing needs of the emerging Black Country Plan. Question whether this is sufficient to demonstrate consistency with the NPPF and the Duty to Co-operate. Draft Policy SP2 would be more resilient if the housing requirement is increased to reflect latest household projections and affordability data, replacing the current housing target of 30,800 with at least 46,700 new dwellings over 22 years 2016-2038. Welcome inclusion of RAF Cosford as an area in which to focus growth in section 5d of the draft Policy. Para 3.26 explains the draft Local Plan responds to the Economic Growth Strategy for Shropshire by prioritising growth zones including the M54 corridor. The implications for Albrighton are considered in our comments to Policy S1.1 Albrighton Support the strategy of directing development to Principal and Key Centres in section 5b of this draft Policy, as a strategy that will deliver sustainably located development. Support designation of Albrighton as a Key Centre, given its location on the M54 corridor.
A0900B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Sansaw Estate supports the policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable". The Estate's long-term vision for Hadnall matches the Local Plan's vision in this regard, given Hadnall's strategic location on the A49 corridor with excellent connections to a wide range of employment opportunities both in the rural area (e.g. the Sansaw Business Park) and in north Shrewsbury. We consider part 2 of Policy SP2 undermines its own aims to meet the county's needs because its proposals for only 1,400 dwellings per annum amounts to a reduction in the amount of housing in the adopted Core Strategy, which plans for 1,530 dwellings per annum from 2021. The figure of 1,400 dwellings per annum is significantly lower than the 2018-based household projections which forecast growth of 1,741 households per annum from 2020 to 2030. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, deleting the current housing target of "around 30,800 dwellings" and replacing it with "at least 46,700 new dwellings" over 22 years 2016-2038. Sansaw Estate encourage the Council to have the vision needed to transform Shropshire's rural settlements into vibrant places that deliver a sustainable rural future for the 21st century. The Coronavirus pandemic has highlighted the potential for radical change in the economy, with many companies and individuals considering new ways of working that are well suited to sustainable rural living. To reflect the new housing requirement and embed a vision for sustainable rural futures, the Sansaw Estate suggest that SP2(6) is amended to insert the words "and visionary rural transformation" to read: "Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development and visionary rural transformation within Community Hubs, identified in Schedule SP2.2, which are considered significant rural service centres..." These two changes to policy SP2 should be reflected in the Community Hub policies, including policy S17.2 in relation to Hadnall to accommodate a higher residential guideline figure of 250 dwellings.
A0900B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Sansaw Estate welcomes the Plan's acknowledgement of Whole Estate Plans in managing land. We support their use by the Council as a material consideration in circumstances where the Whole Estate Plan complements the Local Plan. The value of Whole Estate Plans is that they can help to articulate, explain and demonstrate 'other material circumstances' relating to proposals, adding weight in the planning balance and enabling outcomes that deliver real value across multiple strategic objectives but which might otherwise not have been achievable if judged solely against the policy context of the Local Plan. This has been pioneered and applied effectively in the South Downs National Park and we are delighted to see Shropshire Council reflect this proven approach in their emerging Plan. The Sansaw Estate are developing a Whole Estate Plan. An overview document that sets the scene for the forthcoming Whole Estate Plan accompanies this representation. Page 5 of the 'Enabling Sustainable Rural Futures' document sets out the Estate's emerging thinking for the following locations: Sansaw Dairy; Hardwicke Farm; Black Birches; Hadnall; Clive; Grinshill; Hope Farm; Yorton Farm; Yorton Villa Farm.
A0902B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	The Strategic Approach outlined in Policy SP2 is supported. In particular, the identification of Community Hubs in the rural area, as centres for growth in a sustainable fashion is supported.
A0904B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support Gobowen as a Hub. It is important that other policies in the Plan are framed in such a way to make the delivery of housing and employment proposals straightforward and easily obtainable. This is not always the case and other development management policies should be examined to ensure that unnecessary restrictions on development proposals are not placed in the way of achieving the development that the Plan actually targets.
A0905B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	The general housing strategy for promoting high growth, with nearly 30% of the dwellings in the rural area as set out in Policy SP2, is supported. Focussing rural development in certain named Community Hubs and Community Clusters is accepted as a logical way of ensuring that residential growth is achieved whilst maintaining the character of the rural area. However, many rural settlements that are classified as Community Clusters do not have a nucleated form, and yet are still in need of new development to sustain the community. Villages with a dispersed settlement pattern should not be excluded from the potential benefits from additional development
A0906B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Strategic Approach outlined in Policy SP2 is supported. In particular, the identification of Community Hubs in the rural area, as centres for growth in a sustainable fashion is supported.
A0907B2	Viability and Deliverability of Proposed Site Allocations	Draft Policy SP2	Agree	The basic strategy set out in Policy SP2 is supported in terms of the ambition for high growth in housing and employment. The overall strategy of the hierarchy set out in Policy SP2.5 and .6 is supported, with the emphasis on identifying Community Hubs in the rural area to foster sustainable rural communities.
A0908B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	SP2 is to provide for around 30,800 dwellings in the County by 2038 this is supported. The identification of certain villages as Community Hubs is therefore, supported, in particular Bucknell as identified in Schedule SP2.2. However, having identified certain villages as being suitable in their role as "significant rural service centres", it is important that other policies in the Plan are framed in such a way as to make the delivery of these housing and employment proposals, straightforward and easily obtainable. This is not always the case and other development management policies should be examined to ensure that unnecessary restrictions on development proposals are not placed in the way of achieving the development that the Plan actually targets.
A0909B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Council was aiming for an "Urban Focus" to their proposed distribution of housing development in the County. The target figure for housing growth was 28,750 dwellings at 2016 – 2036. Now extended to 2038, and the target housing figure increased to 30,800. However, the "Residential Guideline" for Shrewsbury – the main urban area in the County has remained at 8,625 houses. To maintain a 30% share of the required housing, this figure would be 9,240, and so the strategy upon which the development guideline for Shrewsbury as set out in Policy S.16 is, in consistent with the earlier stated aim of achieving an urban focus. The additional housing requirement has been to a greater degree to the rural areas of the County. SP2 is inconsistent with the strategy explained in earlier consultation exercises, and does not follow the urban focus which is said to be at the heart of the Plan. This apparent anomaly could be rectified by allocating more land, preferably on additional sites in Shrewsbury. As it stands the allocations may not meet the housing needs of the town to 2038.
A0910B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	The overall strategy of the hierarchy set out in Policy SP2.5 and .6 is supported, with the emphasis on identifying Community Hubs and Community Clusters as the focus for the development of sustainable communities in the rural area. However, whilst the overall strategy might be appropriate, the manner in which the settlements in the rural area have been categorised is not. The Council has devised a points scoring system, which, in itself, is not necessarily a bad idea and it is noted that it has been accepted at other points in the Local Plan process but, as it takes no account of the current function and level of sustainability of the villages in the County, it cannot be fully supported.

Page 14

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0911B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Representation on behalf of Hobbins Management Company covering a range of Policies relating to Bridgnorth. Broadly in support of the policies, but stress that the policy position doesn't appear to have been followed in setting the allocation of employment land at Stanmore. The basic aim of Policy SP2 is supported. However, the estimated need for 300 hectares of employment land, appears to be much more of an aspirational target rather than one that is actually based on identified need This is certainly the case in relation to the proposed allocation of two sites at Stanmore (totalling 11.4 ha) - a settlement that has no need for further employment provision. The emphasis in the Local Plan Review is very much meeting local need, and even if the proposed allocations at Stanmore are intended to cater for Bridgnorth town rather than the rural area in which it is situated, it remains clear that the Stanmore sites are unnecessary, given the amount of currently available but undeveloped or unused employment land in Bridgnorth. The aim of Policy SP2.6, then, is supported. It is clear that this Policy does not support the proposed allocation of 11.4 ha of unneeded employment land at Stanmore, and the type of employment provision being proposed by the Council is not "appropriate rural employment" or any form of "diversification" of the rural economy.
A0916B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Oswestry as a Principal Centre is also supported as this designation accords with the Local Plan's vision, given Oswestry's role as the second market town in Shropshire and its strategic location on the A5 corridor with excellent connections to the Northern Powerhouse through Cheshire and Mid/ North Wales.
A0919B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Whitchurch as a Principal Centre accords with the Local Plan's vision in this regard, given Whitchurch's size, range of services, facilities and employment opportunities and its strategic location on the A49 corridor, with excellent connections to other English regions to the north.
A0921B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Church Stretton as a Key Centre accords with the Local Plan's vision in this regard, given Church Stretton's strategic location on the A49 corridor with excellent connections to Shrewsbury and adjoining regions. However part 2 of Policy SP2 undermines these aims as it only proposes 1,400 dwellings per annum, which is below the figure set out in the Core Strategy and the 2018 household projection forecast. There is also a danger the plan will fail to be consistent with the NPPF. The Government's current consultation proposes changes to the standard method that would apply the 2018-based household projections and apply an affordability adjustment that would increase this figure to 2,124 households per annum. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, replacing the current housing target of "around 30,800 dwellings" to "at least 46,700 new dwellings" over 22 years 2016-2038. The above change to policy SP2 should be reflected in the Community Hub policies, including policy S5.1 in relation to Church Stretton, which can accommodate a much higher residential guideline figure.
A0922B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. Identification of Elson as a Community Cluster settlement accords with this vision, given Elson's employment opportunities and location on the B5068 (less than 1km from Ellesmere, a Key Centre). However, consider part 2 of draft Policy SP2 undermines the aim to meet the county's needs because it proposes only 1,400 dwellings per annum. This amounts to a reduction of housing numbers compared with the adopted Core Strategy, which plans for 1,530 dwellings per annum from 2021. It is also significantly lower than the 2018-based household projections which forecast growth of 1,741 households per annum from 2020 to 2030. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs. There is a danger the Local Plan will fail to be consistent with para 60 of the NPPF regarding use of a standard methodology to calculate the minimum number of homes needed. Government's current consultation proposes changes to the standard method that would apply the 2018-based household projections and apply an affordability adjustment that would increase need to 2,124 households per annum. The draft housing requirement in this policy of 1,400 dwellings per annum is only 66% of the housing requirement using the Government's proposed new standard methodology. Government's 'Planning for the Future' Policy Paper envisages long-term changes to the planning system to substantially boost the delivery of housing. The Housing Delivery Test is expected to play an increasingly significant role. In the short term, the Plan may or may not benefit from transitional arrangements but these will not protect Shropshire from higher housing requirements over the medium and long term. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect latest household projections and affordability data, replacing the current housing target of "around 30,800 dwellings" to "at least 46,700 new dwellings" over 22 years 2016-2038.
A0923B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Ludlow as a Principal Centre accords with the Local Plan's vision in this regard, given Ludlow's size, range of services, facilities and employment opportunities and its strategic location on the A49 corridor, with excellent connections to other English regions to the south.
A0924B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Edstaston as a Community Cluster settlement accords with the Local Plan's vision in this regard, given Edstaston's limited range of services and facilities and its location on the B5476 just over a mile from Wem, a key service centre for this area of the County. Nonetheless, we consider part 2 of Policy SP2 undermines its own aims to meet the county's needs because its proposals for only 1,400 dwellings per annum amounts to a reduction in the amount of housing in the adopted Core Strategy, which plans for 1,530 dwellings per annum from 2021. The figure of 1,400 dwellings per annum is significantly lower than the 2018-based household projections which forecast growth of 1,741 households per annum from 2020 to 2030. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs. There is a danger that the Plan will fail to be consistent with the National Planning Policy Framework, specifically the requirement in paragraph 60 to determine the minimum number of homes needed using the standard method in national planning guidance. The Government's current consultation proposes changes to the standard method that would apply the 2018-based household projections and apply an affordability adjustment that would increase this figure to 2,124 households per annum. The policy's housing requirement of 1,400 dwellings per annum is only 66% of the housing requirement using the Government's proposed new standard methodology. The Government's 'Planning for the Future' Policy Paper envisages long-term changes to the planning system to substantially boost the delivery of housing. The Housing Delivery Test is expected to play an increasingly significant role. In the short term, the Plan may or may not benefit from transitional arrangements but these will not protect Shropshire from higher housing requirements over the medium and long term. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, replacing the current housing target of "around 30,800 dwellings" to "at least 46,700 new dwellings" over 22 years 2016-2038.
A0925B1	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Church Stretton as a Key Centre accords with the Local Plan's vision in this regard, given Church Stretton's strategic location on the A49 corridor with excellent connections to Shrewsbury and adjoining regions. Nonetheless, we consider part 2 of Policy SP2 undermines its own aims to meet the county's needs because its proposals for only 1,400 dwellings per annum amounts to a reduction in the amount of housing in the adopted Core Strategy, which plans for 1,530 dwellings per annum from 2021. The figure of 1,400 dwellings per annum is significantly lower than the 2018-based household projections which forecast growth of 1,741 households per annum from 2020 to 2030. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs. There is a danger that the Plan will fail to be consistent with the National Planning Policy Framework, specifically the requirement in paragraph 60 to determine the minimum number of homes needed using the standard method in national planning guidance. The Government's current consultation proposes changes to the standard method that would apply the 2018-based household projections and apply an affordability adjustment that would increase this figure to 2,124 households per annum. The policy's housing requirement of 1,400 dwellings per annum is only 66% of the housing requirement using the Government's proposed new standard methodology. The Government's 'Planning for the Future' Policy Paper envisages long-term changes to the planning system to substantially boost the delivery of housing. The Housing Delivery Test is expected to play an increasingly significant role. In the short-term, the Plan may or may not benefit from transitional arrangements but these will not protect Shropshire from higher housing requirements over the medium and long term. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, replacing the current housing target of "around 30,800 dwellings" to "at least 46,700 new dwellings" over 22 years 2016-2038. The above change to policy SP2 should be reflected in the Key Centre policies, including policy S5.1 in relation to Church Stretton, which can accommodate a much higher residential guideline figure.
A0928B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Previous representations have been submitted on behalf of Taylor Wimpey and Persimmon Homes in respect of earlier consultation on the Preferred Scale and Distribution Strategy. Context here must recognise a fundamental aspects of government policy and initiatives are to seek to boost the supply of housing and support the Government's regularly stated commitment to delivering 300,000 homes a year by the mid-2020s. The Government has been clear for many years, that housebuilding is critical to boosting the country's economic growth. This extends through such statements as "Laying the Foundations; A Housing Strategy for England (November 2011)", "Housing and Growth" a Written Statement to Parliament, (September 2012), and "Fixing the Foundations: Creating a More Prosperous Nation" (July 2015). All contain policies and initiatives which strongly support the necessity for more house building. The Government's Housing White Paper "Fixing Our Broken Housing Market" was a prelude to many of the more recent and on-going planning reforms which are aimed at addressing the housing crisis. The reforms were consulted upon in May 2017. The White Paper explained and continues the now long held commitment by Government to seek to address the challenges in delivering more housing in the country in the context of the aims with the Framework to significantly boost housing supply. The former Prime Minister's Foreword to the White Paper stated "Our broken housing market is one of the greatest barriers to progress in Britain today...The starting point is to build more houses. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need to build many more houses, of the type people want to live in, in the places they want to live." The Foreword from the Secretary of State confirms "This Country doesn't have enough homes. That's not a personal opinion or political calculation. It's a simple statement of fact." Further, the Secretary of State points out that "For decades the pace of house building has been sluggish at best. As a result, the number of new homes has not kept pace with our growing population. And that, in turn, has created a market that fails to work for far too many people." The Housing White Paper confirmed that further consultation on specific issues would follow its publication, and on the 14th September 2017 the Government consulted on further measures to boost housing supply in England. The consultation document set out the Government's suggested changes to national policy, to help Local Planning Authorities and communities plan for and deliver the homes the country needs. This included: <ul style="list-style-type: none"> a proposed approach for a standard method to calculate local housing need, including transitional arrangements; improving how authorities work together in planning to meet housing and other requirements across boundaries, through the preparation of a statement of common ground; setting out how the new approach to calculating housing need can help authorities plan for the needs of particular groups and to support neighbourhood planning; providing proposals for improving the use of section 106 agreements, by making the use of viability assessments simpler, quicker and more transparent; and seeking further views on how the homes required can be built more quickly. Following the Government's consideration of representations received, much of the above is now embodied within the 2019 National Planning Policy Framework (NPPF) or within new or emerging planning statute and policy. The Government's latest consultation "Planning for the Future" (White Paper) seeks views on its package of proposals to fundamentally reform the planning system in England. The Prime Minister's forward to the "Planning for the Future" White Paper is clear that a principal reason to reform the planning system in England is because 'Thanks to our planning system' there are 'nowhere near enough homes in the right places'. The Secretary of State's forward reiterates the impact that the COVID-19 pandemic is having on delivery of housing, setting out that 'Reforming the planning system isn't a task we undertake lightly, but it is both an overdue and a timely reform. Millions of jobs depend on the construction sector and in every economic recovery, it has played a crucial role.' Its 'Introduction' continues by stating that 'The planning system is central to our most important national challenges: tackling head on the shortage of beautiful, high quality homes and places where people want to live and work... It simply does not lead to enough homes being built, especially in those places where the need for new homes is the highest. Adopted Local Plans, where they are in place, provide for 187,000 homes per year across England – not just significantly below our ambition for 300,000 new homes annually, but also lower than the number of homes delivered last year (over 241,000). The result of long-term and persisting undersupply is that housing is becoming increasingly expensive, including relative to our European neighbours. In Italy, Germany and the Netherlands, you can get twice as much housing space for your money compared to the UK. We need to address the inequalities this has entrenched'. In parallel with the Planning for the Future document, which sets out the Government's plans to undertake a fundamental reform of the planning system, the Government has also issued, in August 2020, a consultation on changes to current planning policy and regulations ('Changes to the current planning system'). This seeks views on a range of proposed changes to the current planning system including the Standard Method for assessing Local Housing Need. The Government's proposed approach seeks to ensure that the Standard Method will deliver the 300,000 new homes a year target, achieve more appropriate distribution of homes, and target more homes into areas where they are least affordable. It is clear from Government and ministerial statements that the Government remains very much committed to substantially increasing the amount of housing as a key component in the wider drive towards continued economic recovery. A revision to the Standard Methodology is key to this and to address its current shortcomings. The concerns of Government, self-evidently, remain about housing delivery and the Government is as committed as ever to addressing the lack of housing supply. This message could scarcely be stronger and its commitment to deliver 300,000 new homes in England per year remains one of the Government's key objectives and a fundamental driver behind the drive to an updated standard method and ongoing reforms to the planning system. This context is a fundamentally important material consideration and backdrop to these representations. These are the principal reason behind many of the reforms that have taken place to planning and sets out a significant context to understanding housing land needs, supply and its aim. The approach is to ensure that housing delivery is used as a tool to positively support and ensure delivery of the homes that people need in line with the Government's objectives to boost supply to significantly greater levels than seen in the past. It is essential that the new Plan provides for an appropriate level of housing. Government policy is advocating a step change in the delivery of new housing. There are significant negative impacts which would result from adopting low levels of housing growth and these must be recognised, not least the significant impact on housing affordability and increased house prices by a lack of supply. Affordability of housing is a factor affecting the Housing Market Area and the need for more affordable housing is well documented through Surveys. In addition to significant impacts on affordability, a low level of housing growth would not meet housing needs, would not support the economic growth aspirations of the vision and could lead to unsustainable patterns of travel with people having to travel further distances between home and work. New housing development supports and enhances new infrastructure and is a way of providing improvements to local social and community infrastructure which would otherwise be difficult to deliver through public sector means. Government policy seeks to ensure that those communities accommodating new development see directly the benefits in improved infrastructure in their communities. Persimmon and Taylor Wimpey believe that the level of housing now being planned for in the Local Plan Review is too low and does not align with the national objective to boost the supply of housing and support the national objectives to build more homes. This is because; <ul style="list-style-type: none"> The Plan proposes to make provision for 30,800 (1400 dpa) new homes over the plan period 2016 to 2038. The level of housing proposed is not sufficient • 1500 homes within this plan requirement are to meet the unmet needs of the Black Country. The Association of Back Country Authorities wrote to the Council in September 2019 confirming they are facing a shortfall of some 26,000 homes over the period to 2038. Shropshire could accommodate a greater proportion of that need. A greater commitment will align accord with the Duty to Cooperate. • Equally it needs to be recognised, in the context that 1500 dwellings of the Local Plan Review housing requirement is to meet some of the unmet needs of the Black Country, the net housing requirement for Shropshire being provided for in the Plan Review is lower at 29,300 (1331 dpa) • The former Core Strategy stepped housing requirement for the period 2021 to 2026 is currently 1530 dpa – rather than boosting supply, the Local Plan Review is reducing annual delivery compared to the current Core Strategy in direct contradiction of the national house building imperative to create a step change in delivery – 1400 dpa is counter intuitive to this aim. • The 2018 household projections published June 2020, Table 406 forecasts growth of 1741 households per annum from 2020 to 2030, such that the Local Plan Review misaligns with this need. • Previous iterations of the Local Plan Review have relied on the Council's own calculation of Full Objective Assessed Needs (FOAN), with additional growth to suggest a "high" level of provision at 1430 dpa. The current draft plan is a reduction of the plan requirement from the previous draft plan. High levels of housing growth were seen by the Council in earlier drafts to support the sustainability of the County and support aspirations to see a positive step change in Shropshire's economy. • Notwithstanding no change to Government Policy since the last consultation on the Local Plan Review, the Council now abandon their "FOAN plus" to now suggest alignment with Local Housing Need using the Standard Methodology (SM) of the Planning Practice Guidance which producing a need of some 25,894 dwellings for the plan period – in doing so however, they fail to recognise the well documented failings of the current SM and the current consultation on a revised SM which results in a housing requirement for the Local Plan Review of 2,124 dwellings per annum or 46,700 for the plan period. Given the obvious deficiency of the current SM, the impending amendment to the SM and the positive direction of government policy, the Council should now embrace the higher figure of the emerging SM and plan for significantly higher levels of growth • Even if the consultation of the revised SM results in a moderated housing requirement than currently consulted upon, it would still be highly likely to be significantly higher than the current Local Plan Review figure. As currently proposed, the current Local Plan Review requirement of 29,300 for Shropshire (excluding the Black Country element) is nearly 40% lower than the emerging SM • In failing to recognise the impending change to the current SM, this will inevitably mean the Local Plan Review will be out of date very quickly and have a limited shelf life, significantly so within 5 years. An early review of the Plan would be inevitable. The Plan should tackle the impending increase in calculated housing need now. • Planning for a significantly greater housing requirement, more aligned with the emergent SM will reduce risk to the Local Plan Review process. The Local Plan Review recognises this risk at paragraph 3.6 stating that in adopting a requirement of 30,800 it provides some flexibility "to respond to changes in LHN". Given however that the emergent SM is some 40% higher than the Local Plan Review requirement, it doesn't plan for any where near sufficient flexibility. This is particularly the case where the Local Plan Review also does not include for any additional reserve sites/allocations, nor does it include any workable flexible policy approach to address changes to SM (see other representations to Policy SP6) • The revised SM is going to come into effect for the purposes of a 5 year land supply calculation within months (given the current Core Strategy housing requirement is over 5 year

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0935B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>Despite its strategically advantageous location close to the West Midlands and the objectives of the Shropshire Economic Growth Strategy to focus growth in the M54 Strategic Growth Corridor, the east of the County has a relatively limited pipeline supply of employment land. These are the most well connected and commercially attractive parts of the County. Other parts of the County do not offer the same strategic economic potential.</p> <p>The West Midlands Combined Authority (WMCA) Strategic Economic Plan (SEP), Midlands Connect, the Marches Strategic Economic Plan SEP, the Shropshire Economic Growth Strategy and the M54 Corridor Study/Employment Land Review all recognise the key role that Strategic Transport Corridors play in meeting growth aspirations of the area.</p> <p>It is understood that the Council has commissioned an infrastructure capacity assessment for the M54 corridor, although this is not yet published. Consider this should include working collaboratively with other local authorities located within the corridor to deliver sustainable growth. It is also noted that a number of proposed infrastructure projects will benefit the M54 corridor, including the M6/M6 Toll Link, West Midlands Rail Freight Interchange, Birmingham to Shrewsbury Rail Service Capacity Improvements and HS2.</p> <p>The current spatial strategy in the draft Local Plan identifies Shifnal as the 'focus for investment, employment, housing and development on the M54/A5 Strategic Corridor' and for the settlement to play a 'key role' in satisfying unmet needs of the neighbouring Association of Black Country Authorities (ABCA). The Plan also proposes a new mixed-use urban extension to the south-west of Bridgnorth which is proposed to deliver 1,050 dwellings and 16ha of employment land. However, consider the contributions that allocations at Shifnal or Bridgnorth could make to meeting growth aspirations of Shropshire's Economic Growth Strategy and serving sub regional or regional market needs is limited, given distance/visibility/access from the strategic road network and available site sizes, these sites are more likely to meet local employment needs only.</p> <p>Consider there is a need for further employment and housing land to be identified in the Draft Local Plan to support the growth aspirations of the County and wider region. This is particularly the case in the functional economic market area around the Black Country, South Staffordshire and east Shropshire.</p> <p>Strategic site promotion (Land at Junction 3 of the M54) submitted within the consultation response. This promotion is supported by an employment needs assessment, illustrative masterplans, updated transport strategy and a site specific Green Belt Review. It was also informed by reference to correspondence from the ABCA to Shropshire Council. The extent of the site is defined by the A5 to north, A41 to east and M54 to south with the western boundary bounded by existing and proposed roads, landscaping and existing woodland of Lizard Wood.</p> <p>The site promotion includes two/four alternative options for the site: The core proposal is as previously promoted and included within the Strategic Sites consultation undertaken by Shropshire Council, with the potential to deliver 50ha of strategic employment land and up to 3,000 homes (on-site facilities including shops, community buildings, medical centre, primary schools, secondary school and over 400ha of open space could also be provided). Alternatively the Strategic Employment Area (SEA) could be either started in advance of a residential component or be completely 'freestanding' without any residential. The SEA could also increase to up to 75ha within the same site boundary, with or without the residential aspect (this increases job opportunities to some 9,100 net additional jobs for new and existing residents). The Employment Needs Assessment undertaken suggests that if a 50ha SEA were developed, it is expected that around 55% of the space could be taken up by B8 uses, 30% by industrial (B1c/B2) activities, and around 15% by primarily office/R&D (B1a/b) space. If the SEA expanded to 75ha, the suggested mix would be 61% B8, 31% industrial (B1c/B2) and 7% freestanding offices/R&D (B1a/b). There is also a strong case to extend the area of the SEA at J3 enhancing its status and its attractiveness to large scale inward investors into the County. These proposals are informed by Covid-19 review on likely long-term changes in how we work and the potential implication on settlement patterns and the need to provide new jobs for displaced industries.</p> <p>Consider that delivery of the SEA has always been a fundamental part of proposals, but is now particularly important in light of the wide-ranging impacts of COVID-19 and Brexit, as it is vital that high quality employment schemes, such as the SEA at J3, are brought forward rapidly in order to support economic recovery. Illustrative masterplans for both options provided as appendices to this representation.</p> <p>Land at Junction 3 of the M54 is on a strategic corridor, fully available, could be delivered quickly, would provide a range of types of jobs and the site promoter aims to create a high quality, sustainable, employment-led proposal. The site has the potential to deliver significant public benefits including between 6,000 to 9,100 net additional jobs for new and existing residents living in nearby towns and villages.</p> <p>Land at Junction 3 of the M54 could benefit the economics of the local area, fully meet growth aspirations of Shropshire's Economic Growth Strategy, meet wider sub-regional/regional strategic needs (supply is particularly acute in ABCA/South Staffordshire which lacks strategic high-quality employment land, as evidenced by the recent Secretary of State decision on the proposed West Midlands Rail Freight Interchange which noted significant need for additional logistics floorspace in the region. This is confirmed within the employment needs assessment undertaken for land at J3 of the M54 which notes increased demand, particularly for large units, from the manufacturing and logistics sectors) and make a meaningful contribution to the ABCA's unmet employment and housing needs (as identified through extensive work undertaken by ABCA - latest estimates are a shortfall of circa 4,500 – 6,500 homes and circa 110 – 330ha of employment land, taking into account capacity of the Black Country urban area, green belt and potential contributions from neighbouring authorities). It is also consistent with Paras 80, 81 and 82 of the NPPF regarding building a strong and competitive economy and the NPPG. It would be complementary and would not compromise any local offer or the aspirations of the Shifnal Place Plan. Object to the strategic approach of the draft Local Plan and consider that as drafted it would not satisfy the Duty to Cooperate, would not meaningfully contribute to meeting the Black Country's unmet housing and employment needs, does not include sites capable of meeting the clearly identified strategic need (east of the County and wider West Midlands) and is at odds with the aims of the Shropshire Economic Growth Strategy and the Strategic Economic Plan for the WMCA to focus growth in the M54 corridor. The need for strategic employment land is particularly important in light of the wide-ranging impacts of COVID-19 and to drive Britain's post-Brexit growth.</p> <p>Green Belt is a major constraint in the West Midlands and East Shropshire preventing the release of greenfield land for employment and inhibiting the ability of the area to meet the economic growth aspirations within the SEPs. Brownfield land is unlikely to provide a sufficient supply of developable land to meet the SEP's ambitions and targets on its own and therefore various green belt reviews across the WMCA area have been undertaken to identify land suitable for development. Consider that there is substantial justification to progress an exceptional circumstances case for the release of Land at J3 of the M54 from the Green Belt and allocate it in the draft Local Plan as a Strategic Site.</p> <p>Land at J3 of the M54 benefits from direct access to the strategic road network and is within 2km of Cosford railway station. This ensures that the site provides an attractive location for commercial operations, providing close links to the other engineering firms and their supply chains across the West Midlands including those at the I54 and T54. Development of Land at J3 of the M54 could complement planned local growth at Shifnal, Albrighton and RAF Cosford. It would also allow direct access into ABCA via the M54 and is therefore well placed to meet cross boundary needs, as noted by ABCA within their response to the Strategic Sites consultation informing Shropshire Council's Local Plan review.</p> <p>Assessment has confirmed there are no insurmountable impediments to delivery of the Site in infrastructure terms and infrastructure improvements would benefit those in the wider area. This includes an updated Transport Strategy which confirms good active travel and public transport connections to key settlements accommodating potential employees on the site. Furthermore any on-site residential would greatly assist self-containment, although with or without on-site residential a sustainable development can be achieved. Public transport links to the site could also be improved and would be of wider benefit.</p> <p>Transport and social infrastructure investment within the M54 corridor is likely to be secured from a range of sources given the degree of alignment with regional and sub-regional economic development strategies. However, land at J3 of the M54 could greatly assist in securing necessary funding for infrastructure projects on the M54.</p> <p><i>Land at J3 of the M54 embeds net zero from the outset to ensure a positive local response to the Council's Climate Change Strategy Framework</i></p>
A0950B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>The housing and employment figures set out in policy SP2 for the period of 2016-2038 are noted, and result in a requirement of around 1,400 new dwellings and 15ha of employment land per annum. In terms of this level of housing delivery, the 'Shropshire Council – Five Year Housing Land Supply Statement' (2019) sets out that over the last 5 years housing completions have reached and surpassed the 1,400 annual figure. However, this has been dependant on non-allocated sites coming forward for development due to the previous lack of a five year housing supply. A number of these sites were on safeguarded land, such as in the northern section of Shifnal (Land North of Haughton Road and Land West of Coppice Green Lane). This highlights the importance of monitoring safeguarded land and releasing it for development so it can contribute to addressing housing need in Shropshire. Such sites were removed from the Green Belt by earlier development plans. This involved consideration of the sites by an Inspector, who concluded that they were appropriate for development, though were not needed to provide the identified housing need at that specific time. The proposed allocation of the currently safeguarded site adjoining Meadow Drive, Shifnal is therefore welcomed. The site is now identified as SHFD13 (Land adjoining Meadow Drive, Shifnal) in the emerging SLP. In terms of Local Housing Need (LHN), Shropshire Council's assessment using the Government's Standard Methodology indicates that as of April 2020 there is a need for 25,894 dwellings over the plan period (2016-2038). As explained in National Planning Policy Guidance, this figure represents the minimum number of homes expected to be planned for, and is therefore a starting point for the delivery of growth in an area. The SLP includes a housing requirement for Shropshire of 30,800 dwellings over the plan period, which Shropshire Council considers to provide flexibility to respond to changes in the Local Housing Need figure over the plan period. However, the additional allowance of 4,906 dwellings over the LHN for the entire plan period of 22 years, is considered to be extremely modest if Shropshire is to meet its wider aspirations for growth. As set out in the Economic Growth Strategy for Shropshire (2017-2021) the Council has a commitment and ambition to grow the local economy of the County through investment. The 300ha of employment land required within the plan period is identified to help drive this growth. However, the provision of additional housing will also be key to promoting growth in the area and supporting the delivery of new employment. The current housing requirement in the adopted Local Plan is 1,370 dwellings per annum. The housing requirement in the emerging plan provides for only 30 dwellings per annum more. This is not considered sufficient to support the economic growth being sought within the County. Requested Change – It is considered that the overall housing requirement identified in the SLP does not represent a boost to the supply of homes in the area, as is required to support the economic growth aspirations of Shropshire Council. A higher housing requirement should be considered by the Council.</p>
A0950B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>Explanatory text for policy SP2 states that following joint working with the Black Country Authorities (BCA), Shropshire's housing requirement of 30,800 dwellings incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan. Due to the size and location of Shropshire it adjoins twelve other local authorities. However, in terms of the duty to cooperate, as set out in paragraph 2.24 of the SLP, Shropshire does not yet have a statement of common ground with any of its surrounding local planning authorities. Such a document is key to determining whether Shropshire should be accommodating housing need from any of these other local authorities. Shropshire is being asked to absorb overspill from the Black Country, the SLP refers to 'positive conversations' with BCA. The BCA 'considers it presents a unique and once in a generation opportunity to drive forward the realisation of Shropshire's economic growth ambitions and at the same time form part of the strategic solution to meeting housing and employment land needs arising in the Black Country' (BCA letter of 20th Sept 2019). Requested Change – It is crucial that Shropshire Council agrees a Statement of Common Ground with adjoining local planning authorities to provide certainty with regards to the Council's housing delivery position and how it relates to all of its surrounding local planning authorities.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0954B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>SP2 – STRATEGIC APPROACH</p> <p>22. This policy is clear and sets out the strategic approach for Shropshire to enable the delivery of development in a sustainable pattern. New development will be focussed in the urban areas at Shrewsbury (as the strategic centre), Principal and Key Centres, Strategic settlements and RAF Cosford Strategic Site. Place Area Plans, Community Hubs and Community Clusters seeks to set out levels of development for rural areas based upon their sustainability credentials.</p> <p>23. It is particularly welcomed that this policy sets out that over the plan period from 2016-2038 that around 30,800 new dwellings will be delivered; equating to 1400 dwelling per year. This is an increase from 28,750 dwellings identified in the consultations on the Preferred Scale and Distribution of Development Consultation in December 2017 and the Preferred Sites in November 2018. There is a commitment to ensure that sufficient land is available to achieve growth aspirations and that the availability of land will be kept under review to ensure a continuous supply of suitable sites. The policy also sets out that the delivery of affordable housing remains a key priority in Shropshire, with around 7,700 affordable dwellings (equating to 25% of the total housing requirement) to be delivered over the plan period. This site is capable of delivery circa 180 dwellings.</p> <p>24. It is noted that the Council has undertaken an assessment of the Local Housing Need using the Government's Standard Methodology. Paragraph 60 of the NPPF makes it clear that this is a requirement to establish the MINIMUM numbers of homes needed across a local authority area.</p> <p>25. The assessment revealed a housing need of some 25,894 dwellings over the plan period. The Council's housing requirement figure includes an additional uplift this capacity in order to respond positively to the overall "high growth" strategy.</p> <p>26. It is considered that this uplift will further support the delivery of family and affordable housing to support local needs; increase the opportunity for specialist housing and the needs of other groups. The figure of around 30,800 provided in policy SP2 therefore has been identified to provide some flexibility to respond to changes in local housing need over the plan period. This approach will also aid the ability for the Council to respond positively to sustainable development opportunities that are not specifically allocated within the Plan, which is key to enable sites like this to come forward.</p> <p>27. This approach is generally supported but it is queried whether the figure of 25,894 is based on the latest Government's Standard Methodology figures. Lichfield's Assessment of Current local plan requirements, recent housing delivery, current standard method and new standard method by region calculates that there will be a yearly requirement of 2,129 dwellings which equates to a requirement of 46,838 dwellings over the plan period. Representation includes an extract from an article entitled How many homes? The new Standard Method – Lichfield's Website. 28. The Council ought to give the proposed new standard method consideration; it is likely to result in the housing requirement increasing now in order to avoid an early review of the Local Plan once adopted.</p> <p>29. In addition to the points raised above, it is pertinent to note that paragraph 3.7 states that the 30,800 housing requirement figure also includes a provision of 1500 dwellings to support the needs of the emerging Black Country Plan, which is unable to provide for its own housing requirement. The latest evidence (Greater Birmingham and Black Country Housing Market Area Housing Need and Housing Land Supply Position Statement – July 2020) suggests that the Black Country Authorities will have to export somewhere in the region of 29,000 dwellings to surrounding authorities under the Duty to Cooperate. It is also well known that Birmingham has a very significant shortfall.</p> <p>30. Given Shropshire's geographical proximity to Birmingham and the Black Country, it is inevitable that Shropshire will need to play more of a role in accommodating a proportion of this overspill demand, particularly towards the eastern side of the County that is functionally, economically and geographically closer to Birmingham and the Black Country.</p> <p>31. In addition to the housing requirement itself, it is noted that within appendix 5 – Residential Development Guidelines and Residential Supply that the majority of dwellings which make up the housing requirement figure consist of units that have gained permission or prior approval (as of 31st March 2019) (8,005 units) or have previously been allocated within the Site Allocations and Management of Development Plan (SAMDev) and are yet to be granted planning consent (3564 units).</p> <p>32. It is also interesting to note that circa 4,700 dwellings have already been completed. It would appear that the emerging residential site allocations will only provide somewhere in the region of 7592 dwellings over the plan period, which represents only 24% of the housing requirement figure.</p> <p>33. It is risky to rely on the 8000 dwellings that have received consent if the overall figure relies on these dwellings coming forward, being implemented and delivered. Previous experience demonstrates that sites benefitting from permission may not come forward for a variety of reasons; economic, climate, land ownership and economic viability to name a few. Consideration must be given to a realistic lapse rate when figures are finalised. Based on historical lapse rates set out in the five year housing land supply paper, it is suggested that a lapse rate of 2-5% going forward should be accounted for when considering future supply and growth to be allocated.</p> <p>S16.2 COMMUNITY HUBS: SHREWSBURY PLACE PLAN AREA</p> <p>44. This policy sets out the residential guideline for each of the Community Hub Settlements. Gleeson Strategic Land Ltd's site is on the edge of Bayston Hill and "around" 200 dwellings are directed to the settlement.</p> <p>45. Within Community Hubs, new residential development will be delivered through any identified saved SAMDev residential or mixed-use allocations; any identified Local Plan residential allocations, or through a Neighbourhood Plan.</p> <p>46. Two site allocations are proposed in Bayston Hill as follows:</p> <p>47. Land off Lyth Hill Road (BAY039) - for 100 dwellings. The table set out at Appendix 5 expects the development of this site to take place in the medium-term, 2025/26- 2029/30. This site was considered to be not currently suitable, but with future potential for the same reasons as the subject site. Richborough Estates have been promoting this site and as far as we are aware, there is no recognised house builder yet attached to it.</p> <p>48. The former Oaklands School (BAY050) - for 47 dwellings is likely to come forward in the short-term (2021-2025). This site does not appear in the SLAA. It is assumed that this site is owned by the Local Authority and there is no recognised house builder yet attached to it. This site appears to be divided into three distinct areas; former School with its own playing field (now closed); Christchurch- church building and car park – in active use in March 2020 and playing fields (also in active use in March 2020). The school has been estimated to extend to 1.13 hectares so it appears high and unrealistic to assume 47 dwellings is achievable on the site, especially given the playing fields, existing trees and allowing for on-site incidental public open space.</p> <p>49. The total new numbers of dwellings directed to the settlement therefore is 147. According to the table in Appendix 5, 27 dwellings have been completed since 2016, with a further 12 having gained permission as of 31st March 2019. Assuming the most recent 12 dwellings are completed, the grand total of new development for the village is 186. 50. Whilst the Plan as currently drafted directs "around 200" to the village, the subject site could make a valuable contribution to housing numbers in this sustainable location. This site was allocated reference BAY040 in the Stage 2 Assessment but there does not appear to be any commentary on how the decision was made to discount the site. It appears to have been sifted out at this stage due to physical, heritage or environmental constraints based on the strategic assessment undertaken within the SLAA. The Sustainability Appraisal rates to the former school site (BAY050) as "good" and the Lyth Hill Road site (BAY039) as "fair", but does not reference discounted sites and so a comparison here is not possible.</p> <p>51. As drafted, an objection must be raised to this policy. The site selection process is not at all clear to follow. It is not obvious or transparent how the various sites have been selected or discounted.</p> <p>52. The village is capable of accommodating additional housing and the site off the A49 is situated immediately adjacent to the settlement boundary. It would be a logical extension to the village and provide sustainable development.</p> <p>53. The SLAA estimated a yield of over 500 dwellings on the site – in reality due to the land levels differences across the site a smaller number is envisaged.</p> <p>54. Notwithstanding the above, it's inclusion with the plan as a residential allocation could reduce the amount of pressure on land needed to be taken out of the Green Belt at Aubeley and in terms of sequential preference, non Green Belt sites must be considered first.</p>
A0955B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>Paragraph 3.6 The housing need target has not been proven and is well above what the N.A. office has been predicting in recent years. The arguments for a total of 30800 houses are not backed up in any of the sustainable arguments put forward. Why does this figure for instance include a 1500 allocation for the West Midlands Black Country Authority when they have not yet put together their plan and they have plenty of sites in which to deliver their current housing needs even if that means using some of their green belt land. In terms of sustainability and Shropshire Council's desire to become carbon neutral, building more commuter housing does not make sense and cannot be justified. The argument that more people will work from home is likely to be in the main ephemeral. I urge Shropshire to remove these housing targets from the plan as there is no justification in including them at this point in time. The plan proposes more housing particularly for Shrewsbury where infrastructure is already creaking and even if the North West Relief Road goes ahead this will not solve the issues Shrewsbury currently has. Neither will the big town plan solve current infrastructure problems particularly with the proposal of an additional 8625 houses to be built in Shrewsbury between 2016 and 2038. I urge Shropshire to reconsider its housing target and reduce it to a lower figure at this point in the planning process and to consider in more detail the effects on the already dire traffic flows in and around Shrewsbury. Independent analysis with community involvement should be part of a plan policy. An example of inadequate analysis relates to the sweetlake development on Longden road where additional traffic flows are well in excess of the developers expert's analysis given as part of their planning application and where local peoples knowledge was ignored A Lower target could lower numbers proposed for Shrewsbury easing inadequate infrastructure issues. Shropshire has a valuable agricultural landscape providing important sustainable food supplies to the UK and excessive additional housing eats into more good quality agricultural land. This is not a sustainable policy for future generations. Agricultural land has high capital value and this does not seem to be adequately reflected in the plan. A more realistic housing target would not only satisfy the population of Shropshire, the majority of individuals who have spoken against such high targets and have felt they have not been listened to, but it would also safeguard very valuable food productive land assets that we have in Shropshire. I urge Shropshire council to reduce housing targets and give greater weight to the use valuable agricultural land is put. I also urge Shropshire council to reconsider earlier consultation results whereby little support for individuals comments have fed through into housing target numbers. It does seem only developers comments have been heard and this is widely viewed particularly in Shrewsbury as undemocratic. The people of Shropshire have not supported the high housing target figure. Higher levels of house building does not mean more affordable housing will be delivered to satisfy local need unless there is a policy which controls to whom such houses are allocated including a policy of no buy to let sales. Such a policy of woefully missing from the plan. I urge Shropshire to provide clarity on how local need demands will be achieved.</p>
A0956B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		<p>Support for meeting wider housing market area needs, but further information should be provided on the contribution to the Black Country housing needs</p> <p>Strategic planning matters need to be positively addressed with these DTC/cross boundary authorities to meet the legal and soundness test of the Duty to Cooperate., noting that 1500 dwellings of the housing requirement towards meeting the shortfall in housing supply within the Black Country. The positive approach of Shropshire to helping meet wider housing market area needs is supported but no further explanation within the draft SLP or supporting evidence to how this figure has been derived. Further information should be provided, and figure kept under review in light of any further evidence from the Black Country Authorities, including progress on the Black Country Local Plan.</p>
A0956B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>Whilst support overall urban focused (particularly Shrewsbury) strategy for future development the Council's aims of delivering economic growth through the provision of housing above and beyond the current standard method minimum requirement, including helping to meet wider housing market area needs . Need to consider the potential for further development to be directed to the urban locations, in particular the Strategic Centre of Shrewsbury, Principal and Key Centres to ensure Plan is "justified" and "effective. This would be to provide further flexibility to the SLP housing delivery strategy and further support the economic growth strategy for Shropshire.</p> <p>Consider the need for further flexibility in the housing requirement in light of the recently published draft Local Housing Need figures (updated draft standard methodology requirements) which indicate a potentially significant uplift in housing needs going forward. An urban focused strategy is supported by the findings of the Sustainability Appraisal & would reduce reliance upon the delivery of small-scale sites which could have a higher risk of non-implementation. In light of the potential reliance upon 'Safeguarded Land' to meet development needs beyond the plan period, non-Green Belt locations need to be considered and exhausted in order to provide further flexibility and certainty of delivery. Draft Policy SP2 (Strategic Approach) identifies 30,800 new dwellings and around 300 hectares of employment land will need to be delivered. To achieve this & a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas/locations identified in Schedule SP2.1, facilitating and recognising and developing Shrewsbury's role as the only Strategic Centre.</p> <p>From the figures provided within Appendix 5 of the draft SLP, it appears that around 70% of the draft SLP housing requirement is directed to the urban areas/locations with around 30% directed to the more rural settlements (Community Hubs and Community Clusters) and wider rural area. However, from totalling the residential guideline figures within Appendix 5 and taking into account the supply from Strategic Settlements, it would appear that only around 28,000 dwellings are identified against the 30,800 dwelling requirement. Given that Appendix 5 does not detail residential guidelines for the 'Community Clusters' it should be identified if this apparent shortfall is assumed to be met within these rural settlements and the wider rural area. If so, then there is a potential degree of uncertainty and unidentified land supply against the housing requirements. Further clarity on the housing delivery figures would therefore be welcomed, including the extent to which housing supply within the 'Community Clusters' and wider rural area is secured via planning permissions and/or allocations.</p> <p>We support Draft Policy SP2 identifying Shrewsbury as the main strategic centre for the plan area to where a commensurate level of new development is to be directed. The status of other urban centres, such as the Principal Centres and Key Centres, is also supported as part of a sustainable development strategy for Shropshire overall. It is considered that the draft SLP should consider the potential for further development to be directed to the urban locations specified in Schedule SP2.1 (under the Strategic, Principal and Key Centres) with a lesser proportion being directed to the more rural settlements in Schedules SP2.2 and SP2.3. A number of smaller Community Hubs have significant development directed towards them e.g. Burford,; Gobowen, Llanymynech ; and Hadnall. Support development in the Community Hubs, and it is necessary to support their long-term sustainability, however the scale of development must be proportionate to the size and sustainability of the settlement. The approach needs to be more robustly justified. More sustainable growth would be achieved by directing more growth to the higher order settlements such as Shrewsbury.</p> <p>By directing more growth to the higher order settlements there is the opportunity for the housing strategy to be less reliant upon smaller scale schemes typically delivered within the lower order settlements. Whilst small-medium scale sites are important to housing delivery caution needed due to generally higher rate of non-implementation</p> <p>Further growth (housing and employment) focused on urban locations and centres (strategic corridors & centres)would therefore serve to boost the economic growth of the County in line with the NPPF & Economic growth strategy. The Sustainability Appraisal (SA) for the draft SLP also outlines the range of positive benefits for an urban focused strategy, particularly in comparison to other strategy options which would involve greater growth in the rural areas. The Council should therefore consider directing a higher proportion of growth to urban locations (Strategic, Principal and Key Centres) whilst providing specific policy support for smaller scale affordable housing provision within the rural areas. The scenario of a higher level of growth within the urban areas (more than 75%) does not appear to have been tested within the SA to date.</p> <p>The recently published 'Changes to the Current Planning System' consultation (CLG, August 2020 published alongside the 'Planning for the Future' White Paper) proposes an updated standard housing methodology, which results in an increase in LHN of around 81% for Shropshire (increasing from 1,177 dwellings per annum under the current standard methodology to 2,129 dwellings per annum under the draft, revised standard methodology). This is more than the current draft SLP housing requirement which equates to 1,400 dwellings per annum (representing a 52% increase). Whilst it is recognised that the proposals are draft and the SLP is likely to be submitted for examination prior to the new standard housing methodology being applied to the Plan, there is a clear need for the draft SLP to recognise the potentially significant increase in LHN and therefore a need for greater flexibility in the housing requirements to provide further headroom going forward.</p> <p>The Council should consider the need for additional residential allocations in sustainable urban locations to provide this flexibility to ensure local housing needs (and those of areas such as the Black Country with which there is a functional relationship) in the current and beyond plan period are met in full</p>
A0957B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		<p>Draft policy SP2 discusses issues such as different parts of Shropshire, proportions of 'affordable' homes and the growing number of Neighbourhood Planning towns. (NB Neighbourhood plans are agreed only after local referenda and eventually have legal force. Shrewsbury is too big for a Neighbourhood Plan but the Big Town Plan is thought to provide strategy, although there will be no referenda. Consequently, considerable additional public consultation will be needed.)</p>
A0971B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>Promotion of land owned by Raby Estate between Shrewsbury and Telford, promoting the "Beslow Estate" based on a Garden Village principles and providing 3,500 homes and 17ha employment land, community uses and infrastructure. This site is put forward as an alternative to three Strategic sites in Shropshire. Response to SP 2 - Raby Estate land could be included in the plan instead of, or as an alternative to the three strategic sites identified in the plan. The reasoning behind this is threefold. Firstly, Shropshire will be required to increase their housing requirement by 1,500 dwellings due to the agreement between Shropshire Council and the Association of Black Country Authorities. Secondly, the plan currently heavily relies on windfall development to meet its housing requirement targets. Finally, the proposed changes to the standard method for calculating housing need. These factors are likely to increase the number of dwellings that Shropshire is required to provide. Based upon this, the site at Beslow could contribute significantly to ensuring that the County can provide the housing it is obliged to provide, in a sustainable manner. Therefore, the housing need and hierarchy provided in policy SP2 is not representative of the true situation with regards to housing</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0971B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Promotion of land owned by Raby Estate in Cressage at Shore Lane. The Raby Estate has inherent issues with the settlement hierarchy proposed in draft Policy SP2, but the inclusion of Cressage as a Community Hub is supported in the current form of the hierarchy, as it removes the village from open countryside classification and means that it can begin to meet the housing needs of the community and Shropshire. Across Shropshire 2551 dwellings are proposed to be delivered via windfall development, which represents 22% of the housing. This is considered a high proportion, which represents unstable grounds on which to base the County's housing requirement on. The attached representations highlight that a greater number of dwellings need to be allocated to accommodate for this.
A0972B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Given the level of housing and economic growth proposed, a rail link along with an upgraded highway network would enable Bridgnorth to take its rightful place as a Principal Centre; aspirational target for growth of the number of dwellings is too high and do not believe there are exceptional circumstances to justify an alternative approach. Needs of neighbouring areas are well met by the amount of housing planned in Telford and Ironbridge. It is essential that the inclusion of affordable housing for people with links to Bridgnorth is central to any development. proposed new housing development is inaccessible from the town centre for pedestrian access and resulting in need for far more parking. The character of the historical town centre needs to be preserved and enhanced not overrun by traffic and car parks. Sustainability of proposed housing development in Bridgnorth not evidenced. Sustainability requires local employment and land provision alone will not produce jobs. Any new developments should be leading examples of sustainability and be sensitive to the local environment and ecology. Housing should be initiated by need not excess developer profits/ council income generation. Whilst reasonable profits are necessary for project viability query whether sufficient money directed to make the development ecologically sound and best quality and sustainability, as well as provide infrastructure and amenities for residents? delivery of affordable housing is key. Deep concern regarding rational for overall figures and 9% dwelling requirement uplift which is not supported locally. This ignores role of Shropshire Council in representing the electorate. New housing for the area is welcomed, but it needs to be of a volume compatible with, and sensitive to, the town and all inhabitants.
A0972B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The case for allocating an additional 1,500 homes to meet the Black Country's projected shortfall is unsound. Shropshire is not adjacent to any of the Black Country Authorities (ABCA); it is therefore not cross boundary with Staffordshire sitting between Bridgnorth and the Black Country. This would also create a significant increase in commuter traffic contra to sustainability aims. The Black Country authorities Urban Capacity study indicates a shortfall of just under 27,000 homes, but the worst shortage is in Sandwell borough, making up over half the total, and nowhere close to Bridgnorth. The West Midlands Mayor, Andy Street, says there is enough brownfield land to cater for new homes in his region. Telford & Wrekin rejected ABCA's request in 2019 on the basis there wasn't any evidence to support them contributing to the unmet Black Country Housing Need. Given all this, the Bridgnorth area would not be an obvious place to make up for the Black Country's projected shortfall.
A0981B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Sport England considers that the wording of the policy should be expanded to set out that the Council will ensure that there is sufficient social infrastructure provision to meet the identified needs of the proposed housing growth, consistent with policy DP27. Currently, the wording of the policy is devoid of any reference to ensuring infrastructure needs are to be met. This would ensure that the proposed policy is consistent with the Council's overall approach to infrastructure provision elsewhere in the plan. This would also ensure that the policy is consistent with para 92 of the NPPF which advises to plan positively for the provision of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments, and para 96 of the NPPF which relates to meeting identified needs for open space, sport and recreation facilities. This will ensure that the development that comes forward through the hierarchy of the strategic centre, principal centres, key centres, strategic settlements/sites, community hubs, and community clusters etc, does so in a way that meets required infrastructure needs within Shropshire for the plan period. The reasoned justification should then refer to the Council's evidence base for infrastructure needs (which includes the Playing Pitch and Outdoor Sports Strategy (PPOSS) and the Built Sports Facilities Strategy (BFS), which consider the facility investment needs to serve the housing growth that is being proposed).
A0984B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Outlines a housing requirement of 30,800 dwellings over the plan period (1,400 per annum), informed by the current standard method for calculating local housing need and the need to provide flexibility (as set out in Para 3.6 of the Draft Local Plan) and 1,500 homes to support the unmet need of the Black Country. Expect the housing requirement to be kept under review as the plan progresses, given ongoing work which may have implications, such as preparation of a statement of common ground with the Black Country and anticipated publication of a revised standard method for calculating local housing need. Support the broad pattern of development outline in Part 5 of the Policy, particularly the need for Principal (and Key) Centres to accommodate significant well-designed new housing and employment development to maintain and enhance their roles and maximise their economic potential. However, around 25% of development is proposed in rural areas, this is a significant proportion of development in locations generally considered less sustainable and somewhat contradict the proposed urban focus. Suggest more development is directed towards urban areas.
A0986B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Note that a recent Government White Paper proposes a new standard methodology for calculating housing need. This would increase need from some 1,177 dwelling to 2,129 dwellings per annum. Therefore growth needs in Shropshire appear to be considerably higher under this new methodology.
A1101B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Agree in principle with the strategic approach of the Local Plan Review to achieve an urban focus to development. Para 3.21 of the explanation provides further explanation of the strategic approach, stating 'to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work'. This should underpin site allocations and should recognise benefits of housing and employment in the same location/site. A new settlement can provide an inclusive community where people have the chance to live and work, which represents a sustainable pattern of growth. BRD030 is not in accordance with the proposed approach, as it is not in the right location to meet identified residential or employment needs of Bridgnorth and there are questions over whether it can be delivered. Stanmore Garden Village is the only scheme likely to deliver this successfully for Bridgnorth. Support the overall quantum of growth for Shropshire (which has been informed by Governments standard methodology for assessing housing need but will also provide flexibility and address the high need for affordable housing and support delivery of specialist housing to meet needs of the community. Furthermore, with increased economic growth and productivity, it will allow housing and jobs to remain in balance; reduce in commuting; and will make for much more sustainable economic growth), but consider the choice of site allocation is critical in delivering it. There is strong evidence that BRD030 is flawed such that it is very unlikely to deliver proposed outcomes. The Council's affordable housing objectives (25% of all housing development) whilst a high proportion of all development, represents only a fraction of the need (799 dwellings per annum as identified within the SHMA 2020). Draft policies will fall short of delivering this aspiration, which cannot be met without greater contributions from specific proposals. As such, it may be desirable for certain allocations to deliver a greater level of affordable housing or low cost housing aimed at specific needs, such as key worker housing to achieve a sustainable pattern of growth/address an existing need. Stanmore Garden Village is significantly able to assist, offering a minimum of 30% affordable housing (equating to 85 units above the 20% proposed policy requirement). Affordable housing provided would meet local needs including social/affordable rent, shared equity (75% maximum), starter homes for first time buyers (20% discount to market), and housing for sale/rent with key worker/local employment restrictions. Stanmore Garden village would deliver 45 more affordable than BRD030 (255 vs 210) despite being smaller. Agree with identification of Bridgnorth as a Principal Centre, given it is the third largest settlement in Shropshire in terms of population and dwelling after Shrewsbury and Oswestry. As the only Principal Centre in the east of the County, Bridgnorth needs to fulfil its role serving its residents and those in its hinterland that rely on it for its extensive range of services, facilities and employment opportunities. Bridgnorth's status as a Principal Centre in the hierarchy distinguishes it from the other tiers such as Key Centres and Rural Areas, so it is right that it contributes towards the strategic growth objectives in the east of the County and accommodates significant new growth. Draft policies need to be stronger to achieve sustainable development that responds to the climate change emergency. They should recognise how the location of development and mixed use sites can reduce the need to travel.
A1106B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The local plan omits a detailed housing trajectory and is therefore inconsistent with the 2019 NPPF. There is no exact policy relating to the number of electric vehicle charging points expected within developments. It would be helpful if the expectations for charging points was more clearly set out, with reference to the impacts of viability being taken into consideration.
A1107B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	I disagree with Policy SP2 as, inexplicably, it does not include the settlements of Diddlebury, Aston Munslow and Munslow as "cluster" settlements. Instead, SP2, quite wrongly, relies on local parish councils to suggest that settlements receive "cluster" status. In the case of the Corvedale villages, this has resulted in little or no housing development taking place in recent years which has meant that the housing needs of these communities has not been met, evidenced by the RHRP survey results for Diddlebury. The Council should therefore address this imbalance in housing provision in the Corvedale by having regard to paragraph 78 of the NPPF and designating Diddlebury, Aston Munslow and Munslow as a "cluster" in Policy SP2 without further delay. These three villages are dependent on each other to provide services and facilities which make the "cluster" as a whole sustainable. The Council, therefore, has no justification for ignoring paragraph 59 of the NPPF and excluding these villages from the opportunity to make their settlements even more sustainable by supporting new housing growth which is desperately needed in the area. For example, the designation of Munslow as a "cluster" village would enable Simon Brandwood to construct a self-build dwelling for his family on land opposite The Chains which can be described as an infill site on the eastern side of the village.
A1119B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Response A1119 submitted on behalf of Laird Estates Group and relates to Warren Park in Stoke Heath. Response on specific policies are: Policy SP2 (Strategic Approach) is not sound because it fails to acknowledge the legal obligations imposed on the authority by the Housing and Planning Act 2016. Clause 124 requires local housing authorities in England to consider: "...the needs of people residing in or resorting to their district with respect to the provision of (a) sites on which caravans can be station..." Essentially, this inserts a requirement into the Housing Act and requires LPAs to include an assessment of housing needs for caravans in their periodic review of housing needs. This recognises the contribution that residential caravans have in contributing to housing supply and allows LPAs to consider the need and demand for park homes in their areas. As currently drafted, the LP Review fails to do this. In addition, it is noted that Para 3.15 refers to an estimated 799 households per year will require affordable housing. This represents 57% of the Council's expected rate of housing delivery and its questionable whether this is achievable. Regardless, Laird Estates consider the LP should recognise that residential park homes are generally low cost, compared to similar sized bricks and mortar houses, so could make a valuable contribution to the authority's overall housing land supply. Furthermore, Table 25 within the SHMA (August 2020) shows the biggest increase in dwelling type between 2001-2011 was 'caravans or other mobile or temporary structure' at 47.6%. This suggests the popularity of residential park homes in Shropshire as a type of residence is increasing. This statement is reinforced by Para 3.148 (SHMA) which confirms "In percentage terms there was evidence of a very small shift from detached and semi-detached accommodation to terraced accommodation, flats and maisonettes and interestingly caravans or other mobile homes. "Significantly, Table 36 (SHMA) shows that 'caravans or other mobile or temporary structure' equate to 0.8% of the Council's housing stock. On this basis, Laird Estates suggests 246 of the Council's housing requirement (0.8% of 30,800) should be the target for residential park homes (at present, zero residential park homes are planning for). To rectify these issues, Laird Estates suggests that the requirements of the Housing and Planning Act 2016 are referred to in supporting text (Paras 3.3 to 3.27) and Policy SP2 part 2 is changed to read as follows: Over the plan period from 2016 to 2038, around 30,800 new dwellings (including 246 residential park homes) and around 300 hectares of employment land will be delivered. This equates to around 1,400 dwellings and 15ha of employment land per annum. This Local Plan ensures that sufficient land is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available."
A1119B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Paragraphs 2.26 to 2.27 fail to recognise the weight that should be given to the Stoke Upon Tern Neighbourhood Plan (NP). Although these paragraphs refer to the three made NPs in the county Paragraph 107 of the Neighbourhood Planning section of National Planning Practice Guidance (NPPG) (Reference ID: 41-107-20200513) (a new paragraph introduced in response to the coronavirus (COVID-19) pandemic) states: "...Where the local planning authority has issued a decision statement (as set out under Regulation 18 of the Neighbourhood Planning (General) Regulations 2012) detailing its intention to send a neighbourhood plan to referendum, that plan can be given significant weight in decision-making, so far as the plan is material to the application..." (highlighted and underlined text – our emphasis) In the case of the Stoke Upon Tern NP, the examiner published his report in May 2019 and recommended that it should proceed to referendum. This demonstrates that the NP is a robust development plan document. Furthermore, Shropshire Council's Cabinet subsequently agreed it should proceed to a referendum and it was due to take place on 16 April 2020. But this did not happen because of COVID-19. The author of this representation has also been advised by the Council's Planning Policy Department that it will work with the NP Group and Parish Council to rearrange as soon as COVID-19 restrictions are lifted. The fact the NP was due to be subject to a referendum and it was only delayed due an unprecedented health pandemic is significant. The absence of any recognition of the Stoke Upon Tern NP therefore means the Local Plan (LP) is not sound because it fails two tests, namely: the test of positivity; and, consistency with national policy. To rectify this, Laird Estates suggests explanatory text is added to acknowledge the Stoke Upon Tern Neighbourhood Plan, its robustness and recognise that it should be given significant weight in planning decisions (and that this weight applies at present). For the same reasons as above, Laird Estates welcomes Policy SP2 part 7 but suggests the wording is changed in the following way so that it is both positively prepared and consistent with national policy: "7. The production of formal Neighbourhood Plans will be supported and can identify development opportunities which will complement proposals in this Local Plan. Where appropriate they can also identify additional Community Clusters. Weight will be given to Neighbourhood Plans after a decision has been issued detailing the authority's intention to send it to referendum."
A1128B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The score of 46 for Westbury in the Hierarchy of Settlements document is incorrect. Evidence submitted with the response confirms that Westbury should have a function score of 52. The hierarchy of settlement document fails to recognise that Westbury has two "outdoor sports facilities" (+1) "amenity green space" (+3) and two "significant employment opportunities" (+2) This would increase Westbury's settlement score from 46 to 52. With a settlement score of 52 Westbury should be designated a Community Hub. A suitable site allocation for Westbury has been identified (SLAA Residential Site WEY006) and is land to the North of Roman Road. The site extends to just under 1.4 hectares and could accommodate around 29 dwellings. The site is both viable and deliverable in line with the policy requirements. A topographical survey, ecology survey, tree survey and access design have been completed and confirm no issues. A planning application could be prepared quickly and the site could be delivered by Chartland Homes in the short term (2020/21-2024/25)
A1129B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The latest calculation of Local Housing Need (LHN) identifies a need of 25,894 dwellings with an additional 1,500 dwellings to help address unmet housing needs arising from the adjacent Black Country Authorities area. The total housing requirement of 30,800 dwellings set out in Policy SP2 is therefore supported as a positive and proactive response to meeting the housing needs of Shropshire overall. The total figure should however, be considered as the minimum level of housing to be delivered in the plan period. An increased level of housing provision above the LHN requirement is more likely to result in the actual delivery and completion of sufficient housing in Shropshire. This is considered to be especially important given the scale of housing required overall and the identified affordable housing needs. The spatial apportionment and distribution of housing requirements is broadly supported with a clear emphasis, rightly, on the development of future housing (and employment) in and adjacent to Shrewsbury as the largest and most sustainable settlement in Shropshire. Our client is however concerned that the Plan proposes significant expansion and development of strategic sites that are not particularly well connected to existing settlements including the development of Green Belt land. It is our client's view that it is important to make best use of and to focus future housing development needs towards Shrewsbury to capitalise on the existing and proposed infrastructure (including the emerging development proposals for the North West Relief Road). Our client concludes that Shrewsbury is capable of supporting a greater level of future housing growth than that currently proposed in the Plan, particularly in order to support new infrastructure, including the Northern West Relief Road. Additional land allocations for housing growth will need to reflect the challenges presented by heritage and ecological constraints and areas of flood risk. The Plan should be modified in Policy SP2 and in other policies to identify and allocate additional housing to Shrewsbury area. This should include making better use of available land and sites such as our client's land to the west of Ellesmere Road (both SHR163 and as part of SHR174).

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1130B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The latest calculation of Local Housing Need (LHN) identifies a need of 25,894 dwellings with an additional 1,500 dwellings to help address unmet housing needs arising from the adjacent Black Country Authorities area. The total housing requirement of 30,800 dwellings set out in Policy SP2 is therefore supported as a positive and proactive response to meeting the housing needs of Shropshire overall. The total figure should however, be considered as the minimum level of housing to be delivered in the plan period. An increased level of housing provision above the LHN requirement is more likely to result in the actual delivery and completion of sufficient housing in Shropshire. This is considered to be especially important given the scale of housing required overall and the identified affordable housing needs. The spatial apportionment and distribution of housing requirements is broadly supported with a clear emphasis, rightly, on the development of future housing (and employment) in and adjacent to Shrewsbury as the largest and most sustainable settlement in Shropshire. Our client is however concerned that the Plan proposes significant expansion and development of strategic sites that are not particularly well connected to existing settlements including the development of Green Belt land. It is our client's view that it is important to make best use of and to focus future housing development needs towards Shrewsbury to capitalise on the existing and proposed infrastructure (including the emerging development proposals for the North West Relief Road). Our client concludes that Shrewsbury is capable of supporting a greater level of future housing growth than that currently proposed in the Plan, particularly in order to support new infrastructure, including the Northern West Relief Road. Additional land allocations for housing growth will need to reflect the challenges presented by heritage and ecological constraints and areas of flood risk. The Plan should be modified in Policy SP2 and in other policies to identify and allocate additional housing to Shrewsbury area. This should include making better use of available land and sites such as our client's land to the west of Ellesmere Road (both SHR163 and as part of SHR174).
A1135B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	30,800 is not consistent with National Policy. Between now and the submission of the Local Plan it is highly likely that the new standard method for calculating the housing requirement will be in play
A1146B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Policy SP2: Strategic Approach The Strategic Approach outlined in Policy SP2 is supported. In particular, the identification of Community Hubs and Community Clusters in the rural area, as centres for growth in a sustainable fashion is supported.
A1152B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Support a beautiful and thriving countryside that enriches all our lives. Support development in the right place which is sympathetic to the landscape and to the needs of local communities and those who work within them. Support building the right types of housing in the right places, in numbers that are clearly needed, to ensure that the County's special qualities are protected and that the genuine needs of its residents are met. We also support the targeted approach of the Productivity Growth economic option as originally put forward in the Issues and Strategic Options Consultation of the LPR, which would encourage the development of newer and more innovative industries. However, we do not believe that the continued aspirational growth preferred by Shropshire Council will protect Shropshire's special qualities or serve its resident population to best effect. Consider that the draft Local Plan is suffused with a model for growth well in excess of demographic need, which is not truly sustainable, because it is at odds with both the climate emergency and the ecological emergency. It has targets for both housing and employment land that are too high, based on figures that are questionable. It won't get the right sort of houses, particularly affordable houses, built in the right places. It also has a flawed consultation process, which is undemocratic. The opening words of SP2 derive from CS1 in the existing Core Strategy. The phrase 'Shropshire will flourish' presumably stems from the motto 'Floreat Salopia' but is surely meaningless as a planning policy. The draft Policy includes an urban focus. Whilst an increased urban focus would undoubtedly be part of an appropriate response to the Climate Emergency, note that proposed guideline figures indicate that a reduced urban element is now being planned. At the Preferred Sites stage, the proposed residential guidelines for Shrewsbury, Principal and Key Centres amounted to 72.6% of total development, this is now only 69.1%. Consider that the guideline figures, both for housing and for employment land, are too high as: -The housing calculations can be broken down into separate constituent elements, highlighting their underlying potentially questionable assumptions -The employment land figures can also be shown to be based on illogical assumptions. -The aim of the Economic Growth Strategy to 'maximise our economic potential' is not only unrealistic but contrary to climate change goals. -Public opinion is against the high targets. With regard to housing requirement, analysis is provided illustrating contributing factors, 12,489 (40%) derive from population change; 8,257 (27%) derives from changes in average household size; 5,148 (17%) derives from the national methodologies inclusion of an uplift in response to the affordability ratio (considered ineffective as building more housing will not reduce cost); 1,500 (5%) to meet housing need in the Association of Black Country Authorities (ABCA); and 3,406 (11%) for Shropshire Council aspirations (including to balance housing and jobs). Consider that windfall supply is underestimated. This includes more supply from conversion of town centre regeneration particularly post Covid-19. No calculation of the greenhouse gas emissions resulting from housing proposals has been undertaken. Consider each new housing increases emissions and contributes to rather than reduces climate change. High growth is therefore contrary to draft policies SP3 and DP12. Consider the Council should seek to minimise necessary growth. It should certainly not seek guidelines that exceed the Government's minimum requirement, and it could justifiably and soundly argue that the Climate Change agenda provides the exceptional circumstance, allowed by NPPF paragraph 60, that would allow it to seek fewer houses than that, were it so minded. Consider it is premature to accept cross-boundary need from ABCA, given delays to their plan and uncertainty about would other closer Local Authorities can contribute. With regard to the employment requirement, the proposed approach is 'balance' with housing. That is a sensible aim, but we still think that the calculation of the employment land so required has been overstated. The logic was outlined in Table 7 of the Preferred Scale and Distribution of Development consultation document and is consistent for all settlements at Preferred Sites apart from Bridgnorth and Shifnal. The guidelines at this present stage of consultation have been altered for some settlements, without any apparent full justification, but the aim of balance between houses and jobs remains. Consider the logic behind the Council's 'balanced growth' calculations is flawed as: -Each new house would not necessarily equate to a requirement for one new job. Not all occupants of new houses will have jobs which require employment land; some will already have jobs; and many will be beyond working age. -The aim of improving median earnings and going for 'smarter' jobs means that higher skilled jobs should be provided. The assumption that each job requires 42.25 sq. m on average is based on a weighting which includes 25% of warehouse-type jobs. The evidence base suggests that higher productivity jobs might require average floorspace of only 31 sq. m per job. That would mean a further decrease in the calculation of the requirement for employment land. -Under that supposedly 'smarter' EGS strategy, buildings on employment sites might well represent more than 40% of an employment site. -Not all jobs require employment space on a dedicated employment site, particularly in a post-Covid19 world where many more people may be working from home. Undertaken a calculation of employment land needs using a precautionary assumption of 1 job per household; balancing household growth proposals; and applying the 'smarter' job density of 31 sq. m, the employment land requirement indicates a need for only 155ha of employment land. Nearly 50% less than that in the draft Local Plan. Further there is an anomaly as the settlement guidelines add up to 375ha rather than 300ha. This seems to us to be a major discrepancy between what is stated in SP2 and what is stated in the detailed settlement policies, and is therefore unsound. Appendix 5 and 6 are presented differently.
A1155B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Response from Association of Black Country Authorities (ABCA). Support duty to cooperate between Shropshire and ABCA particularly over issues relating to housing and employment land. Strongly support the Local Housing requirement of 30,800 homes as set out in Policy SP2 of the Regulation 18 Local Plan in terms of it incorporating 1,500 dwellings to support the housing needs of the emerging Black Country Plan. We agree that this reflects a positive approach to cross-boundary cooperation and responds to the functional relationship between the two areas. However, we are concerned that the Local Plan does not contain a mechanism which would allow the Council to trigger a partial review of the Plan in the light of the rate and location of housing delivery or in the event of a greater need for additional housing - either associated with meeting the needs of Shropshire, or adjacent housing market areas including the Black Country. We would be happy to work with you to explore these mechanisms in more detail. Concerned that the Regulation 18 Plan does not seek to make a contribution to meeting employment land needs arising in the Black Country. The evidential basis of the Local Plan employment target of 300ha as set out in Policy SP2 is not clear and so it is not possible to determine whether within this requirement, there exists any 'headroom' above locally generated needs and / or associated with the housing contribution, that could be attributed to meeting needs arising in the Black Country without the need for additional allocations. We request further engagement with the Council through the Duty to Cooperate to explore how the Local Plan can respond to these issues.
A1168B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Draft Policy SP2 sets out a development strategy based on a settlement hierarchy. The strategic approach is justified by securing sustainable development. Settlements are grouped in the following classifications: Schedules SP2.1 – Urban Locations, SP2.2 – Community Hubs and SP2.3 Community Clusters. The settlement classification is supported. Also strongly support paragraph 3.23 that allows for appropriate levels of development within rural areas, to enhance the longer-term sustainability of rural communities, including Community Clusters. The inclusion of Edstaston, Quina Brook, Northwood, Newtown, Tilley and Aston as a Community Cluster in the Place Plan Area is fully supported.
A1176B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Doesn't agree with Shropshire Council housing target of 30,800. Target should be reduced to Moderate Growth and reviewed over the next 5 years as the impacts of Covid-19 and economic change is assessed. Otherwise there is a danger the plan becomes "out of date" and speculative development applications will follow. Shropshire Should not be accommodating Black Country growth
A1178B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Doesn't agree with Shropshire Council housing target of 30,800. Target should be reduced to Moderate Growth and reviewed over the next 5 years as the impacts of Covid-19 and economic change is assessed. Otherwise there is a danger the plan becomes "out of date" and speculative development applications will follow. Shropshire Should not be accommodating Black Country growth
A1179B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Doesn't agree with Shropshire Council housing target of 30,800. Target should be reduced to Moderate Growth and reviewed over the next 5 years as the impacts of Covid-19 and economic change is assessed. Otherwise there is a danger the plan becomes "out of date" and speculative development applications will follow. Shropshire Should not be accommodating Black Country growth
A1191B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	The proposed strategic approach within draft Policy SP2, which aims to see Shropshire flourish, with new development that meets its needs and makes its settlements more sustainable, is supported. Agree with the Council's approach to deliver around 30,800 homes over the 2016 – 2038 Plan period. It is recognised that this represents a 'high growth scenario', above the 25,894 dwelling figure generated by the Government's current Standard Methodology (and delivering 1,500 dwellings to support the housing needs of the Black Country). Support the Council's position at para 3.6 of the Explanation that the higher housing requirement provides flexibility in the supply etc. Planning for a 'high growth scenario' is critical in the context of the housing need figures arising from Government's consultation on proposed alterations to the Standard Methodology. If implemented as proposed, Local Housing Need for Shropshire would increase to 2,129 dwellings per annum (46,838 dwellings over the draft Local Plan period excluding unmet needs from neighbouring authorities), is significantly higher than the proposed housing requirement. Welcome commitment to keeping the availability of land (both for housing and employment) 'under review', to ensure a continuous supply of suitable sites. This is especially critical when ensuring the delivery of new homes. Consider BUR004 can deliver new dwellings quickly and in the early years of the Plan period, will make a positive contribution to achieving a housing supply throughout the draft Local Plan period. Note commitment to focus development in 'urban areas'. However also support recognition that long-term sustainability of rural communities is essential and new development is needed to ensure the ongoing vitality and viability of local services for these communities. Complimenting growth in urban areas with growth, in particular, in Community Hubs (including Burford) which function as 'rural service centres' and contain a range of services and facilities which provide an important focus for smaller settlements nearby is fully supported. Draft Policy SP2 identifies Burford as a Community Hub. However, the Council's Hierarchy of Settlements Assessment (2020) concludes Burford is a very sustainable rural settlement (achieving a Key Centre score. However, because many of the services are located within adjoining Tenbury Wells, the Council decided to identify it as a Community Hub). Accept this rationale, but consider the proximity of services and facilities in Tenbury Wells should not be forgotten in recognising the sustainability of the settlement.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1192B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2		The proposed strategic approach within draft Policy SP2, which aims to see Shropshire flourish, with new development that meets its needs and makes its settlements more sustainable, is supported. Agree with the Council's approach to deliver around 30,800 homes over the 2016 – 2038 Plan period. It is recognised that this represents a 'high growth scenario', above the 25,894 dwelling figure generated by the Government's current Standard Methodology (and delivering 1,500 dwellings to support the housing needs of the Black Country). Support the Council's position at para 3.6 of the Explanation that the higher housing requirement provides flexibility in the supply etc. Planning for a 'high growth scenario' is critical in the context of the housing need figures arising from Government's consultation on proposed alterations to the Standard Methodology. If implemented as proposed, Local Housing Need for Shropshire would increase to 2,129 dwellings per annum (46,838 dwellings over the draft Local Plan period excluding unmet needs from neighbouring authorities), is significantly higher than the proposed housing requirement. Welcome commitment to keeping the availability of land (both for housing and employment) 'under review', to ensure a continuous supply of suitable sites. This is especially critical when ensuring the delivery of new homes. Clive Barracks and other sites which can deliver in the medium to long term is a crucial part of achieving a supply of housing throughout the Plan period and beyond. Support identification of strategic sites, including Clive Barracks, as a focus for new development. Clive Barracks will form a successful, sustainable and well-designed new community delivering both housing and employment opportunities. It will include an appropriate mix of housing, employment opportunities and local services and facilities to serve existing and future residents, as well as the necessary infrastructure to deliver a sustainable and safe development. Consider the proposed Strategic Approach need to be expanded to reflect the importance of the re-development of brownfield land. The NPPF states planning policies and decisions should give substantial weight to the value of using suitable brownfield land for homes or other identified needs.
A1393B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Paragraph 3.17-3.18 Attention is drawn to the requirement for this site regarding DP22 Flood Risk, and DP 23 Sustainable Drainage Systems, and Flood Risk Planning Policy Recommendation Page 77 Reference 8.28 to Tenbury Wells.
A1394B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 2 Housing Requirement - target of 30,800Explanation Para 3.5, Para 3.6 and Para 3.7This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its "highly ambitious" High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exhortations to "Build Build" the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land. An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. By the next Partial Review (Yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A1618B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	GROWTH PROPOSALS FOR SHROPSHIRE I consider that the aspirational target for growth of the number of dwellings is too high. I consider that meeting the minimum requirement under the standard methodology for housing needs assessment (stated in SP2, para 3.5 to be 25,894 dwellings over the plan period) would be sufficient for Shropshire Council to meet its obligations and that at target close to that should be adopted. Growth and development of housing should be linked to growth in jobs. The two i.e. jobs and housing are interlinked, and should be reviewed together on a more frequent basis (3 – 5 years), rather than a "build it and they will come" policy. See Section 5, "Regulation 18 Consultation Update Report", Bridgnorth Plan Steering Group, September 2020 for more detail:
A1635B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Evidence is old. The housing targets are too low, especially with impacts of Covid – some sites will not come forward. The new Standard Methodology would result in higher targets. The current housing target is not sufficient to protect the council against the potential economic downturn over the next few years and definitely insufficient to meet the likely increased national housing targets being pursued by the Government.
A1644B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The housing number may need to increase based on the new standard methodology recently released by Government. Shrewsbury is a logical location for more allocations. A highly suitable allocation is that proposed by us on behalf of the landowner at Hencote vineyard and winery in this comment and in other related representations for high quality specialised Care Community adjacent to the vineyard. This site has capacity to deliver 265 units of specialised purpose built and managed accommodation comprehensively meeting the needs of the older sector of the population. The site has scope to deliver a care community in an attractive parkland setting on the edge of the proposed urban area, adjacent to the proposed SHR 173 housing allocation, and located within the line of the North West Relief Road
A1646B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The total housing requirement of 30,800 dwellings set out in Policy SP2 is supported as a positive and proactive response to meeting the housing needs of Shropshire. An increased level of housing provision above the requirement is more likely to result in the actual delivery and completion of sufficient housing in Shropshire, particularly with affordable. The spatial apportionment and distribution of housing requirements is broadly supported, with focus on Shrewsbury. Concern that there is expansion and development of strategic sites that are not well-connected to existing settlements including Green Belt. More housing should be in Shrewsbury linked to the NWRR. The Plan should be modified in SP2 and in others to allocate additional housing to the Shrewsbury area. This should include making better use of available land and sites such as our land to the west of Ellesmere Road (REF SHR109) together with the immediate adjoining land (including SHR174 and SHR023) to deliver a single comprehensive scheme that can make a significant contribution towards current and future housing requirements. It should be noted that the landowners of these parcels of land have now agreed to jointly promote their land in order to achieve a deliverable and comprehensive sustainable development of this area.
A1648B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	This policy is supported
A1864B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Hierarchy of Settlements 2020 - Para 5.41a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A1864B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its "highly ambitious" High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exhortations to "Build Build" the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land. An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. By the next Partial Review (Yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A1868B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Hierarchy of Settlements 2020 - Para 5.41a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A1868B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its "highly ambitious" High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exhortations to "Build Build" the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land. An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. By the next Partial Review (Yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A1870B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	request that you consider re-allocating all the windfall housing to Town Centre housing to make use of shops and offices that are standing empty due to the increase in working from home and buying on line
A1890B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The Parish of 'Stoke St Milborough and Hopton Cangeford' was removed from the Community Cluster designation at the request of the Parish Council, and should be shown as OPEN COUNTRYSIDE. However, although the text of the Plan (schedule SP2.3 of policy SP2) correctly shows our parish as OPEN COUNTRYSIDE, both of the maps (Craven Arms Place Plan area, & figure SP2.1 Shropshire) show all of the small settlements within our Parish still marked as Clusters. This is incorrect, all the settlements within our parish should be marked as OPEN COUNTRYSIDE. The settlements incorrectly marked as clusters are: Stoke St Milborough Hopton Cangeford Clee Stanton Clee Downton These should clearly all be open countryside, as is stated in the schedule. Please revise the stated maps.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1891B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The Parish of 'Stoke St Milborough and Hopton Cangeford' was removed from the Community Cluster designation at the request of the Parish Council, and should be shown as OPEN COUNTRYSIDE. However, although the text of the Plan (schedule SP2.3 of policy SP2) correctly shows our parish as OPEN COUNTRYSIDE, both of the maps (Craven Arms Place Plan area, & figure SP2.1 Shropshire) show all of the small settlements within our Parish still marked as Clusters. This is incorrect, all the settlements within our parish should be marked as OPEN COUNTRYSIDE. The settlements incorrectly marked as clusters are: Stoke St Milborough Hopton Cangeford Clee Stanton Clee Downton These should clearly all be open countryside, as is stated in the schedule. Please revise the stated maps.
A1926B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Form 1: A larger range of services (e.g. outdoor play, green space etc.) cannot compensate for the lack of employment or transport. The relaxation of the HoS is unsound and should be removed. Without employment or peak public transport any development in a hub would increase daily car travel. This contrary to SP3, therefore Trefonen status as a Hub is contrary to existing and proposed policies Form 2: 19% target is in excess of the need – the council is pursuing its highly ambitious High Growth target. 1500 for the Black Country places burden on Shropshire. Risk of an out of date Plan due to economic fluctuations between now and 2038. Unknown impacts from Covid-19 – we would therefore ask that the “High-Growth” target is reconsidered, and changed to Moderate Growth. Any Black Country housing supply should be located closer to that area, not anywhere else in the county
A1934B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Form 1: A larger range of services (e.g. outdoor play, green space etc.) cannot compensate for the lack of employment or transport. The relaxation of the HoS is unsound and should be removed. Without employment or peak public transport any development in a hub would increase daily car travel. This contrary to SP3, therefore Trefonen status as a Hub is contrary to existing and proposed policies Form 2: 19% target is in excess of the need – the council is pursuing its highly ambitious High Growth target. 1500 for the Black Country places burden on Shropshire. Risk of an out of date Plan due to economic fluctuations between now and 2038. Unknown impacts from Covid-19 – we would therefore ask that the “High-Growth” target is reconsidered, and changed to Moderate Growth. Any Black Country housing supply should be located closer to that area, not anywhere else in the county
A2097B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The Black Country is well served by roads, trams and railway. There is no need to shift 1500 homes into Shropshire. There are hundreds of homes in the pipeline in the Black Country. There is no need to agree to further ABCA in Shifnal, it would bring further issues relating to congestion, carbon emissions, air and light pollution and harm the countryside.
A2101B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Doesn't agree with Shropshire Council housing target of 30,800. Target should be reduced to Moderate Growth and reviewed over the next 5 years as the impacts of Covid-19 and economic change is assessed. Otherwise there is a danger the plan becomes "out of date" and speculative development applications will follow. Shropshire Should not be accommodating Black Country growth
A2102B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Doesn't agree with Shropshire Council housing target of 30,800. Target should be reduced to Moderate Growth and reviewed over the next 5 years as the impacts of Covid-19 and economic change is assessed. Otherwise there is a danger the plan becomes "out of date" and speculative development applications will follow. Shropshire Should not be accommodating Black Country growth
A2103B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Doesn't agree with Shropshire Council housing target of 30,800. Target should be reduced to Moderate Growth and reviewed over the next 5 years as the impacts of Covid-19 and economic change is assessed. Otherwise there is a danger the plan becomes "out of date" and speculative development applications will follow. Shropshire Should not be accommodating Black Country growth
A2130B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Disagree with the strategic approach of the plan as it is based on an out of date growth model that predates the declaration of the climate emergency and the Covid-19 outbreak. The continued commitment to a high growth strategy for suburban, semi-rural and rural homes can no longer be justified in on the basis of the out-of-date growth strategy and is not compatible with Shropshire Council own praise- worthy ambitions for a net zero carbon county by 2030.
A2147B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 2 Housing Requirement - target of 30,800Explanation Para 3.5, Para 3.6 and Para 3.7This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its “highly ambitious” High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an “out of date” Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exaltations to “Build Build” the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land. An “out of date” Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of “Right Homes in Right Place” in the Draft Housing Strategy 2020-2025.By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% “High Growth” Target is reconsidered by the Council, and changed to a more deliverable “Moderate Growth” 5% above identified needs to avoid a potential “out of date” Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of ‘out of county’ needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A2149B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 2 Housing Requirement - target of 30,800Explanation Para 3.5, Para 3.6 and Para 3.7This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its “highly ambitious” High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an “out of date” Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exaltations to “Build Build” the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land. An “out of date” Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of “Right Homes in Right Place” in the Draft Housing Strategy 2020-2025.By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% “High Growth” Target is reconsidered by the Council, and changed to a more deliverable “Moderate Growth” 5% above identified needs to avoid a potential “out of date” Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of ‘out of county’ needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A2163B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	SHR173 will assist in contributing to this housing target over the Plan period, and reinforce the Local Plan strategy for additional growth to be located at the highest level of the settlement hierarchy, which is supported, and in accordance with the Shropshire Council Hierarchy of Settlements.
A2166B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	support the continued role of Market Drayton as a Principal/Key Centre, acting as a focus for strategic growth objectives in the north-east of the County
A2172B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Housing requirement of 30,800 is too high. Seems to be based on a predicted housing boom which is unlikely due to pandemic. Urges Council to reconsider and set a target more realistic for Shropshire
A2173B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its “highly ambitious” High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an “out of date” Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial led whilst in turn supply by developers is profit led. Despite Government exaltations to “Build Build” the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land. An “out of date” Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of “Right Homes in Right Place” in the Draft Housing Strategy 2020-2025.By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% “High Growth” Target is reconsidered by the Council, and changed to a more deliverable “Moderate Growth” 5% above identified needs to avoid a potential “out of date” Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county. We note the inclusion of Ironbridge Power Station strategic site into the housing supply calculator with 1000 potential homes, but that will not fulfil the full stated need. This will increase pressures on settlements across the county for the supply of ‘out of county’ needs unless sites or location close to that region can be identified without impacting the Green Belt.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2177B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	<p>Policy proposes around 30,800 dwellings (1,400 dwellings per annum) will be delivered between 2016 to 2038</p> <p>The NPPF requires Council's to establish a housing requirement figure for their whole area (para 65). The NPPF also specifies that the determination of the minimum number of homes needed should be informed by a Local Housing Need (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In Shropshire, there are no exceptional circumstances to justify an alternative approach.</p> <p>Using the standard methodology as set out in the latest NPPG, the minimum LHN for Shropshire is 25,894 dwellings (1,177 dwellings per annum) between 2016 – 2038. This calculation is mathematically correct based on 2014 Sub National Household Projections (SNHP), 2019 as the current year and 2019 affordability ratio of 7.97. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and revised when appropriate until the Local Plan is submitted for examination. The minimum LHN for the County may change as inputs are variable, which should be considered by the Council. Government has confirmed its intention to review the standard methodology and consulted on a proposed alternative methodology within 'Changes to the Current Planning System'. Under this revised methodology, the minimum LHN for Shropshire is 2,129 dwellings per annum, significantly higher than the previously calculated LHN and proposed housing requirement. It may become necessary for the Council to update its LHN assessment.</p> <p>Government's current and revised standard methodologies identify minimum annual LHN. This is the starting point and not a housing requirement. Government's objective of significantly boosting the supply of homes set out in the NPPF remains (para 59). Any ambitions to support economic growth, deliver affordable housing and meet unmet housing needs from elsewhere may necessitate a housing requirement above minimum LHN. In Shropshire, there is justification for a housing requirement above the minimum LHN.</p> <p>-NPPG indicates if previous housing delivery has exceeded minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need. The adopted Core Strategy housing requirement of 1,375 dwellings per annum is above the minimum LHN. The Housing Delivery Test (HDT) Results for 2018/19 identified housing completions of 1,843 dwellings, which exceeds the minimum LHN and the adopted and proposed housing requirements.</p> <p>-Wider aspirations of the Economic Growth Strategy for Shropshire are to increase economic growth, productivity and diversification of the labour force. These economic ambitions require an increase in housing requirement above the minimum LHN so that a lack of labour is not to become a constraint to the realisation of economic growth potential. The NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). The Council is seeking to support the long-term sustainability of the County by achieving a sustainable balance between employment and housing growth. The Council should also recognise economic benefits of housing development in supporting local communities (see HBF's Building Communities – Making Place A Home (Autumn 2020) and the Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018)).</p> <p>-NPPG states total affordable housing need should be considered in the context of likely delivery as a proportion of mixed market and affordable housing developments. NPPG states an increase in the total housing figures may be considered where it could help deliver affordable housing. Affordable housing delivery is a key priority for the Council. It is proposed circa 7,700 affordable dwellings will be delivered between 2016 - 2038. NPPG also sets out that households whose needs are not met by the market, which are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the NPPF are considered to be in affordable housing need. The Council should calculate its affordable housing need as defined by NPPG. This figure may be significant in comparison to the minimum LHN. A higher overall housing requirement will contribute towards delivery of a greater number of affordable homes. It is acknowledged that the Council may not be able to meet all affordable housing needs but an uplifted housing requirement above the minimum LHN will make some contribution to meeting affordable housing needs.</p> <p>-As set out in the NPPF, Local Plans should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). It is proposed that Shropshire's housing requirement of 30,800 dwellings incorporates 1,500 dwellings to support the unmet housing needs of the Black Country.</p> <p>The proposed housing requirement of 1,400 dwellings per annum is the same as the adopted housing requirement of 1,375 dwellings per annum, higher than the minimum LHN of 1,177 dwellings per annum but below last year's housing delivery of 1,843 dwellings and the revised LHN of 2,129 dwellings per annum. The proposed housing requirement provides limited flexibility to respond to changes in the LHN, deliver more affordable housing, support economic growth and accommodate unmet housing needs from the Black Country. It is "business as usual" rather than significantly boosting housing supply. Before pre-submission LPR consultation, the Council should consider a higher housing requirement. The housing requirement should also be expressed as a minimum figure.</p> <p>Strategic policies should ensure a sufficient supply of deliverable/developable land to deliver the housing requirement, maintain a 5 Years Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measures. The Council's overall HLS should provide some flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than maximum and provide choice and competition in the land market. There is no numerical formula to determine the appropriate quantum for a contingency but greater numerical flexibility is necessary where HLS is dependent on a few large strategic sites or locations than in cases where HLS is more diversified. Suggest as large a contingency as possible (at least 20%). If during examination, assumptions on lapse rates, windfall allowances and delivery rates are amended or any proposed housing site allocations are removed any built in flexibility is also reduced. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.</p> <p>Housing delivery is maximised, where a wide mix of sites provide choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. There is a wide range of sites by both size and market locations, which should provide access to suitable land for small local, medium regional and large national housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households. The NPPF requires Councils to identify at least 10% of its housing requirement on sites no larger than one ha (or demonstrate strong reasons for not achieving this target (para 68)).</p> <p>The Council should confirm compliance with this aspect of national policy.</p> <p>Would not wish to comment on merits of individual site allocations, but critical assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within its overall HLS, 5 YHLS and housing trajectory are correct and realistic. Assumptions should be supported by parties responsible for delivery and sense checked by the Council. The Council has provided limited information / supporting evidence on a site by site analysis of the deliverability of individual site allocations.</p> <p>The Council's 5 YHLS Statement dated 3rd March 2019 estimates the 5 YHLS between 2019/20 – 2023/24 against the adopted Local Plan housing requirement is 6.42 years or against the minimum LHN is 8 years (based on a stepped trajectory, Sedgefield approach to shortfalls and 5% buffer). Before the pre-submission LPR consultation, the Council should prepare and publish an updated 5 YHLS Statement for 2020/21 – 2024/25 against the proposed housing requirement and trajectory.</p> <p>Appendix 7 : Forecast of Delivery Timescales for Local Plan Allocations is not a housing trajectory. The NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 73). The omission of a detailed housing trajectory is inconsistent with the NPPF. Before the pre-submission LPR consultation, a housing trajectory should be incorporated into the Local Plan.</p> <p>The draft Local Plan promotes a sustainable pattern of growth by directing majority of new development towards larger settlements with the most extensive range of services / facilities and infrastructure.</p> <p>At the plan-making stage, deliverability of development is very closely linked to viability. Viability of individual developments and plan policies should be tested at plan making stage. As set out in the NPPF, viability testing should assess cumulative impact of affordable housing provision, policy compliant standards, infrastructure and other contributions so that there is sufficient incentive for a landowner to bring forward their land for development (para 34). The Council's viability evidence is set out in Local Plan Delivery & Viability Study dated July 2020 by HDH, which demonstrates viability challenges across the County.</p>
A2180B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Shropshire Council has declared a Climate Emergency as have many of the Parish & Town Councils in the county. Surely there is an expectation that the Local Plan takes a strong stance on Climate Emergency. Since declaring a Climate Emergency our Planning Committee has spoken at length of the need for development sites to take more responsibility for energy conservation and generation on development sites but there has never been a policy requirement and our experiences of discussions with developers is that they won't until a policy dictates that they should.
A2268B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Target of 30800 is 19% in excess of the Identified need of 25894 in Shropshire. The incorporation of 1500dwelling for the Black Country places an additional burden on Shropshire during the plan period for the additional supply to be provided as part of the 5 year housing supply. These factors risk an "out of date plan" due to economic fluctuations which are outside of the control of the council. As the fallout from the Pandemic is unclear, better to hold fire now and look again later when the required numbers will be clearer. The 15% high growth target makes no sense in this light.
A2268B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Hierarchy of Settlements: The suggestion in para 5.41 that a large range of services and facilities would compensate for the lack of "significant employment opportunities" and "peak time public transport is wrong. This makes the Hub designation unsound and it should be removed.
A2277B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Target of 30800 is 19% in excess of the Identified need of 25894 in Shropshire. The incorporation of 1500dwelling for the Black Country places an additional burden on Shropshire during the plan period for the additional supply to be provided as part of the 5 year housing supply. These factors risk an "out of date plan" due to economic fluctuations which are outside of the control of the council. As the fallout from the Pandemic is unclear, better to hold fire now and look again later when the required numbers will be clearer. The 15% high growth target makes no sense in this light.
A2277B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Hierarchy of Settlements: The suggestion in para 5.41 that a large range of services and facilities would compensate for the lack of "significant employment opportunities" and "peak time public transport is wrong. This makes the Hub designation unsound and it should be removed.
A2291B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Target of 30800 is 19% in excess of the Identified need of 25894 in Shropshire. The incorporation of 1500dwelling for the Black Country places an additional burden on Shropshire during the plan period for the additional supply to be provided as part of the 5 year housing supply. These factors risk an "out of date plan" due to economic fluctuations which are outside of the control of the council. As the fallout from the Pandemic is unclear, better to hold fire now and look again later when the required numbers will be clearer. The 15% high growth target makes no sense in this light.
A2291B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Hierarchy of Settlements: The suggestion in para 5.41 that a large range of services and facilities would compensate for the lack of "significant employment opportunities" and "peak time public transport is wrong. This makes the Hub designation unsound and it should be removed.
A2292B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Target of 30800 is 19% in excess of the Identified need of 25894 in Shropshire. The incorporation of 1500dwelling for the Black Country places an additional burden on Shropshire during the plan period for the additional supply to be provided as part of the 5 year housing supply. These factors risk an "out of date plan" due to economic fluctuations which are outside of the control of the council. As the fallout from the Pandemic is unclear, better to hold fire now and look again later when the required numbers will be clearer. The 15% high growth target makes no sense in this light.
A2292B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Hierarchy of Settlements: The suggestion in para 5.41 that a large range of services and facilities would compensate for the lack of "significant employment opportunities" and "peak time public transport is wrong. This makes the Hub designation unsound and it should be removed.
A2296B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Target of 30800 is 19% in excess of the Identified need of 25894 in Shropshire. The incorporation of 1500dwelling for the Black Country places an additional burden on Shropshire during the plan period for the additional supply to be provided as part of the 5 year housing supply. These factors risk an "out of date plan" due to economic fluctuations which are outside of the control of the council. As the fallout from the Pandemic is unclear, better to hold fire now and look again later when the required numbers will be clearer. The 15% high growth target makes no sense in this light.
A2296B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The suggestion in para 5.41 that a large range of services and facilities would compensate for the lack of "significant employment opportunities" and "peak time public transport is wrong. This makes the Hub designation unsound and it should be removed.
A2308B30	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Support recognition within Section 5d of this draft policy of RAF Cosford Strategic Site forming a centre of excellence for aviation and engineering, meeting military personnel accommodation needs and support the aspirations of the Ministry of Defence Also support recognition of Clive Barracks as a Strategic Settlement and RAF Cosford as a Strategic Site within Schedule SP2.1 of this draft policy. There are a number of other operational defence sites in Shropshire including Tern hill Airfield, RAF Shawbury and Nesscliffe Training Area, operating and developing in line with national defence requirements, but in the context of the local plan, these sites fall outside specified development boundaries and are therefore located within the countryside. Consider part 6 of this draft Policy should include in principle support for development relating to national defence interests. this would be consistent with Para 95 of the NPPF

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2311B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The strategy to deliver 30,800 new homes and 300 hectares of employment land to 2038 is wrong. It will massively change the size and character of Shrewsbury and many of Shropshire's towns. It will bring a density of homes, people, traffic, congestion and demands for services that will be damaging to the future of Shrewsbury and Shropshire. The Council's own papers recognise the importance of open countryside and that building upon it should be avoided. In particular, Shrewsbury should not be allowed to grow outwards, nor infill in existing green and unbuilt areas. The existing boundaries and the presence of these areas, contribute hugely to the balance and well-being of the town. These boundaries and areas must be preserved for the benefit and value of future generations. The proposed high growth of housing is based upon the assumption that Shropshire needs to grow to thrive, and that a high growth in housing is necessary to achieve a step change in Shropshire's economy and support higher value jobs, and higher wages, and that the influx of significantly more people is required. It is stated that the growth in housing is vital to ensure housing close to employment and to support businesses with a labour force. This argument is overstated and flawed. The Council's Economic Growth Strategy is aspirational, not based in fact or achievement, indeed the Council recognises in its publications that it does not have control over many actions and activities that will generate economic growth. Whilst it is to the Council's credit that it wants to bring economic growth to Shropshire, its accelerated strategy of assigning huge areas of land to this goal, and objective to attract many more people, is wrong. What has been previously proposed as 300 hectares of employment land (at a rate of 15 hectares a year), and 28750 number of homes (requiring some 1,150 hectares at a rate of 58 hectares year) is massive. This is an allocation of land equivalent to some 2030 times the size of the Wembley football pitch. The number of homes would increase the population of Shropshire by about a third (approx. 115000 people), the Council's proposal for Shrewsbury, 8625 homes, represents an increase upwards of 30% in the number of houses and people. This will have a hugely damaging impact upon the infrastructure and services of Shrewsbury and Shropshire. It is crucial this highly negative impact is properly recognised. It will prove impossible to later redress and undo the situation. On page 6 of the Shropshire Council Draft Housing Strategy 2020-2025 it is said the current population is 320,300 people and that this is projected to grow to 337,800 by 2041. This is an increase of just 17,500 people. The Council's proposed growth in housing is far too aggressive and is completely wrong. Such numbers of houses will require the majority provision by the major housebuilders, and is contrary to the intent of the housing secretary, Robert Jenrick, who wants government reforms to reduce their dominance in favour of local authorities and smaller builders, which should then be beneficial to the quality, affordability and relevance of the housing to local people. Shropshire has intrinsic areas of outstanding beauty and historic importance. It is crucial that these are protected and conserved. The proposed allocation of development land impacts these areas negatively. Special consideration should be given to the impact and extent of the proposed development strategy upon the architecture, history and heritage of Shrewsbury. The scale of the proposed developments is incompatible with these areas and the town. Very important farm land will be lost, which is essential for the future sustainability of food supply. Wildlife and its habitat, which contribute much to the quality and well being of people's lives will be badly affected. The Council has mentioned economic opportunities associated with HS2 and the Midlands (in the northern and eastern parts of the county). These are the most significant economic opportunities and Shrewsbury is not strategic to them. Also in contrast to many of the development areas that have previously been listed by the Council, the northern and eastern parts of the county have good existing links, transport infrastructure, and are already attractive to businesses. The Council consultation does not mention Telford and Wrekin Council with whom they should be working hard to further economic development and establish local housing and infrastructure needs. There is not a real basis for the proposed 30800 number of homes. The Office of National Statistics stated that around 18000 was needed. The Council has used a government modelling formula which includes aspiration, not reality, and even this gives a lower number of 25400. There isn't a link between the high number of 30800 and the Council's economic strategy because of the uncertainty surrounding economic development, and which because of the pandemic and Brexit will be suppressed for many years. The Council does not appropriately weight consideration of HS2 and the eastern part of the county with its proximity to the Midlands. The Council's development plans are too aggressive, extending beyond the real need, and will be in conflict with the majority of people responding to the consultation. The Council should downscale it's Housing Strategy so that it is better able to: direct it's resources to meet the needs of people during the Coronavirus pandemic and the economic downturn; work with Telford and Wrekin Council in progressing the development of a new hospital for Shropshire and Mid Wales, which is desperately needed; withdraw from the North West Relief Road which is far too costly, which will increase traffic and congestion in and around Shrewsbury, which will impact badly the environment and the climate; work to utilise and develop the Shrewsbury shopping centres that have been bought at high cost and require significant investment. The Strategy is out of tune with a future which should work to rebalance the impact of people upon the environment and their use of resources.
A2319B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	No specific comments.
A2321B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Policy SP2: Strategic Approach 3.5 Paragraph 60 of the National Planning Policy Framework (February 2019) (NPPF) states that a local housing need assessment should inform the minimum number of homes needed and should be conducted using the standard method in national planning guidance "...unless exceptional circumstances justify an alternative approach...". It adds that "...any needs that cannot be met within neighbouring areas should also be taken into account...". 3.6 Policy SP2, the 'Strategic Approach' establishes that over the plan period 30,800 new dwellings will be delivered, equating to around 1,400 dwellings per annum (dpa). In justifying this scale of provision, reference is made to the standard method of assessing the minimum need for housing, which suggests that at least 25,894 homes – or 1,177 per annum – are needed in Shropshire. The draft plan highlights its approach of providing flexibility beyond this minimum. 3.7 In addition to providing flexibility throughout the plan period, the level of housing growth also incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, where evidence to date indicates the capacity of the urban area for housing delivery is chronically constrained. 3.8 The NPPF and Planning Practice Guidance (PPG) strongly support the position taken by authorities such as Shropshire to identify a housing requirement which is higher than that implied as a 'minimum' level through the standard method. This particularly recognises economic ambitions relating to the M54 growth corridor with a clear commitment across a range of strategies to ensure that this investment is successful, with the outlined aspiration representing a significant potential growth in employment opportunities across the corridor. Furthermore planning for a higher level of provision is necessary to respond to the pressing need to deliver much needed affordable homes to address the consequences of historic under-provision. 3.9 Whilst the proposed housing requirement is higher than the outcome of the current standard method (1,177 dpa), up-to-date demographic projections suggest higher levels of need are likely to arise where recent growth is sustained. On 6 August the Government published the 'Changes to the Current Planning System' document for consultation which set out proposed changes to the standard method for assessing local housing need. The outcome of the revised method for Shropshire would increase the minimum requirement to 2,129 dwellings per year. Whilst it is acknowledged that the revised method is only out for consultation, it does reflect the impact of the up-to-date demographic projections on the need in the District. 3.10 Planning for higher levels of housing need is also considered prudent in the context of the significant housing need pressures identified in the Greater Birmingham / Black Country HMA, with which both Shropshire as a whole and in particular Albrighton are identified as having strong functional housing market relationships. There is little evidence to date that the full scale of need associated with either a minimum level, or indeed those associated with delivering the HMA's economic growth ambitions, will be accommodated in the current generation of Local Plans. The result will be a continued displacement of housing demand pressures, which will in turn place greater pressure on local housing markets in Shropshire, as well as other areas, where connections are strongest. The opportunity exists for the Council to take an even more positive approach in providing for these needs again with reference to the unique position it has in joining housing markets through the M54 growth corridor.
A2323B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Support the ambition for Shropshire to flourish, accommodating investment and new development that contributes to meeting needs and making the districts settlements more sustainable. Consider that SHF019 and P15b can contribute to this. With regard to the housing requirement, recognise the sustained ambitions of the Council to respond positively in providing for housing to meet local needs, with the Draft Plan continuing to provide for 1,400 homes per year (30,800 homes between 2016 and 2038) thus exceeding the current outcome of the standard method (1,177dpa). The NPPF and PPG strongly support the position taken by authorities such as Shropshire to identify a housing requirement which is higher than that implied as a 'minimum' level through the standard method. This particularly recognises economic ambitions relating to the M54 growth corridor with a clear commitment across a range of strategies to ensure that this investment is successful, with the outlined aspiration representing a significant potential growth in employment opportunities across the corridor. Furthermore planning for a higher level of provision is necessary to respond to the pressing need to deliver much needed affordable homes to address the consequences of historic under-provision. Whilst the proposed housing requirement is higher than the outcome of the current standard method, up-to-date demographic projections suggest higher levels of need. Government recently consulted on 'Changes to the Current Planning System' which set out proposed changes to the standard method for assessing local housing need. The outcome of the revised method for Shropshire would increase the minimum requirement to 2,129 homes per year. Whilst it is acknowledged that the revised method is only out for consultation, it does reflect the impact of the up-to-date demographic projections on the need in the District. Planning for higher levels of housing need is also considered prudent in the context of the significant housing need pressures identified in the Greater Birmingham/Black Country HMA (there is little evidence that this HMA can meet minimum need or indeed its growth ambitions, which will displace development outwards), with which both Shropshire as a whole and Shifnal are identified as having strong functional housing market relationships. The opportunity exists for the Council to take an even more positive approach in providing for these needs again with reference to the unique position it has in joining housing markets through the M54 Corridor. Strong evidence-based support (provided as an Appendix to this representation), for the proposed policy approach of allocating and safeguarding land for housing growth in Shifnal. However, based on analysis of this, consider the draft Local Plan should incorporate greater flexibility to support land coming forward where justified. Note reference to the fact that the "availability of land will be kept under review to ensure a continuous supply of suitable sites is available". However, there is no mechanism in place to determine how such reviews would impact upon the policies within the Local Plan or how safeguarded sites would be considered within the plan period should the need arise. Such a mechanism would make the Plan more robust and help ensure that the Council are able to meet their ambitions. Consider Shropshire can accommodate a greater level of growth. With regard to affordable housing, draft Policy SP2 identifies a target of around 7,700 affordable homes during the plan period, or 350 homes per year. As the Draft Plan acknowledges, the Council's evidence base confirms the full need is considerably higher, calculating an estimated need to provide 799 affordable homes a year over the plan period. This level of need represents some 57% of the overall proposed affordable housing requirement and would require a significant increase from recent levels of delivery. The last published Annual Monitoring Report (AMR) confirms in the last seven years the highest annual level achieved has been 441 (2016/17) with the average in the last seven years being only 244 affordable homes per annum. Evidently planning for a level housing growth above the current proposed requirement would further support the delivery of additional affordable housing and mitigate a risk that the aspired boost in provision is not achieved. With regard to the pattern of development, Shifnal is identified as a Key Centre and it is noted that it scores highly (4th highest) of the Key Centres in terms of service and facilities. This means it has significant social infrastructure. This is affirmed within the Sustainability Appraisal (SA) Report for the draft Local Plan which acknowledges that development in line with the proposed guidelines would mean "Existing businesses are likely to be maintained and supported and opportunities to create more or higher value jobs provided... The provision of, and access to, services such as schools, doctor's surgeries and shops is likely to be maintained or enhanced... this option may also; enable more walking and cycling in the town; support access to amenities such as play areas and sports facilities". It also aligns with the Shifnal Neighbourhood Plan's objectives around the provision of health and leisure facilities. It is also noted that the SA confirms public transport is likely to be maintained/increased with opportunities to co-ordinate new development with future provision. Shifnal is well-connected to its wider economic area and is a location that exhibits demand for further residential development, with this expressly recognised within the Draft Plan. The town also already accommodates significant levels of economic activity and employment alongside good social infrastructure. The proposed allocation of a large employment site in Shifnal is strongly supported as a means of sustainably accommodating inward investment and enabling local business to grow building on the advantages of the M54 corridor. This will offer the opportunity to create a more sustainable balance between housing and employment in Shifnal over the plan period.
A2327B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The county's housing and employment targets are wrong – will damage Shrewsbury and many of the towns. Shrewsbury should not grow outwards, and should not build on green infill sites. The Shropshire-wide scale of development is too high and the arguments in favour of this growth is overstated and flawed. It would damage the infrastructure. Only the larger housebuilders would be (mostly) used. Areas of Shropshire should be protected. Farm land will be lost. ONS suggests that only 18,000 houses are needed. NWRR not needed.
A2338B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Stoke St Milborough, Hopton Cangeford, Clee Stanton and Clee Downton are incorrectly labelled as Cluster settlements on the map
A2342B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The Parish of 'Stoke St Milborough and Hopton Cangeford' was removed from the Community Cluster designation at the request of the Parish Council, and should be shown as OPEN COUNTRYSIDE. However, although the text of the Plan (schedule SP2.3 of policy SP2) correctly shows our parish as OPEN COUNTRYSIDE, both of the maps (Craven Arms Place Plan area, & figure SP2.1 Shropshire) show all of the small settlements within our Parish still marked as Clusters.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2369B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 2 explanation paras 3.5 3.6 3.7 SP2 Strategic approach Para 2 Housing Requirement - target of 30,800 Explanation Para 3.5, Para 3.6 and Para 3.7 This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its "highly ambitious" High Growth target. he incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exaltations to "Build Build" the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A2371B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 2 explanation paras 3.5 3.6 3.7 SP2 Strategic approach Para 2 Housing Requirement - target of 30,800 Explanation Para 3.5, Para 3.6 and Para 3.7 This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its "highly ambitious" High Growth target. he incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exaltations to "Build Build" the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A2398B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Generally supportive of the extension of the draft Local Plan period - notes the NPPF requirement for a 15 year period at adoption. Request that all supporting evidence clearly demonstrates that development requirements and targets have been increased accordingly. Point 1 of the draft policy reiterates the aims which are set out in the Vision, as well as the Shropshire Test, and are supported. Point 2 of the draft policy confirms that over the plan period 2016 to 2038, around 30,800 new dwellings and 300ha of employment land will be delivered, equating to around 1,400 dwellings and 15ha of employment land per annum. The policy explanation confirms the proposed housing requirement is nearly 5,000 dwellings above the standard method figure, which represents the minimum number of homes needed. Supports the principle of adopting a housing requirement which seeks to significantly uplift the minimum figure. Paragraph 3.6 of the draft Local Plan confirms the flexibility provided by the increase in the housing figure allows for the delivery of family and affordable housing to meet local needs and support new families coming into Shropshire. Supports the delivery of quality family housing in sustainable locations and acknowledges the role this can play in attracting new families to the County. It is important that the future growth aspirations are aligned with housing policy and that enough of the right types of housing are built to ensure that the labour force and skills the economy needs will be attracted to and retained in Shropshire. Government's proposals for revising the standard method to calculating housing need mean Shropshire needs to press on with their emerging Plan quickly to progress to Reg 19 and submission. If they do not then it may need to be re-thought and cause delay. Point 3 of the draft policy acknowledges that delivery of affordable housing remains a key priority in Shropshire and confirms that the Plan aims to deliver around 7,700 affordable dwellings. Policy explanation confirms there are in excess of 5,000 households on the housing register and the SHMA has identified need for nearly 800 affordable homes per annum during the draft Local Plan period. Support focus on delivery of affordable housing and acknowledge the pressing need within Shropshire. It is important that viability and market attractiveness of settlements and sites is considered when allocating sites. There is little value in allocating land in settlements where there is no market interest, or sites which are overly constrained. Such allocations may either remain undeveloped and undelivered or fail to viably deliver affordable housing. Point 6 of the draft policy references the importance of ensuring the long-term sustainability of rural communities through allocating new development within Community Hubs. Strongly supports the acknowledgment that Community Hubs are significant service centres. It is imperative that a sufficient level of growth is directed to such settlements in order to sustain day to day facilities and secure continued vitality. Many rural settlements provide homes for several generations of the same family and new development will help younger people find homes in the communities in which they grew up. Similarly new housing will also assist in allowing older people to downsize. The draft Local Plan recognises Shropshire has a rural character and network of villages and small towns which serve a wide hinterland as well as its resident population. It is important that the contribution of these settlements is recognised and the key role they play in not only supporting their own rural communities but also the urban conurbations too. For instance, Bayston Hill is located less than 1 mile from the settlement boundary of the County Town of Shrewsbury. Development within Bayston Hill will help to sustain and grow the vitality of both settlements.
A2403B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	The Estate supports the aspirations of the plan to help support and deliver growth and investment in Shropshire. We support the focus of this development on the key settlements, with Shrewsbury retaining its primary settlement function and key location for growth. We are also however pleased to see the plan recognises the rurality of much of the county and the need for the plan to allow appropriate growth in rural areas. This will help to maintain the sustainability of rural communities, including through the provision of affordable housing, and rural economic development and diversification across the whole rural area. The Estate is an example of successful rural diversification, having successfully developed a collection of modern rural workspaces which provide employment for over 300 people'. Such provision will be an important part of providing for sustainable rural communities during and after the current health pandemic and into the future. Policy SP2 proposes the delivery of around 30,800 new dwellings and around 300 hectares of employment land over the plan period. We consider in respect of housing development, Policy SP2 is taking a too conservative approach which may adversely impact upon its wider growth aspirations, and those of the Government to see a continued increase in housing growth and delivery. Under their current consultation on proposed changes to the standard method for assessing local housing need, the use of the most up to date household projections, plus additional adjustments for affordability, would see an increase in Shropshire's housing requirement from the current proposed figure of 1,400 per annum to over 2,100 dwellings per annum. Whilst it is accepted the Government proposals are still at consultation stage, it is also noted that the proposed 1,400 per annum housing target is lower than the current adopted housing requirement of 1,530 in the Core Strategy for the forward period 2021-2026. The role of housing delivery in supporting economic growth is accepted in planning policy. It is therefore recommended that the council's housing targets are revised taking into account the emerging Government consultation to a more aspirational figure which matches their growth objectives. Policy SP2 advises that the employment requirement for Shropshire of around 300ha of employment land over the plan period from 2016 to 2038 seeks to implement the aspirations of the Economic Growth Strategy for Shropshire, key objectives of which are to support and grow new and existing businesses and attract inward investment. The need to allocate new strategic allocations to provide sufficient land to deliver against these aspirations is supported. However, the need for the plan to include sufficient flexibility to ensure necessary development comes forward to support economic growth will be important and is commented on under our representations to Policy SP9.
A2407B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	We note that the plan has a strategic policy SP2 specifically around climate change and Natural England would support this. We also consider that addressing climate change is a theme throughout the plan and that there are specific development management policies (DP12) to minimise carbon in new developments. Natural England supports this approach, especially with regard to the climate emergency and climate change running as a thread throughout the whole plan.
A2412B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	We support the strategic approach set out in the plan, which seeks to deliver 30,800 new dwellings between 2016 to 2038. We also welcome the that Market Drayton is identified as a 'Principal Centre' where development is directed.
A2426B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	In many small settlements there is a case for limited new dwellings, without the level of development that may be necessary to create a Community Cluster. At present only affordable housing can be considered on any rural land outside the Community Hubs or Clusters. This is unnecessarily restrictive, and in defined settlements it should be possible to propose individual developments on infill sites.
A2441B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	A delivery of around 30,800 new dwellings is above the governments' quota. Why is it necessary to be so much over the number of dwellings the government suggests? If it is so that more affordable dwellings can be built in rural areas where you say they are needed, why split the county in half and stipulate 10% of affordable housing in the north and 20% in the South. To reach the government's affordable housing target for the county surely it would be more environmentally better to have a blank 20% rate across the county thus reducing the need for so much building and destruction of the countryside.
A2441B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Increasing the number of houses in Shropshire by some 22% by 2038 seems excessive and well above the government's assessment.
A2455B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Para 2 Housing Requirement - target of 30,800 Explanation Para 3.5, Para 3.6 and Para 3.7 This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its "highly ambitious" High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit lead. Despite Government exaltations to "Build Build" the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A2463B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	The rationale for the retention of flexibility in the land supply, increase the delivery of affordable housing and other specialist housing types are in the spirit of the NPPF's pursuit of sustainable development and significantly boosting the supply of housing. Persimmon supports the Council's urban-focused spatial strategy as it is both deliverable and sound. Full support for the identification of Whitchurch as a Principal Centre
A2468B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	Policy SP2 sets out that 30,800 dwellings and 300 hectares of employment land will be delivered over the plan period 2016-2038. In order to achieve this, the plan will need to plan for more houses to provide against a number of factors that prevent some sites from coming forward at all, slower delivery rates, fewer windfalls, etc. To be positively prepared it is recommended that the plan builds in a buffer of 20% to guard against these potential outcomes and to ensure the plan is positively prepared. Policy SP2 also sets out the Strategic Approach to development across the plan area over the plan period. It is the only policy that provides an over-arching spatial dimension to the plan, but it is simply not clear, and is therefore ineffective, in explaining the levels of growth to various settlement hierarchies. Paragraph 5 of Policy SP2, and the schedule at SP2.1, lists the settlements in various categories, but no indication is provided to the levels of growth to be apportioned to the hierarchies or settlements. For example there appears to be no distinction between Principal and Key Centres and the levels of growth to be directed to these settlements. It is inferred in the policy that the schedule at SP2.1 represents a settlement hierarchy, where greater levels of growth are directed to the higher tier settlements – but this is not clear. One has to go to the individual settlement policies to ascertain how many dwellings and how much employment land is proposed for each place. When one does this, it is also not clear how the quantum has been arrived at; Bridgnorth and Oswestry are Principal Centres and are proposed to deliver 1,800 and 1,900 dwellings respectively, whereas the Principal Centre of Market Drayton is proposed for only 1,200 dwellings. There appears to be no rationale or explanation for the scale of growth directed to each settlement. The Sustainability Appraisal (SA) for this Reg 18 Plan does not assist in clarifying this position. The previous Preferred Scale and Distribution of Development Consultation in 2017 set out a Preferred Development Strategy of 'High' growth with a preferred 'Urban Focused' distribution. However, it is not clear if this preferred strategy is the one that this Reg 18 consultation is now based on. In light of the above it is concluded that Policy SP2 is not an effective policy. Please

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2470B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	Support the target of 30,800 over the Plan Period. However, the current White Paper possible changes to the standard methodology for calculating housing need would mean that Shropshire's housing need would increase by around 2,129 dwellings per annum (from 1,177). However, given the timescale and transitional arrangements it is not expected to affect the LPR. There is however an imbalance in Market Drayton. The employment growth is supported but the residential growth should be higher - minimising the need to commute and securing a sustainable pattern of development. The proposed policy framework in relation to development beyond the settlement boundary of Market Drayton appears to conflict with the positive consideration of housing growth to support economic growth outlined in SP10.
A2476B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	3.4 It is acknowledged that through the plan making process the Council has consulted on various options for housing growth. At preferred options stage the Council promoted the 'high growth' option of 28,750 dwellings. Policy SP2 (2) move that option forwards and now identifies that at least 30,800 new dwellings and around 300 hectares of employment land will need to be delivered over the plan period from 2016-2038.3.5 This is primarily as a result of the incorporation of an additional 1,500 homes to assist meeting the emerging needs of the Black Country Plan, and will be delivered through the Duty to Cooperate. This draft plan demonstrates effective cross-boundary working in this respect.3.6 The stated requirement of 30,800 dwellings over the plan period exceeds the local housing need as calculated at 25,894, using the Government's standard housing methodology. This housing requirement is supported as it assists meeting the National Planning Policy Framework objective of boosting housing supply whilst also seeking to address local housing affordability issues.3.7 Policy SP2(5) and Table SP2.1 recognise Shrewsbury's role as the Strategic Centre of Shropshire, which will be a focus for well-designed new housing and employment development, supported by the necessary infrastructure. The NWRR plays a role in ensuring this is achievable.3.8 This 'urban focussed' growth at Shrewsbury and the Principal and Key Centres has followed through from earlier public consultations and is considered to correctly acknowledge that Shrewsbury has the greatest opportunity to deliver further sustainable growth. It is the highest-ranking settlement in Shropshire in terms of access to facilities, employment and infrastructure and therefore the spatial development strategy is justified in directing growth towards Shrewsbury.
A2477B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Agree	This is supported too and agreed that Market Drayton is a principal centre.
A2497B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP2	Disagree	It was agreed by a large group vote in the Spring 2020 Parish Council meeting that the residents wanted the villages/hamlets Stoke, Hopton cangeford, Cleestanton and Cleedownton to remain as "open Countryside" and not as proposed as "Clusters" Please change this to ensure your plan is in line with residents wishes.
A0057B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	This is incorrect. This was the previous target in the Climate Change Act of 2008. Legislation was passed in June 2019 to enshrine in law the UK's new target to reduce carbon emissions to net zero by 2050.It is very concerning that the Council has got the wrong target in this policy. Surely the policy was written to meet the target the Council quotes i.e. the 2008 Climate Change target. The policy must surely be re-considered and re-written to meet the UK's current climate change target. This is a fundamental mistake to make and I am very surprised it was not noticed at an earlier stage before it was widely distributed.
A0117B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Climate Change policies do not meet the minimum standards set out in Government legislation. Should be strengthened and contain standards covering key issues such as active travel, energy efficiency and tree (canopy cover).
A0134B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		Explanatory text to policies make insufficient reference to the impact of the policy on viability and deliverability Key Evidence listed in Appendix 3 (Key Evidence Informing Local Plan Policies) for Policy DP12 fails to mention the Council's Delivery & Viability Study. Assuming Future Homes Standard (31% reduction) with Merton Rule, car charging points, 10% biodiversity net gain and water saving measures, the Total costs from climate change measures in Policies SP3 and DP12 will be around £246,689/ha. In addition, accessible homes and the Community Infrastructure Levy are estimated to increase contributions from development to around £554,093/ha, as summarised in table 12.8 of the Council's Delivery & Viability Study, reproduced below. These additional costs should be explicitly acknowledged by the Plan and reflected in realistic expectations in relation to other developer contributions.
A0158B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	We support the measures being put forward in the draft plan to move towards a zero-carbon society. We believe that promoting walking and cycling, and the use of zero/low emission vehicles is especially important in rural communities.
A0159B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Local Plan must include robust targets for reducing transport carbon and these targets must take into account the very large amounts of additional carbon that can be expected. Every statement and every policy must answer the question (based on evidence) "by how much will this policy reduce carbon emissions by 2030," and "will this policy add to carbon emissions" Any policies which cannot be convincingly related (with evidence) to its outcome measured in terms of carbon reduction it must be discarded. The Plan does not give climate change enough significance. Sites are in places that are car-dependent, have no or poor access to walking, cycling and public transport. Why does SP3 mention 2008 legislation to reduce carbon by 80% and not mention the 2019 "net zero by 2050" published on 27th June 2019? paras 1a-g in SP3 are at variance with established policies of Shropshire Council and its public statements that damage public transport and active travel e.g. its rejection of 20mph at full council in December 2019. There is nothing in the Local Plan that demonstrates a reversal of these policies and a significant shift in the direction of supporting alternatives to the car. Electric vehicles are not enough and it is a major weakness of the climate change sections of the Local Plan that this fundamental point about transport and climate change is missed. A completely new section should be included in the Local Plan explaining why we must reduce traffic levels (e.g. a 25% reduction in vehicle kms travelled in Shropshire). It is not acceptable that this reference to the largest capital expenditure on transport ever undertaken in Shropshire is not linked to its impacts on carbon emissions. The NWRR has not yet got planning permission and may be subject to a public inquiry. If it is the view of independent experts that the NWRR will reduce carbon then this must be stated in the Local Plan, with evidence. The NWRR is contrary to the objectives of net zero carbon. There is nothing in the Local Plan that gives substance to the aspiration of "maximising the ability to make trips by sustainable modes of transport". Shropshire Council has not used the provisions of the Bus Services Act (2017). If the Local Plan is to make a credible contribution to delivering net zero carbon then a refusal must be possible on grounds that the development will make the climate emergency worse by adding additional carbon
A0167B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		It is imperative that safe and suitable pedestrian and sustainable transport links are maintained between Oxon Hall Caravan Park and the town centre to encourage visitor spend and positively contribute to mitigating climate change. This policy seems to support this principle. Concerned that proposals for development of the SUE West site do not adhere to the adopted Masterplan due to proposed increases in levels of development and levels of open space, ecology, landscape and environmental considerations. Current and emerging policies must be applied when considering proposals for the SUE West and NWRR.
A0187B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	SP3 is not sufficiently integrated into the whole Plan. NPPF and the Climate Change Act require climate change to be central to all planning and development. In addition to DP12, DP15, DP21 and DP22, SP3's omission from Transport, Infrastructure, Economy, Health and Wellbeing shows the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents.
A0188B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	SP3 is not sufficiently integrated into the whole Plan. NPPF and the Climate Change Act require climate change to be central to all planning and development. In addition to DP12, DP15, DP21 and DP22, SP3's omission from Transport, Infrastructure, Economy, Health and Wellbeing shows the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents (respondent ref form 1)
A0214B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050, compared to 1990 levels. The 2019 Target Amendment order increased this to 100% Vehicle journeys make up 33% of Shropshire greenhouse gas emissions (2017 figures). Shropshire Council Policy SP3 ignores the 2019 Target Amendment. Shropshire Council has no 'fit for purpose' Climate Change Strategy relating to the transport needs of proposed developments. As a result, unsustainable 'car dependant' sites such as CST021 continue to be proposed
A0228B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The 2008 Climate Change Act and 2019 Target Amendment order introduced a legally binding target for the UK to reduce its carbon emissions by 100% by 2050 compared to 1990 levels. Shropshire Council's policy SP3 ignores the 2019 amendments and thus the council has no fit for purpose Climate Change Strategy (respondent ref; objection on SP3)
A0238B30	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Don't know / no opinion	Document Ref BTC20:Supports identified Strategic Policies and their application in managing development. Note the definition of Sustainable Development in paragraph 2.1.
A0240B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	2.54 Policy SP3(1)(f) requires new development to reduce carbon emissions through a number of means, including "wherever possible, integrating electric vehicle charging infrastructure in to new development, in line with the requirements of DP12".2.55 L&Q Estates are supportive of the encouragement for the use of electric and hybrid vehicles but consider this should be secured through a national standardised approach implemented through the Building Regulations. This will ensure a consistent approach to future proofing the housingstock.2.56 In this regard, the Department of Transport undertook a consultation on Electric Vehicle Charging in Residential and Non-Residential Buildings in July 2019. This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1to the Building Regulations 2010, which was expected to come into force in 2020.2.57 The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and considered a proposal for one charge point per dwelling rather than per parking space.2.58 The Government estimated installation of such charging points add on an additional cost of approximately £976 per car parking space for an average home.2.59 The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible: 'However, we recognise that the cost of installing charge points can be high in areas where significant electrical capacity reinforcements are needed. To mitigate any potential negative impact on housing supply as a result of these regulations, this consultation seeks views on an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes the threshold for the exemption is set at £3600,which is three times the high scenario cost of the average electrical capacity connection required for one chargepoint.'2.60 In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied: 'The EPBD also sets out requirements for residential buildings undergoing major renovation with more than 10 parking spaces. As a starting point, the government proposes to transpose the EPBD requirements for major renovations - i.e. the installation of cable routes in all parking spaces in scope as we think this is a proportionate requirement. However, the consultation seeks views on the possibility of going further than the EU requirements.'2.61 The requirement for EVCPs should be deleted given the Government's proposed changes to Building Regulations are still at the consultation stage and therefore have not been finalised.2.62 Notwithstanding, L&Q Estates endorses the Council's requirement for development to support the transition to a zero-carbon economy and considers that its land interests at Shifnal would look to support this transition to a zero-carbon economy.
A0250B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		Whilst we support efforts to reduce carbon emissions, the Plan needs to be honest and recognise the significant costs of these measures on development. Local Plan Appendix 3 (Key Evidence Informing Local Plan Policies) fails to mention the Council's Delivery & Viability Study in relation to policy SP3. The significant costs deriving from policy SP3 and its accompanying DP policies need to be explicitly acknowledged by the Plan and reflected in reduced developer contributions in other areas, such as education and affordable housing.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0266B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Onsite energy reduction and generation policies are not in line with climate emergency declarations and are dated and unambitious. The 'Merton Rule' 10% rate onsite contribution dates from a time when energy use would have been much higher; prior to modern insulation and energy use practices common in construction. The combined effect of the fabric requirements and onsite renewable generation will still leave a considerable gap to be made up by 'retrofitting' if new developments are to achieve 'net zero carbon'. A more robust approach could demand a much higher reduction in emissions through a combination of fabric, onsite generation and meaningful offsetting. For example, Oxford Local Plan policy RE1 requires 'at least a 40% reduction in carbon emissions from a 2013 Building Regulations' rising to 'at least 50%' by March 2026 for certain categories of development, to be 'secured through on-site renewable energy and other low carbon technologies (this would broadly be equivalent to 25% of all energy used) and/or energy efficiency measures.' No policy statements have been brought forward to allow effective consideration of renewable energy generation site applications; it seems this is left to neighbourhood plans, of which Shropshire has only a handful, and none of which so far propose renewable energy generation sites. Without a proactive approach to renewable energy the chances of achieving a carbon zero Shropshire in either locally desired or nationally legislated targets seems unlikely. This also fails to capitalise on the economic opportunities identified in the Marches LEP Energy Strategy.
A0268B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		This draft policy places carbon reduction at its heart. A key component of this is the pattern of development, achieving a modal shift away from private car journeys through the location of housing and employment uses at the most sustainable locations. Please also see comments on proposed allocation SHR197VAR.
A0306B011	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Whilst we welcome the inclusion of a specific Climate Change policy, we feel it needs to be much stronger. For example "Climate Emergency" would be a better policy title reflecting Shropshire Council's declaration. SP3 (1e) Weak wording, change "encourage" to "ensure". SP3 (1f) The wording is weak as electric charging infrastructure should be provided in all new development. SP3 (2a) More clarity is needed on what is meant by 'renewable and low carbon energy systems' SP3 (3a) Weak wording, there should be more than 'encouragement'. SP3 (3b) There should be a requirement to restore habitats with potential for significant carbon sequestration and storage potential, including wetlands, peatland, and soils. SP3 (3b) Supporting" should be "requiring", as per Biodiversity Net Gain as a minimum. SP3 (4c) Supporting" should be "requiring", as per Biodiversity Net Gain as a minimum.
A0306B012	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.28 This is out of date. Under the amended Climate Change Act there is now a requirement to bring all greenhouse gas emissions to net zero by 2050.
A0311B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation
A0311B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs
A0323B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A0323B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation (respondent ref; Form 6)
A0323B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.39 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs (respondent ref; Form 9)
A0341B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs (respondent ref; Form 9)
A0356B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A0356B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation (respondent ref; Form 6)
A0356B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs (respondent ref; Form 9)
A0406B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The statement is: 'Supporting the delivery of multiple benefits including ... reduced flood and drought risk ...' The selection of site MUWO12VAR does not support this statement as the development of this site does not guarantee that flooding will not reoccur
A0413B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	It should be clear that the ambition is for Net Zero Carbon emissions (which takes into account all the greenhouse gases as carbon equivalent or CO2 e) and that there should a low carbon economy. It should be clear that the ambition is for Net Zero Carbon emissions (which takes into account all the greenhouse gases as carbon equivalent or CO2 e) and that there should a low carbon economy. Part 2 should include that renewables are considered by Neighbourhood plans and Local Plans, those already in place should be reviewed and updated. The council could provide details of possible areas for renewables and allow for applications for schemes to be considered inline with National policies. The Marches LEP Energy Strategy has a target for 50 % of electricity local demand to be provided by locally produced renewable energy. We welcome the support shown for community energy projects.
A0486B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The amendment to the Climate Act (June 2019) requires net zero emissions by 2050 - para 3.28 refers to a reduction of 80%. This should be updated/clarified. Gases that contribute to climate change are more than just carbon. There is a need to reduce greenhouse gas emissions, including carbon. Object to the policy on these grounds.
A0501B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Shropshire Test needs to include more specific details relating to the need to mitigate the effects of climate change through reducing CO2 emissions. The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target and the planning system will need to play a full role in its achievement. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Within this context, the Shropshire Local Plan, which will set the county's direction until 2038, does not provide a positive framework necessary to guide the county towards a net zero carbon economy. It lacks three key components: 1. Detail in the four key areas necessary for a zero carbon future (see below). 2. The 'how much' and 'by when' targets for every aim; dates and time scale. 3. Baseline data; details of the county's current footprint (please state precisely which data sets are being used in figures : 3.29 i.e. full data set, subset, what is included or excluded) and percentage decrease needed every year to achieve targets, with explanation of what this will mean for each sector and for county residents. Four key areas include: policies to reduce energy demands; a comprehensive sustainable transport system; commitment to develop far more renewable energy; Council guidance to promote a low carbon/more plant based diet (this should be one of the principle aims within Health & Wellbeing strategy) and a county framework to increase re-forestation, using more land for carbon capture, increasing bio diversity and reducing livestock land use. Since such strategies are not clearly set out, with details, targets and time frames, I consider that this plan is not fit for purpose (respondent ref; Form 2)
A0501B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paragraph 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. The graph below is based on this data: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 It has used the subset data which excludes motorway and diesel train emissions. Of the three main sectors of energy demand, transport continues to rise and has overtaken the other two sectors - Industry & Commerce and Domestic energy use. The trend for CO2 emissions for transport is rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. It is not fit for purpose. Therefore I disagree with these paragraphs.
A0642B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Whilst we welcome the inclusion of a specific Climate Change policy, we feel it needs to be much stronger. For example "Climate Emergency" would be a better policy title reflecting Shropshire Council's declaration. Paras 1a-g in SP3 are at variance with established policies of Shropshire Council and its public statements that damage public transport and active travel e.g. its rejection of default 20mph zones at full council in December 2019 when evidence reveals the effectiveness of these lower speed limits in terms of increasing walking and cycling and reducing transport's carbon emissions. Recent years have, in addition, seen reductions in bus funding and there are public statements from the council about demolishing Shrewsbury bus station and destroying a central principle of sustainability in transport which is "integration". Shrewsbury bus station is close enough to the train station to encourage bus and train use in combination and this combination (with attractive ticket deals) is a stimulus to modal shift (transferring car trips to public transport) which in turn reduces carbon emissions from the transport sector The Shropshire track record of neglect and damage to walking, cycling and public transport is at variance with statements in SP3 and there is nothing in the Local Plan that demonstrates a reversal of these policies and a significant shift in the direction of supporting alternatives to the car. There is nothing in the Local Plan that gives substance to the aspiration of "maximising the ability to make trips by sustainable modes of transport". It is possible to produce substantial increases in walking, cycling and bus use and the interventions that deliver these increase are well documented e.g. Cornwall County Council's bus strategy making full use of the Bus Services Act (2017). Cornwall County Council makes sure that buses run 7 days a week and that one ticket for all local bus and train services can be purchased. Shropshire Council has not used the provisions of this Act to improve bus services and there is nothing in the Local Plan to indicate that this will be done in the plan period. Our concerns remain that the text makes nothing compulsory. Great words, 'encourage' and 'where possible' and 'promoting'. Meaningless unless enforced. Our concerns remain that the text makes nothing compulsory. Great words, 'encourage' and 'where possible' and 'promoting'. Meaningless unless enforced. (f) The wording is weak as electric charging infrastructure should be provided in all new development. (g) Fabric energy efficiency should be defined with a minimum figure. 2a: More clarity is needed on what is meant by 'renewable and low carbon energy systems'. 3a: Weak wording, there should be more than 'encouragement'! 3b: There should be a requirement to restore habitats with potential for significant carbon sequestration and storage potential, including wetlands, peatland, and soils. 4c: Supporting" should be "requiring", as per Biodiversity Net Gain as a minimum.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0642B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.28 Why does SP3 mention 2008 legislation to reduce carbon by 80% and not mention the 2019 "net zero by 2050" published on 27th June 2019?
A0642B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.30 The Strategy framework is not a strategy - merely an outline of how the strategy will be developed. The Local Plan needs to reference a complete Climate Change Strategy that shows how the county will respond to the declared Climate Emergency and support the National net zero target. (b) The implications of this policy have not been followed through into the traffic forecasts that are used in the business case for the NWRR. Support for active travel is not in any way linked to adoption of EVs or ULEVs. Driving a car is a sedentary activity and not in any way "active". Years of sustainable transport research have identified how car ownership produces much increased use of cars (rather unsurprisingly) and reduces walk, cycle and bus use. If people sit inside cars and do not walk or cycle they do not meet public health targets for physical activity and they incur an elevated risk of "non-communicable diseases" including diabetes, obesity and cardio-vascular disease. Getting people out of cars and into non-car alternatives reduces carbon emission and there is nothing in the local plan that will stimulate or promote non-car alternatives. There is a large literature on what is needed by way of infrastructure to support walk, cycle and bus use e.g. excellent segregated cycle paths, joined-up networks to link housing with schools and commonly used destinations and these requirements are not supported or funded in Shropshire. Shropshire Council has refused to adopt 20mph contrary to the advice of the World Health Organisation advice in the Stockholm Declaration (communicated to all national governments) that this increases active travel and modal shift away from cars and towards walking, cycling and bus use. Support for active travel is not in any way linked to adoption of EVs or ULEVs. Driving a car is a sedentary activity and not in any way "active". Years of sustainable transport research have identified how car ownership produces much increased use of cars (rather unsurprisingly) and reduces walk, cycle and bus use. If people sit inside cars and do not walk or cycle they do not meet public health targets for physical activity and they incur an elevated risk of "non-communicable diseases" including diabetes, obesity and cardio-vascular disease. Getting people out of cars and into non-car alternatives reduces carbon emission and there is nothing in the local plan that will stimulate or promote non-car alternatives. There is a large literature on what is needed by way of infrastructure to support walk, cycle and bus use e.g. excellent segregated cycle paths, joined-up networks to link housing with schools and commonly used destinations and these requirements are not supported or funded in Shropshire. Shropshire Council has refused to adopt 20mph contrary to the advice of the World Health Organisation advice in the Stockholm Declaration (communicated to all national governments) that this increases active travel and modal shift away from cars and towards walking, cycling and bus use (quotes and from and link to Stockholm Declaration and Government report included in rep).
A0647B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The introduction to the draft Local Plan includes a definition of sustainable development, taken from the NPPF and based on quotes from the United Nations General Assembly. The explanation to Policy SP3 explains the legally binding target from the Climate Change Act (2008) to reduce carbon emissions by at least 80% by 2050, compared to 1990 levels. This clearly sets out that minimising carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. However, there is scant reference to this draft policy within the rest of the draft Local Plan. It is only referenced in draft policies DP12 (carbon emissions), DP15 (green infrastructure), DP21 (water/water efficiency), DP22 (water/flood risk) and will be monitored by the above DPs plus Natural Environment policies and Water policies. It is not referenced within the equally critical areas of transport, infrastructure, economy, and health and wellbeing. This omission indicates the Council's responsibility to reduce the carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. Disagree with this draft policy because it is not sufficiently integrated into the whole plan. It is also unclear which datasets are referenced in para 3.29. The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: Improving insulation. Reducing draughtiness. Recovering heat from air leaving the building through ventilation. CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs.
A0648B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The introduction to the draft Local Plan includes a definition of sustainable development, taken from the NPPF and based on quotes from the United Nations General Assembly. The explanation to Policy SP3 explains the legally binding target from the Climate Change Act (2008) to reduce carbon emissions by at least 80% by 2050, compared to 1990 levels. This clearly sets out that minimising carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. However, there is scant reference to this draft policy within the rest of the draft Local Plan. It is only referenced in draft policies DP12 (carbon emissions), DP15 (green infrastructure), DP21 (water/water efficiency), DP22 (water/flood risk) and will be monitored by the above DPs plus Natural Environment policies and Water policies. It is not referenced within the equally critical areas of transport, infrastructure, economy, and health and wellbeing. This omission indicates the Council's responsibility to reduce the carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. Disagree with this draft policy because it is not sufficiently integrated into the whole plan. It is also unclear which datasets are referenced in para 3.29. The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: Improving insulation. Reducing draughtiness. Recovering heat from air leaving the building through ventilation. CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs.
A0666B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A0666B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: Improving insulation. Reducing draughtiness. Recovering heat from air leaving the building through ventilation. https://www.cat.org.uk/info-resources/zero-carbon-britain/ disagree with this policy because it is incomplete.
A0666B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs
A0670B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A0670B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs
A0698B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The introduction to the draft Local Plan includes a definition of sustainable development, taken from the NPPF and based on quotes from the United Nations General Assembly. The explanation to Policy SP3 explains the legally binding target from the Climate Change Act (2008) to reduce carbon emissions by at least 80% by 2050, compared to 1990 levels. This clearly sets out that minimising carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. However, there is scant reference to this draft policy within the rest of the draft Local Plan. It is only referenced in draft policies DP12 (carbon emissions), DP15 (green infrastructure), DP21 (water/water efficiency), DP22 (water/flood risk) and will be monitored by the above DPs plus Natural Environment policies and Water policies. It is not referenced within the equally critical areas of transport, infrastructure, economy, and health and wellbeing. This omission indicates the Council's responsibility to reduce the carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. Disagree with this draft policy because it is not sufficiently integrated into the whole plan. It is also unclear which datasets are referenced in para 3.29. The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: Improving insulation. Reducing draughtiness. Recovering heat from air leaving the building through ventilation.
A0698B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0862B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		Support in general the measures to minimise carbon emissions. Explanatory text should note that the development industry is being asked to make significant sacrifices to achieve these higher standards. The list of evidence relating to Policies SP3 and DP12 in Appendix 3 (Key Evidence Informing Local Plan Policies) fails to mention the Council's Local Plan Delivery & Viability Study in relation to either policy SP3 or DP12. The implications of reducing carbon emissions are estimated in the Local Plan Delivery & Viability Study. Draft policies will increase development costs significantly, of which £246,689/ha of additional costs derive from climate change measures as calculated by the Council's Delivery & Viability Study. The significant costs deriving from draft Policy DP12 should be explicitly acknowledged by the Plan and reflected in reduced developer contributions in other areas, such as education and other s106 contributions. It will require higher densities in order to achieve viable developments. The explanatory text does not explain how the policy will be implemented. Local Plan Appendix 4 (Delivery and Monitoring Local Plan Policies) suggests measuring, "the proportion of planning consents in which the policy is referenced in planning conditions consistent with the policy criteria" (p321 of the Plan). The implication is that the policy will be applied through planning conditions. When applications to discharge those conditions are made, we can only assume that planning officers will consult building control for confirmation that buildings comply with the policy. We question whether building control (including private sector building control practices) have the resources to respond to such requests. If building control officers are required to check the detailed building designs of every new development, the Council must be able to evidence that the policy will not lead to undue delays, which in turn affect both the viability and delivery of development. Given the potential for the operation of this policy to impose delays at the discharge of conditions stage, greater clarity is required over how the policy will be implemented in practice
A0897B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Welcome sections 1a and 1e of the draft Policy, which seek to reduce carbon emissions by maximising the ability to make trips by sustainable modes of transport and encouraging new development to link to and where possible integrate with public transport. ALB017 helps support this policy by providing residential development within easy walking distance of a good railway service on the Shrewsbury-Wolverhampton line. Whilst supportive of efforts to reduce carbon emissions, the draft Local Plan needs to recognise the significant costs of these measures. Appendix 3 of the Draft Local Plan fails to mention the Council's Delivery & Viability Study in relation to Policy SP3. This study identifies significant costs associated with draft Policy SP3 and DP12. Significant costs deriving from Policy SP3 and accompanying DP policies need to be explicitly acknowledged and reflected in reduced developer contributions in other areas, such as education and affordable housing. Have significant concerns on the potential impact the Policy may have on the viability of residential development in Shropshire.
A0950B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The aim of transitioning to a zero-carbon economy is noted, as is the recognition in paragraph 3.28 of the explanatory text, that this is a very challenging target. As noted in 1. b. of the policy, the delivery of higher density development on the most accessible urban sites is one of the means to reducing carbon emissions. However, in terms of housing delivery this aim is compromised by the requirements of Policy DP16 'Open Space'. Policy DP16 includes a requirement of 30sqm per person of open space on site. This level of provision, which would be in addition to private gardens, would severely compromise the ability to provide higher density housing development. Policy SP3 part 2 goes on to refer to integrating or supporting both on and off-site delivery of renewable and low carbon energy in accordance with the requirements of Policy DP12, as well as supporting district heating and cooling networks, and community energy generation schemes. It is stressed that the practicalities and cost implications of such policy requirements will need to be fully considered and incorporated into the SLP Delivery and Viability Study. The July 2020 Delivery and Viability Study recognises that building to increased standards would require higher costs (paragraph 8.18) and sets out several scenarios for potential build cost implications. The Study needs to take account of local circumstances and up to date information from developers in the Shropshire area and appropriate industry bodies, to ensure that it reflects a true assessment of costs involved in the proposed climate change measures and how this effects site viability. Requested Change – Further consideration is needed in relation the deliverability of the measures set out. This must be reflected in the Delivery and Viability Study supporting the SLP and supported by up to date local evidence from developers and industry bodies.
A0957B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		Draft Policy SP3 makes limited reference to the 'climate emergency' declared by Shropshire Council. It is noted that many experts consider this draft policy is inadequate to provide zero emissions in the plan period. The NPPF considers this matter in terms of sustainability, but now needs stronger consideration of CO2, including construction methods, materials and future energy use.
A0970B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 2.1 of the draft Local Plan includes "The pursuit of sustainable development is at the heart of the planning process" and quotes the NPPF which itself quotes the UN General Assembly in defining sustainable development at the strategic level as "meeting the needs of the present without compromising the ability of future generations to meet their own needs". Taken together with para 3.28 of the draft Local Plan: "The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. 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. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'". This clearly sets out the overriding requirement that minimising carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. Draft Policy SP3 has scant reference within the local plan. It is only referenced within draft policies DP12, DP15, DP21 and DP22. It is not referenced in the equally critical areas of transport, infrastructure, economy and health and wellbeing. Omission from these areas indicates the Council's responsibility to reduce the County's carbon emissions is not seen as essential to future health and wellbeing, economy and safety of its current and future residents. Draft Policy SP3 will be monitored by the above draft DPs plus others within the Natural Environment policies and Water policies. With regard to Paras 3.29 and 3.30 of the Explanation CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. Of the three main sectors of energy demand, transport continues to rise and has overtaken the other two sectors - Industry & Commerce and Domestic energy use. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Disagree with this draft policy because it is not sufficiently integrated into the whole plan.
A0972B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Creating a woodland on half of the proposed Tasley Garden Village site and halving the number of proposed houses would maximise carbon capture and storage & create a leisure opportunity. Not destroying existing woodland, especially ancient and veteran woodlands and trees, by pollution of huge value to our planet. Old trees are ecological treasures providing unique habitats and are far more valuable for biodiversity than younger and recently planted trees because they support a far wider range of species. The location of TGV will increase car use and will comprise a higher density development on a poorly accessible site for walkers and cyclists. Minimising the need to travel can only be done if there is local employment and other facilities. travel for non-food retail or delivery still required. Electric cars only create less carbon emissions if we can create sufficient electricity supply without carbon emissions. Extra housing will create extra journeys. Active travel either by walking or cycling will need to cross a 60mph highway. A particular problem for the less able. Delivery of on-site renewable and low carbon energy is desirable, but renewable often emits more carbon than non-renewable as it is less efficient. No plan for how this is to be achieved
A0981B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	Sport England supports part 1a) of the policy to minimise the need to travel and to promote the use of sustainable modes of transport, as this ties into the health and well-being agenda generally, and to active travel by means of walking and cycling in particular. The explicit reference in part 1d) to prioritising active travel is welcomed, where emphasis is placed not only on new developments but also on linking those developments to existing neighbourhoods and communities. To facilitate a modal shift to cycling, the policy should go further by also making appropriate provision for high quality cycling facilities at destinations such as workplaces to include safe and secure cycle parking, shower/changing facilities and lockers etc.
A0984B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	Support the aims of the draft policy and the transition towards a zero-carbon economy. In particular, support recognition of the need to minimise travel and maximise the ability to make trips by sustainable modes of transport including enhancement of walking and cycling links.
A1101B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	Support development in Shropshire assisting with the transition to a zero-carbon economy. Identified means to achieve this draft policy are supported, but they should be extended to recognise contributions from land use planning - selection of site allocations and the benefits brought by the juxtaposition of uses. Section 9 of the NPPF includes consideration of sustainable transport and highlights the important of considering transport from the earliest stages of plan making. Directing development to the most sustainable settlements is a good starting point, but it should be recognised that within those settlements, some locations/sites can contribute more than others to a transition to zero-carbon. For example, some locations/sites will reduce commuting. In Bridgnorth, as commuting is generally to the east of the settlement to employment locations such as Stanmore Business Park, the conurbation to the east and Telford to the north, a development on the east side of the settlement will significantly reduce miles travelled by car compared to development on the south or west. Furthermore, by locating jobs next to housing, the need to travel is reduced. It is estimated that allocating BRD030 rather than Stanmore Garden Village this will result in an additional 2 million miles of commuting a year (based on BRD030 promoters consultants view that 75% of the peak time (i.e. workers) traffic generated would travel mainly on the single route east, across the River Severn). Planning for juxtaposition of uses can also reduce the need to travel. In the case of Stanmore Business Park at Bridgnorth, current evidence shows that for one of the major local employers circa 72% of its employees currently commute more than 10 miles each way to and from work (Employment Led Development of a Garden Village Community Report). New housing at Stanmore Garden Village would be within easy walking or cycling distance of Stanmore Business Park, can assist in increasing availability of employees to Bridgnorth companies and would reduce the number of in-commuters. The availability of a Local Centre (with convenience store) in the Stanmore Garden Village and potential diversion (and greater frequency of) bus services through the Business Park will also help reduce travel by private vehicle. Planning can and should actively manage patterns of development to reduce emissions and this should be recognised in the policy and applied in the approach to identifying sites. The location and juxtaposition of uses should be the starting point.
A1106B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	DLP SP3. 'Climate Change' states that the council will seek to support the "development or extension of district heating and cooling networks" and support "the development of community energy generation and distribution schemes". We see both these and other expectations in this policy as rather vague and perhaps leading to issues with v
A1116B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Carbon capture and storage is untried technology which is currently being described as the potential saviour of our planet by capturing and storing carbon, and is being used by those who do not want to abandon their attachment to the use of fossil fuels. It is basically an excuse to do little or nothing to clean up and convert energy production manufacturing, transport, building, and agriculture. We need to act now, decisively and fast, by reducing carbon emissions by 'powering down' our energy usage, and 'powering up' green energy. The Zero Carbon Britain Report produced by The Centre for Alternative Technology (CAT - https://www.cat.org.uk/) shows how we can do this in a relatively short time whilst keeping a reasonable living standard. CAT is advising organisations and Councils all over the country. Why not consult them. Coming back to carbon capture and storage it is unlikely that the raw materials needed for the construction of the plant will still exist by 2050 (or whenever) for the scale and number of installations required
A1117B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	In this section you say: 3. Maximising carbon capture and storage, including by: a. Encouraging development to offset its carbon emissions through investment in carbon capture and storage, informed by the Shropshire Climate Change Strategy Carbon capture technology is unproven, difficult to put into place and risks "overshooting the remaining carbon budget". It is better to work with proven technologies, such as wind, solar and hydro. Please refer to this excellent document from the Centre for Alternative Technology. At CAT, they have a zero carbon Britain Innovation hub which trains architects and renewable engineers and technicians who can build the necessary infrastructure, as well as providing education and practical solutions to organisations such as county councils. https://www.cat.org.uk/new-report-zero-carbon-britain-rising-to-the-climate-emergency/
A1143B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	In relation to section 3.28 (but not exclusively) the Council is bound to treat the reduction of carbon emissions as an essential component of all developments and yet SP3 The Climate Change Strategy has scant reference within the local plan. SP3 is only referenced within : DP12 - carbon emissions DP 15 - green infrastructure DP21 – water / water efficiency DP22 – water / flood risk and will be monitored by the above DPs plus others within the Natural Environment policies and Water policies. It is not referenced within the equally critical areas of : • Transport • Infrastructure • Economy • Health and Wellbeing SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1143B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	SP3 is fundamentally flawed, the policy identifies green house gasses (and equivalent) in the statement that the total greenhouse gas emissions for Shropshire were 1.76 million tonnes CO2e. In this statement the 'e' is presumed to stand for CO2 and other greenhouse gasses (CO2 + CH4 + N2O etc) but other than in a cursory paragraph in SP1 (4.171) the policy makes no reference to the other green house gasses many of which cause equally disastrous effects to CO2, this omission is perpetuated in DP12: Greenhouse gas Global Warming potential Carbon dioxide (CO2) 1 (20-20 years in atmosphere) Methane (CH4) 25 (12-15 years in atmosphere) Nitrous oxide (N2O) 298 (>100 years in atmosphere) Hydro fluorocarbons (HFCs) 124-14,800 Perfluorocarbons (PFCs) 7,390-12,20 Sulphur hexafluoride (SF6) 22,800 Nitrogen trifluoride (NF3) 317,200 IPCC Source – (2007).IPCCFourthAssessmentReport:ClimateChange2007.IntergovernmentalPanel on Climate Change. Cambridge University Press, Cambridge. For Shropshire as an agricultural county methane and nitrous oxide are of particular relevance and should not be ignored in this policy or in policy SP9(d)& paragraph 3.84. E.G of England GHG emissions for agriculture 2017: m tonnesCO2e CO2 - 5.6 N2O - 14.3 CH4 - 25.7 Agriculture accounts for about 10% of total UK GHG emissions development of agricultural in the county should be seen to seek to reduce more than just CO2 reductions. I disagree with this policy because it is not complete
A1149B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The pursuit of sustainable development is at the heart of the planning process. The National Planning Policy Framework (NPPF) quotes the United Nations General Assembly in defining what this means at a strategic level: "meeting the needs of the present without compromising the ability of future generations to meet their own needs" This means that the 'Shropshire Local Plan' should consider the carbon footprint of current and future activities and available carbon budget and priorities for addressing the climate and ecological emergency, and offer support for the new technologies and enterprises that Shropshire needs for the future. The draft plan targets for 2050, a generation away, do not meet the NPPF definition of sustainable development because as set out in the Paris Agreement, to allow emissions to continue would compromise the ability of the next generation to meet their needs. In particular, the draft plan reference to the planning system needing to play a full role in the achievement of 80% reduction by 2050 is out of date now that SC has recognised the climate emergency, and SC's own corporate proposals for net zero 2030 will be at odds with this goal. We request that you also recognise the ambition of Shropshire residents and enterprises as set out in the Zero Carbon Shropshire Plan (in preparation by Shropshire Climate Action Partnership) and elsewhere to ensure net zero carbon by 2030 at the latest and ensure that your plans will be re-aligned to be consistent with this goal. We request that you recognise the implications of the United Nations Paris Agreement for Shropshire as set out in the recent Tyndall report as follows: 'the recommended energy only CO2 carbon budget for the Shropshire area for the period of 2020 to 2100 is 11.5 MtCO2', and a consistent emissions reduction rate of -13.5% out to the end of the century is appropriate.' This provides an 'energy only' carbon emissions budget for Shropshire of 10.7MtCO2 from now until the end of your Local Plan period in 2038, and a further 0.8 MtCO2 during 2039 to 2100. The UK Climate Change Committee reported last year that 'Current policies and plans are insufficient to meet the fourth or fifth carbon budgets (covering 2023-2027 and 2028-2032).' There is therefore a clear and pressing need to fundamentally reconsider the policy framework in relation to any plans that Shropshire Council wishes to adopt, in the light of the need for Shropshire to achieve net zero carbon in line with the reductions required by the Paris Agreement and UK obligations under international law. The Centre for Alternative Technology, and others, have demonstrated that we have the solutions we need for net zero carbon Shropshire to be achieved by 2030: 'Our work clearly demonstrates that we already have the tools and technology needed to efficiently power the UK with 100% renewable energy, to feed ourselves sustainably and so to play our part in leaving a safe and habitable climate for our children and future generations.' SCAP is currently working to achieve an appropriate practical Zero Carbon Shropshire Plan (ZCSP) by end December 2020 for net zero carbon Shropshire by 2030, and this will consider the total carbon footprint rather than purely energy emissions, enabling the broadest possible scope for planning the change programme required for this fundamental but vital shift towards sustainable development, the investment in future enterprises and households fit for the future, and the discontinuation of unsustainable practices. Shropshire's carbon emissions continue to race out of control (as typical UK citizens our carbon footprints are more than twice the global average, with 46% of it outsourced overseas). We will burn through this century's carbon budget by 2027 if we continue on current trends. The consequences of failure to implement a ZCSP and achieve net zero carbon Shropshire by 2030 would be catastrophic. Please therefore take cognisance of the ZCSP in finalising the Local Plan for Shropshire.
A1151B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	Maintaining and improving water quality and the treatment of water and wastewater in the face of population growth, changing environmental legislation and climate change pressures will be an ongoing challenge for the development industry over the coming years. As our customers' expectations change, there is likely to be greater demand from customers for environmental improvements which is likely to be reflected in increased environmental standards over time. It is important that United Utilities maintains the ability to flexibly respond to environmental and growth drivers both now and in the future. Future development within the region will need to be managed to enhance the environmental quality of the immediate area and manage the effects of climate change. United Utilities would seek to encourage the use of systems like rainwater harvesting and grey water recycling that help to reduce pressure on public water supply and the public sewerage system. Additional benefits result in a reduced environmental impact by making sure that valuable resources are used efficiently, at time reducing the costs associated with improving local water infrastructure for a new development as they require less mains water. Additional benefit is that such measures will reduce future occupants' costs for both water bills and energy bills (through heating water). We therefore very much welcome the approach to the policies SP3, DP20, DP21 and DP23 and the detail in them to ensure development is delivered in the most sustainable way. One comment to make on the policies quoted above is that would wish to see a linkage between policy requirements mentioned directly to ensure that opportunities as part of any new development are not missed. It is understood that areas like green infrastructure provision will seek to ensure the sustainable management of surface water through multi-functional benefits which are part of a high quality green / blue water environment. The detail within the policy is understood but we would recommend further linkage in policies to encourage holistic approaches as development comes forward. It is important to note that as strategies come forward, like surface water management, there will an expectation for them to reference the connectivity with Green Infrastructure and how the two interact. It is important for the Local Plan to consider the approach to developing strategies and outcomes holistically and would challenge the Local Plan to encourage this approach further in policy wording to ensure opportunities for new development is not missed.
A1152B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	Agreement is subject to a note that the draft Policy is not consistent with other draft policies. Agree wholeheartedly with the thrust of draft policy SP3, in recognition that Climate Change is a present threat to life as we know it. However, the Council cannot at the same time adopt the policy of business as usual, or in fact even more so, as far as housing and economic growth is concerned. Need a 'step-change' in thinking around the issue of continued and relentless growth.
A1170B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The policy lacks strength and allows too much scope for avoidance – for example, policy statement 1 could read 'Reducing carbon emissions by the application of as many means as possible, including....' This reduces the scope for token gestures or cherry picking easy options. It is similar to many previous active transport policies, but it is still a stressful activity to ride a bicycle into Shrewsbury, due to traffic and a lack of priority. This policy should commit to field testing the effectiveness of active transport provision. If says 'wherever possible', but this is almost always possible, so a stronger commitment is needed – I have too much experience of schemes where the developer says something is 'just not possible' for very feeble reasons, when in fact the issue is economic – if they accept the requirement and another developer doesn't they are at a disadvantage.
A1180B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A1180B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30: CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs (respondent ref; Form 9)
A1182B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A1182B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs (respondent ref; Form 9)
A1183B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	SP3 Climate Change We fully support the goals set out in paragraph 1-4. We would note that our community is off grid and the Policies included don't identify a strategy to adopt when as we move to further reduce dependence on gas delivery by tanker of course, replacement of gas boilers due soon or changes in Oil delivery and supply. We have also been made well aware of the more recent effects of climate change and changes in agricultural practice that have resulted in more flooding in our community.
A1630B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The NFU has set out an aspiration for the farming sector to achieve net zero by 2040. The NFU plan focuses on improving productivity within agriculture, increasing carbon stores on farms and boosting renewable and bioenergy production. British farmers have started on the road to net zero and want to do more. Local planning policies must match our climate ambition for farming and support the transition to low carbon business models but supporting our needs for new sustainable infrastructure. We are pleased to see a reference to renewable and low carbon energy in policy SP3. Boosting renewable energy and the bio economy to displace greenhouse gas emissions from fossil fuels and to create GHG removal through photosynthesis and carbon capture is a key part of the NFU ambition for achieving net zero. Therefore we would like to see support for small scale renewable energy in rural areas included in this policy. This could include a range of technologies; solar, anaerobic digestion, biomass crops and small scale wind. A specific reference to bioenergy/bio crop production should be included in paragraph 3.30 C. As our work on net zero evolves more information on the part local farms can play will become available. The NFU has also set out aspirations to maximise carbon capture and storage on farms via hedge and tree planting. Additional trees in the landscape can be delivered by a variety of mechanisms. Tree cover in the county has already been increased via engagement in agri-environment schemes, woodland grant schemes and voluntary planting. It is vital that tree planting is carefully planned and that the right tree is planted in the right place, taking care to recognise the environmental impacts and the effect on land required for food production. The policy indicates that the plan will be "Seeking opportunities to restore wetlands". It is not clear what this would mean in practice. The carbon benefits must be carefully considered along with the impacts on land availability for food production and the effects on the rural economy. We are pleased to see a reference to "Integrating water efficiency measures to mitigate the impact of drought and reduce resource and associated energy consumption". We would like to see support from the planning system for on-farm water storage to build drought resilience across all farming sectors, including livestock enterprises. There may also be opportunities to build catchment resilience with a network of water storage structures that capture peak flows for use during times of drought across the landscape. The explanation section does not outline how the aspirations of policy SP23 would be delivered via the planning system
A1634B1	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A1634B15	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation (respondent ref; Form 6)

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1634B18	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs (respondent ref; Form 9)
A1648B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	This policy is supported
A1844B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	Generally supportive. Welcome reference in para 1d to development prioritising active travel. Development in proximity to waterways can increase use of towpaths and we are keen to ensure that where appropriate, any potential impact is mitigated.
A1896B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A1896B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs
A1935B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	Linking development to public transport in rural areas will Achieve little unless there is an intensive service. More encouragement for renovation rather than Demolition will also reduce carbon emissions.
A2112B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	throughout the plan you are missing a great opportunity. Where is the great step forward our ancestors would have taken in our current circumstances? We need a plan with vision that reflects the environmental and social needs of our population that is so constrained by Covid -19. Open spaces , walks, energy efficiency etc But above all it seems to be missing contingency planning for the consequences of climate change, floods, water shortage, supply of utilities and food and farming support Seven years away is not long!
A2116B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Feels that the plan makes a move to address Climate change through policies in the plan, but that the targets in the plan are set too low and over too long a time scale. I think your balance on the triple bottom line is not weighted nearly enough towards our climate emergency, and your vision of a health and safe county by 2038 for me is in real danger of not being realised, let alone 2048 etc. I do wonder what'll happen to the most marginal in our society if/ when/ should this all start to seriously unravel? I acknowledge you operate in a broader landscape and that you have acknowledged a climate emergency as a council, but that this is focussed on your 2% of county emissions. You have a really strong and interesting chance here to be seriously helping tackle the other 98%, and with COP 26 next Nov, UK will be seriously in the global spotlight. We are working with Philip Dunne to take a NZC plan for south Shropshire to COP 26 with a 2030 deadline – see https://shropshireclimateaction.co.uk/ .
A2130B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Plan does not give enough consideration to onsite energy policies and generation which would allow new housing to be net zero carbon. No policy statements have been brought forward to allow effective consideration of renewable energy generation site applications; it seems this is left to neighbourhood plans, of which Shropshire has only a handful, and none of which so far propose renewable energy generation sites. Without a proactive approach to renewable energy the chances of achieving a carbon zero Shropshire in either locally desired or nationally legislated targets seems unlikely. This also fails to capitalise on the economic opportunities identified in the Marches LEP Energy Strategy.
A2132B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The plan should include initiatives and timescales to reduce the energy demand and put in place more efficient systems (e.g. heat pumps) The move to make electricity greener is underway but often heating is ignored and so need greater emphasis. Over half the energy consumption in a house is used for heating and hot water (e.g. https://energysavingtrust.org.uk/home-energy-efficiency/heating-and-hot-water). Reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector (new builds have a high embodied cost). There is little mention of addressing the heating issue – for newbuilds or retrofit – other than district heating (SP3 and DP12) which is generally only applicable in isolated, specific instances or for dense conurbations. Shropshire is a rural county with many properties using private gas and oil supplies with a resulting increased carbon footprint. Leadership and creative thinking needs to be applied if we are to achieve net zero carbon
A2132B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The plan needs to more explicitly mention the scope for updating and retrofitting existing buildings The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." Demolishing and rebuilding and newbuilds involve a considerable environmental cost. The Royal Institute of Chartered Surveyors has estimated that 51 percent of the lifecycle carbon from a typical residential premise is emitted before the building is even opened. In addition, Shropshire has a large number of character/older homes that cannot simply be replaced (without changing the character of the county). This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Some common options should be detailed (fabric improvements, heat pumps etc.) including the possibility of a reduction in council tax to help offset costs to home owners
A2138B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A2150B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A2150B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paragraph 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. The graph below is based on this data: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 It has used the subset data which excludes motorway and diesel train emissions. Of the three main sectors of energy demand, transport continues to rise and has overtaken the other two sectors - Industry & Commerce and Domestic energy use. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs.
A2158B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A2158B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paragraph 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. The graph below is based on this data: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 It has used the subset data which excludes motorway and diesel train emissions. Of the three main sectors of energy demand, transport continues to rise and has overtaken the other two sectors - Industry & Commerce and Domestic energy use. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs.
A2163B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Parts 1g and 2a of the draft policy make reference to promoting fabric energy efficiency, and integrating renewable and low carbon energy systems in line with draft Policy DP12 of this Pre-Submission Draft. These requirements should not undermine the deliverability of the Plan, as stated at paragraph 34 of the NPPF. Parts 1g and 2a should instead defer to the latest building regulations, as changes have already been made to those, to achieve energy efficiency standards. Planning Policy should not duplicate legal requirements covered elsewhere. Building Regulations already consider energy efficiency of buildings and this policy, as worded, adds no material value. Any requirement that go beyond building regulations should be on a needs only basis, informed by detailed evidence. Para 1g and 2a of this draft policy should therefore be amended to reference in line with building regulations rather than draft Policy DP12. Encouragement of development to offset its carbon emissions through investment in carbon capture and storage (informed by the Shropshire Climate Change Strategy) should be clarified as being an optional requirement. Draft policy should be amended in order to be found sound, as it needs to be fully justified and compliant with national policy.
A2167B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A2174B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	the plan is alarmingly light on measures to reduce carbon emissions. Indeed it does not seem to be aligned with the Council's current commitment. It mentions the planning system needing to play a full role in the achievement of 80% reduction by 2050!! But this is out of date now that the Council has recognised the climate emergency and has adopted proposals for net zero 2030. Particular concern that policies don't provide enough encouragement for sustainable transport such as cycling, nor for carbon neutral housing

Page 30

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2177B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	<p>Draft Policy requires:</p> <ul style="list-style-type: none"> • wherever possible, integration of electric vehicle charging infrastructure into new development in line with Policy DP12 ; • integration of renewable and low carbon energy systems into all residential developments in line with Policy DP12 ; • the development or extension of district heating & cooling networks ; and • integration of water efficiency measures. <p>The Council is committed to an overall goal of making Shropshire net greenhouse gas neutral by 2030. Consider the Council's policy approach to climate change should reflect the Government's proposals on levels of energy efficiency, heat networks, electric vehicle charging points (EVCP) and water efficiency. Government's Future Homes Standard consultation (ended 07/02/2020), indicated the UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The consultation addressed:</p> <ul style="list-style-type: none"> • options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations ; • transitional arrangements to encourage quicker implementation ; and • clarifying the role of Councils in setting energy efficiency standards. <p>Government estimated Future Homes Standard increased costs by circa £2,557 - £4,847 per dwelling. The Council's own viability assessment identified viability challenges across the County and the cumulative impact of proposed policy requirements threatens housing delivery (see HBF response under Viability).</p> <p>The Council is also referred to the consultation on Heat Networks: Building A Market Framework (ended on 1st June 2020). To meet the Government's legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.</p> <p>Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means future price regulation is required to protect domestic consumers. The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.</p> <p>Council's proposed policy approach is unnecessary because of the Government's Future Homes Standard proposals. Before the pre-submission LPR consultation, Draft Policy SP3 Bullet Points 1f, 2a, 2b & 4d and Draft Policy DP12 Bullet Points 1a, 1b, 1c & 1d should be deleted.</p>
A2321B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	<p>Policy SP3: Climate Change</p> <p>3.19 In recognition of Shropshire Council's declaration of a 'Climate Emergency', the Spatial Vision sets the precedent for the Local Plan which is centred on making significant steps towards a zero carbon economy whilst also meeting the identified housing and economic development needs. 3.20 In order to address climate change, as well as fundamental climate change targets and policies, in line with NPPF paragraph 103, it is essential that new development is directed to the most sustainable settlements which are already within close proximity to existing and emerging key employment locations, and which already benefit from sustainable means of transport.</p> <p>3.21 Albrighton's preferred housing guideline of 500 dwellings does not reflect its exceptional sustainability which is clearly evidenced within the Council's 'Hierarchy of Settlement Paper', including a railway station with services to Cosford, Wolverhampton, Birmingham, Telford and Shrewsbury, a wide range of services and facilities and also in close proximity to the Strategic Employment Site at RAF Cosford.</p> <p>3.22 Vistry are therefore concerned that a significantly greater quantum of growth is proposed for settlements without access to railway stations, such as Market Drayton and Ellesmere. The same amount of growth is proposed at Craven Arms, which has a significantly reduced provision of services and amenities compared with Albrighton and is a substantial distance from key regional employment sites, such as the M54 growth corridor. Some of the growth at these settlements should be delivered at Albrighton to enable the creation of truly sustainable development which will assist in meeting the challenge of climate change.</p>
A2323B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		<p>Support the Council's overall goal of making Shropshire Council net greenhouse neutral by 2030, as set out in the Climate Change Strategy Framework. Consider that more growth at Shifnal will assist the Council in their endeavours to transition to a zero carbon economy, and would avoid the need for development to be brought forward in less sustainable locations elsewhere in the District.</p> <p>Consider that SHF019 and P15b is located in a highly sustainable location and benefits from good access to existing public transport with the opportunity for everyday activities to be made by use of existing active transport opportunities, thereby assisting in reducing carbon emissions (the Hierarchy of Settlements indicates Shifnal is one of the most sustainable 'Key Centres' within the district). This therefore provides a strong evidence base for bringing forward residential development in Shifnal.</p> <p>The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020. Therefore, Building Regulations will require developers to build more resilient homes to assist the Council in achieving their target</p>
A2335B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	<p>SP3 is not referenced enough throughout the Plan and in other policies. Its omission from Transport, Infrastructure, Health & Wellbeing and Economy indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents</p>
A2345B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	<p>The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan</p>
A2365B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	<p>The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)</p>
A2372B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	<p>Paragraph 2.1 states:</p> <p>"The pursuit of sustainable development is at the heart of the planning process. The National Planning Policy Framework (NPPF) quotes the United Nations General Assembly in defining what this means at a strategic level:</p> <p>"meeting the needs of the present without compromising the ability of future generations to meet their own needs"</p> <p>Taken together with paragraph 3.28 :</p> <p>"The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. 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. As well as taking actions to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere and lock it into features such as peat and trees, known as 'carbon capture and storage'.</p> <p>This clearly sets out the overriding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised.</p> <p>SP3 The Climate Change Strategy has scant reference within the local plan.</p> <p>SP3 is only referenced within : DP12 - carbon emissions, DP 15 - green infrastructure, DP21 – water / water efficiency, DP22 – water / flood risk and will be monitored by the above DPs plus others within the Natural Environment policies and Water policies.</p> <p>It is not mentioned at all within the equally critical areas of :</p> <p>ITransport IInfrastructure IEconomy IHealth and Wellbeing</p> <p>SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents.</p> <p>I disagree with this policy because it is not sufficiently integrated into the whole plan</p>
A2388B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	<p>This is quite simply insufficient.</p> <p>We would like to refer to the document 'Rising to the Climate Crisis, a guide for Local Authorities' produced by the TCPA and RTPI in 2018. This states that;</p> <p>"It is recommended that LA's should take the following action in evidence gathering for their LDPs. The supply and demand for renewable and low carbon energy must be mapped" (pgs 24/25)</p> <p>"LDPs must contain policies which, taken as a whole, secure radical reductions in CO2 emissions" (pg 30)</p> <p>"Strategic sites which are central to delivering a local planning approach for decentralised energy should be allocated in the local plan" pg 31</p> <p>"identify the most and least environmentally sensitive areas for deployment of different renewable technologies" pg 32</p> <p>"to deliver on the ambition of zero-carbon and energy-positive communities, LPS should set out decentralised renewable energy targets for application across a whole LA area. These targets should be designed to secure a minimum level of decentralised renewable energy use in new developments" pg 33/34</p> <p>We also wish to refer to the document 'Catalysing People-Powered Energy in Yorkshire & Humber' produced by Community Energy England and Sheffield Hallam University 2019. Whilst this is for a different area of the country we feel strongly that the findings also apply to Shropshire. The first recommendation in this report is called 'Planning for Community Energy' this states that,</p> <p>"to translate aspiration into action we recommend that Local Plans, and where relevant Neighbourhood plans and supplementary guidance, should set specific targets to significantly increase the proportion of community-owned and community-led renewable energy generation" pg 23</p> <p>"they should also seek to make use of powers to allocate land for renewable energy development" pg 23</p> <p>"local plans should specify that public or community owned buildings include integrated renewable energy systems" pg23</p> <p>"large private renewable energy schemes should, as a condition of planning permission, include 20% community ownership or an equivalent community benefit arrangement" pg 23</p> <p>And "procurement policies should not prevent community energy organisations from fulfilling the requirements of local plans". Pg 23/24.</p> <p>We trust that Shropshire Council will take note of these points and modify the Local Plan in ways that will enable real carbon reductions in a timely manner with community involvement and buy in.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2398B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Draft Policy SP3 and related draft Policy DP12 discuss the need to integrate renewable and low carbon energy systems into residential development. DP12 expands on this by stating that 10% of the predicted energy needs of a development needs to come from these two sources on-site; with it also requiring a minimum 19% improvement in the energy performance requirement of the 2013 Part L Building Regulations. Para 4.116 of the policy Explanation describes the five stages of the energy hierarchy and that energy options should be pursued in the following order: a. Reduce the need for energy; b. Use energy more efficiently; c. Use renewable energy; d. Use low carbon sources; and e. Use conventional energy. Council is correct to use the energy hierarchy but they appear to circumnavigate it by jumping straight to renewable and low carbon sources. Primary aim should be to reduce energy use; it should not matter if that can be achieved through a fabric first approach. A more sophisticated approach is needed than is currently being suggested.
A2427B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A2427B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. The graph below is based on this data: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 It has used the subset data which excludes motorway and diesel train emissions. Of the three main sectors of energy demand, transport continues to rise and has overtaken the other two sectors - Industry & Commerce and Domestic energy use. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs.
A2432B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A2462B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	We note that Policy SP3 – Climate Change – refers to supporting of renewable and low carbon technologies in development. We would highlight that the visual effects of some types of renewable energy developments e.g. wind turbines and solar farms have the potential to affect the statutory purpose of the AONB. However, we cannot find any reference to a strategic assessment for the planning of renewable energy which may indicate potential locations for development. Clarification on whether any such evidence has been prepared is required to confirm the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty has been factored into your future plans.
A2469B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1)
A2469B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. The graph below is based on this data: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 It has used the subset data which excludes motorway and diesel train emissions. Of the three main sectors of energy demand, transport continues to rise and has overtaken the other two sectors: Industry & Commerce; and Domestic Energy Use. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently, the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. I therefore disagree with these paragraphs.
A2471B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan (respondent ref; Form 1) PLEASE NOTE: There is another attachment which is a duplicate of this response for A2471
A2471B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs (respondent ref; Form 9)
A2475B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Para 3. Carbon capture and storage is usually taken to mean the industrial process of capturing carbon such as from flue emissions of power stations and locking it up underground. In this more general context as here, 'carbon sequestration' would be a better terminology. (Also in para 3.28 and 3.30d). Explanation: This section should refer the declaration of climate emergency by the Council. The Strategy resulting is referenced, but the Council has many strategies and has not declared other emergencies. This underlines the over-riding importance of this cross-cutting issue.
A2477B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Agree	This deals with sustainable development. This policy supports development on site MDR015 ahead of allocated site MDR006.
A2489B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs
A2489B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A2490B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs
A2494B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions by at least 80% by 2050 compared to 1990 levels. This is a very challenging target, and the planning system will need to play a full role in its achievement. This clearly sets out the over riding requirement that minimizing carbon emissions must be central to all planning and development, otherwise the ability of future generations to meet their own needs is compromised. The Climate Change Strategy has scant reference within the local plan, only being referenced in DP12, DP15, DP21, DP22 and not within Transport, Infrastructure, Economy, Health and Wellbeing. SP3's omission from these areas indicates that the responsibility the council has to reduce the county's carbon emissions is not seen as essential to the future health and wellbeing, economy and safety of its current and future residents. I disagree with this policy because it is not sufficiently integrated into the whole plan
A2494B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3	Disagree	Paras 3.29 and 3.30 CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. In whatever way the data is examined, the trend for CO2 emissions for transport is now rising in Shropshire. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Therefore I disagree with these paragraphs
A2504B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP3		Supply of 6.42 years was considered 'sound' now the high growth target is to add 15%, but this ignores the current situation, pandemic, Brexit . when the recession ends we hope Shropshire will need more housing for young workers, recovery will take longer than 6.42 years supply and the assessed housing need i.e. FOAHN
A0238B31	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Don't know / no opinion	Supply of 6.42 years was considered 'sound' now the high growth target is to add 15%, but this ignores the current situation, pandemic, Brexit . when the recession ends we hope Shropshire will need more housing for young workers, recovery will take longer than 6.42 years supply and the assessed housing need i.e. FOAHN
A0306B013	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	This strategic policy is not a robust interpretation of the NPPF definition of sustainable development which is: "development which meets the needs of the present without compromising the ability of future generations to meet their own needs". Throughout the plan the term "sustainable" is used without adequate consideration of environmental implications.
A0318B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	We do not consider the council to have adequately set out the expectations in policy SP4. We do not consider the council to have adequately set out the expectations in policy SP4. The council have not adequately set out the expectations in policy SP4. There should be a link from Policy SP4 to DP12 to allow new development to be built to sustainable standards.
A0341B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete (respondent ref; Form 4)
A0430B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Agree	Support the Council's commitment to their positive approach to sustainable development and this policy is considered to conform NPPF para 11.
A0447B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The context of the profound emergency that the world is and will increasingly experience as a result of pollution of land, sea and air and destruction of the natural world the plan is in general shockingly inadequate, not to say feeble in general tone. This paragraph seems to be unaware of developments of building technology such as 'the passive house' www.passivhaustrust.org.uk/

Page 32

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0501B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the council should be requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it I disagree with this policy because it is incomplete
A0501B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing buildings rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A0501B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3:“ Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.”This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council’s responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by:• Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation. HTTPs://www.cat.org.uk/info-resources/zero-carbon-britain/The local plan excludes real commitment to retro-fitting homes. Given that the number of existing houses far outweighs the number of new homes planned to be built, it is vital that energy demands in homes is significantly reduced, otherwise the county will not reach its net zero target. Therefore I disagree with this policy because it does not include clear commitment, with targets, to retro fit housing stock or give support to home owners to do the same.
A0573B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Agree	Support SP4 recognition of national policy presumption for sustainable development. Support SP4 para 3.87 setting out the strategic approach to conforming with NPPF para 8 to build a strong and responsive local economy ensuring the right land, in the right place to support innovation, growth and productivity by focusing on princip settlements and key centres which recognises Shifnal as a sustainable location for employment development. NPPF para 11 should apply the presumption for development and this must seek opportunities to meet development needs and be sufficiently flexible to adapt to rapid change. Shifnal sites SHF032 and SHF18c would perform positively together or separately as safeguarded land or would contribute to a comprehensive settlement strategy. This responds positively to NPPF para 70 in planning for large scale development and satisfying the three social, economic and environmental tenets of sustainability. In combination, SHF032, SHF18c and SHF18b & SHF18d create a strong basis for local living, creating a cohesive community, reding the need to travel and reducing their carbon footprint
A0642B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	This strategic policy is not a robust interpretation of the NPPF definition of sustainable development which is: “development which meets the needs of the present without compromising the ability of future generations to meet their own needs”. Throughout the plan the term “sustainable” is used without adequate consideration of environmental implications. This is also true for the sustainability appraisals.
A0666B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	New builds cause high levels of carbon emissions (due to concrete/cement use), and there is a large pool of existing building stock that could be repurposed and redeveloped – especially given the current and probably closures due to Covid 19 of many sites, especially in Shrewsbury- is the Council planning to gather the data on this? The local plan shows no commitment to redevelopment, rather it refers to demolition & rebuild, leading to far higher concentrations of carbon emitted in the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35% of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51%.Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A0670B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A0670B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3:“ Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.”This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council’s responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by:• Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation. HTTPs://www.cat.org.uk/info-resources/zero-carbon-britain/ disagree with this policy because it is incomplete.
A0888B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	See wider response.
A0902B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Agree	SP4 is supported. However the policies have not promoted sustainable settlements and have resulted in certain cases of settlements becoming less sustainable as a result of the development plan policies that were adopted. Cockshutt is a case in point. It appears to be the case that the result of the past policies relating to development in Maesbury/Maesbury Marsh – that is, reduced sustainability - is likely to be repeated in the current Local Plan Review. There is a disconnect between the stated strategic aims of the Plan Review and the manner in which land allocations have been made. Maesbury/Maesbury Marsh will not become more sustainable as a result of the policy to regard it as open countryside, and is more likely to become a straightforward commuter village. They are of a size which is at a level of several other villages that have been designated Community Hubs, and have been allowed some development which will help support the existing village facilities and hopefully avoid the necessity to close some. In that way the joint settlement can be made more sustainable, and journeys away from the village for day-to-day facilities can be avoided.
A0910B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Don't know / no opinion	SP4 is supported. However, despite similar strategies being expressed in previous development plans, the policies have not promoted sustainable settlements and have, indeed, resulted in certain cases of settlements becoming less sustainable as a result of the development plan policies that were adopted. Cockshutt is a case in point, where over the past twenty years new development has been restricted through planning policies and this has resulted in the village losing local services and employment opportunities which have then led to further restrictions on development. In turn, this has led to an increase in car borne travel for employment and services. In fact, the policies have achieved precisely the opposite of what was intended. It appears to be the case that the result of the past policies relating to development in Cockshutt – that is, reduced sustainability - is likely to be repeated in the current Local Plan Review. The process of expressing a generalist strategic policy framework, but then making allocations that will not produce the outcome the strategic policies require, is becoming more apparent in the current Local Plan Review. There appears to be a disconnection between the stated strategic aims of the Plan Review and the manner in which land allocations have been made. Cockshutt will not become more sustainable as a result of the policy to regard it as open countryside, and is more likely to become a straightforward commuter village. The Council is asked to read the comments made in respect of Policy SP7 which goes into greater detail of how this process has manifested itself in the Local Plan Review.
A0957B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4		Draft Policy SP4 seeks to address issues of Sustainable Development, which in the NPPF has three aspects of Economic, Social and Environmental sustainability. These are not explicit in the Draft Local Plan and so lack the detailing that might prompt better living for future residents. For example, in the NPPF, the sustainable economic objective should be met by “identifying and coordinating the provision of infrastructure”. Shropshire Place Plans have brief discussion of this without any detailing.
A0970B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the draft local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. There is no commitment within the draft local plan for supporting redevelopment of existing buildings rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate, this is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. RICs has estimated that 35% of the lifecycle carbon from a typical office development is emitted before the building is opened. It says the figure for residential premises is even higher at 51%. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reduce the County’s carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. The greatest energy demand of buildings is heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the draft Local Plan within draft Policy SP3 “Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.” The significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council’s responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: improving insulation, reducing draughtiness and recovering heat from air leaving the building through ventilation. I disagree with this policy because it is incomplete.
A0972B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	Planning law requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Tasley Garden Village would be a material consideration in considering the Planning application for an Industrial Poultry Unit (IPU) on part of the land required for the proposed TGV development. If planning permission is granted for the proposed Industrial Poultry Unit, then this will surely prohibit the inclusion of Tasley Garden Village in the Local Plan.
A0984B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Agree	Welcome the commitment to a positive approach to sustainable development. This policy accords with Para 11 of the NPPF.
A1101B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	Support a positive approach to sustainable development and recognition of the presumption in favour of sustainable development in the NPPF.
A1143B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete.

Page 33

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1143B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding.</p> <p>Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent.</p> <p>The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint.</p> <p>We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether.</p> <p>I disagree with this policy because it is incomplete.</p>
A1143B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector, and there seems no reason why this should be left entirely to Building Control when the inclusion of heat pumps and alternative energy infrastructure the cost implications of meeting high grade energy efficiency might have implication on the key planning issues relating appearance & landscape.</p> <p>The need to retrofit existing buildings is mentioned just once in the plan within SP3: “Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.”</p> <p>This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing.</p> <p>To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels.</p> <p>To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by:</p> <ul style="list-style-type: none"> • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation. <p>https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.</p>
A1146B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Agree	<p>Policy SP4 indicates the Council's intention to take a positive approach in the consideration of development proposals, reflecting the presumption in favour of sustainable development contained in the National Planning Policy Framework. This policy is supported.</p> <p>However, it appears that, despite similar strategies being expressed in previous development plans, the policies have not promoted sustainable settlements and have, indeed, resulted in certain cases of settlements becoming less sustainable as a result of the development plan policies that were adopted. Leebotwood is a case in point, where over the past twenty years new development has been restricted through planning policies and this has resulted in the village losing local services and employment opportunities which have then led to further restrictions on development. In turn, this has led to an increase in car borne travel for employment and services. In fact, the policies have achieved precisely the opposite of what was intended.</p> <p>It appears to be the case that the result of the past policies relating to development in Leebotwood – that is, reduced sustainability - is likely to be repeated in the current Local Plan Review. The process of expressing a generalist strategic policy framework, but then making allocations that will not produce the outcome the strategic policies require, is becoming more apparent in the current Local Plan Review. There appears to be a disconnection between the stated strategic aims of the Plan Review and the manner in which land allocations have been made. Leebotwood will not become more sustainable as a result of the policy to regard it as open countryside with significant restrictions on development; it is more likely to become a straightforward commuter village.</p> <p>It does not appear that the Council has taken note of the manner in which Leebotwood actually functions. The development in Leebotwood is very scattered in nature. It has grown along the former Truck Road and with reference to the railway line. So it does not exhibit the more common nucleated form of development in Shropshire villages.</p> <p>Nevertheless, it supports a sizeable population, and acts as a hub for surrounding hamlets etc. to look to for service. Additional development in Leebotwood will help support the existing village facilities and hopefully avoid the necessity for some to close. In that way the joint settlement can be made more sustainable, and journeys away from the village for day-to-day facilities can be avoided.</p>
A1152B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4		<p>Draft policy SP4, its term 'sustainable' carries a quite different meaning to what is generally meant by sustainable when talking about Climate Change issues. It is increasingly realised that the 'sustainable' development envisaged by the NPPF, and the 'business as usual' thinking, will indeed compromise the ability of future generations to live healthy lives.</p>
A1180B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. https://www.passivhaustrust.org.uk/</p>
A1180B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire Council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.</p> <p>The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3:“Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.”This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to actively advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by:</p> <ul style="list-style-type: none"> -Improving insulation. -Reducing draughts. -Recovering heat from air leaving the building through ventilation. <p>https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.</p>
A1182B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake</p> <p>The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it.</p> <p>I disagree with this policy because it is incomplete. https://www.passivhaustrust.org.uk/</p>
A1182B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether (respondent ref; Form 5)</p>
A1182B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3:“Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.”This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by:• Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation (respondent ref; Form 6)</p>
A1609B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>Disagree that the draft plan to date has been proactively prepared in accordance with the three overarching objectives, which help form sustainable development. Significant weight has been placed on Shifnal's economic objective, as opposed to very little on both its social and environmental objectives. 41 hectares of employment land and 1,500 new dwellings in Shifnal will lead to the substantial loss of both Safeguarded Land and Green Belt. It is felt that the local circumstances, needs and opportunities for Shifnal have not been considered</p>
A1896B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete</p>
A1896B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether</p>
A1896B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	<p>The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3:“Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.”This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by:• Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2150B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. https://www.passivhaustrust.org.uk/
A2150B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A2150B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: “Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.” This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: <ul style="list-style-type: none"> • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation. https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.
A2177B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The NPPF confirms Local Plans should avoid unnecessary duplication including repetition of policies in the NPPF itself (para 16f). The presumption in favour of sustainable development is clearly set out in the NPPF (para 11). In attempting to repeat national policy in Draft Policy SP4, there is a danger that some inconsistencies creep in and lead to small but critical differences between national and local policy causing difficulties in interpretation and relative weighting. Draft Policy SP4 is unnecessary therefore before the pre-submission LPR consultation, it should be deleted.
A2321B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	Policy SP4: Sustainable Development 3.23 Policy SP4. ‘Sustainable Development’ duplicates the National Planning Policy Framework and reiterates the principles set out within Section 38 (6) of the Planning and Compulsory Purchase Act 2004. 3.24 PPG states: “Paragraph 11 of the National Planning Policy Framework indicates that Local Plans should reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. However, there is no need for a plan to directly replicate the wording in paragraph 11 in a policy” (Paragraph: 036 Reference ID: 61-036-20190723). 3.25 It is considered that policy SP4 would be more effective if further details were provided relating to how the presumption will be applied locally, otherwise it should be deleted entirely.
A2323B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4		Draft Policy SP4. “Sustainable Development” duplicates the NPPF and reiterates the principles set out within Section 38 (6) of the Planning and Compulsory Purchase Act 2004 Planning practice guidance explains that Para 11 of the NPPF indicates that Local Plans should reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. However, there is no need for a plan to directly replicate the wording in para 11 in a policy.” It is considered that draft policy SP4 would be more effective if further details were provided relating to how the presumption will be applied locally.
A2365B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. https://www.passivhaustrust.org.uk/ (respondent ref; Form 4)
A2365B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete. (ref form 5)
Page 35 A2372B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. https://www.passivhaustrust.org.uk/ There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire Council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete. The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: “Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.” This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: <ul style="list-style-type: none"> • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation. https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.
A2427B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that Shropshire Council should be requiring and supporting developers, housing associations and others to undertake if it is to get serious about the scale of challenges posed by climate and ecological breakdown . The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it.
A2427B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire Council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we reduce the use of new materials and their impacts.
A2427B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: “Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.” This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. Reducing heat loss from buildings reduces the energy needed to keep them warm. Heat loss from buildings can be reduced by: <ul style="list-style-type: none"> • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation.
A2469B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. https://www.passivhaustrust.org.uk/
A2469B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Agree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A2469B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: “Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.” This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to active advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: <ul style="list-style-type: none"> • Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation (respondent ref; Form 6)
A2470B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Agree	Support this policy
A2471B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete (respondent ref; Form 4)

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2471B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether (respondent ref; Form 5)
A2471B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to actively advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: <ul style="list-style-type: none"> Improving insulation. Reducing draughtiness. Recovering heat from air leaving the building through ventilation (respondent ref; Form 6)
A2475B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	This whole section hinges on the 'presumption in favour', rather than any reference to what 'sustainable' development actually is. This is a huge missed opportunity and explanations of sustainable development should be included. There is ample material to draw on here, such as the UN Sustainable Development Goals. This would help this section to set out over-arching principles behind the Plan. This explanation and qualifier about sustainable development is needed, as the presumption in NPPF is often in practice taken simply to mean a presumption in favour of development.
A2489B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock is an excellent example and needs to be the start of this initiative, not the end of it. There is also a need for appropriate skills training within the county - Shropshire could be leading the way in this innovative approach. I disagree with this policy because it is incomplete.
A2489B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to actively advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: <ul style="list-style-type: none"> Improving insulation Reducing draughtiness. Recovering heat from air leaving the building through ventilation. https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.
A2489B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire Council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A2490B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	New homes should be built to PassivHaus standards. 'Sustainable Development' could be interpreted in many different ways. Strict energy efficient regulations are not mentioned. This could be an area where the county could excel, encouraging developers, housing associations to build to PassivHaus standards. There is a prime example in Much Wenlock, the Callaughton's Ash development. This policy needs to be developed to include these standards, so I disagree with it
A2490B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The local plan does not support the retro-fitting and redevelopment of existing buildings. In many situations this is a more carbon-efficient way of improving the housing stock. The Royal Institute of Chartered Surveyors estimates that 51% of the lifecycle carbon of residential properties is emitted before the home is occupied. Consequently, it is now accepted that demolishing and rebuilding is not the best procedure for climate warming mitigation. This is primarily due to concrete having a huge carbon footprint. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A2494B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	New homes should be built to PassivHaus standards. 'Sustainable Development' could be interpreted in many different ways. Strict energy efficient regulations are not mentioned. This could be an area where the county could excel, encouraging developers, housing associations to build to PassivHaus standards. There is a prime example in Much Wenlock, the Callaughton's Ash development. This policy needs to be developed to include these standards, so I disagree with it
A2494B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	There is no commitment within the local plan for supporting redevelopment of existing buildings rather than demolishing and rebuilding. Concrete is the most widely used man-made material in existence and cement, its key ingredient, has a massive carbon footprint. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. I disagree with this policy because it is incomplete.
A2494B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP4	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector. The need to retrofit existing buildings is mentioned just once in the plan within SP3: "Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings." This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council's responsibility and to commit to actively advise, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing. To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels. To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by: <ul style="list-style-type: none"> Improving insulation. Reducing draughtiness. Recovering heat from air leaving the building through ventilation. https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.
A0238B32	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Don't know / no opinion	Supports identified Strategic Policies and their application in managing development. Note the definition of Sustainable Development in paragraph 2.1. Expect 'quality' in SP5 to include 'character' and 'variation', thus preventing large estate developments with very similar designs, no link to the local vernacular, and little variation to add character
A0266B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Statements on design do not add up to a coherent approach. The inclusion of a Shropshire Test as a gateway policy, SP5 on high quality design and the West Midlands Combined Authority Design Charter are all referred to (and there continues to be talk of a Shrewsbury Test) but none contain the level of detail that can guarantee robust challenge to poor design. The risk is that both planning applicants and objectors could be using the same form of words to justify opposite outcomes. A better approach would be to use a design panel – especially given a lack of capacity and skills within the planning authority - as other areas do and as recommended by the CPRE. Cornwall provides an example – the Cornwall Design Review Panel has been in place since 2015. Such panels can be paid for from developer funds as part of the planning application process
A0306B014	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	This could be strengthened by the additional guidance: "should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage". High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.
A0311B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref; Form 3)
A0323B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref; Form 3)
A0341B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref; Form 3)
A0356B03	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref; Form 3)
A0407B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	The Policy is very welcome. However, it is deficient in that it fails to include a reference to Government advice on effective community engagement on design. Too long developers have failed to engage with the community on design matters. Government clearly favours such engagement, and this should be included in the policy.
A0450B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Policy SP5 must define meaning of 'high quality' to enable developers to achieve this standard and to enable stakeholders to test proposed design schemes.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0501B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref; Form 3)
A0609B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	Support the detailed guidance to achieve high quality design.
A0642B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	This could be strengthened by the additional guidance: "should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage". High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.
A0647B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps). SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A0648B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps). SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A0666B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	High Quality Design. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan. For example: PRINCIPLES of the West Midlands Design Charter 3 : Future Readiness Climate Resilience Developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle. Delivering Low Carbon Development proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction. The potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building : " Undertake Housing Needs Survey, support a survey of empty houses in the parish, investigate affordable housing and more good quality rental property options; ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps). " I disagree with this policy because it is incomplete.
A0670B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.)
A0679B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	High Quality Design. The plan does not specify in enough detail the standards for low carbon development that will not only be resilient to changes in climate, but also minimise the climate impact of its construction. The plan ought to guarantee a survey of empty houses in the parish, investigate affordable housing and more good quality rental property options; ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps), as with the Oswestry Place Plan
A0696B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Don't know / no opinion	The draft policy should include reference to improving the energy efficiency of new housing and commercial buildings. It should also mandate consideration of the total 'carbon cost' of ownership, including travel by the occupiers, over the life of the building.
A0698B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps). SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A0862B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5		Draft Policy SP1 (The Shropshire Test) requires development which, "makes efficient use of land" and draft Policy SP5 (High-Quality Design) includes a requirement to make, "efficient and effective use of land and topography". Support these sections of Policies SP1 and SP5. SHRO54a is 3.86 hectares in size, the proposed guideline figure of only 60 dwellings is equivalent to a density of only 15.5 dwellings per hectare. This is inconsistent with draft Policies SP1 and SP5 as the site is capable of accommodating 116 dwellings at a density of 30 dwellings per hectare. Acknowledge that some of the site will be needed for compensatory car parking for the Shrewsbury Club, however this does not justify a reduction from 116 dwellings to only 60 dwellings. 85 dwellings (net density of 22 dwelling/ha) would be more appropriate.
A0954B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	35. This policy is supported. It generally echoes the aspirations and advice contained within the National Planning Policy Framework (NPPF), "Building Better, Building Beautiful Commission Report", published in January 2020 and the Planning White Paper, August 2021 36. Paragraph 3.38 of the emerging plan refers to the West Midlands Design Charter, which was launched in January 2020. The Charter, developed by the West Midlands Combined Authority, in partnership with the region's local councils, seeks to encourage developers to produce unique and innovative proposals that are grounded in a sound understanding of the local context to: • create a spirit of place; • to promote opportunities for walking, cycling and public transport use; • and incorporate climate adaptation measures as well as creating healthy living environments. 37. The site at Bayston Hill could be developed to accord with the principles set out within policy SP5 and create a high-quality development with a layout designed to maximise views of the AONB beyond, safeguard residential amenity for dwellings along the site edges. A further benefit, and a policy stance supported by Gleeson Strategic Land Ltd is the need to maintain and enhance the existing well used footpath that is located along the northern edge of the site which connects the Hereford Road with Kendrick's Bank and the wider residential development
A0957B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5		SP5 is a desirable policy but likely to suffer from the same lack of impact, due to imprecise wording and ambiguity. Additionally, without sufficient time and expertise the LA will have difficulty in evaluating how effectively the criteria have been considered. Draft policy SP5 seeks to "ensure the creation of better places" through "High Quality Design". It adopts the West Midlands Combined Authorities Design Charter (WMCADC) which is a well-drafted set of over-arching principles for designing developments. There are some 14 principles (e.g. "Opportunities for solar gain are maximised where possible"). Applications are meant to set out how the principles have been considered. These lack specificity and exemplification and consequently the Charter has already failed in the quest for better design - this has been evidenced by recent developments which were poor quality design but claim compliance with the WMCADC. Another problem is the lack of time and available expertise within the LA's Planning Department, since evaluating the degree to which a set of broad aims have been effectively considered by an applicant may require exemplification and detailed experience. The Authority has no trained architect and successful Appeals should be minimised. Shropshire's own voluntary Accreditation Scheme was not effective in raising design quality, despite having a similar set of design criteria. It would seem that design guidance must include enforceable rigour, if Shropshire is to improve building quality. The White Paper "Planning for the Future" also seeks much firmer guidance, following on from the report of the "Building Better – Building Beautiful Commission". Planning reforms are likely to require Local Plans to be shorter, more specific and to include unambiguous "Design Codes". (A design Code is defined as; "A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code, should build upon a design vision, such as a masterplan or other design and development framework for a site or area." Now is the time to elevate standards of design (in all its aspects) by robustly wording policies to ensure they have real impact over their lifetime. Draft Local Plan policies lack sufficient specificity to ensure that developments are of high quality design.
A0961B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	Para 2 & 3 support the detailed guidance to achieve high quality design.
A0970B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	All local plan housing development strategies (not just SP5) require details of standards of design that the council requires of developers in response to climate. The West Midlands Design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan. For example: PRINCIPLES of the West Midlands Design Charter 3 : Future Readiness includes Climate Resilience and Delivering Low Carbon Development. The Oswestry Place Plan includes this proactive statement on house building: " Undertake a Housing Needs Survey, support a survey of empty houses in the parish, investigate affordable housing and more good quality rental property options; ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps). " I disagree with this policy because it is incomplete.
A0970B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Draft policies SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: " The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. " Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?
A0972B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Tasley Garden Village is not a locally distinctive development and its scale is not in proportion to its locality & is of a poor design as too many houses, all of a bland and generic character

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0981B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>Sport England encourages LPA's to develop policies for securing high quality urban design that take into account the needs and opportunities to be physically active. This ties in well with the Council's overall vision and The Shropshire Test to ensure its community is safe and healthy. Sport England has developed its own guidance entitled 'Active Design', which sets out 10 principles to guide how places are designed to promote active lifestyles. A link to the guidance is attached: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design. The proposed policy wording should be amended, either by expanding the reference in part 1 of the policy to community well-being, or alternatively to include a separate paragraph within the policy to require developments to demonstrate how they have addressed the 10 Active Design principles. As part of the guidance, Sport England has developed a model policy which is set out on page 53 of the guidance and is attached on the separate sheet provided. This could be utilised to develop the policy wording. https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design. Suggested model policy wording and reasoned justification:</p> <p>The design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design Principles:</p> <ul style="list-style-type: none"> • Activity for all : Enabling those who want to be physically active whilst encouraging those who are inactive to become active. • Walkable communities : Creating the conditions for active travel between all locations. • Connected walking, running and cycling routes Prioritising active travel through safe integrated walking, running and cycling routes. • Co-location of community facilities: Creating multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity opportunities. • Network of multifunctional open space : Providing multifunctional spaces opens up opportunities for sport and physical activity and has numerous wider benefits. • High quality streets and spaces : Well designed streets and spaces support and sustain a broader variety of users and community activities. • Appropriate infrastructure : Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity. • Active buildings : Providing opportunities for activity inside and around buildings, rather than just between buildings. • Management and maintenance : A high standard of maintenance is essential to ensure the long-term attractiveness of sports facilities along with open and public spaces. <p>Reasoned justification: Active Design, developed by Sport England and supported by Public Health England, provides a set of principles for creating the right conditions within existing and proposed development for individuals to be able to lead active and healthy lifestyles. It focuses on those ingredients of cities, towns and villages that offer individuals the opportunity to be active. The planning system as a whole, including individual development proposals, has a key role to play in creating such opportunities. Planning applications will therefore be assessed against how they embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. The Local Planning Authority will use the Active Design Principles to aid this assessment. Where Design and Access Statements are required to support an application they should explain how the design of the proposal embraces this role and reflects the Active Design Principles. Public Health leads for the local area should be encouraged to work with the planning department to engage at pre-application stage with applicants as they will be consulted on all relevant applications. The Local Planning Authority may use planning conditions and/or planning obligations where necessary to address issues where developments could, but do not, embrace this role and do not adhere to the Active Design Principles. The Active Design guidance, which provides further details for each of the Principles along with a set of case studies, can be found on Sport England's website.</p>
A0984B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	<p>Support the aims of this draft policy and the delivery of new high quality development to ensure creation of better places to live and work. This is consistent with recent Government consultations - Planning for the Future: White Paper (August 2020) and Changes to the Current Planning System (August 2020). Specifically, Pillar 2 of the Planning for the Future: White Paper includes delivery of beautiful and sustainable places, to do this the planning system should set clear expectations of the form of development expected in different locations in ways which reflect local character, address modern lifestyles, and facilitate modern methods of construction. Draft Policy SP5 upholds the aspirations set out in the White Paper and sets out the parameters and expectations of the design of new developments.</p> <p>Part 2 of the policy notes that developments must be in line with national planning policy and the design principles set out within the West Midlands Design Charter. Given the parameters within this draft policy, specific design guidance document for developments within Shropshire may be appropriate to provide applicants with clear guidance for the design expectations within the County. This would ensure design principles are grounded in an understanding of the County's defining characteristics and provides maximum clarity on design expectations within new developments. Such matters could also be dealt with through site specific SPDs.</p>
A0997B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	<p>Historic England welcomes the references to local character and historic interests, as well as building materials and detailing, included in this strategic policy which offers opportunity to conserve and enhance the historic environment.</p>
A1101B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	<p>Support delivery of high-quality design in new development to ensure the creation of better places; promote individual and community well-being; and enhance the way places are enjoyed and experienced by those who live, work or visit.</p> <p>Stannmore Garden Village has a focus on high quality design and with a legacy landowner there is an ability to ensure delivery above the standard and create a real sense of place. It could have a cohesive layout and design and through use of a design code complied with by local and regional housebuilders could deliver locally distinctive development and innovative design that positively contributes to the character, appearance and local identity. The development would be implemented to a high quality phased masterplan.</p> <p>The Community Centre will be designed for traditional retail uses such as independent butchers, bakers and greengrocers selling local produce alongside a café and associated leisure and cultural facilities in buildings with elevations responding to their location and surroundings. Committed to the principles of Garden Village design. The West Midlands Design Charter is fully supported.</p>
A1152B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	<p>Agreement is as far as it goes.</p> <p>Fully endorse the thrust of draft policy SP5, in recognition of the importance of design for creating better places and better buildings within them. Design is notoriously difficult to pin down and there have been the Building for Life standards (mentioned in para 129 of the NPPF), the Shrewsbury Test, and the guidelines developed by Shropshire Council Development Management.</p> <p>Concern is simply that the guidelines in both the West Midlands Design Charter and in the Shropshire Test are perhaps a bit general and possibly bland. Developers might therefore be able to say that they have met those tests whilst still presenting a development that is little better than those that are presently criticised.</p>
A1180B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps'). (respondent ref: Form 3)</p>
A1182B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps'). (respondent ref: Form 3)</p>
A1634B12	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps'). (respondent ref: Form 3)</p>
A1824B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>All the policies should include standards of design, including response to climate change. New schemes to meet zero net carbon should be considered from the outset. The policy is incomplete. Unless legislation pushes general development towards more sustainable solutions, the vast proportion of developers will not focus on carbon reduction or energy efficiency; their focus is on their profit margins.</p>
A1844B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	<p>The design of waterside development should be based on these key principles: orientation should positively address the water and optimise views and natural surveillance of the waterway; a public realm that integrates with the waterway, towpath and opens up access to the water and improvements to pedestrian access to, along and from the waterway. Whilst reference to waterside development within the policy or explanatory text would be welcome, we recognise that the policy is more general. As such we generally support it.</p>
A1896B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps').</p>
A2130B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>Statements on design do not add up to a coherent approach. The inclusion of a Shropshire Test as a gateway policy, SP5 on high quality design and the West Midlands Combined Authority Design Charter are all referred to but none contain the level of detail that can guarantee robust challenge to poor design. The risk is that both planning applicants and objectors could be using the same form of words to justify opposite outcomes. A better approach would be to use a design panel – especially given a lack of capacity and skills within the planning authority – as other areas do and as recommended by the CPRE. Cornwall provides an example – the Cornwall Design Review Panel has been in place since 2015. Such panels can be paid for from developer funds as part of the planning application process.</p>
A2150B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps').</p>
A2158B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps').</p>
A2163B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>Part 5 of the draft policy states developments of poor design will be refused, including those where inadequate information has been provided. This part of the draft policy is written in the negative form and should be more balanced, i.e. where development positively demonstrates design principles being incorporated then planning permission will be granted.</p> <p>The explanatory text of this draft policy requires all planning applications for new development to set out how they comply with this policy and the principles of the West Midlands Design Charter. It is noted that there is an absence of reference to the National Design Guide (Oct 2019) which has significantly more material planning weight than regional design guide. The DfT Cycle Infrastructure Design Guide (July 2020) could also be useful for reference.</p> <p>This policy should be amended in order to be found sound, as it needs to be fully justified</p>
A2173B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	<p>There is no reference to Neighbourhood Plans, Community Led Plans or Village Design Statements being considered as part of compliance with this policy.</p> <p>This should be included for these documents to be "material considerations" as part of overall siting, site layouts, housing styles, and individual dwelling designs</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2177B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Bullet 2 of draft Policy SP5 states development should be designed in accordance with the West Midlands Design Charter. The Council's policy approach to high quality design should align with the NPPF, the latest NPPG and the National Design Guide. Although the West Midlands Design Charter is not intended to set a local design policy (para 3.35), all planning applications for new development must set out their compliance with draft Policy SP5 and the West Midlands Design Charter (para 3.38). The HBF is supportive of the use of best practice guidance, however the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which developers are obliged to use as a pre-condition for the Council's support. Draft Policy SP5 and its supporting text should not convey contrary to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations) development plan status onto the West Midlands Design Charter, which has not been subject to the same process of preparation, consultation and Examination as the Local Plan. Before the pre-submission LPR consultation, Policy SP5 Bullet Point 2 should be deleted.
A2180B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	We welcome this new policy setting out a lot of those material issues that the Town Council always seeks in a development. This goes more way to addressing the desires of the Shrewsbury Test
A2308B31	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Recognise the need to achieve high quality design in development and that this will become increasingly important in the future (given recent proposals in the Planning for the Future White Paper). However, there is a need to recognise with the policy/supporting text that there may be cases where the design of development required for defence purposes is constrained by specific technical and operational requirements and as such flexibility in design may be restricted. Part 3i of the draft policy highlights the need to ensure health and wellbeing of neighbours/other nearby residential, occupiers, businesses and visitors. The draft Policy should also recognise the need to consider the health and wellbeing of occupiers of new residential/business development. Recommend that the draft Policy specifies that development will only be acceptable where it is designed to ensure that it would cause no detriment to the activity or operational capability of MOD assets and sites
A2323B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5		No specific comments.
A2365B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref: Form 3)
A2372B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	High Quality Design. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan. For example: PRINCIPLES of the West Midlands Design Charter 3 : Future Readiness Climate Resilience Developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle. Delivering Low Carbon Development: Development proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction. The potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps. " I disagree with this policy because it is incomplete.
A2412B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Agree	We support the Council's aspirations for high quality design. It is an important requirement for new development in the County. Our aspirations for sites MDR014 and MDR031 seek to deliver high quality design with the proposals carefully designed to provide a local distinctiveness, high quality materials, which seeks to utilise solar gains and integrate Green Infrastructure and sustainable drainage opportunities.
A2427B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	All the local plan housing development strategies (not just SP5) need details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter at least makes much clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan. And the Oswestry Place Plan includes this proactive statement on house building : "Undertake a Housing Needs Survey, support a survey of empty houses in the parish, investigate affordable housing and more good quality rental property options; ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps)." Policy SP5 seems to me to be hopelessly inadequate..
A2469B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref: Form 3)
A2471B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	I disagree with this policy because it is incomplete. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan e.g. 'developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle', 'proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction' and the potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps.) (respondent ref: Form 3)
A2475B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	Since it is accepted that there should be higher standards of design within the AONB should this not be mentioned within this policy?
A2489B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	High Quality Design. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan. For example: PRINCIPLES of the West Midlands Design Charter 3 : Future Readiness Climate Resilience Developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle. Delivering Low Carbon Development: Development proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction. The potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps. " I disagree with this policy because it is incomplete.
A2494B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP5	Disagree	High Quality Design. All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate. The West Midlands design Charter makes clearer statements over building for climate resilience and delivering low carbon development, than is contained in the Shropshire local plan. For example: PRINCIPLES of the West Midlands Design Charter 3 : Future Readiness Climate Resilience Developments should incorporate climate adaptation measures that respond to the short and long term impacts of climate change and address the environmental impact of the proposal across its life cycle. Delivering Low Carbon Development: Development proposals should seek to reduce greenhouse gas emissions by making clear, specific commitments to carbon reduction. The potential for new schemes to meet zero net carbon should be considered from the outset. The Oswestry Place Plan includes this proactive statement on house building ensure all new housing is built to be energy efficient and carbon compliant, with 'green' sources of energy installed (e.g. solar tiles and heat pumps. " I disagree with this policy because it is incomplete.
A0240B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	2.63 Paragraph 3.44 of the Explanation text confirms that 'Appendix 7 of the Local Plan provides information on expected delivery timescales for Local Plan allocations.'2.64 NPPF paragraph 73 requires the following: 'Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.'2.65 L&Q Estates raises significant concern regarding the form of the proposed housing trajectory in that it fails to adequately detail the specific expected rate of housing delivery over the plan period.2.66 The failure to outline specific delivery rates from the identified housing allocations renders the Policy SP6 unsound given its conflict with the requirement of NPPF paragraph 73.
A0430B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	Wallace support Part 1 of the policy which says that in addition to housing development at the allocations set out in policies S1-S20, there will be positive consideration of other sustainable housing development where this does not conflict with the policies of the plan. Wallace is also supportive of the wording of Part 3 of the policy, as it allows the residential guidelines to be exceeded where this is demonstrated to be appropriate. It is important that the residential guidelines are not seen as cap, as they are 'guidelines' after all, and settlements may be suitable for more housing growth than the residential guidelines suggest. The first part of Part 4 says that additional market housing development outside the development boundaries shown on the Policies Map will be controlled in line with policy SP9. Managing Development in the Countryside. Wallace take no issue with this part of the policy although do comment separately on policy SP9 below.
A0573B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Support SP6 and para 3.40 recognition that housing is essential for long term prosperity of Shropshire and para 3.41 recognising the NPPF and NPPG requirements that local plans be flexible and adaptable to change. SP6 requires more flexibility due to Covid-19 impacts and with proposed revision to standard methodology for housing need and satisfying unmet from Black Country. Sustainable development opportunities SHF032 (previously suggested as an allocation) and SHF018c (not previously suggested as an allocation but still positive, suitable and justified for residential use) adjacent to boundary in the east of Shifnal, adjacent to new employment, close to Stanton Road, A41 and M54 Junction 3, should be made available through the plan.
A0642B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Para 3.41 This all but guarantees that climate change will only be considered for a site in question, not the impact on Shropshire as a whole and not the impact on the whole country or planet.
A0647B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?
A0648B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?
A0685B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	Supported with a minor clarification. The policy says this at present: "In particular, additional housing development opportunities which would support the reuse of disused land or premises within settlement development boundaries as shown on the Policies Map; or contribute towards achieving wider town centre regeneration will be supported." It need not be quite so limiting and should instead read: "In particular, additional housing development opportunities which would support the use of all unprotected land or premises within settlement development boundaries as shown on the Policies Map; or contribute towards achieving wider town centre regeneration will be supported." This makes it clear that in principle all land within settlement boundaries not specifically identified for protection (e.g. public open space) will be acceptable in principle subject to compliance with other planning policies.
A0698B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0863B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Draft Policy SP6 seeks to manage the distribution of housing development across Shropshire beyond the allocated sites detailed in Policies S1-20. It is confined to development within settlement development boundaries. It controls the appropriateness of further residential development in settlements where the residential development guideline for a particular settlement has been exceeded. It provides the basis through which residential development outside of the settlement development boundary could be considered, through both Policy SP9 and through either: evidence showing the residential development guideline for a settlement being unlikely to be met over the plan period; or specific considerations set out in Settlement Policies. Draft Policy SP9 provides the basis through which residential development outside of the settlement development boundary could be considered in paragraphs 4 and 5. It tightly controls development in open countryside, with the types of development under consideration being isolated to conversions of existing buildings, or replacement of existing dwellings. Neither Draft Policy SP6 or SP9 provide meaningful flexibility for redevelopment of sites outside settlement development boundaries on brownfield land. Consider the policies, as drafted, cannot be found sound. The NPPF makes clear that there is a need to consider brownfield land for residential development and that where unallocated sites for particular uses are not likely to come forward, they should be considered for alternative uses. Paragraph 118(d) of the NPPF states that planning policies and decisions should: 'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively'. Furthermore, paragraph 121 of the NPPF states: 'Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to: a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this framework; and b) make more effective use of sites that provide community services such as schools and hospitals, provided that this maintains or improves the quality of service provision and access to open space'. The Shropshire Local Plan should be more flexible to allow for circumstances whereby residential development outside of the settlement development boundary (and outside of Green Belt) on brownfield land can be supported, particularly where an existing use on the site can no longer be sustained, as directed by paragraph 121(a). This will ensure the Local Plan is compliant with the NPPF in that the most effective use of land is achieved and achieving deliverability through the plan on unallocated sites. Propose the wording of draft Policy SP6, paragraph 4, is altered to include where all of the following apply: 'The site is brownfield land; The site is not in Green Belt; and The site is no longer viable for its current use.'
A0895B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Fletcher Homes object to Policy SP6(3) because it makes residential development guidelines, "a significant policy consideration" and applies a number of additional policy tests where development will result in the settlement residential development guideline being exceeded. Fletcher Homes also object to paragraph 3.42 that states: "the guideline is not intended to represent a ceiling on development, but going beyond it by too great a degree could result in unsustainable development." Policy SP6 therefore contradicts NPPF para 59 that places an emphasis on "significantly boosting the supply of homes" and paragraphs 60 and 73 to regard housing requirements and land supply as minima and not maxima. SP6(3) will restrict the number of new dwellings in settlements identified in the Plan as 'sustainable settlements' creating tensions between the Plan and the NPPF. This can be resolved by deleting SP6(3) from the Plan and changing policy and text references that state "around x dwellings" to read "a minimum of x dwellings". The Council's 'Local Plan Delivery & Viability Study' finds many sites will not be viable which will require planning consent for 125% - 150% of the land needed to deliver 100% of housing needs or requiring a significant non-delivery allowance to be built into all assessments of whether a settlement might exceed its residential guideline. Fletcher Homes also object to the combined effect of SP6 with DP1 that will have unintended adverse consequences on housing delivery. Policy SP6 seeks to control numbers and Policy DP1 seeks a higher proportion of smaller houses, with a combined effect that sites require more dwellings to achieve the same saleable floorspace and taking the settlement closer to its housing settlement guideline. SP6 and DP1 pull in different directions and this tension is demonstrated in the Council's Viability Study where viability is finely balanced in many parts of the county so developers must maximise saleable floorspace. The dual pressure of Policy SP6 on the number of dwellings in combination with Policy DP1 on the size of dwellings will create deliverability issues across the county as smaller dwellings combined with a limit on numbers that inevitably push down saleable floorspace. To resolve this tension, the word "significant" should be deleted from SP6(3) so the development guideline is one "policy consideration" to be weighed in the planning balance with other policy considerations including housing mix and housing delivery. The words "and a 25% non-delivery allowance" should also be added to the SP6(3) and two further considerations added as additional criteria to read "e. the housing mix" and "f. the delivery of the Plan's allocated sites". This will make SP6(3) more compatible with policy DP1.
A0896B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Galliers Homes object to Policy SP6(3) because it makes residential development guidelines, "a significant policy consideration" and applies a number of additional policy tests where development will result in the settlement residential development guideline being exceeded. Galliers Homes also object to paragraph 3.42 that states: "the guideline is not intended to represent a ceiling on development, but going beyond it by too great a degree could result in unsustainable development." Policy SP6 therefore contradicts NPPF para 59 that places an emphasis on "significantly boosting the supply of homes" and paragraphs 60 and 73 to regard housing requirements and land supply as minima and not maxima. SP6(3) will restrict the number of new dwellings in settlements identified in the Plan as 'sustainable settlements' creating tensions between the Plan and the NPPF. This can be resolved by deleting SP6(3) from the Plan and changing policy and text references that state "around x dwellings" to read "a minimum of x dwellings". Galliers Homes also object to the combined effect of SP6 with DP1 that will have unintended adverse consequences on housing delivery. Policy SP6 seeks to control numbers and Policy DP1 seeks a higher proportion of smaller houses, with a combined effect that developers may not achieve an appropriate housing mix without taking the settlement closer to its housing settlement guideline. SP6 and DP1 pull in different directions and this tension is demonstrated in the Council's Viability Study where viability is finely balanced in many parts of the county so developers must maximise saleable floorspace. The dual pressure of Policy SP6 on the number of dwellings in combination with Policy DP1 on the size of dwellings will create deliverability issues across the county. To resolve this tension, the word "significant" should be deleted from SP6(3) so the development guideline is one "policy consideration" to be weighed in the planning balance with other policy considerations including housing mix and housing delivery. Two further considerations should be added to SP6(3) as additional criteria to read "e. the housing mix" and "f. the delivery of the Plan's allocated sites". This will make SP6(3) more compatible with policy DP1.
A0897B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Section 3 of draft Policy SP6 makes residential development guidelines, "a significant policy consideration" and applies additional policy tests for developments which result in residential development guidelines being exceeded. Para 3.42 of the explanation to this draft Policy notes "the guideline is not intended to represent a ceiling on development". Agree development guidelines cannot be a ceiling as this would run counter to paras 59, 60 and 73 of the NPPF regarding significantly boosting the supply of homes and treating housing requirements and land supply as minimums. However in practice section 3 of draft Policy SP6 restricts the number of new dwellings in settlements identified in the draft Local Plan as 'sustainable settlements'. This creates tension between the draft Local Plan and NPPF that can only be resolved by deleting section 3 of the draft policy and re-wording all the settlement policies from "around x dwellings" to "a minimum of x dwellings". Concerned this draft Policy (SP6) in combination with draft Policy DP1 will have unintended consequences that adversely impact on housing delivery. Draft Policy SP6 seeks to control numbers while draft Policy DP1 seeks a higher proportion of smaller houses, effectively requiring a larger number of units on a site to achieve the same saleable floorspace. It may make it difficult to achieve the housing mix sought by if doing so would result in exceeding the housing settlement guideline. This may cause problems on sites. Furthermore, given viability is finely balanced, as demonstrated in the Council's Viability Study, this could also create deliverability issues across the county. Suggest that if the Council is to retain section 3 of draft Policy SP6, "significant" is deleted, so that the development guideline is "a policy consideration" to be weighed in the round with regard to other policies such as the housing mix and housing delivery considerations (which could be added into the list under section 3 of the draft policy).
A0928B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	The aims and aspirations of this policy are somewhat confusing. It appears that the policy is aimed at supporting and explaining how the Plan's housing requirements will be delivered over the plan period in line with the settlement hierarchy and strategic settlement policies. It also seeks to provide some flexibility and adaptability to changing circumstances particularly in the context of the Housing Delivery Test, but we would also suggest could be a mechanism by which any future increase in housing need through a revised Standard Methodology could be flexibly accommodated within policy. The policy supports sustainable housing development even on sites not allocated provided they do not conflict with policies of the local plan. It also supports the reuse of disused land and premises within settlement development boundaries. Both aspects are not objective to. However, the policy also appears to resist housing development which would lead to the residential development guideline for a settlement being exceeded. This may be appropriate where disproportionate growth is proposed in less sustainable locations and settlements, but where additional development is proposed in sustainable locations, including for example in Shrewsbury and even exceeds its development guideline, such development which would otherwise be sustainable should not be restricted by the development guideline cap. The final section of the policy describes circumstances where additional market housing development outside of settlement development boundaries will be strictly controlled but "may be potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan or where specific considerations set out in the settlement policies apply". This additional flexibility outside of settlement boundaries is welcomed however the policy is still somewhat ambiguous and limited in its application. It may become a critical policy to provide the much needed flexibility given the shortcomings of the current plan requirement and clear evidence of increasing housing need emerging through the revised SM. The policy should additionally address circumstances where the need for housing could increase through the emerging revised standard methodology and could give priority to meeting such needs in line with the settlement hierarchy prioritising Shrewsbury as the main settlement. Giving some flexibility to meet housing needs would add to its soundness. The approach set out in this policy could be supplemented by identifying "reserve" sites which could be accelerated and delivered if housing needs increase. Such an approach would avoid the need for an early review of the plan and increase its longevity.
A0954B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	38. This policy states that in addition to the development of housing on the allocations set out within the Plan, there will be positive consideration of other sustainable housing development where this does not conflict with the policies of the local plan. This includes such a scenario when the residential guideline figure set for a settlement is exceeded – the benefits of the scheme, aside from increasing housing supply, would be weighed up to take account of the number of completions since the start of the plan period, as well as any outstanding commitments, cumulative impact arising from the development and the increase in number of dwellings relative to the guideline. 39. This approach is supported and it gives some assurance that the blanket allocation of specific number of dwellings is not set in stone and that the authority will take a more pragmatic approach to support sustainable development. This also demonstrates a degree of flexibility with the Plan in accordance with the NPPF. 40. It is also encouraging to note that although the policy sets out the importance of the settlement residential development guidelines (with numbers of dwellings directed to each settlement) it clearly states at paragraph 3.42 that: "the guideline is not intended to represent a ceiling on development, but going beyond it by too great a degree could result in unsustainable development." 41. The focus being firmly based on sustainable development rather than housing numbers or a slavish adherence to numerical guidelines.
A0956B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	The draft Policy states "Additional market housing development outside the settlement development boundaries shown on the Policies Map will be strictly controlled in line with Policy SP9, and will only be considered potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific considerations set out in the Settlement Policies." Whilst this monitoring-led approach to the delivery of the housing strategy is supported, the Council should ensure in the first instance that sufficient flexibility for housing land supply is provided in the draft SLP in a way that supports housing delivery in line with the urban focused spatial strategy.
A0972B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Para 4 Should housing development outside that included in the Local Plan, once adopted, be approved, will the development proposed under the Local Plan be limited in number to ensure that the overall numbers for the Bridgnorth area are not exceeded? How will the total numbers be monitored?
A0981B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	Sport England supports the reference in part 1) of the policy to ensure that new housing development will be supported providing it does not conflict with other policies in the Local Plan. Sport England also supports the reference in Part 3c) of the policy that regard will be had to any cumulative impacts on the needs for infrastructure, as this is consistent with other policies in the plan, particularly Policy DP27 to plan positively for the needs for social infrastructure to meet the needs of the proposed housing growth. Sport England recommends that a reference is added (either in the policy wording or reasoned explanation) as to how the Council propose to identify and deliver these infrastructure requirements through the Council's Place Plans and Infrastructure Delivery Plan, and to reinforce the Council's evidence base for infrastructure needs (which includes the Council's Playing Pitch and Outdoor Sports Facilities Strategy (PPOS), and Built Sports Facilities Strategy (BFS)).
A1152B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	Agreement is on the whole. Particularly welcome para 2 of the draft policy insofar as it will be used to actively encourage the re-use of brownfield land, and the regeneration of town centres. Also particularly welcome para 3 insofar as it will be actively used to refuse applications for development that are in excess of guideline figures. The public expect a guideline figure to be treated as a maximum, and are always perplexed that the Council permits development in excess of that. What is the point of a plan, they think, if its guideline figures can be exceeded with impunity? There would be a greater chance of the re-use of brownfield land were the guideline figures for housing not so high. The numbers game has had a catastrophic effect on the ability of brownfield land to contribute to housing land supply in Local Plans. The higher the housing number, the harder it is to pursue brownfield and under-used land for supply, and therefore the greater is the pressure on greenfield sites. This is exacerbated by the huge financial incentive to landowners simply to gain outline planning permission, which is why land market reform is also crucial. There are currently 1 million homes' worth of unbuilt planning permissions on both greenfield and brownfield land in England, which is enough land in the system to meet the Government's mantra of needing 300,000 new houses a year for at least the next three years.
A1170B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	I strongly support these policies to achieve a wider distribution of housing provision and development. My family life suffered harm from a lack of available housing in South Shropshire when it was under a district council. There is however a need to recognise that in many cases 'disused land' in urban and urban fringe locations is of great value for biodiversity; my own professional work in the Black Country has shown this.
A1649B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Don't know / no opinion	The proposed allocation of 250 within Highley in particular could adversely affect congestion in Bewdley town centre. By allocating the majority of development within the strategic and principal centres, the preferred sites document appears to be consistent with sustainable development as outlined in the revised NPPF.
A2177B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Policies SP6 – Managing Housing Development, SP7 – Managing Development in Community Hubs and SP8 – Managing Development in Community Clusters support sustainable housing development within development boundaries (subject to not exceeding residential development guidelines set out in individual Settlement Policies)
A2323B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6		Whilst the draft policy notes that "there will be positive consideration of other sustainable housing development where this does not conflict with the Policies in the Local Plan" there is no reference to the potential of safeguarded sites: Point 4 of the draft policy highlights that sites beyond the settlement boundary "will only be considered potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific considerations set out in the Settlement Policies". The Council have identified safeguarded sites to be delivered beyond the plan period (after 2038) – it would be sensible for the safeguarded sites to be considered in the first instance. It is therefore considered that a robust mechanism should be built into this policy to allow the safeguarded sites to be bought forward at an earlier date if certain criterion is met. Shifnal is one of the most sustainable 'Key Centres' within the district, scoring highly for the provision of existing local services and facilities, local transport, amenity spaces, local employment and schools. Whilst we state that more growth should be directed to Shifnal within the plan period the Local Plan Review would be more robust if a mechanism was built into this policy to allow safeguarded sites to be released at an earlier point (before 2038) should the need arise

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2367B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Para 4 SP4 S17.2 Clive Paragraph 4 of SP6 facilitates development outside development boundaries. S17.2 allows a community-led plan to be used to determine permissions for development outside designated boundaries. These may not be robust enough to inform such an important decision, given that they are not necessarily subject to the level of scrutiny as Shropshire Council documents/policies such as the Local Plan. Furthermore, the test of 'community need', is ambiguous and it unclear how this would be established/determined.
A2367B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Paragraph 3 Paragraphs 3 and 3.42 are not suitably specific to mitigate against limitless development based on subjective assessment. Specific limits/tolerances/criteria are not specified. This means that settlements in hub status have no guarantee of any development limits.
A2401B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Para 3 of SP6 and Para 3.42 of the explanation claim to provide clear guidelines regarding circumstances when development guidelines may be exceeded. However, the vagueness of these guidelines means a limitless amount of development may be approved based on a subjective test. For example, sub-para (d) states, "The increase of the number of dwellings relative to the guideline." Without any form of limit or tolerance, it makes this section of the policy worthless, meaning any number of dwellings could theoretically be approved provided it could be shown that 'due regard' had been given to the conditions. In order to provide residents with some form of peace of mind or confidence in the overall plan for a particular centre or hub, the guidance needs to be more robust and commit to the fact that the proposed guideline number of dwellings should be taken as an absolute maximum. This concern is amplified later in the same para with the statement, "The guideline is not intended to represent a ceiling on development."
A2401B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	Development boundaries are an important mechanism for controlling development. However, para 4 of SP6 provides too much leeway in allowing development outside the boundaries. The clause that allows development outside the boundary where, "there are specific considerations set out in the Settlement Policies," is too wide ranging. The Settlement Policy (S17) for Wem Place Plan Area, specifically S17.2, allows the contents of any community-led plan to be used in support of this decision. Given such plans are not necessarily subject to the same level of scrutiny and consultation as the local plan, I would contest that they are suitable means for informing such important decisions. Also, within the same par, the test of 'community need' is not defined. How is this metric to be assessed and by whom?
A2403B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	The Estate welcomes the flexibility within the plan to support windfall opportunities for housing in other sustainable locations, consistent with the wider policies of the local plan. We note the reference to residential development guidelines. We consider that in order for the plan to be consistent with the growth objectives of the National Planning Policy Framework and emerging Government aspirations as set out within the recent White Paper, it is important that these guidelines are not seen as ceilings for development, and that otherwise sustainable developments should be viewed positively and with consideration given to the overall benefits of the development, irrespective of the delivery position against the residential development guidelines
A2412B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	We support development the premise of allowing unallocated sites within settlement boundary within Shropshire. We would suggest an amendment to point 2: "2. In particular, additional housing development opportunities which would support the development of previously developed sites, or greenfield sites within settlement boundaries as shown on the Policies Map; or contribute towards achieving wider town centre regeneration will be supported." Such an amendment would allow for an appropriate level of windfall sites to come forward, as envisaged in the plan period, as worded it only allows for the reuse of disused land or premises.
A2470B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	Support the approach using Place Plan areas, as it allows local character, need and contexts to be accounted for.
A2476B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Agree	3.9 The thrust of this policy as a whole is for the positive consideration of other sustainable housing development outside of identified allocations, however it refers back to Policy SP9 which aims to strictly control housing outside of settlement development boundaries. 3.10 Policy SP6(4) is supported insofar as it provides some flexibility and the ability for the Plan to respond to development proposals in situations where the residential development guideline is unlikely to be met over the plan period, or where there are specific considerations set out in the Settlement Policies. 3.11 These representations make further comments to Policy SP9 and Policy S.16.1 in this respect, as it is considered that additional sites in sustainable locations adjoining key settlements, such as land at the Berwick Estate, should be capable of being brought forwards where it would accord with the wider aims and strategy within the plan. It is also important to note that the Berwick Estate will be delivering a Whole Estate Plan that is consistent with the themes emerging from this local plan. The attached Vision Document at Appendix 2 provides a snapshot of the emerging Whole Estate Plan and gives a clear opportunity for Shropshire Council to bring forward sustainable development and essential infrastructure with the Estate's support.
A2477B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP6	Disagree	This policy is broadly supported. The addition of a further category would be more positive and would help with plan and development flexibility. The policy could be changed to support windfall development in sustainable locations adjoining main or principal centres when such a development would not intrude into open countryside.
A0155B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	The Policy on Managing Development in Community Hubs (Policy SP7) is too dependent on small sites coming forward as windfall sites when there is no guarantee that this will happen.
A0158B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	The Council strongly supports the criteria set out in SP7, especially a., d. and e. The wording of criterion d. needs to be strengthened to say that "Any development must be accompanied by improvements in infrastructure which will benefit and have the support of the whole community."
A0207B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Hub status gives control over the future of the village in respect of some development identified together with a village boundary which hopefully will safeguard the community for the foreseeable future [NOTE: No Hub specified in B1 of rep - likely to be Cressage, see B2]
A0269B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	We agree provided that the Development Guidelines also inform the provision of Affordable Housing having regard to the evidence base for that strategic allocation
A0269B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Managing Development within Community Hubs In relation to allocated sites, we support this in so far as Neighbourhood and Community Led plans and policies are complementary to and do not seek material change to the Development Guidelines – see SP2 (7)
A0269B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Managing Development in Community Hubs We support the purpose of Development Guidelines as being, in part, to deliver certainty to the development industry
A0436B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Object to use of development boundaries in Community Hubs to tightly control additional open market housing.
A0437B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Object to use of development boundaries in Community Hubs to tightly control additional open market housing.
A0438B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Object to use of development boundaries in Community Hubs to tightly control additional open market housing.
A0439B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7		Support inclusion of a policy which supports the principle of new development in Community Hubs. Object to use of development boundaries in Community Hubs to tightly control additional open market housing. A less restrictive policy or 'looser' development boundaries will improve delivery of new homes. Competition amongst landowners increases preparation of well considered development proposals and ensures delivery (as learnt between 2013 and 2015 when there was no 5 year housing land supply). Overly tight development boundaries coupled with a limited number of allocated sites will not deliver the housing numbers required.
A0440B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7		Support inclusion of a policy which supports the principle of new development in sustainable rural settlements designated Community Hubs (rural service centres which should be the focus for suitable scales of development which respect the character of the village and affords tangible benefits the community). Object to use of development boundaries in Community Hubs to tightly control additional open market housing. CLV012 & CLV018 will provide 66% of Clive's residential guideline, affording important infrastructure and protection against speculative development by the provision of a development boundary.
A0441B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Object to use of development boundaries in Community Hubs to tightly control additional open market housing.
A0442B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Object to use of development boundaries in Community Hubs to tightly control additional open market housing.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0443B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Support principle of new development in Community Hubs. Object to use of development boundaries in Community Hubs to tightly control additional open market housing. Introducing competition between landowners results in well considered development proposals and ensures delivery - as was learnt between 2013 – 2015 when Shropshire Council couldn't demonstrate a 5-year land supply. Concerned that tight development boundaries coupled with a limited number of allocated sites will not deliver the housing numbers required. A less restrictive policy in respect of new open market housing, or 'looser' development boundaries will improve delivery of new homes across the county. As Draft Policy SP7 imposes a tightly drawn development boundary around sustainable settlements, it restricts windfall opportunities and the number of dwellings that could developed. For the Local Plan to be considered sound and consistent with para 70 of the NPPF, sufficient opportunities for windfall development need to be allowed.
A0444B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Object to use of development boundaries in Community Hubs to tightly control additional open market housing.
A0445B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Support principle of new development in Community Hubs. Object to use of development boundaries in Community Hubs to tightly control additional open market housing. Introducing competition between landowners results in well considered development proposals and ensures delivery - as was learnt between 2013 – 2015 when Shropshire Council couldn't demonstrate a 5-year land supply. Concerned that tight development boundaries coupled with a limited number of allocated sites will not deliver the housing numbers required. A less restrictive policy in respect of new open market housing, or 'looser' development boundaries will improve delivery of new homes across the county
A0446B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Support principle of new development in Community Hubs. Object to use of development boundaries in Community Hubs to tightly control additional open market housing. Introducing competition between landowners results in well considered development proposals and ensures delivery - as was learnt between 2013 – 2015 when Shropshire Council couldn't demonstrate a 5-year land supply. Concerned that tight development boundaries coupled with a limited number of allocated sites will not deliver the housing numbers required. A less restrictive policy in respect of new open market housing, or 'looser' development boundaries will improve delivery of new homes across the county
A0508B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	The policy states that appropriate development will be permitted on allocated sites and other sustainable sites within the development boundary of Community Hubs. Clearly where allocations are made or where there are suitable sites within the development boundary then this policy provides support for these Hubs to grow. However, where no allocations are proposed as is the case of Woore, it undermines the ability of the settlement to ensure its longer term sustainability. We, therefore, consider the policy unsound as it is not effective in that it will not enable Woore to ensure its longer term sustainability which is set out as an objective in Policy SP2.
A0609B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Support retention of the development boundary.
A0678B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Note criteria for development in Community Hubs and relevant to development in St Martins. The 3 draft policy criteria (including sub sections) provide a framework under which future development proposals can be appropriately considered.
A0685B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	The policy and its explanatory text are supported. This sentiment is agreed with: "Community Hubs are considered significant rural service centres and the focus for development within the rural area. As such appropriate development will be permitted on allocated sites and other sustainable sites within the development boundary of Community Hubs, as identified on the Policies Map." The site at London Road is within the settlement boundary of the made Woore Neighbourhood Plan and this boundary should remain unchanged in the emerging Shropshire Local plan. To avoid doubt this site should also be included as a housing allocation for up to 10 dwelling.
A0692B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7		Agree the proposed Community Hubs should be the focus for development within the rural area as they are the most sustainable rural locations Section 1f of the draft policy restricts development to the draft residential guideline for each Community Hub. This will stop development in those villages that are most successful in delivering housing, like St Martins and compound the problems identified by the Council's 'Local Plan Delivery and Viability Study', increasing risk that Shropshire will fail to meet the Housing Delivery Test set out in para 11 and footnote 7 of the NPPF. As currently worded this will restrict delivery in some proposed Community hubs and increase it in others, where viability and sustainability is weaker. the draft Local Plan will be more successful in meeting overall housing needs if delivery is the most successful, deliverable and sustainable rural settlements is not unduly constrained. Section 1f of the draft policy should therefore be deleted
A0895B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Fletcher Homes supports the Policy SP7 that, "Community Hubs are considered significant rural service centres and the focus for development within the rural area". Community Hubs must accommodate their own organic growth and that of their rural hinterland comprising the countryside and small hamlets. If Community Hubs are to be the focus for development in the rural area, their residential guideline figures should not be less than the average forecast growth in households. The Office of National Statistics household projections forecast an additional 36,424 households in Shropshire over 2016-2038, equivalent to 26.9% growth of the 2016 figure (equivalent to 1.22% per annum). This level of growth should be the minima for each Community Hub to be the focus for rural development, rather than held back by policies of constraint that diminish their sustainability. SP7(1)(f) restricts development in Community Hubs to that which will, "not result in the settlement's residential guideline being exceeded". This makes the guideline a maxima figure, contrary to NPPF endorsing housing numbers as minima not maxima. This is also contrary to the Government's key objective of, "significantly boosting the supply of homes" in NPPF paragraph 59 and recent Ministerial Statements SP7(1)(f) effectively turns Community Hubs from sustainable settlements in which development is appropriate, into locations where development is refused if the residential guideline is exceeded. This contradicts the policy's earlier statement that, "Community Hubs are considered significant rural service centres and the focus for development within the rural area." There is inadequate justification for why successful and sustainable villages should tip from a positive approach to development to a negative approach, simply because they exceed an arbitrary guideline figure. To resolve these issues, SP7(1)(f) should be completely deleted from the Local Plan.
A0896B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Galliers Homes supports the Policy SP7 that, "Community Hubs are considered significant rural service centres and the focus for development within the rural area". Community Hubs must accommodate their own organic growth and that of their rural hinterland comprising the countryside and small hamlets. If Community Hubs are to be the focus for development in the rural area, their residential guideline figures should not be less than the average forecast growth in households. The Office of National Statistics household projections forecast an additional 36,424 households in Shropshire over 2016-2038, equivalent to 26.9% growth of the 2016 figure (equivalent to 1.22% per annum). This level of growth should be the minima for each Community Hub to be the focus for rural development, rather than held back by policies of constraint that diminish their sustainability. SP7(1)(f) restricts development in Community Hubs to that which will, "not result in the settlement's residential guideline being exceeded". This makes the guideline a maxima figure, contrary to NPPF endorsing housing numbers as minima not maxima. This is also contrary to the Government's key objective of, "significantly boosting the supply of homes" in NPPF paragraph 59 and recent Ministerial Statements SP7(1)(f) effectively turns Community Hubs from sustainable settlements in which development is appropriate, into locations where development is refused if the residential guideline is exceeded. This contradicts the policy's earlier statement that, "Community Hubs are considered significant rural service centres and the focus for development within the rural area." There is inadequate justification for why successful and sustainable villages should tip from a positive approach to development to a negative approach, simply because they exceed an arbitrary guideline figure. To resolve these issues, SP7(1)(f) should be completely deleted from the Local Plan.
A0899B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Object to Policy SP7(1)(f) to restrict development to a scale not exceeding residential guideline figure. Means guidelines are maximum requirement contrary to NPPF para 59 to significantly boost supply and Ministerial Statements which raises the risk of the plan being found unsound. Policy SP7 regards Hubs as significant rural service centre and focus for development in rural areas. Hubs should accommodate their own organic growth and growth of their rural hinterland. Their residential guidelines should not be less than the average ONS forecast for household growth. The Office of National Statistics household projections forecast an additional 36,424 households in Shropshire over 2016-2038, equivalent to 26.9% growth of the 2016 figure. This level of growth should be the minimum for each Community Hub if they are to genuinely be the focus for rural development. This growth in Community Hubs increases the risk that Shropshire will fail to meet the Housing Delivery Test set out in paragraph 11 and footnote 7 of the Framework.
A0900B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Sansaw Estate supports Policy SP7 that, "Community Hubs are considered significant rural service centres and the focus for development within the rural area." This recognises Community Hubs accommodate not only their own organic growth but also that of their rural hinterland. The pandemic highlights the benefits of rural living with possible greater demand for homes and business in the countryside. It is disappointing that Policy SP7(1)(f) seeks to limit development in Community Hubs, only permitting development where it, "would not result in the settlement's residential guideline being exceeded, taking into consideration completions since the start of the plan period and outstanding commitments (including site allocations)". This turns housing guidelines into ceiling figures, contrary to NPPF's consistent use of housing numbers as minima not maxima. This is also contrary to NPPF para 59 to "significantly boost the supply of homes" and expressed in recent Ministerial Statements. It makes the Local Plan's job of delivering the housing and employment development that Shropshire needs much more difficult than it needs to be. In our view, Community Hubs should be allowed the flexibility to respond to changing needs and not have artificial constraints such as a ceiling on numbers imposed on them. The Council's 'Local Plan Delivery & Viability Study' identifies a very serious problem with viability and highlights that many sites may not come forward due to the significant additional costs of policies such as DP12 (Minimising Carbon Emissions), DP1 (Residential Mix) and the Community Infrastructure Levy. Table 12.8 of the Viability Study estimates the additional costs to be around £554,093 per hectare. As many sites will have marginal viability at best, there will be a higher proportion of committed sites (with planning permission or allocated) not delivered. The proposed wording of SP7(1)(f) assumes 100% delivery of outstanding commitments and allocations. In light of the evidence in the Council's 'Local Plan Delivery & Viability Study' that many sites will not be viable, this assumption is likely to result in under-delivery in most Community Hubs in Shropshire. To address this issue requires planning consent for 125% - 150% of the land needed in order to deliver 100% of housing needs. This could be addressed by requiring a 25% buffer to be added to settlement guidelines. Alternatively, consistent with our comments on Policy S17.2, we suggest that all residential guideline figures are expressed as minima. We suggest SP7(1)(f) should be completely deleted and would welcome a cross-reference to Policy SP12 (Whole Estate Plans) in SP7(2) and paragraph 3.55 to read; SP7(2) "Development proposals outside the development boundary of Community Hubs will be managed in accordance with Policies SP9 and SP12 and any other relevant policies of this Local Plan." And paragraph 3.55 "Outside the development boundaries of Community Hubs, new development will be managed in accordance with Policy SP9 and any other relevant policies of this Local Plan including applying as a material consideration Whole Estate Plans that have been endorsed by Shropshire Council."
A0902B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Agree with SP7 as a whole, but there are some weaknesses. Without Hub status a village in the rural area may well begin to lose services and facilities, as is the case in Maesbury/Maesbury Marsh, and the village(s) have become less sustainable as a result. The LPR ought to be looking to reverse these trends. Maesbury and Maesbury Marsh are two settlements that sit immediately adjacent to each other – where a garden in one village ends the garden in the other village begins, and should be a Hub. The residents of the two settlements share the facilities available. The points system used to determine whether or not a village should be regarded as a Community Hub calculated the points attributable to each settlement separately, but in addition missed awarding points for some important local facilities.
A0904B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	The proposal to make Community Hubs the focus for development in the rural area so as to increase the sustainability of the rural area is supported. The re-allocation of Site GOB012 for residential development is supported.
A0906B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	The proposal to make Community hubs the focus for development in the rural area so as to increase the sustainability of the rural area is supported. However, the focus is on housing, rather than any other types of development. Hinstock is identified as a Community Hub and has been provided with sufficient land to meet the assessed housing requirement. Earlier allocations for residential development (in the SAMDev Plan) have not yet been taken up, and yet an additional area of land for more residential accommodation has been allocated in the village (on a site previously considered unsuitable). No land is allocated for employment uses, and no indication of where people living in the new properties (which are mainly family houses, or, if they are smaller, affordable houses) might work. It appears that they are most likely to have to travel to Market Drayton, or Telford. The perpetuation of this trend does not foster sustainable communities. Policy SP7 should give greater advice on how employment opportunities can be introduced into the settlements in the rural area, and suggest that in some cases, employment opportunities might be more appropriately sited outside village development boundaries.
A0907B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	The criteria for managing development in Community Hubs set out in policy SP7.1.a – is supported. It is possible for the proposed allocated site WRP006 at Weston Rhyn to comply with or respond positively to any and all of the criteria set out in Policy SP7.1 (a) – (i).
A0908B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	SP7 is supported. However, the list of requirements set out in Policy SP7.1.a is far too imprecise for many would-be small developers, and these sorts of requirements are off-putting by their nature. Further, DP1 refers to "Residential mix" which will be expected to meet the identified needs of local communities, without any explanation of who will be setting the identified need, where the level of identified need can be sourced, or what may be the case if there is a dispute about the need identified. Reference to the documents listed in para 4.1 still leaves plenty of room for disagreement and interpretation. The list should be refined to ensure delivery is more easily achieved.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0914B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	The statement in Policy SP7 that "Community Hubs are considered significant rural service centres and the focus for development within the rural area" is supported. However it is very disappointing that Policy SP7 seeks to limit development in Community Hubs, only permitting development where it, "would not result in the settlement's residential guideline being exceeded. This section of the policy makes the guideline a ceiling figure, running counter to the National Planning Policy Framework's consistent use of housing numbers as minimums rather than maximums. It is contrary to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It makes the Local Plan's job of delivering the housing and employment development that Shropshire needs much more difficult than it needs to be. In our view, Community Hubs should be allowed the flexibility to respond to changing needs and not have artificial constraints such as a ceiling on numbers imposed on them. We therefore suggest that all residential guideline figures are expressed as minimums and that section 1f should be deleted from policy SP7 in its entirety.
A0954B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	42. This policy is very similar to SP6 but it specific to Community Hub settlements such as Bayston Hill. It is generally supported as Community Hubs are considered to be significant rural service centres and an appropriate focus for much of the development within the rural area. Specifically, Bayston Hill is described in 7.3.10 of the SLAA (August 2020) as: "Bayston Hill is a relatively compact settlement to the south of Shrewsbury on the A49. In terms of constraints, the settlement is flanked to the west by the Rea Brook, which takes a path along the north western edge of Bayston Hill. To the east, the settlement is again bordered by a watercourse which runs along the length of the village edge, and additionally by the railway line. To the north, the A5/A49 Shrewsbury Bypass separates the village from the southern fringe of Shrewsbury, and the land on either side of the A5 corridor a significant and important gap between the two settlements. There are also several dense tree belts of vegetation covered by Tree Preservation Orders on the north western edge of the settlement and on the south west edge. Due to its close proximity to Shrewsbury, the village has strong links with the town and as a consequence, access to good services, facilities and infrastructure. The settlement is serviced by a frequent bus service running from Monday to Saturday. There are a range of services in the village. There are three shops, post office, two schools and four pubs."
A0961B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Para 1 support the retention of the development boundary
A0981B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Sport England supports the reference in part 1d) of the policy to ensure that there is sufficient infrastructure capacity to support the development proposed, and to address any capacity constraints that result from proposed development. Sport England recommends that it would be appropriate to reference (either in the policy wording or reasoned explanation) how the Council propose to identify and deliver these infrastructure requirements through the Council's Place Plans and Infrastructure Delivery Plan, and also to reference the Council's evidence base for infrastructure needs (which includes the Council's Playing Pitch and Outdoor Sports Facilities Strategy (PPOSS), and Built Sports Facilities Strategy (BFS)).
A1126B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Fully endorse the retention of the Green Gap to the north of Bayston Hill.
A1146B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Policy SP7: Development in Community Hubs. Policy SP7 sets out the manner in which development in Community Hubs will be controlled. Outside Community Hubs development will generally be restricted to very special forms of development. However, this places much greater importance on the decisions made in respect of designation of particular villages as Community Hubs. Without that status a village in the rural area may well begin to lose services and facilities. Indeed, that process has begun in Leebotwood, and the village has become less sustainable as a result. The Local Plan Review ought to be looking to reverse these trends. Leebotwood is a very scattered settlement. The points system used to determine whether or not a village should be regarded as a Community Hub calculated the points attributable to Leebotwood missed awarding points for some important local facilities. The village enjoys a regular bus service, a pre-school nursery, a public house, a place of worship, extensive amenity green space, a library, a community hall, and unusually high employment opportunities. As the Plan stands Leebotwood will have no development for the next 18 years, and in that time is likely to struggle to maintain the services it currently provides. This has been the pattern over the past two or three Local Plan policies which have restricted development and led to the loss of the village primary school, shop, and post office. Those lost services are now being used as justification for further restrictions on development. An approach to development in villages that takes into account the way communities actually function, alongside a points system that more accurately reflects the current situation in settlements (and doesn't miss important facilities) would produce a more sustainable distribution of development in the rural area. The most concerning element in this situation is that there is no mechanism built into the Local Plan that will allow "upward movement" from a settlement being situated "countryside" to one that will undertake development to help support local services. This condemns villages that might presently not have sufficient points to 18 years without growth, while they might well be becoming more unsustainable as well. It would be helpful to all concerned if the Council were to propose such a mechanism in the current Plan, to allow villages that can demonstrate that they will become more sustainable
A1191B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Support identification of Community Hubs (including Burford) as 'significant rural service centres' and as the focus for development in the rural area. Consider that proposals for BUR004 comply with the proposed criteria for assessing development in Community Hubs within draft Policy SP7.
A2177B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	Policies SP6 – Managing Housing Development, SP7 – Managing Development in Community Hubs and SP8 – Managing Development in Community Clusters support sustainable housing development within development boundaries (subject to not exceeding residential development guidelines set out in individual Settlement Policies)
A2327B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Agree with maintaining Green Gap between Bayston Hill and Shrewsbury,
A2351B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	There appears to be a circular argument within SP7 Managing Development in Community Hubs. Development will be agreed where there is "sufficient infrastructure capacity to support the development". Hubs have been classed as having sufficient infrastructure but this does not appear to have been adequately assessed within the Hierarchy of Settlements. There is no provision for assessing vehicular access to Community Hubs, hence Clive village being deemed as having sufficient infrastructure despite only having single track roads to it. It could be argued that simply by being classified as a Community Hub the infrastructure is deemed sufficient even when this has not actually been assessed. This then allows for ongoing development beyond the allocated provision.
A2398B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Agree	Support acknowledgement that Community Hubs are significant centres and the inclusion of site allocations for development within the Plan. Para 3.52 of the draft Local Plan confirms that in order to recognise the diversity of the settlements, each Community Hub has been provided with an identified residential development guideline. The text highlights that the figure has been informed by consideration of the characteristics of each Community Hub and aims to provide greater certainty to local communities and the development industry. The SAMDev Plan was adopted in December 2015 and identified Bayston Hill as a Community Hub with a Development Guideline of only 50-60 dwellings between 2006 and 2026. It was considered that this could be achieved through infill development and without identifying specific allocations. This level of housing delivery has failed to sustain the delivery of much needed affordable housing within Bayston Hill, and the approach has had similar impacts in other Community Hubs. The draft Local Plan has identified a residential guideline for Bayston Hill of 200 dwellings which is to be met principally by two allocations. Support the higher level of development directed to sustainable Community Hubs and the acknowledgment that site allocations provide certainty for all parties. However, it is not clear how the guidelines for all tiers of settlement have come about and on what evidence they are based. There is no clarity on how the housing figure has been divided between the settlements. Suggest that further evidence is required to demonstrate how the characteristics have been taken into consideration. For instance 360 dwellings to Gobowen and 355 dwellings to St Martin (two small villages identified as Community Hubs located within 3km of each other and 4.4km from Oswestry) is significantly more than Bayston Hill which is only set to receive 200 dwellings. The Council's Hierarchy of Settlements paper (August 2020) reviews all settlements and establishes a hierarchy based on sustainability. As part of this assessment, settlements are assessed for their provision of primary and secondary services, transport and employment opportunities. Bayston Hill emerges as a highly sustainable settlement and is acknowledged to have good access to services. Overall, the Hierarchy of Settlements study scores Bayston Hill 80 out of a possible 116 total points for sustainability. St Martins and Gobowen score lower than Bayston Hill with overall scores of 77 and 71 respectively. They do not have the same range of services as Bayston Hill and this demonstrates that further justification is required for the identification of development guidelines. Market attractiveness should be a major consideration, as there is little value in allocating land in settlements with no market interest, such sites will remain undeveloped and undelivered. This has been identified by Shropshire Council who has set up Cornovii Developments, a housebuilding company to tackle a shortfall in commercial house building in the county which is pursuing development in St Martins, demonstrating the importance of allocating sufficient land in areas of the borough which are viable and attractive to market housebuilders. With regard to stage 3 of Settlement Hierarchy, consider the four categories identified provide a useful indicator for assessment, but also consider that population should be included in the analysis as larger settlements are generally more sustainable as a greater range of services and facilities can be supported. With regard to stage 4 of the Settlement Hierarchy, consider that Principal and Key Centres should have unique descriptions, given they perform different roles and Principal Centres serve a much wider catchment. With regard to the categorisation of settlements, the lower threshold for Key Centres was ultimately based on professional judgement including that Principal/Key Centres should be well dispersed with reasonable rural hinterlands between them and the strategic centre and other centres. It was specifically highlighted in the earlier consultation document on the Hierarchy of Settlements that some Community Hubs, particularly some of the higher scoring Community Hubs are satellites to larger settlements classified as either a Strategic/Principal/Key centres. Consider that settlements should be assessed based on the level of services that are provided as well as the size of the population. The fact that a centre is located close to a larger centre is not a factor which should impact on the categorisation of settlements. Examples of other Local Authorities provided. Remain of the view that failing to recognise certain settlements which are of significant size and contain key services is not sustainable. Smaller settlements which are close to larger towns are extremely sustainable places to live, given the services available, and there is demand for people to live there. Indeed, the residents of Bayston Hill are about the same distance from Shrewsbury Town Centre as those living in Battlefield or Bicton Heath/Shelton; the only difference being that Battlefield and Bicton Heath/Shelton are within the development boundary of Shrewsbury, whereas Bayston Hill is not. Sustainable development cannot be determined on the basis of a line on a plan. Note that the Settlement Hierarchy has been twice updated but the overall hierarchy remains the same. The identification of appropriate development guidelines for the most sustainable Community Hubs goes some way to addressing these concerns. Support identification of development guidelines for named Community Hubs. Housing figures seek to acknowledge sustainability of Community Hubs, as well as the requirement to meet the needs of small settlements for new housing and sustain the existing services. Allocation of sites in Community Hubs, such as Bayston Hill, provides certainty to communities over development and the security that much needed affordable housing as well as other benefits will be delivered. This approach acknowledges the sustainability of Community Hubs and the requirement to meet the needs of small settlements for new housing as well as sustain existing services.
A2475B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP7	Disagree	The now historical allocation of Community Hubs and Clusters arguably does not serve the AONB well. These are not in fact distributed evenly around the AONB and the south of the county. While in the far west this reflects sparsity of population, the fact of no definition of Community Hubs or Clusters within the Church Stretton Place Plan is something of an anomaly. It also feeds directly into the planning pressures affecting the town, since it is acknowledged that development opportunities are limited there due to the uniquely high quality landscape. The allocation of Community Hubs and Clusters should be reviewed in order to achieve a landscape-led approach to housing allocation for local need within the AONB, as is now identified nationally as good practice for these national landscapes. Again, if the Local Plan is to serve instead of an AONB specific policy document, it must address this need.
A0029B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Don't know / no opinion	SP8 typo error (S11.4 5,162 Page 219)
A0079B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Agree	Llanyblodwel Parish Council support and agree with Policy SP8 and the outlined approach to managing development within Community Clusters.
A0183B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	The draft policy's restriction on site size to be no more than 0.1ha creates a number of inconsistencies in the Plan. It is inflexible, does not reflect typical rural densities, clashes with design policies and misses an opportunity to meet other policy objectives like balanced growth (including home-based businesses) and provision of self-build plots. Section 2c of the policy would be more robust and less open to challenge in the Local Plan examination if it were amended to: "Residential development will be delivered:....2 c. On suitable small-scale infill sites of 0.1ha about 0.2ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings"
A0246B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Welshampton should be considered a Community Cluster within the Local Plan. The village is well provisioned with local amenities, a significant number of dwellings which are reliant on these amenities, located on the A495 close to Ellesmere and is currently a Community Cluster. Welshampton is perfect for small, well-considered infill development.

Page 43

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0435B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Support recognition that rural settlements have interdependent sustainable features. Support development in Community Clusters, as this is vital for the continued health of these settlements. However, the draft policy is too restrictive as: It does not recognise the diverse range of settlements identified as part of Community Clusters. Requiring a suitable site to be infill is too limiting. A maximum site size of 0.1ha is too small for up to 3 houses and does not allow sites to respond to local context. In rural areas single plots are on 0.1ha. Whilst it is acknowledged that an upper limit of houses will help ensure suitable small-scale development is delivered, the provision of an overly prescriptive policy in respect of new housing will be hugely limiting. It is considered unnecessary to impose that such developments are limited to sites 0.1ha and 'infill'. The draft Policy should be amended to allow for suitable larger sites and that a suitable site has permanent and substantial buildings on at least one side, this would increase windfall opportunities
A0436B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0437B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8		Welcome recognition that rural settlements have interdependent sustainable features. This policy supporting development in such communities is vital for their continued health. Support windfall development in Community Clusters. However, the draft policy is too restrictive as it will not deliver sufficient housing in Community Clusters. A maximum site size of 0.1ha is too small for up to 3 dwellings, in rural areas, individual plots occupy sites of 0.1ha and this is recognised as a suitable plot size in the current SAMDev Plan single ploy policy. This should be amended to 0.3ha. The definition of infill is too restrictive and does not recognise the diverse nature/spatial pattern of settlements. This should be amended to existing built form on one side. The proposed approach is a failure to plan positively and is overly restrictive. Whilst it is acknowledged that an upper limit of houses will help ensure suitable small-scale development is delivered, the provision of an overly prescriptive policy in respect of new housing will be hugely limitin
A0438B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0439B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0440B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0441B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0442B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0443B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0444B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0445B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Support recognition that rural settlements have interdependent sustainable features. Support development in Community Clusters, as this is vital for the continued health of these settlements. However, the draft policy is too restrictive as: It does not recognise the diverse range of settlements identified as part of Community Clusters. Requiring a suitable site to be infill is too limiting. A maximum site size of 0.1ha is too small for up to 3 houses and does not allow sites to respond to local context. In rural areas single plots are on 0.1ha. Whilst it is acknowledged that an upper limit of houses will help ensure suitable small-scale development is delivered, the provision of an overly prescriptive policy in respect of new housing will be hugely limiting. It is considered unnecessary to impose that such developments are limited to sites 0.1ha and 'infill'. The draft Policy should be amended to allow for suitable larger sites and that a suitable site has permanent and substantial buildings on at least one side, this would increase windfall opportunities
A0446B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Object to identification of very limited circumstances where new open market development can occur within Community Clusters.
A0903B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Agree	Policy SP8 is supported in relation to development in Buildwas. The site identified on the SLAA residential sites plan, BUD007, is shown as a "rejected" industrial site (as are several others in Buildwas) but it currently enjoys planning permission for the development of 8 dwellinghouses (two of which would be affordable units). The existence of such permissions ought to be recorded in the text of Policy SP8, so the current planning situation is recorded in the Local Plan.
A0905B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Agree	Support Cluster of Edstaston, Quina Brook, Northwood, Newton, and Tilley in Wem. However, development of only those sites within the restrictions and definition placed on infill development by Policy SP8 would be inappropriate for the form in which those settlements have developed to date. These settlements need a certain amount of growth to further their sustainability. It is suggested that the Policy should be modified to indicate the Council's appreciation of the need for flexibility in the interpretation of the definition of "infill", the implementation of the restrictions set out in Policy SP8, and the assessment of what the "immediate built form" of the settlement is, when considering future proposals for development in settlements where the characteristics of such villages militate against a hard and fast interpretation of the criteria specified in Policy SP8. The Policy should be re-worded to indicate the Council's acceptance that development sites in Cluster settlements will be determined with a significant degree of flexibility, very much having regard to the overall character and form of the settlement in question, rather than the rigid requirement for infill plots to be of less than 0.1 ha and be surrounded on all three sides by existing buildings.
A0922B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Draft Policy SP8 seeks to maintain or enhance the sustainability of Community Cluster settlements through provision of modest levels of development, this is supported. Community Clusters are sustainable locations for development in the rural area. The current pandemic has highlighted the benefits of rural living and we anticipate greater demand for homes and business to locate in the countryside in the future. Very disappointing that section 2.c of the draft Policy seeks to limit development in Community Clusters to "small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings". This section runs counter to the Government's key objective of, "significantly boosting the supply of homes" expressed in para 59 of the NPPF and in more recent Ministerial Statements. It also makes delivery of housing to achieve the Local Plan housing requirement/local need more difficult. Consider Community Clusters should be allowed the flexibility to deliver larger sites with a greater number of dwellings on them, so long as the proposals do not conflict with the criteria in section 4 of draft policy SP8 (criteria which provide sufficient control over the delivery of new development to ensure that new development is of an appropriate scale). Suggest section 2.c of the draft Policy is rephrased to enable larger developments (subject to the criteria in the remainder of the policy being met). Land identified as ELS001 is an example of a site that is larger than 0.1ha and can accommodate more than 3 dwellings but would otherwise accord with the criteria in the policy and should therefore be supported as a sustainable windfall development that would make a greater contribution to the overall need for housing in Shropshire. Site promotion with indicative site layout appended to submission.
A0924B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	The objective of Policy SP8 to maintain or enhance the sustainability of Community Cluster settlements through the provision of modest levels of development is supported. Community Clusters are sustainable locations for development in the rural area. The current pandemic has highlighted the benefits of rural living and we anticipate greater demand for homes and business to locate in the countryside in the future. It is therefore very disappointing that section 2.c of Policy SP8 seeks to limit development in Community Clusters to "small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings". This section runs counter to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It makes the Local Plan's job of delivering the housing development that Shropshire needs more difficult than it needs to be. In our view, Community Clusters should be allowed the flexibility to deliver larger sites with a greater number of dwellings on them, so long as the proposals do not conflict with the criteria in section 4 of policy SP8 (criteria which provide sufficient control over the delivery of new development to ensure that new development is of an appropriate scale). We therefore suggest that section 2.c of the policy is rephrased to enable larger developments (subject to the criteria in the remainder of the policy being met). Our client's land in Edstaston (submitted under Shropshire's 'Call for Sites' and identified by the Council as site EDS005 'The Old Post Office, Edstaston', provides an example of a site that is larger than 0.1ha. and can accommodate more than 3 dwellings but would otherwise accord with the criteria in the policy and should therefore be supported as a sustainable windfall development that would make a greater contribution to the overall need for housing in Shropshire. A site location plan is attached to this letter
A0981B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Agree	Sport England supports the reference in part 4d) of the policy to ensure that there is sufficient infrastructure capacity to support the development proposed, and to address any capacity constraints that can be addressed by the development. Sport England recommends that it would be appropriate to reference (either in the policy wording or reasoned explanation) how the Council propose to identify and deliver these infrastructure requirements through the Council's Place Plans and Infrastructure Delivery Plan, and also to reference the Council's evidence base for infrastructure needs (which includes the Council's Playing Pitch and Outdoor Sports Facilities Strategy (PPOSS), and Built Sports Facilities Strategy(BFS)).
A1120B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Whilst the introduction of a definition for 'infill' is welcomed, it is felt that there is too much rigidity in directing new housing development, that does not take into account local context and character and will hamper new development on a otherwise sustainable development. Aston is a very much linear and tight-knit settlement, with a clear nucleated cluster of housing in a regimented form, as a result the availability for new development (aside from conversions) is few and far between. It is therefore requested that a degree of flexibility be introduced to the definition of infill, in recognition that no two sites or settlements are the same. For draft Policy SP8 to be applied so rigidly, with no allowance for slight interpretive anomalies would limit new development in Aston so heavily, that it is likely the settlement will not deliver on any windfall new-build. Instead new housing will be delivered through conversions, of which are disproportionately high-value and will exclude Aston from delivering its longer-term sustainability

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1123B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	However, with Tilley identified as a Cluster settlement, any new housing growth must be in accordance with draft Policy SP8, specifically Point 2. Whilst the introduction of a definition for 'infill' is welcomed, it is felt that there is too much rigidity in directing new housing development, that does not take into account local context and character and will hamper new development on a otherwise sustainable development. Tilley is a very much a tight-knit linear settlement and a largely historic settlement, hence the recent designation of a Conservation Area. As a result, the availability for new development (aside from conversions) is few and far between. It is therefore requested that a degree of flexibility be introduced to the definition of infill, in recognition that no two sites or settlements are the same. For example, land adjoining the north-western edge of the settlement, on a parcel of land that is physically and functionally well connected to the existing settlement, yet would fail to comply with draft Policy SP8 owing to a lack of development on two sides. For draft Policy SP8 to be applied so rigidly, with no allowance for slight interpretive anomalies would limit new development in Tilley so heavily, that it is likely the settlement will not deliver on any windfall new-build. Instead new housing will be delivered through historic conversions, of which are disproportionately high-value and will exclude Tilley from delivering its longer-term sustainability. Additionally, Tilley is characterised by large detached farmhouses and former barn conversions. The designation of a Conservation Area will add further pressures on any new housing scheme providing a sympathetic form and layout, whereby the requirement that no infill site be bigger than 0.1 hectare and provide no more than 3 units, will result in any new housing development unable to meet the requirements of draft Policy SP8 and draft Policy DP24 concurrently.
A1140B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Gravelsbank is no longer a Cluster without justification. It is unclear why Shropshire Council have gone from 42 Community Clusters in the Bishops Castle area, to just 16 in the Local Plan Review. It is our view that the development status of Gravels (including Gravelsbank) should remain designated as a Community Cluster to retain some limited development and help address the shortfall in delivery since the SAMDev was adopted and meet the growing need for different types of housing identified in the NPPF and the draft Local Plan (Policies DP1 – DP7). Lichfields have indicated that using the new methodology there is a significant increase from 1,400 dwellings per annum proposed in the Local Plan, to 2,129 dwellings per annum for Shropshire in the following publication https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/#section18 .
A1168B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8		Draft Policy SP8.1. defines community clusters with reference to modest levels of appropriate development defined at SP8.2.c. Consider the criterion and reference to infill sites of less than 0.1hectares and up to a maximum of 3 dwellings to be too prescriptive. It is likely that such restrictions may not provide sufficient scope for meeting local housing needs or enough opportunity sites to genuinely sustain rural communities. Moreover, Community clusters are typically 'villages' characterised by a variety of settlement forms & for this reason, the reference to infill sites is likely preclude many candidate sites. Greater weight should be given to such issues as sustainability, connection to services, footpaths and avoidance of flood risk. Draft Policy SP8.2.c should be amended to refer to sites capable of accommodating between 5-10 dwellings to allow for example, a courtyard scheme, which may be far more appropriate in some rural location than 3 detached dwellings. As written Draft Policy SP8.2.c is unsound and in conflict with the Council's Strategic Approach to ensuring sustainable development.
A2169B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Agree	It is good to see that the Council support the delivery of rural exception schemes, including cross-subsidy and entry-level exception sites, in community clusters consisting of individual or groups of small rural settlements. This will provide opportunities for the delivery of affordable housing in rural areas where there is a proven need which is particularly important in Shropshire which is rural in nature.
A2177B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	Policies SP6 – Managing Housing Development, SP7 – Managing Development in Community Hubs and SP8 – Managing Development in Community Clusters support sustainable housing development within development boundaries (subject to not exceeding residential development guidelines set out in individual Settlement Policies)
A2199B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Agree	The inclusion of the Neighbourhood Planning process as a mechanism to consider future additions to Community Clusters across the county is a welcome addition and a positive move Given the previous baseless decisions and non-consultative approach made by members of Sutton upon Tern Parish Council during 2012-2015, it is now reassuring to know that a robust mechanism will be in place going forward in the form of the Neighbourhood Planning process. This should ensure fair and balanced decision making based on thorough local community consultation; accountability; and expert oversight by the local authority and will act as a protective factor to mitigate against those with a vested interest on either side of any possible future debate:
A2416B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	THIS RESPONSE IS MADE UP FROM 2 ATTACHMENTS FOR A2416 SP8.2 1of2 and SP8.2 2of2) Sheet 1 of 2 The wording of policy SP8.2.c. is too restrictive and prescribed from a policy point of view and should be more flexible to allow for the judgment of the decision maker. Site Size Limit: Object to the use of a site size limit. A site size limit is unnecessary and sufficient safeguards to the scale of development are proposed elsewhere in the policy. Most Community Cluster settlements have low density patterns of existing development with average individual plot areas being in excess of 0.1ha (more typically between 0.2-0.5ha in many rural settlements) so even if one unit were proposed on a 0.1 ha site it would result in a scale/massing/pattern of development that is inappropriate to the surrounding area in terms of its relationship between existing buildings and streetscenes etc. and therefore conflict with policy SP8.4. With schemes of 3 units on up to 0.1ha it would obviously result in even more inappropriate development. The 0.1ha or less limit will result in very few schemes being able to comply with policy SP8 4a and also SP5 in particular SP5.2. and SP5 3.b) k) and l) so this policy wording is ineffective in terms of delivering the housing requirement in rural areas. Within and well related to the built form of the settlement: Object to the use of word "and". Recommend replacing "and" with "or" because many rural cluster settlements do not have a clear defined uniform built form in Shropshire, many are loose-knit or a combination of loose-knit and groups of dwellings but nevertheless they form a combined rural settlement where any one part of the settlement is no less sustainable than another. For example a site such a disused farm yard on the edge of cluster settlement may not always be considered as "within" but it may clearly be well related to the settlement and subject to complying with SP8.4. should be supported as SP8.4 gives sufficient safeguards to limit/avoid/control visual impact and any potential erosion/encroachment into open countryside. Have permanent and substantial buildings..... Object to the requirement of "permanent and substantial buildings" . Recommend either the removal of the whole of this phrase and allow the decision maker to assess impact of the a proposal against SP8.4. and other policies OR replacing "permanent and substantial buildings" with "existing built structures" which then allow the decision maker to assess the appropriateness of any proposal against the context of any surrounding buildings and streetscene, it is irrelevant whether adjacent buildings are permanent and substantial and this could also lead to unnecessary discussions/disputes on the type and condition of the adjoining building where for example a building that the LPA may consider to be temporary or poor quality in structure may have been and may still remain in situ for many decades. ...Continued on Sheet 2 Sheet 2 of 2on at least two sides: Object to the requirement for buildings on at least two sides. This is too restrictive and would exclude potentially suitable sites such as the above example on the edge of a settlement where they would otherwise fully comply with SP8.4. Recommend removal of this phrase or amending to "on at least one side". Ultimately it is considered that SP8.2.c. is too restrictive and will result in very few suitable Community Clusters site meeting this overly prescribed criteria and therefore the estimated delivery of units from Community Clusters is likely to be far less than the Local Plan anticipates. The policy should be made more flexible for the decision maker to assess appropriateness against SP8.4 and the plan as a whole including SP5.2&3.
A2454B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Don't know / no opinion	Farlow Parish has 3 housing clusters as detailed in '56 Cleobury Mortimer Place Plan Map': Hill Houses, Farlow and Oreton. While the Hill Houses area is quite specific, Farlow and Oreton are open villages spread out over a larger area. The cluster would seem to be a guide and the Parish Council takes a view with local knowledge and precedent. We assume the above is acceptable and no tighter limit is put on the area of a cluster.
A2475B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP8	Disagree	The now historical allocation of Community Hubs and Clusters arguably does not serve the AONB well. These are not in fact distributed evenly around the AONB and the south of the county. While in the far west this reflects sparsity of population, the fact of no definition of Community Hubs or Clusters within the Church Stretton Place Plan is something of an anomaly. It also feeds directly into the planning pressures affecting the town, since it is acknowledged that development opportunities are limited there due to the uniquely high quality landscape. The allocation of Community Hubs and Clusters should be reviewed in order to achieve a landscape-led approach to housing allocation for local need within the AONB, as is now identified nationally as good practice for these national landscapes. Again, if the Local Plan is to serve instead of an AONB specific policy document, it must address this need.
A0091B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Would like clearer guidelines for previously developed/brownfield land in the countryside. Would help clarify basis for consideration of planning applications for specific sites. Practice appears to be to treat sites as windfall but this seems inappropriate under SP9 .
A0100B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Policy should provide more flexibility and clarity for sites, adjacent to the existing settlement development boundaries, particularly Shrewsbury where growth required, which are considered 'countryside' by default but have no distinguishable countryside use/contribution. This will assist in the delivery of the Plan's housing and employment targets. Policy SP9 should be amended, to allow for sustainable and well-located development opportunities to be delivered on the edges of key settlements.
A0138B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9		Policy SP9 should be amended to recognise the need for specialist older person accommodation and suggested changes to Policy DP1, which would include specialist older person accommodation as an exception to restrictions in the countryside. We suggest under point 4 "h. specialist housing such as retirement living or sheltered housing; extra care housing or housing-with-care; and residential care homes and nursing homes where there is a shortage of provision locally."
A0167B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9		Welcome support for tourist related development within the countryside. However further clarification is required with regard to 3b. The retention and appropriate expansion of an existing established business, unless relocation to a suitable site within a settlement or other established or allocated employment location would be more appropriate; Tourist operators are concerned that they may be required to relocate (time, cost and inconvenience) at the discretion of the Council. Parameters as to when such considerations are required, criteria against which such decisions will be taken and explanation of how the process will be managed and paid for should be provided. Without such certainty this proposal cannot be supported as it is not considered consistent with the NPPF and could have a detrimental impact on the long term future of tourist related development. Current conditions mean policies should support economic growth, businesses and job retention
A0306B015	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	We feel intensive livestock units should be covered here, given their impact through ammonia on sensitive sites already subject to levels in excess of their critical threshold.
A0344B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	concerned that the policies will not address further application for intensive livestock units. Shropshire Council has found to its financial cost that there is currently a policy vacuum over ILU dev, yet this plan has little that will address the vacuum, despite the fact more and larger ILU proposals will come forward. Why does para 3 not also say no adverse community / social impacts and no adverse economic impacts on other businesses?. wants more clarity and strategic approach. proposes SC develops some simple guidelines which would help all parties. it is noticeable that the multiple mentions of tourism specify sustainable and green yet these words do not apply to farming developments.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0392B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	<p>Risk(s): That because of the location of a school, an area may be targeted for a large and/or multiple applications for these exception sites which would not be sustainable and adversely affect the character of the local area. It could also create blocks of affordable homes that goes against the policy for new developments of this being mixed in with market value homes. Exception sites could be targeted for affordable homes outside of the development boundary in blocks, rather than these being mixed in with market value homes within the development boundary where access to services is much better and sustainable than in the open countryside.</p> <p>Comment(s): 1. This policy actively encourages affordable exception site dwellings, entry level exception sites and cross subsidy exception housing schemes where they meet the relevant development policies. This provides criteria to be met but doesn't adequately ensure that development in the countryside does not adversely change the countryside from large and/or multiple applications in the same area. This paragraph needs to reflect this through the addition of wording (which could be added to Paragraph 6) such as: "Proposals for affordable exception site dwellings, entry level exception sites and cross subsidy exception housing schemes must be assessed, including in conjunction with other development in the local area, to ensure that local services are not overwhelmed and that the character of the local area is not adversely affected by the cumulative effect of the multiple schemes." 2. The cumulative impact on settlements of exception sites being built next to another exception site goes against the policy of mixing affordable housing within market value housing, therefore a control needs to be added to this policy to ensure that multiple exception sites located next to or in the close vicinity to each other don't create a block of affordable housing in one area, effectively causing "ghettoism" and also a lack of social cohesion. Although it could be argued that the "change of character" requirement prevents this, developers will use design and appearance to counter this as it is not specific enough regarding the mix of housing as required for new development sites. It is recommended that a statement is added to this policy to ensure that exception sites are not easily justifiable adjacent to another exception site and that where a second exception site is proposed in the same locality as an existing exception site, that this shall not change the mix of housing beyond what would be expected within a new development. 3. Affordable homes are more sustainable when built within a development boundary as the access to services is much more sustainable than the open countryside; all forms of multiple dwelling exception sites should be placed in higher level settlements where the infrastructure is more suitable and able to cope with the increased demand. Where allocated sites or windfall sites are available within a development boundary, then the policy should require that these are utilised first before any exception sites adjacent to the development boundary or in open countryside are allowed. Proper consideration must be given to housing allocations already identified within the Allocated Sites and other suitable windfall sites within the defined development boundaries. It is inevitable that there will be pressure to add exception sites adjacent to the development boundary, so it should be recognised that development boundaries have been identified for a reason and that expansion of this in some directions would be completely incongruous with the character of the settlement and its undesirability should be respected where appropriate representations are made. The above comments may also need to be reflected into the relevant DP for each type of exception site</p>
A0430B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	<p>The Council will wish to protect the open countryside around key settlements beyond those sites allocated, this policy wording further reinforces our view that the Site should be included within Shifnal's new development boundary – regardless of whether it is ultimately allocated or safeguarded in the plan. By including the Site within the proposed settlement boundary this provides greater scope to then add a monitoring / 'Plan B' policy should the Council be minded to consider such an approach within the plan when noting the various matters and issues cited in Section 3 of these representations. SP9(1) says: "The management of development in the countryside will reflect the Plan's urban focused development strategy which seeks to direct the majority of new development to the Strategic, Principal and Key Centres and new Strategic Settlements. Within the rural area, the Plan identifies Community Hubs and Community Clusters as the focus for new development, whilst also supporting new affordable housing provision for evidenced local needs and fostering appropriate rural employment opportunities, subject to the further controls over development that apply to the Green Belt, the AONB and other designated areas." This part of the policy clearly reflects the plans emphasis on the larger towns meeting the majority of the County's needs. However, SP9(4) goes on to say: "New market housing will be strictly controlled outside the development boundaries of the Strategic Centre of Shrewsbury, the Principle Centres, the Key Centres, the new Strategic Settlements and the Community Hubs. Within Community Clusters only new market housing which meets Community Cluster Policy SP8 criteria will be acceptable. Outside these areas, subject to the further controls that apply in Green Belt, residential development proposals will be positively considered where they meet all the relevant requirements of Local Plan policies and relate to..." It then goes on to list several criteria relating to affordable housing exception sites, gypsy and traveller development, reuse of building with heritage significance, sub-division of dwellings, replacement dwellings and essential rural worker dwellings. The criteria listed are generally consistent with the NPPF's rural exception policy (paragraph 64d) and isolated homes in the countryside policy (paragraph 79a-d). Wallace do not have any particular comments to make in relation to the set criteria. In this instance, the safeguarded land to the south and west of Shifnal is depicted as falling outside of the proposed settlement boundary. As such, this policy would also apply to the Site and arguably reads as though the Council would favour residential development in more rural locations over and above additional homes coming forward on the edge of the key settlements on sites located outside the settlement boundaries.</p>
A0436B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0437B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0438B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0439B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0440B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0441B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0442B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0443B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0444B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0445B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	<p>Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters. Acknowledge development within the Countryside needs to be carefully managed, however the countryside is a 'place of work and play' for a significant proportion of the county's population. Careful consideration of the impact of new development in the countryside is supported, however a careful balance needs to be struck so not to hamper growth and improvements to the local economy and housing stock. Proposals within the draft policy for replacement dwellings is overly onerous. Whilst it is acknowledged there is a desire to avoid modest houses being replaced with substantially larger properties, requirements for replacement dwellings to not be materially larger and occupy the same footprint is illogical. General Permitted Development Rights afford homeowners the opportunity to extend properties significantly and typically replacement of existing dwellings is only considered where the property is dilapidated, inefficient and no longer fit to serve as a modern house. Therefore, to limit the house to the same size of the existing footprint does not afford flexibility to improve the dwelling to cater for modern living and space standard. It is considered that an alternative suitable safeguard would be to afford a % limit on the increase of the Gross Internal Floor area of the replacement dwelling from the original dwelling.</p>
A0446B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the strict controls on additional market housing in the countryside beyond Community Hubs and Community Clusters.
A0506B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Section 4a of this policy allows for housing exception sites which comply with various policies but it does not mention Policy DP26 which relates to the AONB. DP4 (Affordable exception sites) and DP7 (Cross-subsidy exception sites) allow for local needs exception sites around key centres such as Church Stretton. It must therefore be made clear that this case applies in Church Stretton, even though the town is within the AONB.
A0508B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	In light of our objection to Policy SP7 and the absence of any allocations in the Plan for Woore, we also object to Policy SP9 in that it is overly restrictive in controlling new housing development on sites outside the development boundary around a settlement.
A0609B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Agree	Support the strict control of housing.
A0642B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Agree	Again, the aspiration to significantly reduce the need to travel has very significant implications for traffic modelling used to support the business case for the NWRR. This calls into question the plan's support for the NWRR.
A0647B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs." The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0648B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A0692B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9		Draft Policy SP9 should recognise that all countryside is not equal and as such sites adjoining a settlement development boundary are more positively considered than those in isolated rural locations. Para 78 of the NPPF recognises sites adjoining villages can contribute to sustainable rural development and are different from deep countryside, stating "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities". As sites adjoining a Community Hub are not 'isolated', can contribute to meeting housing need (including need for self-build housing) and can be part of sustainable rural development, suggest an additional category is added to the existing list (a) - (g) in part 4 of the draft policy, to allow: (h.) Self-build and custom-build housing on suitable sites adjoining Community Hub settlements.
A0698B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A0863B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9		Draft Policy SP6 seeks to manage the distribution of housing development across Shropshire beyond the allocated sites detailed in Policies S1-20. It is confined to development within settlement development boundaries. It controls the appropriateness of further residential development in settlements where the residential development guideline for a particular settlement has been exceeded. It provides the basis through which residential development outside of the settlement development boundary could be considered, through both Policy SP9 and through either: evidence showing the residential development guideline for a settlement being unlikely to be met over the plan period; or specific considerations set out in Settlement Policies. Draft Policy SP9 provides the basis through which residential development outside of the settlement development boundary could be considered in paragraphs 4 and 5. It tightly controls development in open countryside, with the types of development under consideration being isolated to conversions of existing buildings, or replacement of existing dwellings. Neither Draft Policy SP6 or SP9 provide meaningful flexibility for redevelopment of sites outside settlement development boundaries on brownfield land. Consider the policies, as drafted, cannot be found sound. The NPPF makes clear that there is a need to consider brownfield land for residential development and that where unallocated sites for particular uses are not likely to come forward, they should be considered for alternative uses. Paragraph 118(d) of the NPPF states that planning policies and decisions should: 'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively'. Furthermore, paragraph 121 of the NPPF states: 'Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to: a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this framework; and b) make more effective use of sites that provide community services such as schools and hospitals, provided that this maintains or improves the quality of service provision and access to open space'. The Shropshire Local Plan should be more flexible to allow for circumstances whereby residential development outside of the settlement development boundary (and outside of Green Belt) on brownfield land can be supported, particularly where an existing use on the site can no longer be sustained, as directed by paragraph 121(a). This will ensure the Local Plan is compliant with the NPPF in that the most effective use of land is achieved and achieving deliverability through the plan on unallocated sites. Propose the wording of draft Policy SP6, paragraph 4, is altered to include where all of the following apply: 'The site is brownfield land; The site is not in Green Belt; and The site is no longer viable for its current use.'
A0894B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to Policy SP9(4) which should recognise land adjoining a settlement development boundary requires less protection than land in isolated rural locations to support self-build and custom build housing. Insert an additional clause (h) into SP9(4) to read: (h) Self-build and custom build housing on suitable sites adjoining development boundaries.
A0899B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Policy SP9 states that, "new market housing will be strictly controlled outside the development boundaries of... Community Hubs." The policy's approach of restricting development runs counter to Policy S14.2 (Community Hubs: Oswestry Plan Area) which seeks to deliver significant amounts of housing outside development boundaries of Community Hubs. This inherent contradiction will cause problems in the delivery of the Plan. We suggest that Policy SP9 recognises that all countryside is not created equal and that sites adjoining a settlement development boundary should be treated more positively than isolated rural locations. Paragraph 78 of the Framework recognises that sites adjoining villages can contribute to sustainable rural development and are different from deep countryside, stating, "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities." In recognition of the fact that sites adjoining a Community Hub are not 'isolated', can contribute to meeting Shropshire's housing needs and can be part of sustainable rural development, we suggest that an additional category is added to the existing list (a) - (g) in part 4 of policy SP9 to allow: (h.) Self-build and custom-build housing on suitable sites adjoining Community Hub settlements. This addition will assist Shropshire Council in meeting its needs for self-build housing. Our comments on Policies DP2 (self-build and custom-build housing) and DP7 (cross-subsidy exception sites) provide more detail on why the above change will help the Plan deliver its housing needs for this type of housing and more affordable housing.
A0899B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	NPPF para 71 also supports the provision of entry level self build on exception sites and this support should be introduced into policy DP7 to permit self build and custom build on exceptions sites possibly reflecting the approach in Telford and Wrekin Policy HO11.
A0900B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Support the objectives of policy SP9 which has a synergy with Sansaw's Whole Estate Plan. The Estate sees its role as one of long term stewardship of its land and buildings, maintaining its past heritage and creating new 21st century buildings that will provide a new heritage for future generations. The Sansaw Estate support the positive approach in sections 2 and 3 of Policy SP9 to economic and community development in the countryside. We welcome the policy's enablement of a wide range of uses that will strengthen rural sustainability. SP9(3)(a) could be restrictively interpreted as only supporting very small-scale development and so appears to contradict SP9(3)(c). The reference to small-scale is unnecessary, contradictory and potentially undermines the policy which already requires that proposals, "maintain or enhance countryside vitality and character" and so, the term "small-scale" should be deleted from SP9(3)(a). The Estate has a number of historic buildings in which it will invest in renovations over the plan period. We welcome SP9(4)(d) to permit the sustainable re-use of buildings with heritage significance but the policy is worded so tightly that it will render renovation unviable and/or impractical in most cases. There is little point in investing in the future of a building if it cannot be brought up to modern standards and in most cases this does involve some alterations or extensions to the original building. This can be done very sympathetically to provide a successful mix of the original and the modern and we suggest deleting the words "alteration, extension" from SP9(4)(d).
A0928B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	The Policy sets out various provisions in relation to the management of development in the countryside which reflect the plans urban focused development strategy. It includes provisions for economic activities as well as other activities appropriate to a rural area. In respect of housing it confirms that new market housing will be strictly controlled outside of development boundaries. However, the policy should cross reference to the flexibility allowed for open market housing in the countryside within policy SP6 if the circumstances of policy SP6 are met.
A0961B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Agree	Para 4 support the strict control of housing
A0970B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Draft policies SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A0971B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Promotion of land owned by Raby Estate between Shrewsbury and Telford, promoting the "Beslow Estate" based on a Garden Village principles and providing 3,500 homes and 17ha employment land, community uses and infrastructure. This site is put forward as an alternative to three Strategic sites in Shropshire. SP9 Managing Development in the Countryside The proposed amendments are to the wording of Policy SP9 (Managing Development in the Countryside) to include specific reference to Whole Estate Plans as a policy exemption.
A0972B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Para 1 Bridgnorth should not be included as a Principal Centre. Whilst 3rd largest town in Shropshire by population, there has been no improvement in the highways infrastructure, there is no Railway Station, and public transport is poor. These factors render Bridgnorth an unlikely choice for the uptake of employment land and also for the sustainability of a single large housing development as proposed in the draft SLP. Para 3 Small scale economic development is desirable and possibly achievable in Bridgnorth, insufficient to employ one member of each household on the scale of development proposed. The potential for expansion of tourism is limited without spoiling the nature of the town & experience that drives it.
A1119B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Laird Estates broadly welcomes the Council's approach in providing housing for a range of needs, particularly, older people, which is defined as "People over or approaching retirement age, including the active, newly retired through the very frail elderly..." (NPPF, Annex 2) and supporting age restricted general market housing. Laird Estates also broadly welcomes the approach of having specific policies for different types of residential accommodation yet is disappointed there is no such policy for residential park homes despite their wide-ranging benefits. As currently drafted, the absence of any recognition of residential park homes and the benefits and role that they play in housing markets means the LP is not sound because it fails two tests, namely: the test of positivity; and, consistency with national policy. To remedy this, Laird Estates suggests that the benefits listed above are referred to in supporting text (Paras 4.35 to 4.39). Laird Estates also recommends a new policy is prepared to provide guidance to promoters and operators of residential park home developments.
A1152B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Support the intention, within the Hierarchy of Settlements, that the countryside should come last in priority for development, below Strategic, Principal and Key Centres and new Strategic Settlements and below Community Hubs and Community Clusters. Would continue to support the inclusion of single plot rural exception sites within paragraph 4a of the draft policy but we do not support the intention, within that paragraph, that either entry level exception sites or cross subsidy exception housing schemes be allowed in the open countryside. If there is an identified need within a parish for affordable housing, then for reasons of sustainability, any affordable exception site housing other than single plots should always be situated near an existing Hub by preference, rather than even a Community Cluster, and certainly not in the countryside. To allow larger exception housing sites, such as entry level exception sites or cross subsidy exception housing schemes, in the countryside would conflict with the sustainability objectives of the Plan, particularly with the Climate Change objectives.
A1161B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Agree	We welcome the direction of this policy and the general reference to the AONB policies. This policy should be strengthened by including specific reference to the need to meet AONB design guidance and specifically within the AONB that all agricultural development comply with the Shropshire Hills Agricultural Building Design Guide
A1183B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	We welcome the revision of Policy in this draft as it clarifies as much as is possible what was outlined in CS5 (our own status currently) and recognises the need to support rural vitality. The Policy and associated linked narratives also emphasise the need to be sensitive to the changing demographic of rural communities, changes in agricultural practice and working or shopping from home and therefore different needs for support locally. This might well include supporting broadband as infrastructure (still poor in our community) but now a utility functionally, health and exercise agendas as well as support for small units of economic activity. The draft Policy again doesn't require any metric to assess performance against any standard or baseline measurement Cross Boundary Issues and Duty to Cooperate 2.24 Our location very near to both Staffordshire and Telford and Wrekin Council makes us very aware of the additional complexity generated by development in these local authority areas. This was briefly mentioned in the introduction to the draft Local Plan and we would suggest a section of narrative pulling together how this scoping and related work is managed would be helpful.

Page 47

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1630B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	For rural communities to remain vibrant and economically active they need a continued delivery of housing and the development of a broad based economy. Rural development can include the development of agricultural businesses and also the growth of innovative rural businesses or the relocation of businesses into rural areas. Rural workers dwellings We are concerned by the proposed limits on the size of a rural workers dwelling as outlined in section 3.76. Frequently a need for a second dwelling arises on the appointment of a manager for a farming enterprise (e.g. poultry and horticultural businesses). When new dwellings are constructed for farm businesses it is important that they are large enough to cope with the many demands of the farm business, together with the needs of a family. The house will almost certainly require adequate space for a farm office. It will also require an entrance porch and utility area where soiled outdoor clothing and shoes can be stored and washed in a space separate to the main living accommodation. This is especially important in poultry businesses for maintaining adequate biosecurity measures. These needs are often not met by an 'off the shelf' design for homes on new developments. As these dwellings are frequently required to accommodate workers 24 hours a day they would not be in a position to move house to accommodate a growing family. This policy should be reconsidered in order to provide adequate accommodation for a range of family circumstances. Agricultural buildings New agricultural buildings are often required to meet evolving environmental and animal welfare standards. New agricultural buildings and associated infrastructure (such as manure stores and farm reservoirs) also have a role to play in climate change mitigation by ensuring that food is produced efficiently while also protecting air, soil and water quality. Historic farm buildings were there to facilitate food production and modern buildings are simply the latest in a long line of rural buildings which are designed to accommodate the production of safe, affordable, high quality food. The scale of the building is often important to give livestock sufficient space and ventilation and to accommodate modern agricultural machinery and other infrastructure. Operations need to be of sufficient scale to make them economically viable.
A1871B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	3c is desirable but not always achievable, but is in conflict with DP13. DP9 should therefore reflect the wording of DP13
A2177B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Policy SP9 – Managing Development in the Countryside strictly controls new development outside development boundaries.
A2308B32	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	There are a number of operational defence sites in Shropshire including Tern hill Airfield, RAF Shawbury and Nesscliffe Training Area that are located within the countryside. It is vital that defence activities are protected from adverse impact from other development and that development in respect of the ongoing roles of defence sites supporting national defence is able to be undertaken to ensure that operational activities are not compromised. The need for the recognition of defence requirements within this draft Policy, as set out in Para 95 of the NPPF. Concerned that this draft Policy could potentially restrict development required in the national interest on defence sites in the countryside and that it does not adequately protect defence sites from third party development. Section 2 of the draft Policy recognises a need for flexibility in delivering development to support and meet rural economic and community needs but there is no recognition of development required in the national interest. Section 3 could potentially relate to defence related development, however none of the criteria a to f explicitly refer to defence and therefore there is currently insufficient clarity within the draft Policy. There is reference (criteria b) to existing established businesses but defence sites are not strictly businesses. There is also reference (criteria e) to infrastructure, but it is unclear whether this is only community infrastructure. Would like to see a specific policy within the draft Local Plan dealing with defence related development (raised in previous consultations). However, this issue could be addressed within draft policy SP9, to satisfy the requirements of NPPF Paragraph 95, as follows: Development required to support or meet operational defence requirements. Would also like to see the draft policy recognise development in the countryside should not adversely impact on defence sites/activities
A2337B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	This area has already had significant development recently. Drainage and sewers may not be able to cope with more development. The town's infrastructure is struggling already. The needs of the existing residents need to be taken into account first.
A2403B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	The Estate generally supports the council's proposed approach to managing development in the countryside as set out within Policy SP9, particularly the support for development outside of the identified Community Settlements, to support development needs and aspirations across the wider rural area. The Estate is pleased to see at Policy SP9 recognition of the countryside as a living-working environment and the need for flexibility and positivity in decision making to ensure the needs of rural businesses and communities can be met, where they do not result in unacceptable adverse impacts. A cross reference to Whole Estate Plans, and their importance as a material consideration and their role in facilitating such development, should be made within Policy SP9, to ensure clarity in future decision making. In respect of housing delivery, whilst generally supportive of the proposed criteria for new housing development, the Estate considers that the policy could be more positive by including opportunities for small scale infill development where the proposed development would maintain local character and landscape setting and give rise to no adverse impacts. This would mirror national policy provisions for small infill developments within green belt villages, and allow for a positive approach to development and an efficient use of land, and aid the delivery of new homes within the villages around the key settlements and strategic corridors, thus contributing to the sustainability of the districts rural communities.
A2412B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Agree	We support the principle of development within existing settlements. Such an approach should be brought forward within the Council's allocations, which seeks to allocate land within the countryside, where there are still potential sites within settlement boundaries to meet the housing need.
A2416B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Policy SP9.4.c.: Object to the wording of policy SP9.4.c. due to conflict with NPPF. Draft policy supports residential conversions of permanent buildings only in locations which are not isolated and are reasonably accessible to services and facilities whereas the NPPF supports isolated homes in the countryside where the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets. The draft policy SP9.4c should be amended in accordance with the NPPF
A2470B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	Object to the use of settlement boundaries in circumstances such as this where they preclude otherwise sustainable development from coming forward. This conflicts with the objectives of the Framework to significantly boost to boosting the supply of housing. NPPF is clear that sustainable development should proceed without delay in accordance with the presumption in favour of sustainable development, the use of settlement limits is likely to arbitrarily restrict such development from coming forward; this does not accord with the positive approach to growth required and set out in Policy SP2. It is suggested that due to the rural nature of the county, a blanket approach to development beyond the settlement boundary may not be appropriate nor effective. A criterion-based approach that considers additional residential schemes that adjoin the settlement boundaries of the Strategic Centre of Shrewsbury and the Principal Centres may be a more appropriate approach.
A2475B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	This policy does not adequately address the issue of large intensive livestock units, which have been the commonest form of major development within the AONB in the last decade. It has also been an area of significant contention elsewhere in Shropshire and so should be addressed in this policy as well as relying on the AONB policy DP26 The AONB Management Plan policy P5 Agricultural Development has some material to draw on here. Key issues are around airborne nitrogen, waste materials especially in relation to the water environment, the physical landscape impact of large buildings, noise and odours, and associated traffic. The Plan should actively encourage sustainable forms of farming (with explanation) as is done for other sectors and economic activity. The policy also does not provide adequate guidance on large scale renewable energy installations (i.e. those not directly associated with other built development, but sited in the countryside). This includes solar farms and onshore wind. Again this has been an area of contention in the AONB, and we have seen a solar farm outside the AONB refused on landscape grounds, while one within the AONB was granted. National policy has steered away from onshore wind, but the imperative of the Climate Emergency means an enormous shift to renewables. The AONB Partnership is fully supportive of urgent action for the climate, but believes this can be done without compromising the qualities of the AONB, which are important in the broader ecological and climate crisis. These are both key areas in which there is a case for an AONB specific policy document for the Shropshire Hills AONB, and the Local Plan must address this need if it is to serve the purpose instead
A2476B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	3.12 This representation supports the positive considerations of sustainable employment, tourism, other business and community development proposals in the countryside as set out in SP9(2)and SP9(3). Provisions within SP9(4) for the re-use or sub-subdivision of existing buildings in rural areas, including heritage assets, are also supported. These provisions will support sustainable rural growth across Shropshire. However the locations set out in the Local Plan would benefit from being more sustainably located and the Berwick Estate clearly provides land that is more sustainably located than the present options being considered. Please refer to Appendix 4 for the isochrones supporting this rationale.3.13 In respect of SP9(4) more broadly, we raise objection to such a blanket approach to dealing with residential development outside of settlement development boundaries is positive, or indeed in accordance with the spirit of the NPPF. The policy should recognise that sustainable development is capable of coming forwards in locations that are outside but adjoining settlement development boundaries, which may be well-served by infrastructure and have very good access to facilities and employment. The policy should also allow more consideration of development proposals based on their individual merits. The Berwick Estate is not presently included within the settlement boundary and consequently is not able to positively contribute to the sustainability of Shrewsbury. By including either within the settlement boundary, or a acknowledgement that the can be a valid and positive contribution of this land adjacent to the settlement boundary then the land promoted within the Vision Document at Appendix 2 is capable of supporting the Local Plan
A2477B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP9	Disagree	This could be amended in line with the above sentiment. There is much difference in sustainable and landscape impact terms between sites in open countryside with their inherent undeveloped nature and value and sites adjoining larger or principal towns which are sustainable and have little intrinsic landscape value. Policy should reflect these facts
A0100B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	Highlight role of Policy SP10 supporting economic growth. Agree that the prioritisation of Shrewsbury, as a strategic centre, for the delivery of economic growth and investment is appropriate and will encourage the implementation of economic development proposals which deliver employment through both Class B and other employment generating uses.
A0167B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10		Support Council aspirations for economic growth/development and therefore the principles of the policy. However, it must be consistent with legislation, therefore changes to the use class order regarding the definition of employment uses need to be reflected. Given the current global health crisis, policies must meet the changing needs of businesses and is sufficiently positive and proactive in supporting growth, development and business investment to secure the long term future of the local economy and existing jobs and businesses.
A0306B016	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	5b: Improved digital connectivity can reduce the need for additional infrastructure and reduce the need to travel. SP10 (5d) Investment should be prioritised for sustainable transport in appropriate locations, as road transport is a major contributor to the Climate Emergency.
A0430B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	SP10(2) and (3) say that Shropshire will promote its economic potential by, amongst other things, developing and diversifying its local economy, and delivering sustainable economic growth and investment at Key Centres, Strategic Settlements and Strategic Corridors. To this end, it is set out elsewhere in the plan that at the Key Centre c Shifnal, 39.0ha of land will be removed from the Green Belt and allocated for employment use. At RAF Cosford, the plan is seeking to release a further 220.9ha to be allocated as a Strategic Site for economic growth. Wallace fully commend this, given their location within the M54/A5 Strategic Corridor. SP10(5) goes on to say that the delivery of employment will be supported by, among other things, housing of the right type, quality and tenure and affordability in the right locations. Indeed, Shifnal will be within the key area of search for housing for the growing workforce arising in Shifnal and RAF Cosford, as well as elsewhere in the strategic corridor, and on this basis is suitable not only for the level of housing growth set out in the plan but arguably more
A0501B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12:" Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources."10% is not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. The energy strategy must include the firm commitment to invest in, support and encourage renewables but it is missing from the local plan. Increasing our production and use of renewable energy must be central to future policy. It is positive that some steps have been made, e.g. the Bryn Y Plentyn Farm in Middleton, but this is just a small start and the local plan must be proactive, ambitious and really committed to massive investment and support. Therefore I disagree with this policy because it is incomplete.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0573B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	Support SP10(5)(a) and para 3.87 that principal and key settlements are the primary focus for employment investment (also SP10(3)(a)(b)) based on their land offer, housing, services and accessibility. Employment allocations SHF18b and SHF18d adjoin the existing employment areas in the town and will improve availability of new employment conforming to SP10 aspiration that key centres are a focus for growth. Shifnal has delivered limited employment land over the last 10 years and recently lost employment and to other uses and these employment allocations redress the issues of low jobs density, a jobs deficit and lower employment levels. Delivery of employment needs to be supported by investment in housing in the right locations and the inclusion of alternative safeguarded land should be considered at SHF013 and SHF018c. SHF013 was previously to be allocated as residential land f suitable for release from the Green Belt and its continued protection as Green Belt is questioned by Shifnal's need for housing investment to support economic growth. SHF018c was previously identified as suitable for release from the Green Belt, sustainably located, within walking distance of services, at east of town, close to employment, on Stanton Road with ready access to M54 via A41 and Junc. 3 and supported by findings of M54 Growth Corridor Strategic Options Study.
A0642B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	5b: Improved digital connectivity can reduce the need for additional infrastructure and reduce the need to travel. Again has implications for NWRR Business Case. 5d: Investment should be prioritised for sustainable transport in appropriate locations, as road transport is a major contributor to the Climate Emergency.
A0670B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A0906B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	SP10 is supported. However, employment opportunities in Hubs Policy indicates only that employment opportunities will be limited in Community Hubs to "saved allocations", windfall development or small scale employment uses. There is little scope for matching residential growth in Hubs with appropriate levels of employment. There is little point in seeking to create sustainable communities if there are no job opportunities to match them; such a miss-match will only lead to extra commuting, almost certainly by private car, which is an unsustainable situation. If greater numbers of affordable housing are to be located in rural areas then there is an even greater need for employment development as transport costs to find employment are likely to wipe out the affordability of the properties concerned.
A0910B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	SP10 does not produce an environment that is encouraging to start-up, new, or expanding employment generating uses and provides a very negative approach to employment development., particularly SP10.4.f. Modern technology provides a wide variety of opportunity for employment in rural areas, and this should be encouraged. SP10, then, is not supported because it does not give appropriate support. It should be reworded to show support from all kinds of employment development in rural areas.
A0935B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	Support draft Policy SP10 in terms of delivering sustainable economic growth and investment in 'strategic corridors', as referred to under part 3 (c) of the Policy Consider 'Strategic Corridors' do not just comprise groups of settlements on transport corridors but also 'key nodes' such as sites which benefit from direct access and visibility from strategic corridors, for example those adjacent to strategic road junctions/roundabouts. These 'key nodes' are recognised in the Shropshire Employment Land Review (ELR) (2019) as a potential opportunity to deliver strategic growth. The ELR also adds that these strategic opportunities 'could complement the planned local growth associated with existing settlements.' Draft Policy SP10 should recognise that the M54 corridor is the most prominent strategic corridor in Shropshire and therefore has the greatest potential to support growth. This is acknowledged in the Shropshire ELR (2019)
A0956B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	Urban focused approach to the spatial strategy for economic growth is supported. These opportunities should be aligned with the corresponding housing growth strategy. Support for provision of 300hectares of employment land over the Plan period. The urban focused approach to the spatial strategy for economic growth is supported, with the Strategic, Principal and Key Centres being a focus for growth. This potential for economic growth should be aligned and maximised by the corresponding housing strategy for growth. The aim to provide around 300 hectares of employment land over the Plan period is also supported. The Site benefits from a close location to the A5 and therefore is ideally located for a range of employment uses and has the potential to create a high number of jobs for the local population
A0970B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A0972B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	Bridgnorth is not on a strategic corridor and should be downgraded from a Principle Centre as it will be unable to produce the "expected" economic growth proposed in the SLP, and the large scale of the TGV development will lead to Bridgnorth becoming a dormitory town with the usual associated major traffic problems; The proposal from Taylor Wimpey includes 16 ha of employment with an additional 6.3 ha is from the SAMDEV employment land allocation in Tasley. The developers state that there will be 1250 economically active within the new development, this is in addition to the ca. 750 additional employable residents contained in the SAMDEV allocation. Whilst the TW proposal states that 1700 new jobs will be created by this development this figure is doubtful & there is agreement by the council that a lower target more achievable. Conflict with SAMDEV proposal that cattle market from its current site as part of a new industrial site on the south of the A458. TGV proposal would once again bring the cattle market within close proximity of housing. Currently only a few major employers (i.e. those with >100 employees) in Bridgnorth. Ninety per cent of Bridgnorth businesses employ fewer than ten people. No major employers have relocated to Bridgnorth in the last twenty years. Residents therefore justifiably sceptical of the TW and SC targets because historically employers are not highly attracted to Bridgnorth.
A0984B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	Support the aims and objectives of this policy, which is consistent with Chapter 6 / para 81 of the NPPF, setting a clear vision and strategy to encourage economic growth and criteria to match the strategy and meet needs over the plan period There is significant potential within Shropshire to expand the current economy and secure economic growth, which this policy seeks to achieve. Shropshire is well located to secure economic growth as its geographic location and economic landscape provides significant opportunities: -Its location within the West Midlands Combined Authority and Midlands Engine and on the border of the Northern Powerhouse/Wales present significant collaborative cross-border benefits. -It is within the thriving Marches LEP (one of the largest LEPs in the Country). -It has a reputation for being a good place to live and has an economically active population with higher levels of qualifications than the national or regional average. Support part 5a of the draft policy which recognises the need to deliver housing of the right type, quality, tenure and affordability in the right locations in order to support economic growth and the delivery of new employment. However, greater weight should be afforded in the policy to this issue. Bridgnorth is well located to deliver and support a significant proportion of this economic growth, welcome the support for this within the draft policy. Bridgnorth is the principal market town in east Shropshire and recognised by The Marches LEP in their Strategic Economic Plan as an 'opportunity town' linked to its "large manufacturing sector with supply chain links into the West Midlands". Bridgnorth is also one of the main locations of businesses and jobs in the east of the County and the manufacturing industry in Bridgnorth is considered to be strong with close links to Telford and automotive chains in West Midlands. Delivering new homes within Bridgnorth will be key to delivering economic growth - housing and economic growth delivery are intrinsically linked. The HBF report on the Economic Footprint of UK House Building (2015 and 2018) recognises the positive impact of house building on the economy and that delivering appropriate levels of housing which is affordable for local people and allows them to move jobs and match skills supply with employer demand is an important part of providing a healthy, well-functioning local labour market (the opposite is also true). It is important that the supply of workers is not inhibited by a constrained housing supply or the availability/affordability of housing, particularly in Shropshire with its ageing population (well above national averages and expected to continue to rise) and given the affordability of housing. It is therefore particularly important for Shropshire, and Bridgnorth, to ensure that younger people and families are able to live (and work) in the local area, it is therefore critical that the plan delivers new housing in the right location and that is affordable in order to meet the aims of this draft policy. The Draft Housing Strategy recognises that "The largest challenge for essential rural workers, younger people and families is the affordability of housing, both social and market housing."
A0997B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	Historic England welcomes reference to the historic environment in this policy, particularly in terms of reference. The context of the policy offers potential opportunities for heritage led regeneration which could conserve and enhance the historic environment.
A1101B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	Support the principle of the economic growth vision in this draft policy. Consider the employment proposed for allocations at BRD030 will not make a meaningful contribution to delivering growth at Bridgnorth. Stanmore Garden Village can make a significant contribution as an employment led development of a garden community. Delivery of the draft economic strategy is dependent on delivering the right sites, in the right locations. The draft strategy supports economic growth and investment in the Principal Centres, such as Bridgnorth and in 'Strategic Corridors' including Bridgnorth within the eastern corridor. Bridgnorth is well placed to deliver growth, but to ensure delivery it is crucial that growth is on appropriate sites and in the right circumstances to allow it to thrive. Meaning locating employment, housing and facilities together in places where people and businesses want to be. A Socio-Economic Study (Appendix of this Rep) identifies the significance of the economy of Bridgnorth to Shropshire and the strength of the employment sector of Bridgnorth's economy. It highlights the thriving local economy with the highest quality employment largely located at Stanmore Business Park. It also considers Census data points to Bridgnorth having a lower rate of self-containment (people living and working in the town) than other locations, with around 39% of the residents working in the town and 61% working elsewhere (the majority (51%) commuting to locations elsewhere in Shropshire, Telford and Wrekin and Wolverhampton). An employment and residential allocation can rebalance this position. Part 5a of draft Policy SP10 recognises the importance of the right sites and circumstances for the economy to flourish. This needs to flow through to site allocations. Bridgnorth is important to the Shropshire economy and Stanmore Business Park is a major focus of that. Further evidence on the importance of Stanmore Business Park and associated opportunities is provided within a Report on the Employment Led Development of a Garden Community (Appendix of this Rep). Evidence supports growth at Bridgnorth and demonstrates the need for expansion of Stanmore Business Park and the contribution such expansion along with housing of the right type in the right place can make to reduce out commuting, leading to greater self-containment of Bridgnorth. For draft Policy SP10 to deliver, the allocation of BRD030 needs to be reconsidered as the economic evidence supports allocation of Stanmore Garden Village
A1143B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	A key requirement to the success of sustainable economic growth is the need for better integrated public transport systems that effectively connect rural communities with key employment areas, the 2017 Bus Services Act encourages and empowers local Authorities to do just that. "The government is making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim - and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future I disagree with this policy because it is incomplete.
A1143B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	In the light of the Council's climate change commitments a key requirement to the success of sustainable economic growth is the need for better integration off sustainable energy both as an economic source for work and power but also as part of all new industrial development Shropshire's economic growth strategy makes no mention at all of supporting renewable industries. Or the inclusion of alternative energy systems as being integral to sustainable economic growth. With the exception of a vague comment in paragraph 3.88(j) of SP10 there is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment; it is a fast growing industry and brings the carbon reduction energy that is needed. Section 6 of the Shropshire Climate Change Strategy Framework identifies the importance of supporting and increasing capacity for alternative energy production in Shropshire, and section 7.6 states that "The strategy's objectives will also be imbedded in and referenced from other Council plans and strategies right across the organisation". This intention is replicated as key priorities in the Marches LEP Energy Strategy. This strategy requires overt commitment to invest in, support and encourage renewable energy capacity in Shropshire and this is missing from the local plan. I disagree with this policy because it is incomplete

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1152B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	Consider the Shropshire Economic Growth Strategy is unsound and based on information which we heavily criticise given it is riddled with errors and includes fundamental errors such as suggesting "Shropshire can be a world leading rural economy by 2030", which is more hype than reality and based on subjective views and round-tab discussions rather than evidence. Also had doubts about the Oxford Economics Productivity Growth Forecast. The Shropshire Economic Growth Strategy has not been subject to Sustainability Appraisal, which underlines the view it is unsound. Draft policy SP10 includes four paragraphs from the Shropshire Economic Growth Strategy. The Sustainability Appraisal 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'. Consider that until all development becomes zero carbon, any development will make this problem worse, not better. To comply with draft policy SP3 Climate Change, the Council should seek to keep economic development to the minimum required. However, the Explanation to policy SP2 states the vision of the EGS is stated as "To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high quality assets". 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. 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. 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 SP5
A1152B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	Consider the Shropshire Economic Growth Strategy is unsound and based on information which we heavily criticise given it is riddled with errors and includes fundamental errors such as suggesting "Shropshire can be a world leading rural economy by 2030", which is more hype than reality and based on subjective views and round-tab discussions rather than evidence. Also had doubts about the Oxford Economics Productivity Growth Forecast. The Shropshire Economic Growth Strategy has not been subject to Sustainability Appraisal, which underlines the view it is unsound. Draft policy SP10 includes four paragraphs from the Shropshire Economic Growth Strategy. The Sustainability Appraisal 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'. Consider that until all development becomes zero carbon, any development will make this problem worse, not better. To comply with draft policy SP3 Climate Change, the Council should seek to keep economic development to the minimum required. However, the Explanation to policy SP2 states the vision of the EGS is stated as "To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high quality assets". 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. 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. 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 SP5
A1182B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan (respondent ref; Form 13).
A1192B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	Proposed strategy for economic growth is supported. Support identification of Strategic Settlements such as Clive Barracks, as locations where economic growth and investment will be supported. As documented with draft Policy S19, Clive Barracks will deliver approx. 6 hectares of employment generating land. Committed to working with the Council to ensure employment opportunities at Clive Barracks are responsive to local need, market demands and the aspirations of the economic growth strategy for Shropshire. Flexibility over the nature of the employment generating uses at Clive Barracks will be key in ensuring success of this aspect of the scheme.
A1818B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	There should be support for renewable energy
A1896B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan
A2150B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A2158B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12 "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A2163B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	This policy places the focus for economic growth and investment towards Shrewsbury, to develop its role as the County Town and Strategic Centre. The delivery of employment will be supported by investment in housing to make Shropshire a good place to live, work and play. This policy is supported as it recognises the role of Shrewsbury, within the settlement hierarchy, (as set out in the Shropshire Council Hierarchy of Settlements and the need to balance employment growth alongside new housing developments to support an expanded workforce. The two go hand-in-hand, and sustainable growth is achieved when the desire and aspiration of a new workforce are satisfied by a complementary housing market.
A2167B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12 "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A2365B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete. (response ref form 13
A2403B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	The Estate supports the aspirations of Policy SP10 to positively support enterprise, diversity of the local economy and sustainable economic growth, including in appropriate rural locations. We support the focus of this development on the key settlements, with Shrewsbury retaining its primary settlement function and key location for growth. We are also pleased to see provision made for windfall developments in the countryside where appropriate and in line with other policies in the local plan. A cross reference to Whole Estate Plans, and their role in facilitating such development, should be made within Policy SP10, to ensure clarity in future decision-making
A2412B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Agree	We support and welcome the Council's approach to economic development. Particularly in these current times, need to ensure support to economic generation. However, it is important that the policy considers the recent amendments to the use class order, and that employment generation isn't restricted to just the old B uses. A number of different commercial uses such as care homes and nurseries, for example, can employ a greater number of employees than some traditional B uses.
A2427B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A2469B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A2471B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan (respondent ref; Form 13).
A2475B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	Para 1. The first sentence reads like an Economic Strategy vision but not a planning policy. Para 3.88 The visitor economy is underpinned by Shropshire's high quality environment, especially in places such as the AONB. This is undermined by the history of major development in the AONB, and the new Local Plan must take steps to protect the AONB better from major developments, to safeguard the long term economy of the area as well as the environment.
A2489B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% not enough, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A2490B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is far TOO low, and 'low carbon energy sources' needs defining. 10% could be achieved by a few solar panels, no mention of homes being totally roofed in solar tiles, community ground source heat pumps, etc no encouragement to creativity. Also, it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast-growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2494B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP10	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12 "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is too little, and 'low carbon energy sources' needs defining ... however it is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. I disagree with this policy because it is incomplete.
A0100B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Policy SP11 generally supported. However, greater consideration should be given to the release of greenfield land in complimentary locations to ensure the level, variety and pace of delivery required for employment land development. Support provision for mixed-use development and site sustainability and infrastructure provision requirements. Greater support for edge of centre is needed. Provide opportunity, if appropriately located, to capitalise on and support existing infrastructure and that being provided as part of strategic urban extensions. Support Section 4 of Policy SP11 criterion for Windfall Employment Sites and scope for the development of windfall sites to meet the delivery requirements for employment land across the plan period
A0142B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Policy SP11.2.e. requires that employment development proposals demonstrate they satisfy the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. (Form 3)
A0167B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11		Support Council aspirations for economic growth/development and therefore the principles of the policy. However, it must be consistent with legislation, therefore changes to the use class order regarding the definition of employment uses need to be reflected. Given the current global health crisis, policies must meet the changing needs of businesses and is sufficiently positive and proactive in supporting growth, development and business investment to secure the long term future of the local economy and existing jobs and businesses.
A0238B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Document Reference BTC12 :Agree with Policy intent that requires that "Development proposals will be expected to demonstrate that ... The infrastructure investment is sufficient to serve the proposed or intensified use ...". However, the draft Local Plan does not identify the infrastructure needed to support the proposed development around Bridgnorth or identify sufficient investment to implement it.
A0299B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11		Housing numbers are fine, but may be issues with safe pedestrian access to site and nearby facilities and affordable houses
A0306B017	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	In paragraph 3.29, it is stated that business energy use is the highest contributor to Climate Change. We see no obvious reference to addressing this in SP11 - there should be.
A0306B018	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Para 3.108 There is a contradiction within a single sentence. Development should "respond positively" but then refers to environmental assets as "constraints". Further definition on the meaning of a 'positive response' is needed. This should include as a minimum actively enhancing biodiversity, as required by the NPPF, and supported by the Nature Recovery Strategy and Biodiversity Net Gain
A0508B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	No specific comment on the content of the policy although the uses classes that have been referred need updating in accordance with The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
A0538B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Support for SP11, but the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A0539B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Support for SP11, but the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A0540B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Support for SP11, but the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A0573B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Support SP11 to deliver 300 hectares of employment development and the delivery of allocated sites. This policy approach is considered sound and critical to the ambition to deliver sustainable economic growth in the Shropshire Economic Growth Strategy. Sites SHF018b and SHF018d are strategically important opportunities for sustainable economic growth as outlined in the Shropshire Employment Land Review and the significant role of Shifnal as a Key Centre in the growth objectives for the east of Shropshire. There are currently no employment sites suitable and readily available for employment uses and Green Belt Opportunity Area 3 including SHF018b and SHF018d can address this shortfall and rebalance the employment land supply. A submitted employment land study supports this position noting the employment allocations are vital in stimulating growth in the town and rebalancing housing and employment uses which currently defines its distinctive dormitory character evident in the relatively large net outflow of commuters. Shifnal struggles to achieve growth in the its employment base and new investment will help reverse the stagnation in employment growth.
A0642B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	In paragraph 3.29, it is stated that business energy use is the highest contributor to Climate Change. In fact transport is the biggest contributor in Shropshire and is not adequately addressed in the Local Plan. In any case we see no obvious reference to addressing business carbon emissions in SP11 - there should be!
A0642B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Para 3.108 There is a contradiction within a single sentence! Development should "respond positively" but refer to environmental assets as "constraints"! Further definition on the meaning of a 'positive response' is needed. This should include as a minimum actively enhancing biodiversity, as required by the NPPF, and supported by the Nature Recovery Strategy and Biodiversity Net Gain.
A0910B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	SP11 appears to allow Class B employment development anywhere in the County outside the Strategic Centre and the Principal Centres, as long as it complies with the stated policies. This is seemingly a very flexible and encouraging policy. However, compliance with the restrictions imposed by those other policies referred to, make compliance very difficult, and thus compliance with SP11 will create serious problems for delivery. Employment development is essential in rural locations. The number of people employed in agriculture has significantly diminished over the past thirty years, and it is important that new forms of employment are introduced into villages if they are to become more sustainable. The idea of focussing such development on Community Hubs is supported, but this must be matched by a willingness to accept that new development in the rural area will not always be associated with agri-type employment. Whilst then, the basic aims of Policy SP11 are supported, the way proposals for such development are considered as expressed in the Review is not something that can readily be accepted.
A0912B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Strategic Policy S11 'Delivering Sustainable Economic Growth and Enterprise': The aim and objective of this policy, to support the delivery of the economic growth strategy and promote a 'step change' in the economic productivity of the Shropshire economy is supported. However, the supporting text to the policy details that "employment development on allocated and larger windfall sites will primarily comprise Class B uses at around 80% of the land area", whilst "other employment uses may therefore comprise 20% of the land area to maintain these uses below the historical rate of non-Class B development on employment land" (paragraph 3.99). Given the uncertainty of post COVID marketplace it is considered that policy SP11 should provide greater flexibility in the employment uses permissible on allocated sites to ensure that the needs of Shropshire and its communities are met. It is therefore requested that bullet point 2 of policy SP11 be amended to provide greater flexibility by removing the word 'predominantly' and consequential changes made to the wording of supporting paragraphs 3.98 and 3.99.
A0928B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Employment needs are set out in Policy SP2. In the current economic climate, it is essential that Shropshire provides support to business and opportunities for economic growth consistent with the economic objectives of the Framework. Key to this is adopting a strategy which plans for growth and provides sufficient land and other flexible development opportunities to support economic growth. Taylor Wimpey and Persimmon support the Plan in the way it supports the overall Economic Growth Strategy for Shropshire. Shropshire has a real opportunity to continue to be a highly attractive location for investment. It is essential that there is a sufficient workforce available to meet the jobs growth associated with the proposed employment development requirement and this must be provided sustainably, reducing the need for in commuting to Shropshire and stemming out commuting. The strategy for employment land delivery must be integrated with and supported by growth in housing provision which will both retain and attract the required workforce.
A0935B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Draft Policy SP11 provides further guidance on the delivery of the strategic land supply and the use of established employment areas. The strategic supply of land and protected employment areas are identified on the Policies Map and in the Authority Monitoring Report which will monitor the delivery of employment development. The need for new sites is recognised. However, as referred to under comments on draft Policy SP2, additional land beyond the proposed requirement of around 300 hectares is likely to be required in certain locations in order to provide choice and competition in the market and a good range of sites to meet different employment needs to 2038, as well as supporting the Economic Growth Strategy and the growth aspirations of the wider area.
A0956B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Urban focused approach to the spatial strategy for economic growth is supported. These opportunities should be aligned with the corresponding housing growth strategy. Support for provision of 300hectares of employment land over the Plan period. The urban focused approach to the spatial strategy for economic growth is supported, with the Strategic, Principal and Key Centres being a focus for growth. This potential for economic growth should be aligned and maximised by the corresponding housing strategy for growth. The aim to provide around 300 hectares of employment land over the Plan period is also supported. The Site benefits from a close location to the A5 and therefore is ideally located for a range of employment uses and has the potential to create a high number of jobs for the local population
A0972B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Does this include a proposal to build a rail link from Bridgnorth. Given the level of housing and economic growth proposed, a rail link along with an upgraded highway network would enable Bridgnorth to take its rightful place as a Principal Centre. Para 4.98 obvious place for new industrial/business development would be close to the i54. b proposed car battery factory development, an industry which will facilitate 'green' vehicle transport, and had the potential to create 3000 jobs & more than £1 billion to the region's economy was rejected by Shropshire Council reflecting muddled decisioning. The M54 is a logical place for industry and business development, not winding A roads near Bridgnorth.

Page 51

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0984B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Seeks to deliver around 300ha of employment land. Overall welcome this, as it recognises the need to address a structural imbalance between the provision of new housing and the employment opportunities in towns such as Bridgnorth! Part 2 of the draft policy states employment development will predominantly comprise Class B uses but will include some employment generating sui generis, Class A2, C1, C2, C2A and D1 uses with appropriate ancillary Class A1, A3, A5 services uses. Support the recognition of the need to provide a mix of uses within employment areas, and the employment land generating potential of other uses. However, this draft policy will need to be updated to take into account amendments to the use classes order which came into force in September 2020. Part 5 of the draft policy seeks to protect employment areas primarily for Class B employment uses. Support protection of employment land and consider there to be a need for employment land within Bridgnorth and Shropshire, however are concerned part 5a which would require a market assessment of the employment land both in the settlement and the County to show there is a satisfactory supply for the remaining period of the Local Plan. Shropshire is very large and diverse as such a review of all the employment land is considered unjustified. Employment land in one settlement may seek to achieve a different vision and objectives than another and therefore each settlement is not comparable. This should be amended to require a market assessment of the employment land within the settlement which the application relates to as opposed to a county-wide review. The Shropshire Employment Land Review (2019) (ELR) considers Bridgnorth to be well placed to deliver economic growth, as the second largest of 5 market towns in Shropshire and given its location to the west of the West Midlands conurbation, the town has potential to attract investment into Shropshire and to trade into these larger urban markets and it is necessary to open up new areas of land for development. Key market signals include loss of key local employers. The ELR makes recommendations on the potential for employment on sites in and around Bridgnorth, although it should be noted that this pre-dated promotion of BRD030. The ELR identified land around Stanmore Industrial Estate as Category B (general suitable location which the market might regard as a reasonable investment prospect, subject to the degree of environmental/technical constraints and impact on viability), however the ELR also noted that this area is in the Green Belt and a robust exceptional circumstances case would be needed to justify the release of Green Belt land. Again, since this report was published BRD030 has been promoted in a non-Green Belt location and is considered to be a more suitable location for employment land.
A1101B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Support the principle of the economic growth vision in this draft policy. Consider the employment proposed for allocations at BRD030 will not make a meaningful contribution to delivering growth at Bridgnorth. Stanmore Garden Village can make a significant contribution as an employment led development of a garden community. Delivery of the draft economic strategy is dependent on delivering the right sites, in the right locations. The draft strategy supports economic growth and investment in the Principal Centres, such as Bridgnorth and in 'Strategic Corridors' including Bridgnorth within the eastern corridor. Bridgnorth is well placed to deliver growth, but to ensure delivery it is crucial that growth is on appropriate sites and in the right circumstances to allow it to thrive. Meaning locating employment, housing and facilities together in places where people and businesses want to be. A Socio-Economic Study (Appendix of this Rep) identifies the significance of the economy of Bridgnorth to Shropshire and the strength of the employment sector of Bridgnorth's economy. It highlights the thriving local economy with the highest quality employment largely located at Stanmore Business Park. It also considers Census data points to Bridgnorth having a lower rate of self-containment (people living and working in the town) than other locations, with around 39% of the residents working in the town and 61% working elsewhere (the majority (51%) commuting to locations elsewhere in Shropshire, Telford and Wrekin and Wolverhampton). An employment and residential allocation can rebalance this position. Part 5a of draft Policy SP10 recognises the importance of the right sites and circumstances for the economy to flourish. This needs to flow through to site allocations. Bridgnorth is important to the Shropshire economy and Stanmore Business Park is a major focus of that. Further evidence on the importance of Stanmore Business Park and associated opportunities is provided within a Report on the Employment Led Development of a Garden Community (Appendix of this Rep). Evidence supports growth at Bridgnorth and demonstrates the need for expansion of Stanmore Business Park and the contribution such expansion along with housing of the right type in the right place can make to reduce out commuting, leading to greater self-containment of Bridgnorth. For draft Policy SP10 to deliver, the allocation of BRD030 needs to be reconsidered as the economic evidence supports allocation of Stanmore Garden Village
A1152B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Do not believe that the evidence supports the aim to deliver around 300ha of employment development. Not only is there a lack of evidence, but such an aim is not consistent with Climate Change objectives Furthermore, individual guidelines for employment land within the Settlement policies add up to 375ha, well in excess of the 300ha requirement, which is an unsound inconsistency. Para 2 of this draft policy is too vague, as it encompasses almost all use classes. The opening statement that employment development will predominantly comprise Class B uses is also unhelpful without specifying more particularly which use classes will be favoured. The EGS seeks 'smarter' jobs. That aim will not be achieved if the Council has to allow Class B8 Storage and Distribution development, with low employment density and low wage jobs attached to it. Para 4d's reference to the Countryside should be removed and dealt with in draft Policy SP9. Para 3.107 welcome the explanation that in the Countryside, agricultural and non-agricultural diversification and green tourism and leisure may also be supported at a scale that is appropriate for their location, as these are important economic activities in the rural economy. We note however the recent tendency in Development Management to refuse applications for tourist-related applications on the grounds that they are unsustainable, specifically because they are in rural locations, and will therefore foster the use of private cars for access. In this context, the word 'green' in para 3.107 might need to be further defined. In para 2e and 3.108 welcome the fact that proper protection will be given to the Green Belt, the Area of Outstanding Natural Beauty, areas of landscape value and the natural and historic environment!
A1192B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11		Principle of draft Policy SP11, to deliver around 300 hectares of employment development over the Plan period, is supported. However, it is essential that flexibility is retained over the nature of the employment generating uses at sites such as Clive Barracks. Employment Opportunities at Clive Barracks need to be able to respond to local need, market demands and what will be changing aspirations of the economic growth strategy for Shropshire. Flexibility over the nature of the employment generating uses at Clive Barracks will be key in ensuring success of this aspect of the scheme. Draft Policy SP11 refers to need for development on allocated sites, such as Clive Barracks to satisfy site-specific guidelines. Concerned about the guidelines for Clive Barracks (See S19).
A1609B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Why has such a large proportion of the employment requirement been allocated to Shifnal? Shifnal lacks the required highway network, infrastructure and level of services needed to facilitate the addition of 41 hectares of employment land on its fringe. We would also like Shropshire Council to illustrate why in their Highways Assessment is the employment allocation (Site 2- plot SHF018b & d) identified as having a low or medium for highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. We would like evidence from Shropshire Council that the methodology used is correct when used to calculate Shifnal's employment need, particularly with the possible double-counting of the 40% at para 5.204
A1649B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Don't know / no opinion	Wyre Forest District Council welcomes further employment land allocated in the local plan review. Employment land should be located within sustainable locations, with access to the strategic road networks and where possible to encourage vibrant town centres with a day/night economy. Wyre Forest has already a strong employment relationship with Shropshire, with 638 out commuting and 1,037 inflowing to Wyre Forest per day2. Coupled with greater land allocation for employment this may contribute to further employment out-migration from Wyre Forest.
A1871B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	The policy could be a barrier for Sui Generis uses for waste management. A change to policy is required over Explanation Text
A2308B33	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Agree	Welcome reference to employment generating sui generis development within this draft policy. Welcome reference within Para 3.110 to ensuring that strategic and local employers can secure their operational base and meet their future development needs for growth and expansion.
A2403B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	Policy SP11 advises that the employment requirement for Shropshire is of around 300ha of employment land over the plan period from 2016 to 2038. The need to allocate new strategic allocations to provide sufficient land to deliver against these aspirations is supported. The Estate supports the recognition that the introduction of wider use employment (non B uses) on allocated sites will provide flexibility to meet land demands for other employment generating uses. This also reflects changing Government legislation to introduce more flexibility into the planning use class system in order to ensure a responsive and efficient use of land and premises to meet changing economic needs, as supported by paragraph 81d) of the National Planning Policy Framework. It is suggested that the policy also needs to acknowledge the flexibility encouraged by Paragraph 120 of the Framework, and provide for a mechanism whereby historic allocated sites which have not come forward for their allocated use, should be considered positively for alternative uses. An example would be the Estate's employment allocation at Battlefield (Site Ref SHR203), which could potentially be utilised more efficiently as a mixed use site reflecting the residential allocation on the adjacent half of the site, as well as surrounding commercial uses. The provision for additional windfall development out with the strategic allocations and existing employment sites, is also supported.
A2475B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP11	Disagree	3.108 Shropshire Hills AONB not Shropshire AONB.
A0306B019	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	What constitutes an 'Estate?'; how small or large an enterprise? 'Estates' have great potential to contribute to Nature Recovery Networks and so there should be reference to the forthcoming Nature Recovery Strategy.
A0310B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	The TC support the decision not to allocate land at J3 as a garden village, however, it could appear that the policies are written in a way to allow for such a scheme to be promoted again. The Plan gives little explanation for the reasoning of this policy. The TC object to this policy as being unnecessary and prejudicing the future protection of Green Belt and public participation on development proposals.
A0900B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	Object to SP12 and the explanation in paragraph 3.116 which notes that Whole Estate Plans may add value to the planning process but do, "not replace the primacy of the Local Plan in decision making." This acknowledges that where there is a fundamental conflict between an Estate's vision and the Local Plan, the Local Plan will prevail. Consequently, Policy SP12(1)(a) requires the Whole Estate Plan does, "not conflict with the objectives and policies of the Local Plan." This requirement for compliance with the Plan in all respects renders a Whole Estate Plan marginal in terms of added value in the planning process and will result in far fewer coming forward. This would be a missed opportunity as they are hugely valuable in delivering balanced and sustainable land management and providing transparency and insight around estate's activities to the wider community. Amend SP12(1)(a) by deleting the words "and do not conflict with" to read "The objectives, policies and land use proposals of the Whole Estate Plan complement the objectives and policies of the Local Plan". This will allow the flexibility to endorse Whole Estate Plans that are considered to add value to the Local Plan, even if they depart to some extent from county-wide policies. A suitable policy to achieve this objective has been adopted by South Downs District Council.
A0917B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	The Leighton Hall Estate welcomes the Plan's acknowledgement of Whole Estate Plans in managing land. We support their use by the Council as a material consideration in circumstances where the Whole Estate Plan complements the Local Plan. However The current wording of Policy SP12: Whole Estate Plans requires in section (a) that the Whole Estate Plan does, "not conflict with the objectives and policies of the Local Plan." This requirement for compliance with the Plan in all respects renders a Whole Estate Plan marginal in terms of added value in the planning process and will result in far fewer coming forward. This would be a missed opportunity as they are hugely valuable in delivering balanced and sustainable land management and providing transparency and insight around estate's activities to the wider community. We therefore suggest the following change to Policy SP12 to allow flexibility that will give the Council leeway to endorse Whole Estate Plans that they consider add value to the Local Plan, even if they depart to some extent from county-wide policies: "Whole Estate Plans are a method by which Estates can articulate their long-term vision for their land and premises interests and how these will be achieved. In recognition of the nature of Shropshire, and the potentially important role they play in managing land within the County, Whole Estate Plans prepared by Estates will be endorsed by the Council and used as a material consideration in decision making where they have demonstrated all of the following: a. The objectives, policies and land use proposals of the Whole Estate Plan complement and do not conflict with the objectives and policies of the Local Plan; b. It has been prepared in collaboration with relevant external organisations, including statutory bodies; and c. It has been subject to meaningful public consultation."
A0935B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	Draft Policy SP12 states Whole Estate Plans prepared by estates will be endorsed by the Council and used as a material consideration in decision making subject to identified conditions. Support the principle of draft Policy SP12, but consider that it is not clearly written as currently drafted, contrary to para 16 of the NPPF. For example, it is not clear how to interpret what is meant by 'meaningful' public consultation. In addition, sections (b) and (c) could easily be combined into one criterion.
A0971B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	Promotion of land owned by Raby Estate between Shrewsbury and Telford, promoting the "Beslow Estate" based on a Garden Village principles and providing 3,500 homes and 17ha employment land, community uses and infrastructure. This site is put forward as an alternative to three Strategic sites in Shropshire SP 12 Whole Estate Plans the inclusion of a Whole Estate Plan policy within the pre-submission draft Local Plan is welcomed. However, for the full range of benefits of a Whole Estate Plan to be realised, amendments to policy wording are required. These amendments would in effective allow the endorsement of Whole Estate Plans that, to some extent, conflicted with the development boundaries policies of the local plan. The proposed amendments are to the wording of Policy SP12 (Whole Estate Plans), removing the requirement that the Plan does not conflict with the Local Plan and replacing it with a requirement that the Whole Estate Plan is in general conformity with the local plan.

Page 52

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1152B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	The central concept of seeking to ensure sustainable land management is sound when, 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. Proposed policy SP12 should define what constitutes an 'Estate', for instance whether it would be of a size equivalent to that of a Parish. 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. Whether or not there is a policy allowing Whole Estate Plans to be endorsed, it is always open to Estates, as it is to any developer, to put in planning applications to be tested against the policies in the Local Plan. If, as stated in para 3.115, many Estates are engaged in the preparation of Whole Estate plans, it would have been open to them have presented those plans for consideration as part of the current process. Given these issues, this draft policy seems irrelevant, and would be better omitted. If retained, something more than 'meaningful' consultation is required. The existing wording of para 1c should instead state: "It has been subject to the same level of public consultation as is required for Neighbourhood Plans"
A1609B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	We do not understand why Policy SP12 has been included, as plans put forward by estate owners are non-statutory. Does this policy intend to put greater weight on such proposals? The purpose of this policy and general wording are both unclear. Policy SP12 would give the Bradford Estates the opportunity to promote J3 again during the plan period which undermines certainties and assurances given to the group and the public in meetings. Policy SP12 does refer to "meaningful public consultation" but the group and the public are concerned this can be open to wide interpretation depending on the point of view of the promoters, planning authority etc. Shifnal Matters object strongly to these policies which we feel are unnecessary and will prejudice the future protection of the green belt and will be prejudicial to public participation on any future development proposals.
A1630B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	Whole Estate Plans are an interesting concept and we support the aim of building a long-term vision and objectives for the way an Estate manages and utilises its land and assets. It is encouraging that the plan acknowledges the important role estates play in the management of land and premises. They also have an important role in biodiversity and landscape delivery and within communities. Shropshire also has many large scale agricultural enterprises which manage substantial areas of land. They may also benefit from a similar approach which would consider future planning and infrastructure needs along with climate change and biodiversity delivery. Collaboration between farm businesses and estates is likely to be encouraged as part of the new ELMS scheme. Therefore we would welcome a conversation about how this concept could be expanded to involve additional land managers
A2403B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Agree	We support the use of Whole Estate Plans (WEP) by the Council as a material consideration in circumstances where the WEP complements and supports the objectives of the Local Plan.
A2403B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Disagree	Sundorne Castle Estate welcomes the Plan's acknowledgment of the role of Whole Estate Plans(WEP) in managing land in the county. We support their proposed use by the Council as a material consideration in decision making. We would suggest that the policy wording could be more ambitious to ensure that the policy does not stifle the ambition or the particular needs and aspirations of an Estate, where the WEP remains complementary to the overall strategic aspirations of the Local Plan, but perhaps goes beyond what the local plan policies anticipate more generally for the rural areas. For example, the South Downs National Park Local Plan recognises that whole estate plans may be able to demonstrate particular material considerations that may justify development outside of settlement boundaries. We would suggest the policy could be re-written as follows: Whole Estate Plans are a method by which Estates can articulate their long-term vision for their land and premises interests and how these will be achieved. In recognition of the nature of Shropshire, and the potentially important role they play in managing land within the County, Whole Estate Plans prepared by Estates will be endorsed by the Council and used as a material consideration in decision making where they have demonstrated all of the following: a. The objectives, policies and land use proposals of the Whole Estate Plan complement (Remove: "and do not conflict with") the strategic objectives and policies of the Local Plan's. It has been prepared in collaboration with relevant external organisations, including statutory bodies; and c. It has been subject to meaningful public consultation. It is also important that other key policies within the plan contain cross references to Policy SP12 to ensure that the role of WEPs is seen as a clear enabler for the acceptability of development which might otherwise be constrained in rural areas. This would provide clarity in decision making moving forwards. This might be applicable for example to Policy SP11 under the windfall section; Policy SP6 section 4 when discussing housing outside of settlement boundaries; and of particular importance, Policy SP9, the key policy for managing development in the countryside. The unique ability of an estate to bring forward development in a cohesive manner and which provides for overall sustainability benefits when viewed as a whole, should be an important consideration in support for giving whole estate plans an appropriate weight in decision making.
A2476B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP12	Agree	3.14 Policy SP12 allows for Estates to prepare non-statutory Whole Estate Plans in order to articulate a long-term vision for their land and premises. In order for this to be endorsed by the Council it must compliment the policies and objectives of the local plan, been prepared in collaboration with relevant external organisations and has been subject to meaningful public consultation. This policy is generally supported. The Council should identify priority Estates where it is important for them to deliver Whole Estate Plans that will contribute to the success of the Local Plan and also community initiatives such as the Shrewsbury Town Plan. Berwick Estate will be pleased to engage with this.3.15 The Vision Document submitted on behalf of the Berwick Estate provides a snapshot of the long-term ambitions for the Estate, however this will be shortly followed by the production of a Whole Estate Plan. In order for a Whole Estate Plan to be established and meet the tests of SP12 as drafted, the strategic objectives for Shrewsbury within S16.1 should be amended to support additional development arising at Berwick Estate, safeguarding land for the delivery of the NWRR, and to facilitate capturing resilience in the housing land supply, as set out in the following sections of these representations. As it stands, the Local Plan does not specifically identify land at the Berwick Estate for development and for the Whole Estate Plan to become consistent with the Local Plan, the Council should consider including land at Berwick Estate as a key contributor toward meeting the tests of soundness to successfully deliver the LocalPlan.3.16 Should this occur, the Estate will be pleased to work with relevant authorities to produce along-term Whole Estate Plan, which will be of clear benefit to the local area.
A0241B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP13	Agree	The Coal Authority supports the inclusion of this policy which identifies a Mineral Safeguarding Area for the Shropshire Local Plan Area which includes surface coal resource.
A0306B021	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP13	Disagree	Para 3.122 Restoration and aftercare of mineral sites should follow Biodiversity Net Gain principles as a minimum.
A0644B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP13	Disagree	Object to the placement of responsibility for critical infrastructure such as design and construction of on and off site flood alleviation measures especially on such a sizeable development. Hunters Gate developers failed to deliver satisfactory infrastructure and nobody was made accountable for the flooding of homes affected. Serious flooding in 2007 and 2020 with many reports, including EA, on flood alleviation measures necessary. Also strongly opposed to any significant further development in and around MW which causes the Farley Brook to flood, as the sole drainage watercourse from the town to the River Severn.
A0997B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP13	Agree	The reference to locally distinctive materials is noted and welcomed
A1871B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP13	Disagree	There appears to be no reference to the avoidance of sterilisation by non-mineral development within MSAs, though this does appear in DP31. This is confusing. It should explicitly apply to any non-mineral develop either within or adjacent to MSAs or protected infrastructure. DP31 could then provide details of the extent of buffer zones etc. it currently does (Form 3). Is Point 3 sufficient to compensate for a possible shortfall in production of sand and gravel in the region as it becomes increasingly challenging to find replacements for major sites nearing the end of production? There needs to be sufficient flexibility to cope with changes in local circumstances or to accommodate national guidelines for aggregate provision (Form 4)
A2163B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP13		The draft policy states that Shropshire's important and finite mineral resources will be safeguarded to avoid unnecessary sterilisation, with protection afforded to Mineral Safeguarding Areas (MSA). SHR173 is included within a sand and gravel safeguarded area (as illustrated in Figure SP13.1). Draft policy MD16 (3) requires non-mineral applications within a MSA to be accompanied by a Mineral Assessment. A Mineral Resource Assessment report has been prepared for SHR173, which demonstrates that minerals cannot be extracted in an economically viable way, and is constrained further by existing residential properties, the railway line and a gas pipeline. It also demonstrates there is an abundance of high-quality Sand & Gravel deposits within the County and that the seven-year landbank required by the NPPF has been exceeded. Additionally, prior extraction of the mineral was also shown to be unfeasible, and so the background evidence base demonstrates that on this particular site, safeguarding the land for mineral extraction would be inappropriate to take forward within this emerging Shropshire Local Plan. SHR173 should be a strategic allocation and excluded from the need to be safeguarded further with an MSA, as the Minerals Report we prepared demonstrates extraction of minerals on the site would be unpractical and unviable, and is in compliance with the Minerals Plan.
A2308B34	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP13	Disagree	To ensure that mineral working/extraction or restoration of a mineral site does not result in creation of an attractant environment for large or flocking bird species that can cause detriment to aviation safety, would like to see an additional criterion added to the draft policy: "Where an application would result in mineral working or extraction falling within a designated safeguarding zone (Birdstrike Zone/Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for both the extraction and post restoration phases. It would also be necessary to agree details of the restoration of an extraction site to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."
A0306B021	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP14	Disagree	Para 3.124 We welcome reference to the government's 25 Year Environment Plan but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.
A0696B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP14	Don't know / no opinion	Encouragement for reductions in the amount of waste, including packaging and single use plastic should be added to this strategy. The need for a circular economy should be emphasised. Item 6 of the draft policy should include "The detailed performance of the waste recycling process will be fully visible at all times to the public, regardless on whether the recycling is carried out by SC or a private contractor."
A1648B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP14	Agree	There are significant movements of waste from Cheshire West and Chester into Shropshire, but as policy SP14 ensures the continued operation of existing waste management facilities is safeguarded, this does not raise any strategic issues.
A2308B35	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP14	Disagree	To ensure waste processing/management sites do not result in the creation of an attractant environment for large and flocking bird species that can cause detriment to aviation safety, would like to see an additional criterion added to this policy: "Where an application would result in waste management development falling within a designated safeguarding zone (Birdstrike Zone/Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for operation of the business which would include measures designed to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."
A0306B022	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP15	Disagree	Para 3.127 Planning policy should encourage and enable the reduction of waste akin to the waste management hierarchy. This policy seems to accommodate 'inevitable' increase in waste.
A0642B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP15	Agree	Para 3.124 We welcome reference to the government's 25 Year Environment Plan but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.
A0642B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy SP15	Disagree	Para 3.127 Planning policy should encourage and enable the reduction of waste akin to the waste management hierarchy. This policy seems to accommodate 'inevitable' increase in waste.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0101B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		<p>Para 2a: The requirement to carry out a Housing Needs Survey is likely to deter development of very small sites by small developers. Suggested that the threshold for this policy should be 10 units.</p> <p>Para 2b: Object to this - experience in delivering homes in Shropshire is that demand for 2 bedroomed houses is limited and has diminished further in recent years. More people work from home than before, which is accelerated by Covid, meaning extra bedroom is more necessary. 2 bed-houses generally represent less efficient use of land. If the Council decide a minimum proportion is required this should be reduced from 25% to 10%.</p> <p>Para 3: This should be more prescriptive in the case of open market dwellings stating that national space standards will apply unless specific considerations justify otherwise. The proposed requirement that affordable homes should comply with space standards and that open market housing doesn't necessarily have to also contradicts policy DP3 which requires affordable and open market homes to be indistinguishable.</p> <p>Para 5: Suggested that the threshold be increased to 10 dwellings and the percentage of M4(2) dwellings be reduced to 35% which is still a high proportion and better reflects the level of need outlined in the explanation without undermining viability and deliverability.</p> <p>Para 6a: Inappropriate & illogical to require specialist housing of this type to be provided on general market housing sites - these are generally developed and operated by specialist organisations. Location or specific site conditions means that not many sites are suited to these type of development - housing of this type will in many instances qualify as affordable housing. The threshold for provision of specialist housing should be increased to 200 dwellings & subject to evidence of need. The policy would deter many SME developers from delivering medium sized sites of 50-100 dwellings & undermine the ability of the Local Plan to meet its delivery targets</p> <p>Para 6b: The objectives of this policy appear to be similar to policy 5 which, subject to the points outlined above, is supported. It might be appropriate to combine the two policies</p>
A0134B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		<p>Section 2a of the Policy requires development to reflect the profile of housing need established by a Local Housing Need Survey, where one exists</p> <p>However, there is a need to provide clarity about when a Local Housing Need survey is considered up to date within the Explanation of this policy. Currently the policy is inflexible and will distort the market which changes very quickly.</p> <p>An example of rapid change is Covid-19 which increased demand for home offices and larger properties.</p> <p>Another is the ageing demographics which increase demand for granny annexes and additional ground-floor en-suite bedrooms.</p> <p>Other changes cannot be predicated, but surveys over 3 years old will not be reflective of current need, given its emphasis on smaller properties.</p> <p>We strongly encourage the Council to identify and monitor how many older person housing units are needed in each of the four types of housing that it identifies in paragraph 4.36, namely, "a. Age-restricted general market housing; b. Retirement living or sheltered housing; c. Extra care housing or housing-with-care; and d. Residential care homes and nursing homes". As a minimum, the need for each of the above types of housing should be quantified.</p> <p>The Policy will encourage older persons' housing on larger sites, but is unlikely to meet Shropshire's total need for this type of housing. To help meet these needs, specific allocations for older persons housing should be made. Furthermore, the Policy should also provide guidance on how applications for 100% specialist housing to re-balance the local housing stock will be considered. We suggest "7. Specialist housing developments will be considered positively on sites within settlement development boundaries. Where there is a shortage of specialist housing relative to recognised needs, proposals outside but adjoining development boundaries will be considered positively."</p>
A0138B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		<p>Welcome recognition of the need to provide older persons housing.</p> <p>Statistics on the level of growth in older people within the Plan do not consider the 2018-based SNHP.</p> <p>The SHMA and associated policies should be updated to consider the 2018-based SNHP.</p> <p>Whilst the Plan indicates it will monitor the number of older person specific dwellings permitted in Shropshire, it is only possible to measure the effectiveness of a policy if there is also a target figure.</p> <p>We strongly encourage the Council to identify and monitor how many older person housing units are needed in each of the four types of housing that it identifies in paragraph 4.36, namely, "a. Age-restricted general market housing; b. Retirement living or sheltered housing; c. Extra care housing or housing-with-care; and d. Residential care homes and nursing homes". As a minimum, the need for each of the above types of housing should be quantified.</p> <p>The Policy will encourage older persons' housing on larger sites, but is unlikely to meet Shropshire's total need for this type of housing. To help meet these needs, specific allocations for older persons housing should be made. Furthermore, the Policy should also provide guidance on how applications for 100% specialist housing to re-balance the local housing stock will be considered. We suggest "7. Specialist housing developments will be considered positively on sites within settlement development boundaries. Where there is a shortage of specialist housing relative to recognised needs, proposals outside but adjoining development boundaries will be considered positively."</p>
A0228B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	There is a greater need for adapted homes than affordable. The policy should reflect this (respondent ref; objection 4 on DP1)
A0238B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Don't know / no opinion	Document Reference BT19:generally supportive of policies for controlling development and the level of affordable housing. However, it appears that larger developments are anticipated to proceed under the control of single, large developers, with a potentially dominant say over masterplanning and commercial participation. Concerned that there should be clear provision in these policies for Shropshire Council and local communities to have adequate control over these matters.
A0240B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	<p>3.1 Policy DP1(3) requires that 'all affordable dwellings will achieve the nationally described space standard' and that 'all open market dwellings are strongly encouraged to comply with the nationally described space standard'.3.2 Should the Council wish to apply the optional nationally described space standards ('NDSS') to both market and affordable new-build dwellings, this should be done in accordance with Footnote 46 of NPPF Paragraph 127(f): policies may 'make use of the nationally described space standard, where the need for an internal space standard can be justified.'3.3 In justifying the requirement for NDSS on affordable dwellings, it is noted that an explanation is provided through the DSLP at paragraphs 4.7-4.16; justification for the requirement on open market dwellings is provided at 4.17. However, whilst the justification makes reference to the SHMA, at paragraph 4.11-4.12, it is noted that the SHMA itself undertakes no assessment or analysis of the need for NDSS on either affordable or market new-build dwellings. Consequently, it is understood that justification for this policy requirement is set out solely through the DSLP at paragraphs 4.7-4.17.3.4 As set out under Paragraph 31, all policies should be 'underpinned by relevant and up-to-date evidence', and 'should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.' Additionally, the PPG28 sets out: 'Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Local planning authorities should take account of [need, viability and timing]'3.5 In this regard, paragraph 4.11 refers to a finding of the SHMA which identified overcrowding in11% of social rented accommodation. Clearly, social rented accommodation represents only one tenure of affordable housing; such a finding disregards other affordable housing tenures, whereby households in Shropshire may not necessarily experience overcrowding, and thus does not represent the overall trend.3.6 The Council also speculates on the impact of the 'bedroom tax' on overcrowding within the social rented sector; it provides no further evidence otherwise justifying the need for NDSS on new-build affordable housing.3.7 L&Q Estates consider the Council has erroneously conflated the issue of overcrowding with the need for NDSS. Simply put, NDSS assists in mitigating impacts from overcrowding and does not in itself reduce the level of overcrowding. Whilst overcrowding in the region may be an issue requiring tackling, the Council should consider it a symptom of an under-supply of housing29.3.8 Before adopting the NDSS, the Council should provide an accurate local assessment evidencing the case for Shropshire as this has not been demonstrated, and thus the policy requirement fails the test of soundness and should be removed.</p>
A0250B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		<p>Section 2a of the Policy requires development to reflect the profile of housing need established by a Local Housing Need Survey, where one exists</p> <p>However, there is a need to provide clarity about when a Local Housing Need survey is considered up to date within the Explanation of this policy. Currently the policy is inflexible and will distort the market which changes very quickly.</p> <p>An example of rapid change is Covid-19 which increased demand for home offices and larger properties.</p> <p>Another is the ageing demographics which increase demand for granny annexes and additional ground-floor en-suite bedrooms.</p> <p>Other changes cannot be predicated, but surveys over 3 years old will not be reflective of current need, given its emphasis on smaller properties.</p> <p>We suggest that section 2a of the Policy should be amended to refer to, "a recent Local Housing Need Survey that has been undertaken within the past 3 years...</p> <p>Section 2b requires set proportions of housing to be 2 and 3 bed where there is no local housing need survey, this was assessed in the Councils Delivery and Viability Study, which concludes a high proportion of typologies are not viable. We agree with comments on this study regarding the mix being too restrictive and with too many small units the mix should be left to the market.</p> <p>Our experience is that majority of housing developments have a relatively high proportion of larger homes to ensure viability. If section 2b is retained, developers will increase dwellings on a site to ensure viability. This will increase densities and may alter local character, particularly in rural area.</p> <p>Section 5 of the policy requires 5% of dwellings on larger sites to be built to the M4(3) (wheelchair user dwellings) standard and a further 70% to be built to the M4(2) (accessible and adaptable dwellings) standard. To accommodate these costs, there is a need for flexibility about house types.</p> <p>The policy should therefore be less prescriptive to ensure viability. This could be achieved by deterring section 2 or editing to include consideration of a sites specific characteristics e.g. "c. The site's characteristics require a different mix</p>
A0269B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Residential mix Overly prescriptive, policy should allow developers to bring forward their own evidence of local demand to inform mix Please
A0316B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Agree	I am very pleased to see acknowledged the tremendous need for additional social housing and for smaller homes, rather than the 4+ bed detached dwellings that make up the majority of the housing I've seen built in Shrewsbury recently.
A0318B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	<p>We question the legitimacy of DP1.3. The explanatory text sets out that providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high quality of life and is responsive to changing household requirements. The explanatory text identifies that it is equally relevant for both market and affordable housing provision.</p> <p>In considering the evidence that a greater proportion of social renters are in overcrowded accommodation, we consider it unlikely that this will be solved through adherence to the nationally described space standards. Instead, the right size dwelling would overcome overcrowding issues — for example, having affordable renters in the correct number of occupants to bedrooms, rather than an additional 3sqm of space. We recommend the following amendment to the text:</p> <p>"DP1.3. All affordable dwellings and open market dwellings are strongly encouraged to comply with the nationally described space standard."</p> <p>We consider the policy fails to set out what type of housing should be delivered for older persons, with no set range identified in the policy for sites of 50 or more dwellings or indication for where the housing should be provided</p>
A0430B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Object to DP1 because evidence still needs to be provided to justify the figures set out in this policy. DP1(1) states that residential development will be expected to provide a mix of dwelling sizes, types and tenures, in accordance with the Council's SHMA. This policy should offer flexibility and account for changing requirements throughout the plan period and localised and site specific evidence to support a departure from the district wide requirements set out in the SHMA. This flexibility is important since clearly any policy on residential housing mix must ensure that it does not frustrate delivery by being over prescriptive. DP1(5) requires developments of five or more new homes to provide at least 5% of the dwellings to be built to the M4(3) (wheelchair user dwellings) and a further 70% of the dwellings to be built to the M4(2) (accessible and adaptable dwellings). DP1(6) requires developments of 50 dwellings or more to deliver a range of specialist housing to meet the diverse needs of older people and those with disabilities. Support the provision and delivery of these types of homes, however the blanket approach of this policy may not be appropriate, so an element of flexibility should be incorporated.
A0436B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		<p>Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand.</p> <p>The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals).</p> <p>The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land.</p> <p>Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.</p>
A0437B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		<p>Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand.</p> <p>The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals).</p> <p>The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land.</p> <p>Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0438B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0439B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0440B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0441B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0442B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0443B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0444B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Agree	Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0445B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0446B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise importance of new development providing an appropriate mix of housing types, sizes and tenures to meet identified local needs. However, latest evidence only provides a snapshot of current housing needs. Further, the accuracy of the 'Right Home Right Place' Local Housing Need Surveys is questioned as it is understood it is challenging to get local communities to engage. Hence the proposal that 50% of open market dwellings reflect the resulting profile seems overbearing and will hamper developers ability to respond to market forces. Need to retain the ability for developers to respond to the market and build properties to cater for market demand. The alternative proposal that at least 25% of open market dwellings have 2 bedrooms or less and at least a further 25% of open market dwellings have 3 bedrooms both limits housebuilders ability to respond to local demand and fails to recognise that the profile of first time buyers has changed with entrants to the housing market often being in their 30's when they typically have a family. It is considered more reflective of modern demographic trends to have a split of 35% 3 beds and 15% 2 beds (3 bed houses are preferred by families and 2 beds by individuals). The policy needs to provide flexibility so the plan is able to respond to changes in circumstances, meet need and make best use of land. Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings, however urge further flexibility be demonstrated and robust evidence presented on the type of housing demanded.
A0450B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Policy DP1 should set a target provision for specialist housing on sites of 50+ dwellings to clearly define the developers planning obligations.
A0506B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	The Town Council carried out a Housing Needs Survey (HNS) in conjunction with Maria Howell and Tim Shrosbree of Shropshire Council. Prior to any site being developed the Town Council would suggest that, as laid down in the NPPF (Para 128), early discussion between applicants, the local planning authority and the local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. This also includes looking at the results of the HNS to ensure the required mix of housing and tenure is addressed. The need for specialist housing designed to meet the diverse needs of an ageing population which is living longer, is important, especially in Church Stretton.
A0513B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Policy DP1 sets out guidance in relation to the anticipate residential mix of housing developments. This largely reflects the findings of Council's Strategic Housing Market Assessment (SHMA). However, Criterion 6 requires (on sites of 50 or more dwellings) the provision of an appropriate range of specialist housing to meet the diverse needs of older people such as age restricted general market housing, retirement living or sheltered housing, extra care housing and residential care/nursing homes. Whilst such provision is an important component of the residential market, no justification has been provided for such a requirement. There is no evidence base document that sets out the need for such facilities and as a result Criterion 6 should be deleted as it cannot be justified. The provision of such facilities should be market led and justified at the development management/application stage based on a demonstrable need for such a facility.
A0609B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Agree	Support this in order to achieve more smaller dwellings than at present.
A0636B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Local housing requirements are not realistically taken into account. In my opinion "affordable housing" is a misnomer and in no way provides housing for those most in need. The use of the term "affordable housing" is misleading, the reality is workers on the average national wage or below cannot obtain a mortgage and aspire to own a home for their family. The provision of 14 "affordable" homes, whatever that implies, is ignoring the real problems with the provision of housing for the less well off in society.
A0678B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Agree	Support the principle that a mix of house sizes, types and tenure provide the most effective means of meeting a range of community and also market needs. Policy requirements are noted.
A0697B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Acknowledge need for housing that meets the specific needs of certain household and age groups in the community is likely to increase nationally due to the general ageing of the population. However, footnote 46 of the NPPF states requirements regarding optional technical standards (M4(2) accessible and adaptable dwellings and M4(1) wheelchair user) and national space standards must address an identified need for such properties and only be applied where the need for an internal space standard can be justified. The draft Local Plan relies on wheelchair use in households nationally and the demographics of Shropshire as justification of optional technical standards. Question whether this is sufficient evidence. Suggest this requirement is loosened to reflect lack of specific justification in Shropshire. Object to the proposal to provide an appropriate range of specialist housing for the elderly on all sites of 50 dwellings or more, as there is a lack of justification on need/viability of this policy. Such a requirement is also contrary to national policy, which does not specifically require provision of such housing to meet specific needs akin to an affordable housing policy (para 62 of the NPPF). Policy wording should be revised to reflect local evidence and national policy

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0853B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Object to Policy DP1(6) requiring specialist housing, including older persons accommodation and specialist dwellings to meet the needs of those with disabilities and special needs, on all sites of 50 or more dwellings. Whilst we recognise that there is a need for specialist accommodation in Shropshire, as demonstrated by the SHMA, it is unclear how DP1(6) will operate in practice. DP1(6) states that 'a range' of specialist housing will be provided, but it does not specify how much specialist housing within an individual proposal. Achieving a 'range' of specialist housing on many sites of less than 200-250 dwellings will be extremely challenging. Most sites within the range of 50-250 dwellings are acquired and developed by a single developer, with limited capacity to deliver specialist housing such as a care homes or extra care accommodation. This is balanced by the likelihood that some smaller sites will be acquired by providers of specialist accommodation where 100% specialist housing may be delivered. DP1(6) should be amended so that, sites below 250 dwellings are not obliged to provide specialist housing but are encouraged to do so. Large strategic sites of 250+ dwellings could maintain a requirement for specialist housing as part of an appropriate mix of dwelling types. Specific requirements may be set out in relation to sites where specialist accommodation would be appropriate in part or whole, having regard to the suitability of individual sites and any specific locational needs.
A0853B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	For the Local Plan to be sound, a far more flexible policy approach is needed in DP1 to properly reflect the nature of the evidence base, which has inherent demographic limitations and cannot fully reflect market demand and people's aspirations. Such an approach would also reflect the fluid nature of the issue, having regard to changing practices such as increased levels of working from home, which may increase demand upon house sizes and bedroom spaces. We therefore consider that the policy should be amended to state that, where appropriate, residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, having regard to evidence from the SHMA, market demand and any other local evidence (including the Council's Right Home Right Place survey). Demographic-based projections produced by the SHMA fail to consider the full picture and do not accurately reflect market demand. It is therefore essential that Policy DP1 recognises this and is amended to make clear that the dwelling mix set out in the SHMA is a starting point only, and is to be applied flexibly, reflecting local needs and market demand. The SHMA (as referenced in Policy DP1(1)), sets out an analysis of housing need broken down by sizes, types and tenures (SHMA Part 2, Section 3). However, there are several significant issues when using this analysis to determine the mix of housing on sites: Firstly, the 2020 SHMA assesses household change using the 2014-based Sub National Household Projections (SNHP), which equates to household growth of 19,136 over the plan period (989 household per annum). This does not correlate with the proposed housing requirement figure in the plan (1,400 dwellings per annum). It cannot be assumed that the difference (just over 400 dwellings per annum) needs to be provided at a similar mix to the elements of household growth that have been assessed. Secondly, the SHMA does not assess the size, type, tenure and range of housing that is required in particular locations or settlements. Shropshire is a large authority area and there will be significant divergences between the demographic and demand drivers behind housing mix within different areas and settlements. Thirdly, the SHMA fails to adequately consider market trends and demand. Even if the SHMA methodology is considered to provide a robust projection in terms of the baseline demographics, it does not provide any evidence to suggest that the disaggregation of this data into different household groups accurately reflects the needs of the current or future population (factoring in demand and habits). For example, there is no reason why a single or two person household cannot buy or rent a three or four-bedroom home – indeed, they might even prefer to do so; hence demographic projections which suggest an increase in smaller households, for instance, do not necessarily translate into a need for smaller units. Additional factors to consider include the demand for spare bedrooms for family guests (particularly relevant to an ageing population), and increasing demand for home working which often results in the need for an additional bedroom to be utilised as a home office. Whilst the COVID-19 pandemic has forced people to homework on a temporary basis, significantly higher levels of homeworking (potentially for multiple persons within a household) are likely to continue in the future.
A0853B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	The Council's Right Home Right Place survey is both a positive and innovative method for assessing need but DP2(2)(a) is not a sufficiently robust method for determining the mix of 50% of the dwellings on a site, particularly larger sites, as the survey is likely to only capture a small part of the market at any one time. The survey also appears to have a focus upon certain segments of the market such as affordable housing, noting that it does not seek to disaggregate rents above £650 per month or market value of a property above £180,000. We would therefore question whether the survey would adequately reflect the need and demand for market housing, and whether sufficient numbers of households seeking housing within higher price bands are likely to engage with this type of survey to provide an accurate reflection of the market. Therefore whilst such a survey could be a material consideration in determining the mix of housing, we do not consider that it is appropriate for the policy to stipulate that 50% of the housing should follow the mix deriving from such a survey. Finally, in relation to Policy DP2(2)(b), this sets out a precise mix for 50% of the market dwellings (25% 2-bedroom and 25% 3-bedroom) in the event that a Right Home Right Place survey has not been undertaken. It is not clear what justification there is for setting these requirements. Table 11 of the SHMA estimates a need for 5,459 2-bedroom dwellings and 9,454 3-bedroom dwellings. Notwithstanding the significant limitations in the SHMA data (see paragraph 4.4 of this statement), even these figures do not justify the proposed mix of 25% 2-bedroom and 25% 3-bedroom dwellings. The policy appears to be seeking a disproportionately high level of 2-bedroom dwellings. It is not clear why the policy does not similarly set out any minimum requirement for larger 4+ bedroom homes, given the important role that such housing can play in meeting the needs of families and freeing up smaller accommodation elsewhere in the supply chain.
A0853B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Object to DP1(4) requiring all dwellings specifically designed for older people or those with disabilities or special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and also to DP1(5) requiring this provision in 5% of dwellings on sites of 5 or more dwellings. These requirements are not consistent with NPPG paragraph 56-009 requiring the wheelchair accessible homes standard (i.e. M4(3) standard) to be applied only to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (i.e. certain types of affordable housing). DP1(4) needs to be amended and DP1(5) must state that the 5% requirement only applies to the element of affordable housing. In terms of viability, the Council's Viability Study (paragraph 8.15) assumes that any wheelchair accessible homes will be affordable homes, in accordance with the section of the NPPG referred to above. However, the cost is still projected to be significant (£10,111 per dwelling, or £32,750 per hectare based on a 5% requirement). The Viability Study indicates that viability in many parts of the borough is challenging, with the affordable housing requirement of 10% being pursued on the basis of 'on-the-ground' experience rather than the results of the assessment itself. However, such on the ground experience was achieved prior to the introduction of additional policy requirements. The NPPG tests of necessity and viability have not been met in relation to the proposed requirements for both M4(2) and M4(3) standard dwellings.
A0853B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Object to Policy DP1(5) that requires, on sites of 5 or more dwellings, 70% of new housing be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations. The need for higher accessibility, adaptability and wheelchair housing standards is addressed at paragraphs 6.267 – 6.294 of the SHMA. However, the evidence does not appear to support the proposed requirement for 70% of all new dwellings to meet M4(2) standard in accordance with Paragraph 56-007 of the NPPG that requires local planning authorities to use specific evidence to justify setting higher accessibility, adaptability and wheelchair housing standards. We therefore consider that the evidence and policy should be reviewed, and more realistic assumptions applied. We note that in other recent Local Plans where requirements for M4(2) housing have been introduced, the requirement has been far lower than proposed in Shropshire. For example, in Central Lincolnshire the requirement is 30%, and in Harrogate the requirement is 25% for the following reasons: Firstly, the analysis in the SHMA (paragraphs 6.290 – 6.294) cites the upper levels of need identified in Table 94. However, the preceding analysis at paragraphs 6.258 – 6.266 indicates that this need could be met through homes built to M4(1) standard, which is required by building regulations for homes. It does not represent a total need for homes to be built to the higher M4(2) standard. Secondly, and notwithstanding the above, Table 94 of the SHMA applies the very broad assumption that only 53% of Shropshire households in current or future housing need due to a long-term health or physical disability (LTHPD) could be absorbed by converting existing properties to bring them up to M4(1) standard. However, that assumption fails to recognise that for households who require adaptations where these are not possible in their current home, their choice is not simply to stay in their current home or acquire a new dwelling built to M4(1) or M4(2) standard. It is reasonable to assume that such households would also consider moving to one of the 10,000 houses already built to M4(1) standard, or one of the 73,000 properties within Shropshire which the SHMA estimates can be brought up to M4(1) standard (SHMA, Figure 70). Furthermore, paragraph 6.292 of the SHMA also recognises that a proportion of this need will be met within specialist older person accommodation, but this does not appear to be quantified within the assessment. Thirdly, even if the upper need figures set out in Table 94 are realised, and it is assumed that all of that need is for M4(2) or M4(3) accommodation and none of that need is met within the existing stock, it is not realistic to assume that such a large proportion of the 30,800 dwellings planned in the Local Plan Review need to be built to that standard to meet the need. The housing market does not work in such a way that building thousands of homes to M4(2) standards will result in them being purchased and occupied by households falling within that need. There will be significant demand for new housing from other elements of the population, and furthermore many households will stay (by choice) in their existing homes even if it is not of an accessibility standard which meets their needs. The NPPG tests of necessity and viability have not been met in relation to the proposed requirements for both M4(2) and M4(3) standard dwellings.
A0862B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Section 2b of draft Policy DP1 states where there is no local housing need survey, "at least 25% of open market dwellings will be dwellings with 2 bedrooms or less. At least a further 25% of open market housing will be dwellings with 3 bedrooms or less." This mix is reflected in the Council's Delivery & Viability Study, which proceeds to find that a high proportion of its typologies are not viable. Concur with comments received by the Council when it consulted on the Delivery & Viability Study, that: • The mix may be overly restrictive with too many small units. • Housing mix is too general and should not be used. Mix should be left to the market." Consider the majority of housing developments have a relatively high proportion of larger homes in order to achieve sufficient saleable floorspace to make development deliverable. Retaining section 2b will mean developers will be forced to increase the number of dwellings on a site in order to achieve sufficient saleable floorspace to make a scheme viable. Pressure to deliver sufficient saleable floorspace from smaller dwellings will result in pressure to exceed housing guideline figures for a site. To be deliverable, the Plan should be amended to ensure that guidelines are always expressed as a minimum. Section 5 of the draft Policy requires 5% of dwellings on larger sites to be built to the M4(3) (wheelchair user dwellings) standard and a further 70% to be built to the M4(2) (accessible and adaptable dwellings) standard. The Council's Delivery & Viability Study reports that these requirements impact on development costs of 10% of dwellings M4(3) £65,500/ha and 100% of dwellings M4(2) £22,000/ha. Using these figures and assuming a proportionate cost, the equivalent costs of 5% of dwellings to M4(3) standard and 70% of dwellings to M4(2) standard would be £32,750/ha and £15,400/ha respectively, a total of £48,150/ha. To accommodate these extra costs, developers need sufficient sellable floorspace and that requires a degree of flexibility to match housing types to current market demand. As currently worded, draft Policy DP1 severely limits that flexibility. The Local Plan will be more viable and deliverable if the policy is less prescriptive. Consider section 2 of the draft policy should be deleted (preferred) or amended so part a recognises need for a recent Local Housing Need Survey and reduces the proportion the policy applies to 33% of the development; part b applies 20% to 2 bed or less and 20% to 30 bed or less; and a new part c is added which states "A convincing case is made that current market conditions or the site's characteristics require a different mix". Residential development will have to comply with draft Policy DP1 (Residential Mix) which requires sites of over 5 dwellings to include 25% of dwellings to be 2 bed or less and a further 25% 3 bed or less; and sites of over 50 dwellings to include a range of specialist housing to meet the needs of older people. These requirements will reduce the average size of dwellings significantly. The indicative layout plan for SHR054a was submitted with the 'Call for Sites' assumed an average floorspace of around 115sqm per dwelling. The emerging policies will bring the average floorspace down to around 85sqm. Smaller units require an increase in the number of dwellings by approximately 35% in order to achieve the same floorspace coverage. Therefore, in order to achieve the same floorspace as shown in the indicative layout plan at these smaller sizes, there would need to be at least 81 dwellings on the site.
A0888B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	See wider response.
A0896B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Galliers Homes objects to Policy DP1(2) and recommends that this section of the policy is entirely deleted from the Plan. This is because DP1(2)(a) requires development proposals to reflect the profile of need recorded in a Local Housing Need Survey. These surveys are snapshots of need and accurate for only a short period of time. DP1 in the explanatory text provides no qualifiers as to how recently a survey should have been conducted and may be used which makes DP1 inflexible and open to distorting a local market that is changing very quickly. If DP1(2) retained then DP1(2)(a) should refer to "a recent Local Housing Need Survey that has been undertaken within the past 3 years.....". It should also be recognised that local needs surveys may not be appropriate where a development is catering for Shropshire-wide need including households moving into Shropshire. The existing households in the parish may not be representative, particularly for larger developments that cater for county-wide housing need. Evidence from other sources may be appropriate in establishing an appropriate mix of housing. DP1(2)(b) also requires that, where there is no local housing need survey, "at least 25% of open market dwellings will be dwellings with 2 bedrooms or less. At least a further 25% of open market housing will be dwellings with 3 bedrooms or less." This mix is reflected in the Council's Delivery & Viability Study, which concludes a high proportion of its typologies are not viable. Galliers Homes agrees with the comments on the Delivery & Viability Study, reported on page 260 of the Study, that: The mix may be overly restrictive with too many small units. Housing mix is too general and should not be used. Mix should be left to the market." In our experience, many housing developments have larger homes to achieve sufficient saleable floorspace to be viable. If section 2b is retained, developers will be forced to increase the number of dwellings on a site in order to achieve sufficient saleable floorspace to make a scheme viable. This increases densities and alters the local character, especially in areas characterised by relatively low density housing across rural Shropshire. The pressure to deliver sufficient saleable floorspace from smaller dwellings will result in pressure to exceed housing guideline figures for both specific allocations and for settlements (our comments on Policy SP6 refer). To be deliverable, the Plan should be amended to ensure the number of dwellings is always expressed as a minimum. DP1(5) requires 5% of dwellings on larger sites to be built to the M4(3) (wheelchair user dwellings) standard and a further 70% to be built to the M4(2) (accessible and adaptable dwellings) standard. The Council's Delivery & Viability Study reports that these requirements impact on development costs to the order of 10% of dwellings at M4(3) costing £65,500/ha and 100% of dwellings at M4(2) costing £22,000/ha. These figures with assumptions on proportionate costs, the equivalent costs of 5% of dwellings to M4(3) standard and 70% of dwellings to M4(2) standard would be £32,750/ha and £15,400/ha respectively, a total of £48,150/ha. Significant extra costs are imposed by Policy DP12 Minimising Carbon Emissions, estimated in the Council's Viability Study at £249,689/ha. In addition to CIL and affordable housing contributions, the burden on development is substantial. To accommodate these extra costs, developers need sufficient sellable floorspace and that requires a degree of flexibility to match housing types to current market demand. As currently worded, Policy DP1 severely limits that flexibility. The Local Plan will be more viable and deliverable if the policy is less prescriptive. In light of the above, we suggest that the Council either deletes section 2 of the policy in its entirety (preferred) or amend DP1(2) to require that a Local Housing Need Survey is recent and has been undertaken within the past 3 years and that only 33% of open market dwellings will reflect the profile of the housing need established within the survey; or 20% of open market dwellings will be dwellings with 2 bedrooms or less. Also that at least a further 20% of open market housing will be dwellings with 3 bedrooms or less; or to consider a further clause as DP1(2)(c) that a convincing case is made that current market conditions or the site's characteristics require a different mix.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0897B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Section 2a of the draft policy requires development to reflect the profile of housing need established by a Local Housing Need Survey, where one exists. However such surveys are only ever accurate for a very short period of time. There is no qualifier in the explanatory text as to how recent a survey should be to be relevant. The current policy wording could be interpreted that a needs survey conducted 8 years previously should be adhered to. This is inflexible and will distort the market, which can change very quickly. Recent examples of rapid change are the Covid19 pandemic, which has dramatically increased the demand for home offices, larger homes and suburban gardens. Another example is rapidly rising elderly population resulting in demand for granny annexes and additional ground-floor, en-suite bedrooms. A third is the number of young people renting rooms in shared houses, demand met by private landlords purchasing larger 4 and 5 bedroomed properties to let as HMOs. Difficult to predict what other changes might occur during the draft Local Plan period, but it can be stated with a high degree of certainty that housing needs surveys over 4 years old will no longer reflect current needs and that the current profile of need, with its emphasis on smaller properties, may no longer be relevant in future years. To ensure the policy is not rapidly out-dated, section 2 of the policy should be deleted in its entirety. If retained, section 2a should be amended to refer to, "a recent Local Housing Need Survey that has been undertaken within the past 4 years.....". It should also be recognised that local needs surveys may not be appropriate where a development is catering for Shropshire-wide need including households moving into Shropshire. Existing households in the parish may not be representative, particularly for larger developments that cater for county-wide housing need. Evidence from other sources may be appropriate in establishing an appropriate mix of housing. Section 2b identifies a dwelling mix where there is no Local Housing Need survey. This mix is reflected in the Council's Delivery & Viability Study, which finds a high proportion of its typologies are not viable. Agree with the comments received by the Council when it consulted on the Delivery & Viability Study (summarised within it) that: "The mix may be overly restrictive with too many small units and Housing mix is too general and should not be used. Mix should be left to the market". In our experience, the majority of housing developments have a relatively high proportion of larger homes in order meet market demand and to achieve sufficient saleable floorspace to be viable. If section 2b is retained, developers will be forced to increase the number of dwellings on a site to achieve sufficient saleable floorspace to make a scheme viable. This will increase densities and may alter local character, especially in locations where existing character comprises relatively low density housing, as occurs in many parts of Shropshire. This may also result in housing guideline figures being exceeded for both specific allocations and settlements (see comments on draft Policy SP1 and draft Policy S1.1). To be deliverable, the draft Local Plan should be amended to ensure the number of dwellings is always expressed as a minimum. Section 5 of the draft policy requires 5% of dwellings on larger sites to be built to the M4(3) (wheelchair user dwellings) standard and a further 70% to be built to the M4(2) (accessible and adaptable dwellings) standard. This requirement potentially conflicts with section 2b's requirement for 25% of houses to be small with 2 bedrooms or less. Using the Council's Delivery & Viability Study the impact of this draft policy requirement on development costs can be extrapolated to £32,750/ha and £15,400/ha respectively, a total of £48,150/ha. To accommodate these extra costs, developers need sufficient sellable floorspace and that requires a degree of flexibility to match housing types to current market demand. As such suggest deletion of section 2 of the policy in its entirety (preferred) or amends section 2 to specify timescales for local housing needs assessments (4 years) and the proportion this is applied to is reduced to 33%; and that the requirement for an alternative mix is changes to "developer demonstrates a mix appropriate to market conditions and/or the site's characteristics."
A0928B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	The Policy requires that residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities. It is suggested this should be in accordance with the councils strategic housing market assessment. Specific provisions are made for at least 25% of open market dwellings to be 2 bedroom properties or less; a further 25% of open market housing should be 3 bedrooms or less. We believe that this policy needs to be applied flexibly. Any housing survey relied on needs to be up to date and the policy should highlight this. Consideration should also be given to the expertise of house builders who are the forefront of the housing market and have a strong understanding of housing needs and demands in an area. Equally consideration needs to be given to the urban context and locality as some areas may be small suitable for a particular housing mix in urban design terms than others. In respect of other building standards proposed for house building, it is unclear as to the evidential justification for the requirements set out and why they have been set at such prescriptive levels. Certain aspects of the policy are vague. It is not clear as to the extent to which these provisions have been assessed in terms of their impact on development viability and delivery.
A0961B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Agree	Para 2 support this in order to achieve more smaller dwellings than at present
A0972B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Query if Shropshire Council undertaking a housing needs assessment for Bridgnorth to ensure needed housing mix achieved, as prescribed in DP1.2? If not, why? Query how a housing needs assessment can be invoked by the local town and parish councils
A0984B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Agree	Support the aims of Part 1 of the draft policy and the need to provide a mix of homes that meet local needs. However, it is important that the draft policy offers flexibility to respond to changing needs and site specific evidence. Any policy on residential housing mix must ensure that it does not frustrate housing delivery by being over prescriptive. Part 2 of the draft policy is more prescriptive. Generally support the use of Local Housing Need Survey to help guide at least 50% of the open market housing mix, as specified within Part 2a of the draft policy. However, it is understood that such surveys are not available for all settlements, if this requirement is retained, surveys should be available for all Principal/Key Centres and regularly reviewed, otherwise the effectiveness of the policy and the ability to meet community needs is reduced. There is also a need to define what an equivalent survey to a local housing needs survey is. Part 2b states an alternative requirement (25% of open market dwellings with 2 bedrooms or less and at least a further 25% with 3 bedrooms or less), this needs to be clarified. Clarification is required as to when this applies (as introduced by the use of 'or' at the end of part 2a is this applicable in all circumstances or only where a Local Housing Need Survey has not been carried out); and whether provision of say 50% 2 bedroom properties complies with the requirement. The requirements of Part 2b also need to be based on up-to-date evidence, without publication of SHMA part 2 it is unclear if this is the case. Part 5 of the draft policy requires developments of 5 or more dwellings to provide 5% M4(3) and 70% M4 (2), whilst the explanation explains the ageing demographics of Shropshire more specific evidence of these requirements should be provided (consistent with NPPF footnote 46 and NPPG section 56 paras 005-007). Part 6 requires development of 50 dwellings or more to deliver a range of specialist housing to meet the diverse needs of older people and those with disabilities. Committed to providing homes that are accessible/adaptable and suitable for a the whole population.
A1106B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Policy DP1. Residential Mix part 3 states that "all affordable dwellings will achieve the nationally described space standard. All open market dwellings are strongly encouraged to comply with the nationally described space standard". We object to this as a requirement for open market residential units. Ultimately the imposition of prescriptive NDDS should be justified, as made clear in footnote 46 of the NPPF. In DLP para 4.11 it is stated that the around "11% of households in social rented accommodation were overcrowded as opposed to around 6% of households in private rented and 2% of households in owner-occupied accommodation". In other words, 89% of households in social rented accommodation are not overcrowded. It seems unclear why Shropshire should use this as a justification for the imposition of the NDDS on any new affordable housing. Other Local Authorities have a much higher proportion of overcrowded households. For example, the London Borough of Brent's 2018 SHMA calculated that 29.6% households were overcrowded (https://www.brent.gov.uk/media/16415908/eb_h_01-brent-strategic-housing-market-assessment.pdf). Brent's Design Guide (2018) states "new development should provide adequate space, access and orientation and adhere to the relevant space standards". Parts of the policy could potentially, inadvertently, cause developers and housing associations to be unable to deliver the much-needed affordable housing. For example, within the policies supporting text it is stated that the "minimum floor to ceiling height is set at 2.3m for at least 75% of the Gross Internal Area". This requirement will lead to potentially significant cost increases and is unjustified. No reason is provided for this to cover 75% of the internal area. Floor to ceiling heights can be discussed with Shropshire's planners and urban design officers on a case by case basis. Design policy should be flexible enough to provide a wide range of dwelling types, in order to ensure residents are able to have a choice and can express their own individual tastes. The provision of extra ceiling height could add significant cost on to the construction of dwellings. In simple terms, this and other NDDS requirements do not actively promote an increase in floorspace and the benefits to future residents are negligible. The NDDS are not justified and given that the NDDS have the potential to lead to viability issues, which consequentially may lead to affordable housing not being provided, these elements should be removed or re-worded to advise the use of the NDDS rather than demand it. Without further evidence the policy should be removed.
A1152B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Disagreement is in part. Fully endorse intention of para 1 of the draft policy, to provide a mix of dwelling types to meet the needs of the different sections of society, in accordance with the SHMA. However, part 2 of the SHMA, giving details of the different sections of society, was not published until 22 September 2020. There is also differences between sections of society addressed in the Right Home Right Place (RHRP) surveys, SHMA and para 1 of the draft policy. Idea behind the RHRP surveys is admirable. However, currently surveys only cover 18 of the 59 settlements with proposed housing guidelines, so there is still a way to go before there is widespread coverage. Para 2 of the draft policy refers only to open market dwellings. There should also be reference to the affordable housing need. Para 2a requires only 50% of open market housing to reflect the need profile identified in the RHRP surveys. From the wording of paragraph 2b, the implication is that it is the number of bedrooms that is being referred to, although that is not specifically stated. RHRP surveys show that the vast majority of need is for 2 and 3-bed houses. The corollary of paragraphs 2a and 2b is that up to 50% of open market houses will still be 4+ bedroom houses, which are patently not what is being shown as needed. The draft policy contained in para 2 will therefore continue to make worse the shortfall of houses that are needed. The conclusion here is that the profile of need should be met to the extent of much more than 50%. The final sentence of para 2 is weak, in referring to a 'suitable' mix and variety. Developers are always likely to plead that what they propose is 'suitable'. The sentence would have more teeth if it read 'the remainder of the open market dwellings will include a mix and variety of dwelling sizes to be determined by the latest available evidence of need'
A1161B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Agree	We strongly support the mix of residential types but request the policy is strengthened to ensure that the proposed proportions are applied to any future full planning permissions including where outline permission is already granted and that this is expressly stated in the policy.
A1191B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Part 2 of the draft policy sets out requirements for sites of 5 or more dwellings to provide a mix of housing types. Generally support this, however consider the proposed policy wording should be amended as follows: "The remainder of the open market dwellings will include a suitable mix and variety of dwelling sizes having regard to housing market demand". Note requirements within the remainder of the draft Policy. The Illustrative Masterplan prepared for BUR004, shows how a range of different housing types can be accommodated within the site in line with emerging policy.
A1192B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Consider draft policy wording relating to consideration of a Local Housing Need Surveys needs to be updated to have regard to up to date Local Housing Need Surveys, to ensure delivery of housing reflects current needs and not a snap shot in time (over a 22 year period). Also consider the alternative proposed split (based on the SHMA), should be the starting point and not a definitive requirement. As with the Local Housing Need Survey, such a requirement is reflective of a certain point in time and housing needs could easily change over a 22 year period. Suggested wording is as follows: "On sites of 5 or more dwellings: a. In locations where an up to date Local Housing Need Survey has been undertaken through the 'Right Home Right Place' initiative to an equivalent survey endorsed by Shropshire Council, at least 50% of open market dwellings will reflect the profile of housing need established within the survey; or b. The developer should seek to deliver: 25% of open market dwellings at 2 bedrooms or less 25% of open market dwelling at 3 bedrooms or less". Generally support the principle that the remaining 50% of dwellings should include a suitable mix and variety of dwelling sizes. However, consider proposed wording should be amended to provide greater certainty and ensure deliverability as follows: "The remainder of the open market dwellings will include a suitable mix and variety of dwelling sizes having regard to housing market demand". Note proposed requirements relating to affordable dwellings and dwellings designed for older people and those with disabilities or special needs
A1644B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	During the Plan period, households with a person aged 65-84 years are projected to increase by 42.8%. In response, it is stated that the policy approach which enables people to remain in their own homes for longer is complemented by policies which support the provision of specialist accommodation for the elderly. The Plan's definition of the types of accommodation is not realistic or up to date in its thinking and approach, as schemes are now more sophisticated and comprise a mixture and gradation of care within a range of accommodation types. What is needed is more of the emerging generation of care communities which offer a gradation of staged care and support as the inhabitants become older and / or their needs change. The Council's suggestion that all housing developments in excess of 50 units will deliver specialised care or retirement living is unrealistic, not researched, not based on the facts and it will not deliver. At best the Council's policy approach may secure one or two standard care homes, but that will fall short of adequately addressing this serious issue. It is suggested that instead a proportion of specialised purpose built accommodation is also required, in the form of purpose built and managed care communities, which deliver a range of accommodation incorporating staged, flexible and responsive levels of supporting healthcare and well-being. A highly suitable location is that proposed by on behalf of the landowner at Hencote vineyard and winery
A2163B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Part 6 of this draft Policy requires sites of 50 or more dwellings to include specialist housing for older people and those with disabilities. This needs to be robustly justified by the preparation of needs assessments to be reasonably applied, and found sound. This draft policy should be amended in order to be found sound, as it needs to be fully justified and compliant with national policy.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2169B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	We welcome the inclusion of policy DP1 which will guide the dwelling and tenure mix of residential developments. We understand that part two of the Shropshire SHMA will identify the mix of dwelling sizes, types and tenures needed to meet the needs of the local community. It is a shame that part two of the SHMA has not been published alongside this pre-submission consultation in order for us to ascertain if the proposed housing mix is appropriate. Seeks clarity on Right Home Right Place surveys as a means of identifying local affordable housing need during the Covid-19 outbreak. Wishes to see the need for Nationally Described Space Standards (NDSS) removed from policy DP1 unless it can be demonstrated that there is a clear need for such a standard in all residential properties in Shropshire.
A2169B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Referring to part five of policy DP1 in relation to accessible and adaptable dwellings, we support incorporating a proportion of new affordable dwellings that meet the category standard in order to provide for those in need. However, we have viability concerns over the level of accessible and adaptable dwellings which are required to be provided on site. Part 5 of policy DP1 states the following: "On sites of 5 or more dwellings, at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and a further 70% of the dwellings will be built to the M4(2) (accessible and adaptable dwellings)" This equates to 75% of the dwellings on site meeting either M4(2) or M4(3) standards, which will have considerable implications on viability. In order to justify this policy requirement, the Council must be able to demonstrate that delivering these proportions of M4(2) and M4(3) dwellings on site is a viable prospect for housing associations and developers through undertaking robust viability testing that considers an array of variables. It is common knowledge that both these types of dwellings are more costly to provide than regular dwellings, however, there is a significant difference between what is expected for M4(2) and M4(3) accessible dwellings. For example, M4(3) compliant dwellings require a greater footprint than M4(2) dwellings and are therefore significantly more costly for developers to provide. Our members inform us that for many developers, M4(3) dwellings can often only be delivered through bespoke housing types which increases costs. Bullet point 3 requires all affordable dwellings and encourages all market dwellings to achieve Nationally Described Space Standard (NDSS)
A2177B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	If the Council wishes to apply the optional NDSS to new build dwellings, this should be done in accordance with the NPPF (para 127f & Footnote 46). Footnote 46 states "policies may also make use of the NDSS where the need for an internal space standard can be justified". The NPPF also states all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG states "where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing". Before adopting the NDSS, the Council should provide a local assessment evidencing the case for Shropshire. The Council has not demonstrated in its supporting evidence the need for all affordable housing to meet NDSS. The Council's evidence only identified overcrowding in 11% of social rented accommodation (para 4.11) as opposed to all affordable housing tenures. The Council also suggested such overcrowding may be an unintended consequence of the "bedroom tax" (para 4.13) rather than a systemic problem to resolve. NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. Need is generally defined as "requiring something because it is essential or very important rather than just desirable". Identification of a need for the NDSS should identify harm caused or may be caused in the future. If it had been the Government's intention that generic statements simply stating in some cases the NDSS had not been met justified adoption of the NDSS then the standard would have been incorporated as mandatory in Building Regulations, which is not the case. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all affordable housing will impact on affordability and effect customer choice for affordable homeownership products such as First Homes. Introduction of NDSS for all dwellings may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs. This may lead to unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. Non-NDSS compliant dwellings may be required to ensure that those on lower incomes can afford a property, which meets their bedroom requirements. The Council should assess potential adverse impacts on meeting demand for First Homes and other affordable homeownership products, which may affect delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. An adverse impact on the affordability may translate into reduced or slower delivery rates. If the proposed requirement for NDSS is carried forward, the Council should include transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date. Before the pre-submission LPR consultation, the requirement for NDSS should be deleted. If the NDSS is adopted, then the Council should put forward appropriate proposals for transitional arrangements. Bullet Point 4, states all dwellings specifically designed for older people or those with disabilities or special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations. Bullet 5 states on sites of 5 or more dwellings, at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and a further 70% of the dwellings will be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations, unless site-specific factors indicate that step-free access cannot be achieved. If the Council wishes to adopt optional standards for accessible & adaptable dwellings, this should be done in accordance with the NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states "that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties". As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG to ensure an appropriate evidence base is available to support any proposed policy requirements. NPPG sets out evidence should include identification of: likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; variations in needs across different housing tenures; and viability. Detailed information on the accessibility and adaptability of the existing housing stock, the size, location, type and quality of dwellings needed and variations in needs across different housing tenures in the County should be incorporated into the Council's supporting evidence. Many older householders already live in the County. Many will not move from their current home but will make adaptations as required to meet their needs, some will choose to move to another dwelling in the existing stock rather than a new build property and some will want to live in specialist older person housing. The existing housing stock (146,126 dwellings in 2019) is considerably larger than the new build sector (only 0.8% annual addition to existing stock) so adapting the existing stock is likely to form part of the solution. The optional standards should only be introduced on a "need to have" rather than a "nice to have" basis. Need is generally defined as "requiring something because it is essential or very important rather than just desirable". If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case. The SHMA Report dated March 2020 identified that the percentage of Shropshire residents reporting "very good" or "good" health was higher than comparisons with England & Wales and West Midlands (para 3.76). The number of households containing someone with a health problem is in line with the proportion for England & Wales and slightly lower than that found in West Midlands (para 3.81). Long Term Health Problem or Disability is in line with England and slightly lower than West Midlands (para 3.83). It is important to note that not all health problems affect a household's housing needs therefore not all health problems require adaptations to homes. All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards, which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available to the older existing housing stock and benefit less able-bodied occupants. M4(1) standards are likely to be suitable for most residents. There is no rationale for the selection of 5 dwellings as the threshold for qualifying developments or the percentage provisions of 5% for M4(3) and 70% for M4(2) sought. The Council state the requirement for M4(3) is for a wheelchair adaptable home (which includes features to make a home easy to convert to be fully wheelchair accessible) rather than a wheelchair accessible home (which includes the most common features required by wheelchair users) (para 4.31). This distinction should be set out in the policy wording rather than in the supporting text. The Council is also reminded that the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG. Government's consultation "Raising Accessibility Standards for New Homes" (ending on 1st December 2020) estimates the additional cost per new dwelling is approximately £1,400 for dwellings, which would not already meet M4(2). In September 2014 during the Government's Housing Standards Review EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. M4(3) compliant houses are also larger than NDSS (DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013) therefore larger sizes should be used when calculating additional build costs for M4(3) and any other input based on square meterage. The Council's own viability assessment identifies viability challenges and threats to housing delivery from the cumulative impact of proposed policy requirements. Before pre-submission LPR consultation, Bullet points 4 & 5 of draft Policy DP1 should be re-considered and modified by the Council. Bullet Point 6 states on sites of 50 or more dwellings an appropriate range of specialist housing designed to meet the diverse needs of older people, such as age-restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care and / or residential care homes / nursing homes and an appropriate range of specialist dwellings to meet the needs of those with disabilities and special needs will be provided. The NPPF states housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All households should have access to different types of dwellings to meet their housing needs. Market signals are important in determining the size and type of homes needed. When planning for an acceptable mix of dwellings types to meet people's housing needs, the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites. The Local Plan should ensure that suitable sites are available for a wide range of developments across a wide choice of appropriate location
A2321B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	The draft plan should not include a prescriptive policy on housing mix, size, types or tenure as needs will change over the plan period. Such a policy would potentially undermine viability and delivery of sites. We consider that any such policy should be dealt with as a supplementary planning document which can be regularly updated and, in addition, there should be no 'blanket' policy – standards should reflect the needs of specific settlements and areas.
A2323B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1		Recognise that draft policy DP1 states at point 1 that "Residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, including families with children, older people, people wishing to build their own homes and people with disabilities and special needs in accordance with Shropshire Council's Strategic Housing Market Assessment" the following points (2 to 6) each state that new development "will" meet the requirements set out in policy rather than being "expected". The draft policy should acknowledge that the final mix of any development will be subject to further negotiation between the applicant and the District Council during the planning application stage. This approach is justified in that demography and market signals will change over the plan period to 2038. Detailed prescription should be avoided in order to not undermine market demand and financial viability, which can put delivery at great risk. Such factors are will ensure the emerging Local Plan Review responds to paragraph 122b of the NPPF.
A2412B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	The plan fails to adequately provide for the need for the growing older person population. Specific allocations should be made for retirement living.
A2412B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	We note and support the aspiration to deliver a mix of properties on a development. However, within point 2, a threshold of five is proposed. The threshold is too low and too hard to implement on a practical scale. Suggest that a threshold of 20 or more dwellings is implemented.
A2441B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	As stated in the document, Shropshire has an older population and that segment of the population will increase. With that in mind, could it be part of the policy that a percentage of new homes must be bungalows. There seems to be an assumption that once older people want to down size or find something more manageable they'll happily go into care homes or assisted living. This is not the case. Many older people would like to remain in their homes, and a bungalow would meet those needs. Bungalows also help with providing homes for disabled people.
A2463B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Disagree	Concern that the SHMA findings will be overruled on a settlement-by-settlement basis. If a settlement-specific approach to housing mix is justified by the evidence, then this should be incorporated as part of a duly made Neighbourhood Development Plan rather than a housing needs survey that would not be consulted upon or independently tested. We cannot see from the supporting text to Policy DP1 or the plan's evidence base how the threshold of 50 dwellings has been arrived at and how it responds to the quantum of need for such housing types over the plan period.
A2470B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP1	Don't know / no opinion	The policy should provide for flexibility going forward so that the Plan is able to respond to changes in circumstances at the time of an application being submitted to the local planning authority so that development opportunities can make better use of the land available whilst responding to the housing needs at that time. In this regard Gladman support the general approach of the policy. Gladman suggest that further clarity is required to justify the inclusion of the WMS (2015) requirements, notably those included in Paragraph 5 of Policy DP1. It is difficult to ascertain the conclusions of the viability studies and therefore how the policy requirements have been derived. It does not appear that the viability study has acknowledged the data relating to M4(3) standards, nor has it been reflected within the SHMA. It may also not be appropriate to have a blanket policy approach to wheelchair accessible properties as the need may vary across locations, sites and schemes. We do not object to this policy, but believe that further justification is required for some of its aspects.
A0101B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Whilst supporting the principle of the provision of self-build plots we do not believe this policy to be practicable and in many cases it may undermine the viability of developments. If the Council wishes to encourage self-build housing more appropriate policies should be developed.
A0156B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	The draft plan makes minimal provision for self build projects. Policy DP2 simply says that developers will be "encouraged" to make serviced and self build plots available within their sites. The wording of the policy should be changed to state that developers will be "required" to provide a percentage of self build plots unless they can prove that there is no local demand or that the scheme will thus become financially unviable.
A0238B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Document Reference BTC3: Re Point 2, policy should be extended to include "small local builders", suggest allocating at least 10% of larger sites for their use & policy rephrased so that the default position is that 10% of the dwellings must be made available for Self-Build and Custom-Build developers as serviced plots. The use of the word 'encouraged' makes this policy unenforceable.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0430B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Support provision of self-build and custom-build housing and the contribution to the overall housing supply but concerned in relation to the level of self-build and custom-build housing suggested and that the demand for such a significant number of serviced self and custom-built plots over the plan period is not yet fully evidence. Furthermore, were 10% be applied to the safeguarded land at Shifnal it would equate to over 100 self-build plots and the distribution of these plots would need careful consideration to prevent there being large areas of undeveloped land within the Site if there was insufficient demand. In terms of the requirement for self-build and custom-plots, DP2(2) suggests that on sites of ten or more dwellings, 10% of the dwellings are encouraged to be made available as serviced plots for self-build and custom-build developers, where there is an identified need on the Self-Build Register. It is noted that the Self-Build Register identifies that the number of applications for self-build plots in the County is falling year-on-year with applications for just 62 self-build plots made between October 2018 and October 2019.
A0436B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0437B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0438B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0439B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0440B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0441B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0442B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0443B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0445B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0446B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome principle of supporting self-build and custom-build housing, which is consistent with government aspirations. The policy will open up a range of opportunities for individuals to develop their own homes. The complexity and timescales of development should not be overlooked. Flexibility about the location of self-build plots should be provided, so they don't hamper the development of the remaining site. To ensure delivery flexibility should be provided to allow plots to revert to normal market housing if they are not taken up within a given time-period, say 12 months.
A0513B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Policy DP2 requires the provision of 10% of residential schemes (over 5 or more dwellings) to be provided as serviced plots for Self-Build and Custom-Build developers where there is an identified need on the Self-Build Register. No justification is provided for this requirement and there is no indication within the policy as to how developments that don't provide serviced plots will be considered and assessed. As a result, the policy cannot be justified. Whilst MD&DP appreciate that demand for Self-Build and Custom Build properties is increasing, they believe these are best provided on dedicated plots rather than being required as part of each individual/larger development schemes.
A0678B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Support the aim of the delivery of self-build or custom build housing. Note the draft policy does not seek provision as an absolute requirement. Note the minimum marketing requirement of 36 months. This period represents a significant time and, particularly in the context of small to medium scale developments, could extend beyond the actual completion of development works associated with the main site delivery. As such the 36 month timescale is considered too long and it is considered that a reduced marketing period is appropriate and a policy 'return mechanism' required should self / custom build disposal not be achieved.
A0692B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		Welcome support for self-build housing in this draft policy. Agree self-build housing provides wider choice of quality homes, can contribute to meeting the needs of different groups in the community and represent part of the solution to achieving mixed and balanced communities. Council estimate around 9% of local housing need is for self-build and custom-build plots (around 2,400 dwellings over the draft Local Plan period). Rural areas are capable of delivering a high proportion of this need as they have strong market demand and suitable sites. The draft Local Plan could better deliver this level of self-build housing if it enables delivery where market demand is strongest. However the draft Local Plan currently restricts development of self-build sites adjoining Community Hub settlements, which is a missed opportunity to increase self-build delivery. The first section of the draft policy promises "support" for self-build housing, but is not explicit on how. Suggest the policy explanation states that in decision-making, provision of self-build plots will be a positive benefit when applying draft policies SP6 (Managing Housing Development), SP7 (Managing Development in Community Hubs) and SP9 (Managing Development in the Countryside). The second section of the draft policy states the Council will "encourage" 10% of dwellings on larger sites to be self-build plots. "Encourage" needs to be defined. Suggest the policy explanation states to encourage provision of self-build/custom-build plots, the Council will accept their inclusion adjoining development boundaries and on cross-subsidy exception sites.
A0853B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Object to DP2(2) for all sites of 10 or more dwellings to provide 10% of houses as serviced plots for self-build, as a need has not been demonstrated for this type and scale of provision. Table 131 of the SHMA suggests that around 2,390 applications will be made for inclusion on the Self-Build Register during the plan period. However, the evidence at tables 132 and 133 of the SHMA shows that the supply of such units is exceeding additions to the Self-Build Register. The SHMA sets out the positive steps that the Council has taken to encourage self-build, for which it should be commended. However, as supply is currently outstripping demand by 33% (SHMA, paragraph 11.16) it not clear why a further policy requirement to deliver self-build plots on all sites above 10 dwellings is needed. Notwithstanding the above, DP1(1) that supports appropriately located Self-Build and Custom-Build housing developments is supported where they comply with all relevant policies of this Local Plan. However, if there is unmet demand for self-build plots, there is no evidence that it could be satisfied through the provision of serviced plots on large residential developments. The Inspectors Report paragraph 168 to the Cornwall Local Plan states: "The Council's published change on this policy (J.1, 46) was too prescriptive in requiring larger developments to provide at least 5% of development as serviced plots for self-build/custom-build. There is not yet the evidence to justify this level of prescription and there must be considerable uncertainty as to whether plots on large new housing estates would be attractive to self-build/custom-build from the anticipated small site windfalls and the modification to policy 8 to apply the WMS would ensure that plots for 1-5 dwellings do not have to contribute to affordable housing, thus making gaining permission and implementation more straightforward." Therefore whilst the principle of providing plots for custom and self-build development is supported, it is more appropriate to firstly identify the scale of demand for such units, and then allocate suitable sites specifically for this purpose through a call-for-sites exercise. In fact, smaller sites are much better placed to meet the demand for self-build development, which is likely to be for bespoke units in rural or semi-rural locations, rather than serviced plots within large scale housing developments. Without prejudice to in-principle concerns, the draft policy also contains a requirement to market plots for 36 months at a 'fair plot valuation'. This is not a reasonable timeframe for marketing the site as a shorter period would bring forward demand where there is an unmet need for land for this type of housing.
A0897B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Para 4.43 of the draft Local Plan notes the SHMA estimates 2,400 applications are likely for inclusion on the Self-Build Register over the draft Local Plan period. It also notes "this equates to around 9% of the calculated local housing need. As such it is considered appropriate to encourage larger development sites to make 10% of dwelling available for Self-Build developers..." This reasoning displays an exclusive focus on the quantity of self-build plots combined with a complete disregard for the location and suitability of those plots. There is no evidence that self-builders wish to live on larger, modern housing estates. Conversely, there is considerable anecdotal evidence that they prefer more individual plots. Larger housing estates are not the right location for most self-builders. The policy would be better framed to take a positive approach towards small scale self-build plots across the county. The wording/requirements of the policy are problematic as: -It is unclear whether the requirement for self-build plots is a requirement and non-compliance will result in refusal of a Planning Application. Needs to be clarified. -The self-build register provides only a county-wide figure. Given the size of the county provision may not meet needs. As such the wording of the policy should be amended to reflect need for self-build plots in the settlement not just in general. -The 10% requirement does not match evidence. The SHMA (Part 2) demonstrates need is being met, as such a requirement for 10% which is not in current policies is unnecessary/not justified by evidence and will fail the tests of soundness. It should be deleted. Section 2b of the draft policy requires self build plots to be accessible at an early stage in the development, "prior to 25% occupation of the relevant phase". However simultaneous construction of self-build and housebuilder development is impractical. Proposed requirement to provide plots "prior to 25% occupation of the relevant phase" be deleted. Section 2d of the draft policy requires plots to be marketed, "for at least 36 months at a fair plot valuation and in accordance with a marketing strategy to be approved by Shropshire Council." Timescales envisaged mean occupants of new housing estates could be living next to unfinished plots for over 3 years. Purchasers want to know the end date for construction work around them, not be faced with the inherent uncertainty over the timing, size and appearance of the self-build plots. Lack of certainty will significantly reduce sales values of the housebuilders' product and undermine viability and delivery on larger estates. The Council's Viability Study does not factor this impact on sales values in its assumptions (it states self-build requirement "has been tested" however Appraisals in Appendix 11 of the Viability Study only show the development value of built properties, with no values for self build plots - neither do the cashflow spreadsheets include any self-build plots, or allow for up to 36 months to sell them), this undoubtedly requires more work/explanation/consideration before the Local Plan examination.
A0899B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Object to policy DP2 despite the well intentioned objective to increase self build and custom build and the recognition in explanatory para 4.41 that these forms of housing meet the needs of different groups in communities. DP2 starts by offering support for these forms of housing but this needs to be explained in the text below the policy by adding the following paragraph to read: "In its decision-making, the Council will consider the provision of self-build plots as a positive benefit of development in the planning balance when applying policy SP6 (Managing Housing Development) and SP7 (Managing Development in Community Hubs) and SP9 (Managing Development in the Countryside)". DP2 ends by offering encouragement for 10% of dwellings to be self build plots but this needs to be explained in the text below the policy by adding the following words "To encourage provision of self-build and custom-build plots, the Council will accept their inclusion on cross-subsidy exception sites". DP2 overlooks the capacity of the rural area to provide a significant proportion of the 9% of dwellings needed in the form of self or custom build dwellings. The rural area offers a powerful combination of strong market demand and suitable sites. This would be facilitated by permitting this self build dwellings adjoining Community Hub settlements which has the following three fold benefit: helps deliver the quantity of self-build and custom-build housing that Shropshire needs; and provides a suitable form of cross-subsidy to enable the delivery of rural affordable housing that Shropshire needs, and helps ensure Shropshire meets the Housing Delivery Test set by the Framework. NPPF para 71 also supports the provision of entry level self build on exception sites and this support should be introduced into policy DP2, DP7 and SP9 to permit self build and custom build on exceptions sites possibly reflecting the approach in Telford and Wrekin Policy HO11.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0984B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Support delivery of self-build and custom-build housing and the contribution that this makes to the overall housing supply, but concerned by the level suggested (10%) particularly on larger strategic sites: For example 10% of dwellings on BRD030 would equate to 105 dwellings, which is a considerable amount, almost a whole year of registrations on the self-build register. Suggest further consideration of evidence and a cap on larger strategic sites. There appears to be a lack of evidence to support this requirement. Also concerned with the requirement to market self-build plots for 36 months, which is considerably longer than other locations. This could hamper the delivery of other adjacent plots. 12 months would seem more appropriate
A1106B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Policy DP2. sets out Shropshire's approach towards Self-Build and Custom-Build Housing. Part 2 of the policy states "2. All sites of 5 or more dwellings in designated rural areas and 10 or more dwellings or sites of 0.5 ha or more elsewhere, are encouraged to make 10% of the dwellings available as serviced plots for Self-Build and Custom-Build developers, where there is an identified need on the Self-Build Register". Although we support the policy as only an encouragement rather than a requirement, we disagree with the sentiment that a policy for self-build and custom-build housing is justified. There is no evidence that Self-Build homes are desired by residents who live within development sites. Self-Build homes are more commonly found on individual plots and not within development sites. This policy's encouragement for the development of self-build houses on sites larger than 0.5 ha could be problematic for several reasons. If the self-build house is designed in such a way that it is not in keeping with the general vernacular of the rest of the site then it will be noticeably out of character; unsuitable and jarring for residents. If the design of the self-build is similar to the other homes on the site, then the development of the self-build home is aesthetically open to debate, as it is for all intents and purposes the same as the houses, with the only difference being it was erected by an independent construction team. The construction of a self-build house is likely to be slower than the construction of houses which are being developed by a housebuilder who is carrying out works with a consortium of specialised workmen who have a wealth of experience erecting similar homes. This approach is neither justified nor sensible. It will be impractical, and we recommend the removal of section 2 of the policy.
A1116B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	The DP2 policy seems to be aimed more at self-builders with financial means. DP6 seems aimed at individual self-builders with reduced financial means which is good. There is also a need to make provision for low-income self-build groups of people, like the Walter Segal self-build groups of the past but updated to today's Building Regs, PassivHaus standard, and 'green' site development. The Walter Segal schemes often proved successful in supporting community building and in establishing stable occupation, as well as providing the opportunity to gain skills and make people employable.
A1152B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Don't know / no opinion	Unsure. The wording of para 2 may need rethinking, or refining, in that 10% of 5 is only 0.5, so the requirement would be for only half a plot to be provided for self-build on sites with only 5 dwellings in designated rural areas. One disadvantage of self-build is that they are currently exempt from CIL, so the burden of funding infrastructure falls elsewhere. We suggest that a discounted rate of CIL may be more appropriate for self-build rather than complete exemption.
A1191B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Agree	Note requirements of Part 2 of the draft Policy. BUR004 is able to provide 10% of the total 100 dwellings as plots for Self-Build/Custom-Build homes.
A1192B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	Note the draft policy encourages rather than requires or expects provision of 10% sold-build/custom-build housing. Appreciate this flexibility, given sites such as Clive Barracks could be required to deliver up to 75 dwellings as self-build/custom-build plot The draft Policy should recognise that for large-scale developments, it is often very difficult to accommodate self-build/custom-build plots without having a negative impact on viability. For Clive Barracks, it is not clear whether implications have been fully assessed. Would not rule out providing such plots at Clive Barracks, however provision must be seen as part of the proposals for the whole site, including all aspects such as planning obligations and abnormal costs of development. Key practical considerations for self-build/custom-build include: preference for remote/private settings (difficult on large development sites); low sale relates for such plots due to the restricted nature of the market (can make sites unviable); mainstream developers offer small plot areas/assign low values to avoid risk; and on large strategic sites with high infrastructure investment, accommodating these plots is difficult/costly (viability concern). Request the draft Policy is reworded to provide further flexibility and ensure that there is no expectation all sites deliver self-build/custom-build plots
A2163B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	This draft policy has a prescribed level of 10% serviced plots for self-build purposes on sites delivering 10 or more dwellings, where there is an identified need on the Self-Build Register. This sentiment is supported, but it is suggested that the spatial strategy that underpins this amended. Reference is made to the HBF comments on self-build, where it is acknowledged that customers seeking self-build opportunities also seek smaller, more rural sites rather than serviced plots within a larger strategic allocation. It is suggested that rural housing sites are encouraged to be proposed as self-build sites, which may be more attractive and thus more deliverable/successful. Para 61 of the NPPF requires the housing needs of different groups to be assessed and footnote 26 of the NPPF refers to self-builders, however the NPPF does not provide a specific percentage of self-build plots to be provided and that the Self-Build Register should inform demand, with enough suitable development permissions allowed to meet the identified demand. This draft policy should be amended in order to be found sound, as it needs to be fully justified and compliant with national policy
A2321B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Disagree	In line with Vistry's response to Policy DP1, the imposition of an inflexible requirement for the delivery of serviced plots on sites could again undermine the viability and deliverability of sites.
A2323B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2		It is noted that residential developments of 10 or more homes are encouraged to make 10% of the new homes available as serviced plots for self-build and custom-build developers, where there is an identified need. However, we consider that a consideration is whether providing such homes in large scale new build developments is meeting the needs and aspirations of those people who have registered for a self-build / custom-build home. To avoid self-build and custom-build plots being left undeveloped a mechanism should be built in to enable the plots to be delivered by the developer if a self-build and custom-build developer is not found after a certain period. Phasing and legal agreements will have to ensure that the provision of 10% of all homes on a development for self-build / custom-build homes would not have an impact on the delivery and occupation of the wider development. This should be a requirement of any policy to ensure that overall housing need for the District can still be met, most likely through the ability of major housebuilders to deliver at scale
A2470B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP2	Don't know / no opinion	In general, this policy is supported – any such policy must have robust evidence. But there is no reference to the council's figures given (in the LPR) within the SHMA. In addition, the conclusion on the viability for self-build plots is not clear in the assessment as no further reference to such housing types is given within the rest of the study. Further evidence is therefore needed for this policy. We would request that the policy has added flexibility as there is no guarantee that these units will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise sustainable land for housing.
A0026B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	The Parish Council asks that registered providers should work with Town and Parish Councils to ensure that there is a requirement to offer local residents first option on affordable homes. This could be achieved via a Local Lettings Policy. This is important in order to provide family support from childcare, to help with the elderly. We request that this is added to policy DP3.
A0101B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support this policy but suggest that para 1c is in conflict with policy 1h, particularly on larger sites. This could be addressed by including a phasing provision or introducing a graduated requirement – e.g. 50% of affordable to be provided before 50% general market occupancy and 100% before 80% general market occupancy.
A0158B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	We agree that there should be a very strong focus on affordable housing in future. During the Local Plan period, more than half of new homes should be affordable. The Council agrees that there should be a higher affordable housing ratio in the south of the County, but would prefer this to be 30%.
A0238B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Don't know / no opinion	We agree that there should be a very strong focus on affordable housing in future. During the Local Plan period, more than half of new homes should be affordable. The Council agrees that there should be a higher affordable housing ratio in the south of the County, but would prefer this to be 30%.
A0240B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	As concluded in its response to draft Policy SP2 (Strategic Approach), L&Q Estates recommends that the Council affords further consideration to an uplift of its LHN to account for acute affordable housing need, and subsequently adjusts its housing requirement to reflect this.
A0269B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Affordable Housing Provision We object, in that no exception is made where Development Guidelines record that local provision of Affordable Housing is adequate and has been catered for elsewhere
A0306B023	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield
A0316B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Disappointed that the project notes the overcrowding in social housing and the need for affordable housing, yet only allocates 10% of housing developments to affordable dwellings (20% in South Shropshire). I would like to see the very greatly increased so that local people can afford to stay in their county. Without young people, working people and young families, rural communities will die. We need affordable housing, not estates where 90% are unaffordable to the local community.
A0318B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	We support policy DP3 and the provision of affordable housing within Shropshire. There is a clear need to maximise the affordable housing provision, accepting the constraints regarding land value. However, we note that the delivery of the affordable housing requirement for the area will fall short through this policy. The affordable housing provision should be revised to accord with SP2.
A0392B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Risks: That the applicant still has the ability to easily argue that the affordable housing can be grouped in one area for their convenience and perceived benefit for the selling of the market value houses. Comment(s): We welcome and support the requirement for affordable housing to be indistinguishable from the open market housing, including by way of character, design, location and size. We strongly believe that the affordable housing shall be distributed amongst the market value housing and not all in one place. We believe that this is the intention of this statement, but would like the distribution of affordable housing throughout the site to be made clear and unambiguous as the wording in paragraph h states "appropriately" and this could still result in them all in one location if the applicant argues that this is appropriate for convenience rather than the benefit of the residents.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0392B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Risks: That low income families may not have sufficient access to private cars to support access to employment and that they become further disadvantaged from the location / infrastructure / services of a particular site. That tenuous and clearly unsustainable statements are made about the ability to meet the walking, cycling and public transport criteria, particularly in open countryside where there might be a bus service, but it is not suitable to support access to employment and local services. Comment(s): We welcome and support the requirement for affordable housing to "maximise opportunities for future residents to access services and facilities by walking, cycling or public transport". However, affordable housing that doesn't provide sustainable public transport to employment opportunities as a minimum will further disadvantage those with low incomes who do not have access to their own vehicle. We believe that this should be changed to a firm requirement for all affordable housing sites to provide access to services and facilities, including schools and employment, by means other than just private cars. As experience has shown that some of the claims that sites have access to services and facilities by walking, cycling and public transport in a rural setting are very tenuous, we strongly suggest that the following requirements are placed on applicants: a. Claims that access is available by walking shall be risk assessed with appropriate mitigation added to the application to cover where the routes cannot be assessed as safe (e.g. where there are no pavements and/or the roads are narrow and support large/fast moving vehicles). b. Claims that access is available by cycling shall be risk assessed with appropriate mitigation added to the application where the routes cannot be assessed as safe (e.g. narrow roads that are also used by large/fast moving vehicles). Where cycle routes are proposed, these shall meet the latest Government Guidelines for the provision of cycle routes. c. Where access is by public transport, the sustainability based on the current timetable shall be assessed and how this works for employment, visiting the local Doctor's Surgery plus access to schools and shops.
A0430B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Support the need to deliver affordable housing and fully recognise obligations on site promoters to assist in meeting such needs, as set out in DP3(1)(a) which requires 20% of homes to be affordable. Committed to delivering the required amount of affordable homes on the Site. Notwithstanding this, DP3(2) is also welcomed, which allows for reduced rate of affordable housing based on the viability or otherwise of sustainable schemes where evidence is clearly presented and agreed by the Council, as this approach is endorsed by the NPPF. DP3(1)(d) says that where affordable housing is to be secured on site, its tenure should comprise 70% social or affordable rent accommodation and 30% intermediate or other affordable housing, unless evidence of local need indicates otherwise. Support the flexibility this part of the policy provides. However, clarity is required on whether the "other affordable housing" includes First Homes for sale at a discount of least 30%, and it is respectfully requested that DP3(1)(d) be kept under review to ensure consistency with the Government's policy changes with regards to First Homes.
A0433B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	The draft policy headed affordable housing target rates, which implies they are not minimums and are liable to reduction as seems to typically happen when Planning Permission is granted. The rates are very low.
A0436B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0437B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0438B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0439B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0440B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0441B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0442B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0443B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support different affordable housing provision levels, depending on location within the district, as assessed within section 3 of the SHMA and the Viability Assessment. Support the flexibility for reduced rates of affordable housing where viability concerns exist.
A0450B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Policy DP3 needs a more rational justification for the two affordable housing requirements (at 10% and 20%) beyond the reasons given in paras 4.47 and 4.49. The justification must explain the need for two different levels of provision in the County and the differences between the circumstances in the north and south of the County. The exact location of the boundary between the two areas requires a better rationale than relying on the River Severn with no other justifiable rationale in other locations across the County. This rationale should explain how the circumstances differ to the immediate north and south of the boundary to justify its location.
A0508B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	We support the differentiation in the affordable housing requirement on those sites in the north of the County to sites in the south and welcome the lower threshold for sites in the north
A0609B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support the percentage differential and same build quality for all types of dwellings.
A0636B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Local housing requirements are not realistically taken into account. In my opinion "affordable housing" is a misnomer and in no way provides housing for those most in need. The use of the term "affordable housing" is misleading, the reality is workers on the average national wage or below cannot obtain a mortgage and aspire to own a home for their family. The provision of 14 "affordable" homes, whatever that implies, is ignoring the real problems with the provision of housing for the less well off in society.
A0642B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing pitch strategy 2010-2020 states; (the updated one due out October 2020 is being used to support the local plan!) Building new facilities on new sites is generally a 'last resort' approach when all other options have been explored given the capital investment implications. It is only appropriate where there is a lack of provision overall and deficiencies across a number of sports which cannot be fully addressed by implementing the policy options outlined above. In other words not only is there a lack of infrastructure for cycling and pedestrians but also a lack of infrastructure in the design of new facilities including public open spaces that families can actually access.
A0697B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Object to the insertion of a planning condition with the draft policy regarding the need to transfer affordable dwellings prior to completion of 50% of the consented open market housing. This criteria is not necessary, as such requirements are set out in planning conditions accompanying a Planning Permission. It may not be appropriate or viable to apply this criteria in such a prescriptive manner. Circumstances/events may occur through the life of a consent/development which necessitate changes to such triggers. This requirement should be removed and such triggers determined in consultation with the applicant and relevant registered provider during the Planning Application process.
A0896B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	The proposed approach of a fixed 10% affordable in the north and 20% affordable in the south provides certainty and is considered deliverable for medium-sized sites (10-50 dwellings). Policy DP3.1d requires a split in affordable housing tenures of 70% affordable or social rent and 30% intermediate housing. The Government have since published a consultation on proposed changes to planning policy and regulations that propose that 25% of the affordable units must be First Homes. If this change is introduced, the tenure split will need to reflect Government policy.
A0897B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Local Plan Delivery and Viability Study finds proposed policy requirements (discussed in more depth under Policy DP12) make viability very challenging for all sites over 60 dwellings in the south of the county (sites from 60-250 dwellings are shown to be unviable if affordable housing requirements are higher than 10%). At 15% or 20% affordable housing, the residual land values (RLV) of these schemes fall below the benchmark land value (BLV) of £425,000, which represents the minimum return at which a reasonable landowner is likely to sell their land. These types of development comprise 76% of the planned development in the south of the county (according to the Local Plan Delivery and Viability Study). The issue raised by the Delivery & Viability Study is therefore very significant for delivery in the south of the county. As such consider that the rate for affordable housing contributions should be reduced from 20% to 10%. Draft Policy DP3.1d requires a split in affordable housing tenures of 70% affordable or social rent and 30% intermediate housing. This is inflexible and is likely to be problematic over the lifespan of the Plan. The draft Policy would be strengthened by stating, "unless evidence of local need indicates otherwise or unless an alternative mix is considered appropriate and agreed with the developer." Government have recently published a consultation on proposed changes to planning policy and regulations that propose that 25% of the affordable units must be First Homes. If this change is introduced, the tenure split will need to reflect Government policy. The most effective response is to ensure the policy is flexibly worded to enable change over the lifespan of the Local Plan.
A0928B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	The approach to simplify the provision of affordable housing to two bands of 10 and 20% across Shropshire is generally welcomed. Reference to viability review is also in line generally with the approach set out within national policy. However, the policy is overly detailed and prescriptive on the type of affordable housing to be provided with elements which would be better included within an SPD. Affordable housing needs change over time and such prescription on tenure split, rent caps and equity share is inappropriate in a Local Plan policy intended to apply for a 22 year plan period. Equally we would highlight the broader definition of affordable housing with the Annex to the Framework and the policy should allow for a more flexible approach to the provision of a wider range of affordable housing. The Government are also consulting on further changes to the provision of wider affordable housing types including a focus on First Homes and the policy should allow flexibility for this and include for this within the affordable housing definition.
A0935B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Subject to viability testing, support draft Policy DP3 with regard to the affordable housing thresholds. There should be flexibility within the draft Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0961B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Para 1a support the percentage differential and same build quality for all types of dwellings
A0984B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	Support the need to deliver affordable housing. Support applying different affordable housing ratios to different parts of the County, based on needs and viability, as this accords with para 34 of the NPPF. The requirement in the south is 20%, committed to achieving this on BRD030. Support tenure split and provision of flexibility on this to ensure local needs are met. Support the distribution of affordable housing throughout the site
A1106B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	We support Shropshire's approach towards affordable housing in general. We urge the Council to take notice of the potential for open-book viability assessments to be used for determining the provision of affordable housing expected within developments. The approved application for 296 residential units (ref: 14/00246/OUT) underwent de
A1152B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	A much greater numbers of affordable houses are needed. Table 35 of the SHMA part 2 (published on 22nd September) indicates a need in Shropshire for 17,574 affordable houses between 2016 and 2038 (799pa), this is referenced in the draft Local Plan. Satisfying this need would equate to 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) in draft Policy SP2, whilst draft policy DP3 proposes targets of only 10% in the north and 20% in the south. At present (according to the latest AMR) only 21% affordable housing is achieved. If only 10% of houses in the north are 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. The ambition should therefore be to build a greater proportion of affordable houses than is provided for in draft Policies SP2 or DP3. It is noted that an Inspector at the rerun Teal Drive, Ellesmere Inquiry indicated that a more effective means of solving the housing crisis than building more home is to build more council housing, this is supported by housing completion data which shows a reduction in completions since councils stopped building housing. The existing Core Strategy originally aimed for 30% affordable housing. Understood this was reduced after the 2008 financial crash, by reference to viability assessments, to the current proportions of 10%, 15% and 20% in different geographical areas. Viability studies have again been carried out to inform the draft Local Plan. Do not see the need for the proposed para 2 of draft policy DP3. Developers will know from the outset what percentage of affordable housing provided for in policy, and should therefore be able to pay an appropriate amount for the underlying land in order to provide them with an acceptable profit level, without recourse to further pleading of exceptional circumstance as to viability.
A1191B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Note that draft Policy DP3 would mean BUR004 is required to provide 20% affordable housing. Do not object to this requirement and have provided for 20% affordable within the Indicative Masterplan. Proposed requirements c. to f. are noted. However, consider these are detailed matters for S106 Agreements and should be considered on a site by site basis e.g. it may not be appropriate on every site to deliver all the affordable dwellings by completion of the 50% market dwelling, and for some areas depending on housing need the tenure split of the affordable may need to be varied from the 70/30 split proposed. Therefore, proposed requirements c. to f. should be deleted to ensure flexibility and enable the Authority to best respond to its housing need at that time.
A1192B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Draft Policy DP3 seeks 10% affordable housing in the north and 15% in the south. Clive Barracks lies in the 10% north 'zone'. Welcome this in comparison to the provision of 15% affordable housing. However, note the previous Shropshire Dynamic Viability Index 2013 (SDVI) suggests affordable levels should be in the 0% to 5% region for the north. Appears to be a disconnect between the evidence base of the SDVI and the draft policy. The Council's 2020 Local Plan Delivery and Viability Study, states in Para 12.97: "Just under half of the planned development is in the lower value North area. Very little development is shown as viable, even without affordable housing. In spite of these results, based on this 'on the ground' experience there is a strong case to have a minimum requirement of 10% affordable housing. The Council should be cautious about relying on development from this area to deliver the housing requirement." Evidence to support 'on the ground' claims that sites in the north can deliver 10% affordable housing is limited. Table 10.17 of the Local Plan Delivery and Viability Study provides details of sites in the north that are far smaller than most proposed through the emerging Plan; the largest is a 48-dwelling scheme. These sites are, simply, not comparable to larger strategic sites and trying to suggest these comparable make a "strong case" for a blanket 10% affordable level is incorrect. Note many of the supplied comparable to support a 10% rate 'on the ground' are dated from 2015 to 2017, based on historic assessments of Section 106, CIL and other planning obligations. In addition, there is no analysis of those comparable site's abnormal and infrastructure costs, or their CIL and Section 106 obligations. This means the few examples provided cannot form a reliable body of evidence on which to base a policy for a blanket 10% affordable contribution. Given the SDVI and Viability Study both confirm that an extremely reduced quantum of affordable housing is deliverable in the north, it is considered the amount of affordable housing to be secured through sites in the north of the Authority should be revisited, with a far lower percentage, which reflects the evidence base, taken forward in the draft Local Plan. Recognise Part 2 of the draft Policy provides for reduced rates of affordable housing if exceptional circumstances are evidenced. However, if 10% affordable provision is progressed in the north, evidence suggests all sites will have to go through the process of evidencing exceptional circumstances to reduce the affordable housing provision. This is not considered a suitable or appropriate methodology and is misleading as the public/Councillors will expect delivery of 10% affordable housing, which in most instances will not occur. Strategic Brownfield Sites, such as Clive Barracks are viable and deliverable, but at lower affordable housing levels than greenfield sites, meaning a need to apply part 2 of the draft Policy. Whilst a flexible approach in respect of viability is appropriate, some certainty is required. As such the starting point for affordable housing provision will not be a percentage requirement evidenced as undeliverable. Para 63 of the NPPF states "To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount". Footnote 28 suggests this should be equivalent to the existing gross floorspace of the existing buildings. The draft policy should be revised to better reflect the evidence base and nature of sites which are to be brought forward in the north. Alternatively, strategic sites should be omitted and the approach to affordable housing, CIL and other contributions addressed in the site-specific policy (see comments on draft Policy S19).
A2130B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	We highlight that Shropshire Council's own assessment of housing need, published after the main consultation document, requires more affordable homes than planned – by almost 10,000. So both the overall target and the proportion of affordable homes target require a complete rewrite. We also query the definition of affordable. The amount people pay for their housing is taking up an increasing proportion of their income. Nationally, 2/3 of private renters pay 1/3 of their income on rent – The Green Party thinks this is wrong. The Government's definition of "affordable" is 80% of market value. This is ridiculous and doesn't address the need of so many households in south Shropshire. The South Shropshire Green Party believes that "affordability" should be linked to local incomes rather than property values. The current definition of "affordable" as 80% of average property values is in truth not "affordable" for many. We don't just need more homes, we need more affordable and particularly best quality social housing homes. We need to make sure that any new housing in is the right sort in the right place. We need to make sure that any new houses are built to the standards we need for our sustainable future.
A2163B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	The requirement for 10 or more dwellings or sites of 0.5ha or more to provide 10% affordable housing in the north of the District is supported. It is also supported that reduced rates of affordable housing will be considered in exceptional circumstances, where evidence is presented demonstrating viability concerns.
A2169B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	We are pleased to see that the Council recognises the importance of affordable housing delivery. Observing these affordable housing need figures, the thresholds laid out in part a) of policy DP3 seem exceptionally low considering the Council's key concerns regarding the demand for affordable housing. The council should be more ambitious their targets in order to ensure an adequate of AH is delivered over the plan period. Although we acknowledge that the council have recognised the sometimes difficult 3 viability hurdles that come with housing development in Shropshire, we think the minimum threshold is too low and should be of a higher value for developers to aspire to
A2169B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Affordable Rents Part e) of policy restricts affordable rents to 80% of market rent, noting that this should not exceed the Local Housing Allowance. This is acceptable as long as the guidance within the MHCLG policy statement on Rents for Social Housing is applied, which permits annual rent increases on both social rent and affordable rent properties of up to CPI+1 percentage point from 1 April 2020. However, there is no certainty as to whether LHA will increase annually or remain static as it did for four years prior to the recent raise in April 2020. Typically, when pursuing a new development, Registered Providers often cap affordable rents equal to Local Housing Allowance (LHA) on first let, assuming that rents will inflate in line with Government policy on rent increases. By capping affordable rents in perpetuity, it prevents Housing Associations from increasing their affordable rents in line with Government policy. Preventing such inflation can have critical impacts on Registered Providers. For example, a Housing Associations long term assets may experience a static rent against a rise in all of their costs of management and maintenance in the face of inflation. In essence, this would give the effect of a rent cut for these businesses. The significant concern is that this scenario would be highly unsustainable and uncompetitive for Housing Associations and could potentially severely threaten the delivery of affordable housing across Shropshire
A2169B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Retaining affordable housing in perpetuity The sole reference to retaining affordable housing in perpetuity is in Annex 2 where this is sought for affordable housing delivered on rural exception sites. This principle is appropriate and supported by our Members as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. Securing affordable housing in perpetuity more widely is not supported by the NPPF and housing associations for a number of reasons, foremost of which is that it restricts lenders appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns
A2173B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	DP3 Affordable Housing Provision - DP3.1(h) DP4 Affordable Exceptions - DP4.1(k) DP5 Entry Level Exceptions - DP5.1(i) DP6 Single Plot Exceptions - DP6.1(h), DP7 Cross Subsidy Exceptions - DP7.1(l) and (n). None of these Policies refer to access to employment. There is a requirement for reasonable access to local services by walking, cycling or public transport, but none of these Policies refer to daily access to employment. Sustainable travel to work is key for the suitability of developments and meeting Climate Emergency aims and Policy SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 If employment is not available in the settlement then there must be daily peak time public transport - and many low paid jobs are weekends or shifts. Also access to key Secondary services like GP, dentist, and pharmacy by return public transport at suitable times of day is vital. These Policies aim to assist lower income households. If they are not to become burdened with additional costs and/or isolated from a wider range of opportunities (e.g. budget supermarket shopping, leisure and cultural activities) then a regular and frequent public transport, including evenings and weekends, is fundamental.
A2173B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	The whole document is not objective but puts a positive spin on everything that the Cabinet sought to promote from the outset of the Review in its "highly ambitious" High Growth strategy for both housing and economic growth. Hierarchy of Settlements There are clear contradictions between the Sustainability Objectives set out in the Report with the application of Policy within the Hierarchy of Settlements and with Community Hub designations which are purported to give significant positive effects on sustainability. The relaxation of key criteria for Community Hub settlements in the HoS to not require multiple significant employment and peak time public transport is still included. Lack of these will fundamental requirements will result in additional private vehicle use travel use which is contrary to the Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is contrary to the "Spatial Vision" and SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 which seeks to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions. Road transport is identified as the largest single contributor of CO2 emissionsSO6 is explicit to focus developments to accessible locations, and reduce vehicle use. Table 1.1 Housing Targets All options proposed at initial Issues & Options stage were above the FOAHN identified needs of the county, with additional growth additions of 5%, 10% or 15% respectively. Therefore they all have significant benefits, irrespective of current SAMDev targets. The lower rates might as well not have been included as options if they were never going to be given creditability in the sustainability assessment Table 1.2 'Poor' sites. Numerous sites assessed as 'Poor' appear to have been selected to be allocated for development. That makes no sense. Table 2.7There is no assessment of employment opportunities within the Sustainability assessments for residential sites – if they are available in the settlement, how far they are from the site, how accessible they are by sustainable travel walking wheeling or cycling, or by public transport at times when they will trade (including shift patterns if applicable)These are key factors in achieving sustainable development to meet Sustainability Objectives SO2 & SO4economy and services, and also SP3 Climate Change and Sustainability Objectives SO5, SO6 & SO12which seek to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions. Road transport is identified as the largest single contributor of CO2 emissionsSO6 is explicit to focus developments to accessible locations, and reduce vehicle use.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2173B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Table 2.7 Services assessment The footnote states that the list of services is consistent with the Primary Services in the Hofs That is incorrect. Table 2.7 does not assess Nursery, Convenience Store, Post Office, Petrol Station which are considered "essential for day-to-day life", whilst including many Secondary items that are "nice to have but not essential". Access to all the Primary services is fundamental to sustainability. Table 2.8 Peak time public transport provision is included in Table 2.7 but not in Table 2.8 This should be a key factor in assessing and comparing sites. DP3 Affordable Housing Provision This policy does not itself "reduce the need for people to travel by car", that is purely determined by the siting of the Open Market development that it forms part of and that being accessible by sustainable travel. If sites or settlements do not have that provision then all residents will have to use cars, potentially impacting more on lower income households, and on the environment. DP4 Affordable Exception Sites This policy does not itself "allow for a reduction in the need for private car use" It may not increase the need if every one of the new residents uses the other options. Also the requirement is only to access "local services" which in a rural settlement might not include many secondary services or, crucially employment. If settlements or sites do not have that provision then all residents will have to use cars, potentially impacting more on lower income households, and on the environment. Whilst minimal harm to landscape character and historic feature is noted for urban settings, the impact to rural settlements from these developments is not specifically considered, and the likely impact is played down to suit. DP5 Entry Level Exceptions includes consideration of this fact. DP6 Single Plot Exceptions. Only reference is to urban settings with no mention of locations in or adjacent to rural settlements where impacts will be greater DP7 Cross Subsidy Exceptions This completely overlooks developments adjacent to rural settlements. These do not have the "best access to services and facilities in the county" It cannot be said that they "naturally" reduce the need for travel by car, or that they "encourage" sustainable travel. DP7 only requires access to local service and facilities, but makes no mention of accessibility to employment opportunities If settlements or sites do not have work opportunities then all residents will have to use cars, which potentially impacts more on lower income households, and on the environment.
A2177B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Draft Policy DP3 requires new residential development of 5 or more dwellings in Designated Rural Areas and 10 or more dwellings elsewhere to provide onsite affordable housing of 10% in the north and 20% in the south as defined by geographical areas in Figure DP3.1. Onsite affordable housing tenure to comprise of 70% social or affordable rent accommodation and 30% intermediate or other affordable housing unless local need evidence indicates otherwise. The Council's own viability assessment identified viability challenges across the County and the cumulative impact of proposed policy requirements threaten housing delivery. The NPPF promotes affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures (para 64). The Council's policy approach to affordable housing tenure is inconsistent with national policy. The Government's consultation on Changes to the Current Planning System (ending on 1st October 2020) also proposes further changes to delivering First Homes. Before the pre-submission LPR consultation, draft Policy DP3 should be re-considered and modified by the Council
A2321B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Paragraph 20 of the NPPF states that strategic policies should make provision for housing, including affordable housing. Paragraph 62 of the NPPF goes further to distinguish that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified. 4.4 Vistry therefore consider that the reference to the identification of 'exceptional circumstances' in part 1B of Policy DP3 to be removed for the draft plan as it directly conflicts with guidance contained within the NPPF.
A2323B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3		Acknowledge para 20 of the NPPF states that strategic policies should make provision for housing, including affordable housing. However, the terminology used at point b of draft policy DP3 states "Ensuring that only in exceptional circumstances will either an offsite provision or a financial contribution in lieu of on-site provision be supported on major housing development" is not in accordance with para 62 of the NPPF. Para 62 of the NPPF states that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified. The NPPF does not specify any such definition of "exceptional circumstances" for off-site provision or an appropriate financial contribution in lieu. This terminology should be removed from the emerging Local Plan Review.
A2441B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Disagree	Up until this document is approved Bicton Parish is in North Shropshire. In a BID board meeting on 29 September, Councillor Nutting referred to Bicton as North Shropshire. Why has it been moved to South Shropshire in the Local Plan? There is no explanation. Please reinstate it as North Shropshire.
A2470B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP3	Agree	This policy is supported
A0158B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Agree	The Council would be inclined to support an affordable exception site on the strict understanding that the dwellings would be affordable in perpetuity, there is suitable community engagement in advance and proper consideration is given to the infrastructure requirements arising from the development.
A0238B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Don't know / no opinion	This policy is supported
A0306B024	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield
A0316B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Agree	I'm very happy to see provision for large-scale affording housing sites. Hopefully this can be used widely across the county to offset the mere 10/20% allocated to affordable dwellings in DP3.
A0392B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	Risks: That the criteria allows these sites to be almost anywhere in Shropshire due to the very subjective terms for appropriate, sustainable and, but to a lesser extent, isolated. There is also a risk that areas in the vicinity of a village school will be targeted for multiple applications which are not appropriate for the area which has been covered by the comment to SP9. Comment(s): The suitability criteria for Affordable Exception Sites in "Another settlement with a school or appropriate access to a school by sustainable modes of transport" could be argued to be anywhere in Shropshire as what is meant by the following subjective statements: a. Appropriate access b. Sustainable mode of transport c. Isolated Location in Paragraph b Also, many rural locations do not have sustainable access to local services by walking cycling or public transport (including school transport) to support the appropriate access and sustainable mode of transport requirements. This needs to be considered in conjunction with the response to SP9.
A0392B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	Risk(s): That low income families may not have sufficient access to private cars to support access to employment and that they become further disadvantaged from the location / infrastructure / services of a particular site. That tenuous and clearly unsustainable statements are made about the ability to meet the walking, cycling and public transport criteria, particularly in open countryside where there might be a bus service, but it is not suitable to support access to employment and local services. Comment(s): We welcome and support the requirement for affordable housing to have "reasonable access to local services by walking, cycling or public transport". However, this should also include employment opportunities to ensure that those without access to a private car, have sufficient opportunity to be able to travel to work. Also, as experience has shown that some of the claims that sites have access to services and facilities by walking, cycling and public transport in a rural setting are very tenuous, we strongly suggest that the following requirements are placed on applicants: a. Claims that access is available by walking shall be risk assessed with appropriate mitigation added to the application to cover where the routes cannot be assessed as safe (e.g. where there are no pavements and/or the roads are narrow and support large/fast moving vehicles). b. Claims that access is available by cycling shall be risk assessed with appropriate mitigation added to the application where the routes cannot be assessed as safe (e.g. narrow roads that are also used by large/fast moving vehicles). Where cycle routes are proposed, these shall meet the latest Government Guidelines for the provision of cycle routes. c. Where access is by public transport, the sustainability based on the current timetable shall be assessed and how this works for employment, visiting the local Doctor's Surgery plus access to schools and shops.
A0438B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Agree	Draft policy DP4 affords a great opportunity to develop a significant number of affordable dwellings across rural settlements. However, it should be noted that securing land for such developments proves extremely challenging as landowners are not motivated to sell land for development unless they feel an appropriate land value is being paid, hence policy DP7 which assists in affording an element of cross subsidy is strongly supported.
A0642B27	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing pitch strategy 2010-2020 states; (the updated one due out October 2020 is being used to support the local plan!) Building new facilities on new sites is generally a 'last resort' approach when all other options have been explored given the capital investment implications. It is only appropriate where there is a lack of provision overall and deficiencies across a number of sports which cannot be fully addressed by implementing the policy options outlined above. In other words not only is there a lack of infrastructure for cycling and pedestrians but also a lack of infrastructure in the design of new facilities including public open spaces that families can actually access.
A0665B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	The Explanation text to DP4 says that there is an expectation that exception sites will not exceed 25 dwellings. The policy wording itself needs to say this, but 25 homes should not be open to debate and the new policy wording should say a maximum of 25 dwellings. Paragraph 4.57 should be amended to reflect this. Exception sites are supposed to be just that, an exception. If you let them be any size then they should be defined in the local plan as specific allocations. 25 is a reasonable number under this policy, and whilst the plan thinks this is the right amount, it needs to be enshrined in the actual policy.
A1152B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Agree	Broadly agree with these policies. Note in particular that the wording of the policies prevent such sites being built in the open countryside. That reinforces views that the wording of policy SP9 should be amended to remove para 4a. Only single plot local needs affordable exception sites should be allowed in the countryside.
A1870B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	request that this paragraph be removed from the policy, as we are concerned that it will be exploited in order to seek development in isolated rural hamlets It seems unnecessary as it should be covered in paras 1.a.i. and 1.a.ii. It also appears to contradict with 1.b, as such a location will by definition be in an isolated location. If a school is not in a Strategic, Principal, Key Centre, Community Hub or a Community Cluster Settlement it surely must be in an isolated rural location away from the normal facilities you would find in the above. We are also concerned about the wording "... appropriate access to a school by sustainable modes of transport" and the scope for this being exploited. Just because a school is accessible in this way, it does not mean that sustainable modes of transport will be used once the development has been completed. It is also very ambiguous and is vital that "sustainable modes of transport" be defined, with appropriate examples such as walking, cycling, transit, carpooling, car sharing, and green vehicles

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2173B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	DP4.1(c) limits development to that required by Identified Local Needs survey However, the Policy does not include a definition of scale, which is only set out in the Explanation para 4.57 saying there is an "expectation" that will not exceed 25dwellings adjacent to Strategic, Principal & Key Centres. That is very open to interpretation and not binding, so gives no confidence to local residents. For Community Hubs & Clusters and other rural settlements there is no limitation to scale of development. As 'Affordable Exception' developments are predominately intended to be built adjacent to those rural settlements, any development could be large in relative terms. There is also no cumulative impact limitation on multiple developments adjacent to settlements. In Policy DP5 Entry Level Exception Sites DP5.1(b) includes limitations of scale within policy wording In Policy DP7 Cross Subsidy Exceptions DP7.1(e) includes guide of scale within policy wording We believe that Policy DP4 Affordable Exception Sites must define limits of scale and cumulative impact adjacent to Community Hubs & Clusters and other rural settlements (as well as limited to Identified Local Needs) within Policy. DP4.1(k). Does not refer to access to employment. Sustainable travel to work by walking, wheeling, cycling, or public transport are key for the sustainability of settlements and meeting Climate Emergency aims and Policy SP3 Climate Change.
A2173B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	Multiple or phased "exception" developments would have a cumulative impact amounting to the same, or arguably greater impact, as a large development on rural settlements over the course of time. We do not believe that this is the intention of NPPF in allowing Rural Exceptions. Limitations on cumulative "Exception Site" developments adjacent to individual settlements must be included within these policies.
A2173B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP4	Disagree	DP3 Affordable Housing Provision - DP3.1(h) DP4 Affordable Exceptions - DP4.1(k) DP5 Entry Level Exceptions - DP5.1(i) DP6 Single Plot Exceptions - DP6.1(h), DP7 Cross Subsidy Exceptions - DP7.1(l) and (n). None of these Policies refer to access to employment. There is a requirement for reasonable access to local services by walking, cycling or public transport, but none of these Policies refer to daily access to employment. Sustainable travel to work is key for the suitability of developments and meeting Climate Emergency aims and Policy SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 If employment is not available in the settlement then there must be daily peak time public transport - and many low paid jobs are weekends or shifts. Also access to key Secondary services like GP, dentist, and pharmacy by return public transport at suitable times of day is vital. These Policies aim to assist lower income households. If they are not to become burdened with additional costs and/or isolated from a wider range of opportunities (e.g. budget supermarket shopping, leisure and cultural activities) then a regular and frequent public transport, including evenings and weekends, is fundamental.
A0238B27	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Don't know / no opinion	DP4.1(c) limits development to that required by Identified Local Needs survey However, the Policy does not include a definition of scale, which is only set out in the Explanation para 4.57 saying there is an "expectation" that will not exceed 25dwellings adjacent to Strategic, Principal & Key Centres. That is very open to interpretation and not binding, so gives no confidence to local residents. For Community Hubs & Clusters and other rural settlements there is no limitation to scale of development. As 'Affordable Exception' developments are predominately intended to be built adjacent to those rural settlements, any development could be large in relative terms. There is also no cumulative impact limitation on multiple developments adjacent to settlements. In Policy DP5 Entry Level Exception Sites DP5.1(b) includes limitations of scale within policy wording In Policy DP7 Cross Subsidy Exceptions DP7.1(e) includes guide of scale within policy wording We believe that Policy DP4 Affordable Exception Sites must define limits of scale and cumulative impact adjacent to Community Hubs & Clusters and other rural settlements (as well as limited to Identified Local Needs) within Policy. DP4.1(k). Does not refer to access to employment. Sustainable travel to work by walking, wheeling, cycling, or public transport are key for the sustainability of settlements and meeting Climate Emergency aims and Policy SP3 Climate Change.
A0306B025	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield
A0392B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Disagree	Risk(s): That the criteria allows these sites to be almost anywhere in Shropshire due to the very subjective terms for appropriate, sustainable and, but to a lesser extent, isolated. There is also a risk that areas in the vicinity of a village school will be targeted for multiple applications which are not appropriate for the area which has been covered by the comment to SP9. Comment(s): The suitability criteria for Entry Level Exception Sites in "Another settlement with a school or appropriate access to a school by sustainable modes of transport" could be argued to be anywhere in Shropshire as what is meant by the following subjective statements: a. Appropriate access b. Sustainable mode of transport c. Isolated Location in Paragraph b Also, many rural locations do not have sustainable access to local services by walking cycling or public transport (including school transport) to support the appropriate access and sustainable mode of transport requirements. This needs to be considered in conjunction with the response to SP9.
A0392B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Disagree	Risk(s): That low income families may not have sufficient access to private cars to support access to employment and that they become further disadvantaged from the location / infrastructure / services of a particular site. That tenuous and clearly unsustainable statements are made about the ability to meet the walking, cycling and public transport criteria, particularly in open countryside where there might be a bus service, but it is not suitable to support access to employment and local services. Comment(s): We welcome and support the requirement for affordable housing to have "reasonable access to local services by walking, cycling or public transport". However, this should also include employment opportunities to ensure that those without access to a private car, have sufficient opportunity to be able to travel to work. Also, as experience has shown that some of the claims that sites have access to services and facilities by walking, cycling and public transport in a rural setting are very tenuous, we strongly suggest that the following requirements are placed on applicants: a. Claims that access is available by walking shall be risk assessed with appropriate mitigation added to the application to cover where the routes cannot be assessed as safe (e.g. where there are no pavements and/or the roads are narrow and support large/fast moving vehicles). b. Claims that access is available by cycling shall be risk assessed with appropriate mitigation added to the application where the routes cannot be assessed as safe (e.g. narrow roads that are also used by large/fast moving vehicles). Where cycle routes are proposed, these shall meet the latest Government Guidelines for the provision of cycle routes. c. Where access is by public transport, the sustainability based on the current timetable shall be assessed and how this works for employment, visiting the local Doctor's Surgery plus access to schools and shops.
A0438B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Agree	Draft policy DP5 affords a great opportunity to develop a significant number of affordable dwellings across rural settlements. It will assist in delivering additional affordable housing, although concerns about the need for landowners to be motivated to sell land by an appropriate return apply to this policy.
A0642B28	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing pitch strategy 2010-2020 states; (the updated one due out October 2020 is being used to support the local plan!) Building new facilities on new sites is generally a "last resort" approach when all other options have been explored given the capital investment implications. It is only appropriate where there is a lack of provision overall and deficiencies across a number of sports which cannot be fully addressed by implementing the policy options outlined above. In other words not only is there a lack of infrastructure for cycling and pedestrians but also a lack of infrastructure in the design of new facilities including public open spaces that families can actually access.
A1152B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Agree	Broadly agree with these policies. Note in particular that the wording of the policies prevent such sites being built in the open countryside. That reinforces views that the wording of policy SP9 should be amended to remove para 4a. Only single plot local needs affordable exception sites should be allowed in the countryside.
A1870B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Disagree	request that this paragraph be removed from the policy, as we are concerned that it will be exploited in order to seek development in isolated rural hamlets It seems unnecessary as it should be covered in paras 1.c.i. and 1.c.ii. We are also concerned about the wording "... appropriate access to a school by sustainable modes of transport" and the scope for this being exploited. Just because a school is accessible in this way, it does not mean that sustainable modes of transport will be used once the development has been completed. It is also very ambiguous and is vital that "sustainable modes of transport" be defined, with appropriate examples such as walking, cycling, transit, carpooling, car sharing, and green vehicles
A2169B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Disagree	We welcome the inclusion of a policy on entry-level exceptions. Entry-level exception sites have been widely welcomed as an addition to the opportunities Housing Associations have to meet housing needs in areas that may not otherwise have been considered suitable for general housing proposals. However, it is important to note that unlike the policy on rural exception sites, the NPPF does not seek to secure affordable housing delivered on entry-level exception sites in perpetuity. Therefore, we request that part e) of Policy DP5 is removed as it would be inappropriate to require this in a local policy.
A2173B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Disagree	DP3 Affordable Housing Provision - DP3.1(h) DP4 Affordable Exceptions - DP4.1(k) DP5 Entry Level Exceptions - DP5.1(i) DP6 Single Plot Exceptions - DP6.1(h), DP7 Cross Subsidy Exceptions - DP7.1(l) and (n). None of these Policies refer to access to employment. There is a requirement for reasonable access to local services by walking, cycling or public transport, but none of these Policies refer to daily access to employment. Sustainable travel to work is key for the suitability of developments and meeting Climate Emergency aims and Policy SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 If employment is not available in the settlement then there must be daily peak time public transport - and many low paid jobs are weekends or shifts. Also access to key Secondary services like GP, dentist, and pharmacy by return public transport at suitable times of day is vital. These Policies aim to assist lower income households. If they are not to become burdened with additional costs and/or isolated from a wider range of opportunities (e.g. budget supermarket shopping, leisure and cultural activities) then a regular and frequent public transport, including evenings and weekends, is fundamental.
A2412B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP5	Agree	We support the Councils aspirations in line with the NPPF for the delivery of modest entry level homes schemes to assist first buyers or renters.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0238B28	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Don't know / no opinion	request that this paragraph be removed from the policy, as we are concerned that it will be exploited in order to seek development in isolated rural hamlets It seems unnecessary as it should be covered in paras 1.c.i. and 1.c.ii. We are also concerned about the wording "... appropriate access to a school by sustainable modes of transport" and the scope for this being exploited. Just because a school is accessible in this way, it does not mean that sustainable modes of transport will be used once the development has been completed. It is also very ambiguous and is vital that "sustainable modes of transport" be defined, with appropriate examples such as walking, cycling, transit, carpooling, car sharing, and green vehicles
A0306B026	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield
A0392B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	Risk(s): That multiple applications over time will gradually erode the current gaps between settlements and areas within settlements changing the character of the local area. Comment(s): The policy of single plot exception sites is acceptable if they do not risk joining together settlements or elements of settlements that are separated by agricultural land as this will adversely affect the character of the settlement. The requirement for "is within and well related to the built form" provides some protection, but the requirement "has permanent and substantial buildings on at least one side", would allow a slow progression of single plot exception sites to gradually move the built form and close up any current gaps in development. To prevent this, it is suggested that a single plot exception site cannot be built next to another dwelling approved within the plan period, unless it is genuine in-fill
A0392B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	Risk(s): That low income families may not have sufficient access to private cars to support access to employment and that they become further disadvantaged from the location / infrastructure / services of a particular site. That tenuous and clearly unsustainable statements are made about the ability to meet the walking, cycling and public transport criteria, particularly in open countryside where there might be a bus service, but it is not suitable to support access to employment and local services. However as these are single dwelling sites, proportionality needs to be in place and therefore the public transport is deemed the key criteria. Comment(s): We welcome and support the requirement for single plot exception sites to have "reasonable access to local services by walking, cycling or public transport". However, this should also include employment opportunities to ensure that those without access to a private car, have sufficient opportunity to be able to travel to work. Also, as experience has shown that some of the claims that sites have access to services and facilities by walking, cycling and public transport in a rural setting are very tenuous, we strongly suggest that the following requirements are placed on applicants: a. Where access is by public transport, the sustainability based on the current timetable shall be assessed and how this works for employment, visiting the local Doctor's Surgery plus access to schools and shops.
A0434B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	The current single plot exception policy is very innovative. Recognise need for clarity on what represents a suitable site, but there is a need for flexibility as often sites adjacent to the existing built form are not available due to 'hope value'. There remains a key role for local members and town/parish councils to inform the suitability of sites, reflecting local characteristics - for instance in 'loose-knit' communities.
A0445B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	The current single plot exception policy is very innovative. Recognise need for clarity on what represents a suitable site, but there is a need for flexibility as often sites adjacent to the existing built form are not available due to 'hope value'. There remains a key role for local members and town/parish councils to inform the suitability of sites, reflecting local characteristics - for instance in 'loose-knit' communities.
A0609B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Agree	Support requirement for substantial structure on one side.
A0642B29	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing pitch strategy 2010-2020 states; (the updated one due out October 2020 is being used to support the local plan!) Building new facilities on new sites is generally a 'last resort' approach when all other options have been explored given the capital investment implications. It is only appropriate where there is a lack of provision overall and deficiencies across a number of sports which cannot be fully addressed by implementing the policy options outlined above. In other words not only is there a lack of infrastructure for cycling and pedestrians but also a lack of infrastructure in the design of new facilities including public open spaces that families can actually access.
A0961B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Agree	support the requirement for substantial structure on one side
A1152B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Agree	Broadly agree with these policies. Note in particular that the wording of the policies prevent such sites being built in the open countryside. That reinforces views that the wording of policy SP9 should be amended to remove para 4a. Only single plot local needs affordable exception sites should be allowed in the countryside.
A1870B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	concerned that this will lead to development spread beyond settlement undefined boundary lines. We ask that you replace it with the following wording "The site is within and well related to a built form of a settlement and has permanent and substantial buildings on at least two sides of the proposed site."
A2173B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP6	Disagree	DP3 Affordable Housing Provision - DP3.1(h) DP4 Affordable Exceptions - DP4.1(k) DP5 Entry Level Exceptions - DP5.1(i) DP6 Single Plot Exceptions - DP6.1(h), DP7 Cross Subsidy Exceptions - DP7.1(l) and (n). None of these Policies refer to access to employment. There is a requirement for reasonable access to local services by walking, cycling or public transport, but none of these Policies refer to daily access to employment. Sustainable travel to work is key for the suitability of developments and meeting Climate Emergency aims and Policy SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 If employment is not available in the settlement then there must be daily peak time public transport - and many low paid jobs are weekends or shifts. Also access to key Secondary services like GP, dentist, and pharmacy by return public transport at suitable times of day is vital. These Policies aim to assist lower income households. If they are not to become burdened with additional costs and/or isolated from a wider range of opportunities (e.g. budget supermarket shopping, leisure and cultural activities) then a regular and frequent public transport, including evenings and weekends, is fundamental.
A0158B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	The Council would be unlikely to support the development of a cross-subsidy exception site in Alveley and Romsley. We consider that the main purpose of any such proposal would be to build more open-market housing in the Green Belt.
A0238B29	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Don't know / no opinion	support the requirement for substantial structure on one side
A0256B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	It is not clear how the number of 10 dwellings was reached, as it then goes on to say "will not normally exceed 10 dwellings". Why the figure of 10 I agree with a Local Lettings Plan and particularly in Green Belt locations and in the more rural areas, the first priority for housing allocation should be the established need for housing within the respective Parish. Local families and individuals do not take kindly to the wider area being included in housing allocations. Local Lettings policy should be developed further to enhance the opportunities for local people to acquire housing appropriate for their needs. There should not be a preference for the affordable homes to be delivered and managed by a Registered Provider. The other options included in J should be able to deliver cross-subsidy schemes, as it increases the opportunity to deliver affordable housing
A0258B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	Concern that the cross-subsidy policy will lead to housing in inappropriate locations, such as outside the development boundary. In the case of Hanwood, the parish council wishes to emphasise that the integrity of the development boundary and physical separation and policy distinction of Hanwood being a hub vs. Hanwood Bank open countryside must be maintained and not compromised as result of cross-subsidy development outside the boundary
A0306B027	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield
A0318B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	We support the inclusion of a policy about cross-subsidy exception sites, but the policy restricts the market housing proportion to 30% on sites not normally exceeding 10 dwellings. 70% is considered excessive and a lower ratio of 50% would enable affordable housing to be delivered in Shropshire. We do not consider a cap to provide the necessary result, but should one be considered the cap should increase to 20-25 dwellings, providing a realistic funding model for the registered provider. We note that paragraphs 1.f and 1.g replicate each other and therefore recommend a single, revised, paragraph: DP7.1.f. At least 50% of the homes provided will be affordable housing and of a type, size and tenure that meets the local housing needs evidenced in the housing needs survey.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0392B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	<p>Risk(s): That the criteria allows these sites to be almost anywhere in Shropshire due to the very subjective terms for appropriate, sustainable and, but to a lesser extent, isolated. There is also a risk that areas in the vicinity of a village school will be targeted for multiple applications which are not appropriate for the area which has been covered by the comment to SP9.</p> <p>Comment(s): The suitability criteria for Cross-Subsidy Exception Sites in "Another settlement with a school or appropriate access to a school by sustainable modes of transport" could be argued to be anywhere in Shropshire as what is meant by the following subjective statements: a. Appropriate access b. Sustainable mode of transport c. Isolated Location in Paragraph b Also, many rural locations do not have sustainable access to local services by walking cycling or public transport (including school transport) to support the appropriate access and sustainable mode of transport requirements. This needs to be considered in conjunction with the response to SP9.</p>
A0392B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	<p>Risk(s): That low income families may not have sufficient access to private cars to support access to employment and that they become further disadvantaged from the location / infrastructure / services of a particular site. That tenuous and clearly unsustainable statements are made about the ability to meet the walking, cycling and public transport criteria, particularly in open countryside where there might be a bus service, but it is not suitable to support access to employment and local services.</p> <p>Comment(s): We welcome and support the requirement for cross-subsidy exception sites to have "reasonable access to local services by walking, cycling or public transport". However, this should also include employment opportunities to ensure that those without access to a private car, have sufficient opportunity to be able to travel to work. Also, as experience has shown that some of the claims that sites have access to services and facilities by walking, cycling and public transport in a rural setting are very tenuous, we strongly suggest that the following requirements are placed on applicants: a. Claims that access is available by walking shall be risk assessed with appropriate mitigation added to the application to cover where the routes cannot be assessed as safe (e.g. where there are no pavements and/or the roads are narrow and support large/fast moving vehicles). b. Claims that access is available by cycling shall be risk assessed with appropriate mitigation added to the application where the routes cannot be assessed as safe (e.g. narrow roads that are also used by large/fast moving vehicles). Where cycle routes are proposed, these shall meet the latest Government Guidelines for the provision of cycle routes. c. Where access is by public transport, the sustainability based on the current timetable shall be assessed and how this works for employment, visiting the local Doctor's Surgery plus access to schools and shops.</p>
A0437B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		<p>Support this draft policy as it recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared. As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse.</p>
A0438B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Agree	<p>Draft policy DP7 affords a great opportunity to develop a significant number of affordable dwellings across rural settlements. It recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared (example provided). As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse. Clarification that cross-subsidy schemes could be appropriate in settlements with a school or appropriate access to a school by sustainable modes of transport is considered helpful. List of 74 settlements (excluding Strategic/Principal/Key Centres) identified, this offers scope for the policy to deliver a significant proportion of affordable housing albeit flexibility needs to be shown into how a local communities housing need can be ascertained. Several potential cross subsidy sites have been appraised to assess if the proposed 30% open market housing results in a reasonable land value to incentivise landowners. This concluded costs and land values vary greatly dependent on servicing costs/site specific abnormals. Subsequently consider suitable flexibility should be included in this policy, allowing sites with evidenced abnormals/servicing costs allow an increase in the proportion of open market housing. Initial viability assessments suggest that modest linear development, located adjacent mains services are the most likely to be delivered. The advantage of the draft policy proposed is that it affords the opportunity to assess a range of suitable sites and in turn negotiate with a number of different landowners.</p>
A0439B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		<p>Support this draft policy as it recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared. As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse.</p>
A0442B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		<p>Support this draft policy as it recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared. As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse.</p>
A0443B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		<p>Support this draft policy as it recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared. As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse. Appreciate each proposal will be treated on its merits, however the policy should be afforded suitable flexibility, to allow developments to reflect characteristics of each settlement. Land in the immediate vicinity of the Old Malthouse, Hinstock, could represent a potential cross-subsidy site, subject to local need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0444B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		Support this draft policy as it recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared. As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse.
A0445B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Agree	Support this draft policy as it recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared. As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse.
A0446B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		Support this draft policy as it recognises that to deliver affordable housing, landowners need appropriate incentives. Landowners in rural areas have typically owned land for generations and sell they need a fair return whilst also addressing community needs. Standard exception sites don't typically yield attractive land values and due to economies of scale Registered Providers wish to develop at least 15-20 units, which are often too much development for modest rural settlements. The draft policy strikes a compromise, enabling delivery of affordable housing by allowing 30% of the development to be open market housing and the affordable units to respond to local need. It will also allow for creation of more balanced communities. Concerned that the policy is too rigid and does not allow proactive landowners/developers to deliver affordable housing. Why is there a need to demonstrate no public grant is available and affordable exception schemes are unviable. It could be argued that a standard exception site will be viable, as it will deliver a land value greater than existing (typically agricultural) value, but ignores the fact landowners will not sell unless they achieve a reasonable return. Proving local need is key to the success of this draft policy. Obtaining data is challenging. Flexibility is required to allow landowners to assess the housing need and not rely on historic (out dated) data. Whilst Shropshire Council 'Right Home Right Place' Survey attempts to collate suitable data, local communities are only motivated to engage once a development proposal is tabled / application prepared. As such Cross Subsidy proposals should be publicised to gauge the community's attitude, level of demand, nature of demand etc. Welcome flexibility regarding the size of cross-subsidy schemes, where there is local need. Flexibility regarding management of properties is also welcome, as registered providers may not want to manage them, whilst others may value involvement (landed estates, community land trusts, development companies and private landlords). Represents an opportunity to deliver affordable housing without relying on the public purse. Appreciate each proposal will be treated on its merits, however the policy should be afforded suitable flexibility, to allow developments to reflect characteristics of each settlement. Land in the immediate vicinity of the Old Malthouse, Hinstock, could represent a potential cross-subsidy site, subject to local need.
A0609B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Agree	Support community engagement and restriction to 10 dwellings.
A0642B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing pitch strategy 2010-2020 states; (the updated one due out October 2020 is being used to support the local plan) Building new facilities on new sites is generally a 'last resort' approach when all other options have been explored given the capital investment implications. It is only appropriate where there is a lack of provision overall and deficiencies across a number of sports which cannot be fully addressed by implementing the policy options outlined above. In other words not only is there a lack of infrastructure for cycling and pedestrians but also a lack of infrastructure in the design of new facilities including public open spaces that families can actually access.
A0665B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	Part (e) of DP7 says the scale of the development will solely be dictated by the evidence of local affordable housing need but will not normally exceed 10 dwellings. As with my comments on DP4, this needs to be more precise and there should be no room for being imprecise. The words "not normally" should therefore be deleted from the policy.
A0692B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		The draft Policy offers great potential, but is fatally undermined by the requirement to prove that a 100% affordable scheme is "unviable". This undermines the point of cross-subsidy exception sites, para 77 of the NPPF states "Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help facilitate this." (emphasise facilitate). The purpose of cross-subsidy housing is to enable more exception sites to come forward by making them more attractive not more viable. In Shropshire, only limited numbers of exception sites have come forward in recent years (as evidenced by low delivery). Increasing delivery requires significant change to the current situation by providing incentives to landowners to make land available for affordable housing and housing associations to build them. Therefore requirement to demonstrate an exception site is unviable should be removed.
A0899B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	Object to Policy DP7 as it does not conform with NPPF para 77 by improving land valuations on rural exceptions housing schemes which is the principal barrier to the delivery of more affordable housing schemes. Amend Policy DP7(1)(a) by deleting the words "...and that that an affordable exception scheme is unviable" to read "It is demonstrated that no public grant is available". The policy and explanatory text do not identify how a scheme will be judged to be unviable. The reliance on abnormal development costs for a scheme overlooks the core issue of plot valuations which deter landowners from selling land. The Delivery and Viability Study para 6.25 identifies that Housing Associations often buy affordable plots at £15,000/plot but open market housing plots can attract £40,000 - £100,000/plot. There is a need in NPPF para 77 to facilitate the delivery of cross subsidy schemes by providing incentives to landowners to sell and this incentive will be the proportion of open market housing that is permitted in a cross subsidy scheme. Amend DP7(1)(f) by deleting the words "At least 70%" to read "A majority of the homes provided will be affordable housing of a type and tenure that meets the local housing needs evidenced in the housing needs survey".
A0899B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	NPPF para 71 also supports the provision of entry level self build on exception sites and this support should be introduced into policy SP9 to permit self build and custom build on exceptions sites possibly reflecting the approach in Telford and Wrekin Policy HO11.
A0932B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	No site in Shropshire has come forward for development under this policy since its adoption The policy is not supported by any evidence to demonstrate that the improvements will lead to the delivery of local needs affordable housing across the county, thereby undermining its ability to ensure there is adequate housing opportunities for households with a local connection.
A0961B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Agree	Para 1 support community engagement and restriction to 10 dwellings
A0976B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Agree	We support the Policy although the level of Cross Subsidy should be tailored to each site through a viability assessment. In certain settlements, 70% affordable is more achievable than others. In addition, evidence gathered from Right Home Right Place should form the level of cross subsidy. Not all people in the rural area want an affordable home and it is important that the RHRP initiative feeds into the communities aspirations.
A1118B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	Ruyton XI Towns Parish Council has agreed that it has no major concerns about the proposals specifically relating to Ruyton XI Towns parish, e.g. community hub status, development boundary, site allocation etc. However, there are very serious concerns about the broader exception site policies over various headings, and specifically Cross-subsidy exception site policy DP7. It is felt that all the different types of exception scheme policies (100% affordable exception sites, entry-level housing, single plot exceptions, cross-subsidy, etc.) include vague and undefined references to proximity to services and facilities, as well as undefined references to "sustainable modes of transport". It is also noted that proximity to employment does not seem to be included in the conditions for exception sites under any of the various headings, which impacts the sustainability of a proposed development, e.g. if residents still have to drive by car to their place of employment. There are serious concerns that this vagueness and lack of definition could therefore be open to exploitation by developers. In terms of policy DP7 for example, the initial conditions of cross-subsidy exception sites are that they must be:[...] within or immediately adjoining the built form of: i. A Strategic, Principal or Key Centre; ii. A Community Hub or Community Cluster Settlement; or iii. Another settlement with a school or appropriate access to a school by sustainable modes of transport. The lack of definition of "sustainable transport" in point iii) above potentially allows for cross-subsidy exception sites to be built outside the main built form of Ruyton XI Towns village, and instead be attached to much more rural settlements, such as Wykey, Wigmarsh, Eardiston, Weirbrook, etc. It was felt by the Council that the wording in this example and other exception scheme policies would make it very difficult for Shropshire Council Planning department to refuse applications for exception sites in these areas, which are currently classed as open countryside. The consequences of this are significant and worrying. Under the cross-subsidy exception site policy for example, if additional development is permitted on exception sites of up to ten houses each time, this would have a significant negative impact on not just the character, but also the infrastructure demands of these settlements outside of Ruyton XI Towns village. It would also represent significant residential development in addition to the proposed housing guideline figure for Ruyton XI Towns Community Hub (around 125 dwellings). We also note that the wording of the housing guideline figure of "around 125 dwellings", as well as policy SP6, both allow for the housing guideline figures to be exceeded, rather than 125 being the maximum, which also raises some concerns. It would be much more appropriate for affordable housing (under its various forms) to be provided within or adjoining the built form of community hubs where possible, so that the new affordable housing is in genuinely sustainable locations, i.e. next to schools, shops, medical centres, bus services, etc. The Parish Council strongly believes that policy DP7 and all other exception scheme policies should be urgently clarified as per the points raised above, in order to protect rural settlements that are outside the community hub boundary from contentious and inappropriate development. On a related note, the Parish Council also notes (in the Appendix, Oswestry area Place Plan site assessments, pages 33-35) that out of 22 potential sites considered for preferred development sites in the parish, after assessment by Shropshire Council only site RUY019 has been put forward for allocation for development. All other sites were therefore effectively rejected on the grounds of their sustainability assessment. The Parish Council would like to suggest that Shropshire Council includes an additional clause in policy DP7 (and other relevant exception scheme policies) to the effect that any sites that have previously been assessed and rejected by Shropshire Council should not be considered for exception sites.
A1152B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Agree	Broadly agree with these policies. Note in particular that the wording of the policies prevent such sites being built in the open countryside. That reinforces views that the wording of policy SP9 should be amended to remove para 4a. Only single plot local needs affordable exception sites should be allowed in the countryside.
A1271B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7		Extract of a response to a previous consultation provided: Cross-subsidy policy should be applied in very special situations on sites where the construction of the affordable housing would GENUINELY not otherwise be viable. The ACTUAL purchase price of the land (or property to be converted) included in the build-out cost as a condition. The mix must be determined locally after consultation with the Local Member and the local communities likely to be affected.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1870B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	request that this paragraph be removed from the policy, as we are concerned that it will be exploited in order to seek development in isolated rural hamlets It seems unnecessary as it should be covered in paras 1.b.i. and 1.b.ii. It also appears to contradict with 1.c, as such a location will by definition be in an isolated location. If a school is not in a Strategic, Principal, Key Centre, Community Hub or a Community Cluster Settlement it surely must be in an isolated rural location away from the normal facilities you would find in the above. We are also concerned about the wording "... appropriate access to a school by sustainable modes of transport" and the scope for this being exploited. Just because a school is accessible in this way, it does not mean that sustainable modes of transport will be used once the development has been completed. It is also very ambiguous and is vital that "sustainable modes of transport" be defined, with appropriate examples such as walking, cycling, transit, carpooling, car sharing, and green vehicles.
A2169B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	In a similar vein to our response to entry level exception sites, we support this policy although part h) which seeks to secure the affordable housing in perpetuity should be removed.
A2173B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	We do not consider this specific policy is required as the NPPF Para 77 allows for viability discretion on 100% Affordable Housing Rural Exception developments, which are allowed in 'Countryside' outside existing settlements. A key factor in viability of 100% Affordable Exception schemes is land value. If landowners can foresee higher land value via a Cross-subsidy Exception scheme that will be what they will hold out for. By introducing this specific policy it could reduce the percentage Affordable Homes provided. Without prejudice to the above, if this Policy is to be included then we disagree with the minimum 70% Affordable Homes requirement in DP7.1(f). We consider it should mirror the Open Market development Affordable Homes requirements for its location within the county i.e. it should be in North 90%AH / 10%OM and in South 80%AH / 20%OM to reflect identified local needs. Para DP7.1(a) refers to viability of schemes – how will this be determined? Without public grant, viability is synonymous with profitability. It is inherent that Developers are profit led, and therefore they will seek to build the maximum Open Market housing within any development to maximise profit. Clearly, every development will differ in terms of land values and build costs related to site factors, and saleability of Open Market housing. No indication is given of what might be deemed an acceptable profitability level on a scheme for the developer; nor how this would be assessed and determined within the Planning Application process (indeed is it a legally a consideration under the Planning Act?). DP7.1(l) and (n). Neither refer to access to employment. Sustainable travel to work by walking, wheeling, cycling, or public transport are key for the sustainability of settlements and meeting Climate Emergency aims and Policy SP3 Climate Change.
A2173B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP7	Disagree	DP3 Affordable Housing Provision - DP3.1(h) DP4 Affordable Exceptions - DP4.1(k) DP5 Entry Level Exceptions - DP5.1(i) DP6 Single Plot Exceptions - DP6.1(h), DP7 Cross Subsidy Exceptions - DP7.1(l) and (n). None of these Policies refer to access to employment. There is a requirement for reasonable access to local services by walking, cycling or public transport, but none of these Policies refer to daily access to employment. Sustainable travel to work is key for the suitability of developments and meeting Climate Emergency aims and Policy SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 If employment is not available in the settlement then there must be daily peak time public transport - and many low paid jobs are weekends or shifts. Also access to key Secondary services like GP, dentist, and pharmacy by return public transport at suitable times of day is vital. These Policies aim to assist lower income households. If they are not to become burdened with additional costs and/or isolated from a wider range of opportunities (e.g. budget supermarket shopping, leisure and cultural activities) then a regular and frequent public transport, including evenings and weekends, is fundamental.
A0158B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP8	Don't know / no opinion	Shropshire's future policy and practice must ensure that there is no need to provide sites for gypsies/travellers on Green Belt land.
A1170B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP8	Disagree	Overall I find the policy good and thorough, but as I have worked on planning applications in this matter, I have found a recent trend in the traveller community to seek to establish one or two unit sites on their privately owned land. This allows much better integration with the local community, although the planning applications are often met with prejudice and almost blatant racism. Many travellers have realised, as a consequence of the COVID 19 emergency, that large sites have serious social and health problems. This policy could give stronger support to small private site development.
A1648B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP8	Don't know / no opinion	The Shropshire GTAA 2017 reported movement between Cheshire West and Shropshire as a potential cross-boundary issue identified by stakeholders. Cheshire West and Chester is part of a sub-regional partnership with Halton, Warrington and Cheshire East that prepares the GTAA. The latest GTAA was published in June 2018 and does not recommend the counting of vacant pitches as a component of supply for Cheshire West and Chester. Further discussion on this point would be useful to understand the approach to meeting Traveller needs in Shropshire.
A2180B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP8	Disagree	Whilst this policy sets out the criteria for the development of a transit site, we are a bit disappointed that a site hasn't been identified. This seems to go against the grain of our constant battle to address unauthorised encampments in the town and the time and expense of moving them on. There was also suggestion that the Police wouldn't continue to use their powers to move travellers on if the Council did not consider suitable transit arrangements. We respectfully request that this be revisited.
A2353B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP8		It has been a continual problem on the industrial estates and office parks around the town not merely on vacant land but also on office and factory car parks that gypsies and travellers have frequently used these areas in transit between seasonal destinations. Whilst difficult to secure allocated gypsy sites we press Shropshire Council for more efforts in providing a long-term solution to this issue which is extremely disruptive to many individual businesses in Shrewsbury
A0100B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	Agree with sequential preference to the development of strategic corridors and prioritisation of both allocated and windfall sites in Shrewsbury. Policy will allow positive response to demand from new businesses and supported by the delivery of new housing. Approach encourages the prioritisation of significant new development and will make effective use of existing transport routes. The sequential release of additional employment land may also help to attract major employment development into the County and encourage other scales of employment uses
A0167B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9		Whilst it is understandable to focus developments in accessible and well connected locations, there are concerns that this could lead to additional development in and around Oxon Hall Caravan Park. This location has already and will continue to be disrupted by proposals at SUE West and there is also the NWRR and a potential flood alleviation strategy to consider. Would not wish to see further development which would undermine viability as such would have to object to any proposals for a strategic corridor in the vicinity of Oxon Hall. Genuinely concerned that Oxon Hall Caravan Park may not survive in circumstances where the noise, dust, pollution and disturbance created both during construction and operation of these developments discourages visitors to the site.
A0306B028	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Para 4.91 We would like to see a preference for strategic corridors to focus on rail.
A0306B029	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Para 4.93 Replace "should" with "must" in para 4.93.
A0306B030	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Para 4.94 Replace "should" with "must" in para 4.94.
A0406B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Whilst there are planned improvements to the A5 road, there is no mention of possible improvements to the A4169/A458 junction in Much Wenlock to enable any enhancement to this strategic corridor to take place. This would seem to contradict what is stated in the Explanation 4.89 and 4.90, e.g. 'making effective use of the ...road route through these corridors'.
A0430B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Support the acknowledgement of this Strategic Corridor and the opportunities arising in Shifnal and RAF Cosford. DP9(1) sets the strategic approach to the delivery of significant development and infrastructure investment within the 'Strategic Corridors' served by the principal rail network and strategic and principal road networks in Shropshire. Paragraph 4.91 identifies the strategic corridors including, amongst others, the M54/A5 Strategic Corridor with opportunities in and around Shifnal as a Key Centre and RAF Cosford as a significant location. Consequently, DP9(3) goes on to say that development at the strategic corridors should be sequentially located, starting with the Principal and Key Centres on an allocated site firstly or a windfall site. Support this approach and acknowledgement of Key Centres at the top of the hierarchy, but consider that safeguarded sites if included within the settlement boundary could also be included in the hierarchy, particularly if there is a monitoring / 'Plan B' policy in the plan.
A0506B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	The document states: "Church Stretton and Craven Arms as Key Centres within the Shropshire Area of Outstanding Natural Beauty. 4.92. Shropshire Economic Growth Strategy seeks to promote a 'step change'". Craven Arms is not in the AONB, so a correction is required here.
A0573B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	Support DP9 to focus major development along principal rail and strategic road routes through Shropshire including the strategic corridor of the Eastern Belt M54/A5 and the opportunities in and around the Key Centre of Shifnal. The significance of the M54 is recognised in the M54 Growth Corridor Strategic Options Study. Shifnal is the first major town on the M54 west of the conurbation and represents a logical first location for growth to assist the County's aspirations and to meet an identified local need for employment land. Development of SHF018b and SHF018d is recognised in the M54 Study which reflects the significance of Shifnal and recognises the site location, east of the town, is within the significant M54 Growth Corridor. The Shropshire Economic Growth Strategy recognises the location as a highly sustainable location to support economic growth and to deliver jobs and investments, possibly offering an element of residential use by co-location and adjoining the Shifnal Industrial Estate to provide a natural extension to this established area of commercial activity.
A0642B31	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Para 4.91 We would like to see a preference for strategic corridors to focus on rail. See comments made on: 3.26 (b) We question the ability for this strategic corridor to deliver true sustainable economic growth in the absence of a clear policy of promoting sustainable transport: 3.26 (d) The identification of a strategic corridor linking to HS2 that is based solely on road transport is an example of the unsustainable results of the scheme and we do not welcome its mention in the Local Plan and on 3.26 (e) We question the ability for this strategic corridor to deliver true sustainable economic growth in the absence of a clear policy of promoting sustainable transport.
A0642B32	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Para 4.93 Replace "should" with "must" in para 4.93.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0642B33	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Para 4.94 Replace "should" with "must in para 4.94.
A0697B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Not this draft policy seeks to deliver step change in the capacity and productivity of the local economy and to contribute to this "Strategic Corridors" (particularly those with rail and road links) will be the primary focus for major development and a sequential approach will be taken to this development of which a. includes principal and kt centres. Greater recognition needed of the potential contribution from settlements such as Albrighton to delivering draft policy objectives. Albrighton is one of only two settlement situated on the corridor into the West Midlands conurbation with the greatest economic demand and potential for economic growth and prosperity. The level of growth planned for Albrighton (just 500 dwellings or 22 dwelling per annum)completely ignores wider economic objectives in the draft Local Plan and is unlikely to contribute significantly to delivering this draft policies objectives. Greater integration of this draft policy and the draft settlement policy for Albrighton (Policy S1) is required, through identification of additional growth at Albrighton, consistent with its location along the Borough's principal strategic corridc
A0911B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	Representation on behalf of Hobbins Management Company covering a range of Policies relating to Bridgnorth. Broadly in support of the policies, but stress that the policy position doesn't appear to have been followed in setting the allocation of employment land at Stanmore. Policy DP9 sets out how the Council believe that the "step change" in capacity and productivity of the local economy might be achieved – by the identification of "strategic corridors" The concept of focusing employment development along major transport routes is supported, as is the requirement that there should continue to be regard for national and local policies that relate to the Green Belt. However land at Stanmore has poor links to the M54 and principal road network and is difficult to access by foot or cycle. National policies restrict development in the Green Belt unless exceptional circumstances exists. No exceptional circumstances have been advanced by the Council that would justify removing the proposed employment sites at Stanmore from the Green Belt.
A0912B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	The supporting text to this policy specifically identifies (paragraph 4.91(e)) Ludlow as a Principal Centre on a Strategic Corridor and the policy states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity". Policy DP9 is therefore supported as it identifies the importance of Ludlow as a significant centre for growth in Shropshire, both socially and economically.
A0916B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	The supporting text to this policy specifically identifies (paragraph 4.91(b))Oswestry as a Principal Centre on a Strategic Corridor and the policy states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity". Policy DP9 is therefore supported as it identifies the importance of Oswestry as a significant centre for growth in Shropshire, both socially and economically.
A0935B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Support the aim of 'Strategic Corridors' with both rail and road connectivity being the primary focus for major development especially along 'strategic corridors.' However, as referred to under draft Policy SP10, it should be noted that 'Strategic Corridors' do not just comprise groups of settlements on transport corridors but also 'key nodes' such as sites which benefit from direct access and visibility from strategic corridors, for example those adjacent to strategic road junctions/roundabouts. Draft Policy DP9 should also recognise that the M54 corridor is the most prominent strategic corridor in Shropshire and therefore has the greatest potential to support growth.
A0972B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Para 1, 3 & 4Bridgnorth is the only Principal Centre with no rail link and the last upgrade of the highways infrastructure was the by-pass. Given the level of housing and economic growth proposed, a rail link from Bridgnorth along with an upgraded highway network would enable Bridgnorth to take its rightful place as a Principal Centre. Para 4.98 obvious place for new industrial/business development would be close to the i54. but proposed car battery factory development, an industry which will facilitate 'green' vehicle transport, and had the potential to create 3000 jobs & more than £1 billion to the region's economy was rejected by Shropshire Council reflecting muddled decisioning. The M54 is a logical place for industry and business development, not winding A roads near Bridgnorth.
A0984B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	Supportive delivery of a 'step-change' in the capacity and productivity of the local economy. To contribute to this, the primary focus of major development will be along 'Strategic Corridors', where there is a concentration of rail and strategic road routes. Support identification of the eastern belt (M54/A5, A41/A464 and A4169/A458/A454) in which Bridgnorth is located as a strategic corridor. This is a key road corridor located in proximity/connected to the rest of the West Midlands. This strategic location allows both Bridgnorth and Shropshire to take advantage of the growth potential and collaboration associated with the West Midlands economy and supply chain. Support recognition (Part 2) that significant development and infrastructure investment will be located within the Strategic Corridors. Bridgnorth is well connected to the West Midlands economy and investment in this strategic Corridor will assist in economic growth of both Bridgnorth and Shropshire. Support Part 3 which recognises Principal Centres as top of the hierarchy of sequentially located sites.
A0997B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	The inclusion of the historic environment in Criteria 4c is welcomed and we note would be supported by Policy DP24
A1143B69	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	"Proposals for development in the 'strategic corridors' must satisfy the requirements of Policy SP11(Delivering Sustainable Economic Growth & Enterprise)and consider b. The need for infrastructure investment to support: i. The delivery of the development; and ii. The accessibility of the rail and road networks;" Whilst road networks might include better integrated bus services this statement is at best ambiguous. A key requirement to the success of sustainable economic growth is the need for better integrated public transport systems that connect rural hubs with key employment areas this policy and especially section 4 / 4b would be greatly strengthened by making a clear link to policy DP, the 29. 2017 Bus Services Act encourages and empowers Local Authorities to do just that, and "The government is making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future I disagree with this policy because it is incomplete and could be strengthened.
A1152B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Broadly disagree as the 'step change' that is referred to in this policy is fundamentally at odds with Climate Change objectives. Consider responses to previous consultations are relevant The first sentence of the draft policy appears to be somewhat tautological and could do with being refined. It essentially says 'Strategic Corridors' will be the primary focus for major development along 'strategic corridors'. Para 2 should first emphasise that there should be a presumption against development in the Green Belt or the AONB, regardless of whether a HRA is also produced. Emphasis in para 4a on the need to balance the delivery of housing and employment growth is not fostered by the proposals in Bridgnorth, Market Drayton, Oswestry and Shifnal, where there are considerable and marked imbalances between the proposed housing and employment land guidelines. The policy will therefore foster increased levels of commuting, which is against the Climate Change objectives.
A1183B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	DP9 Strategic Corridors We note that a strategic corridor i.e. Eastern Belt and North East Shropshire and A41 corridor runs through our locality and note that although there are no proposals for development at present the increase in traffic activity and use of the A41 generally even though the road is de-trunked remains a significant concern. We are concerned that the use of major roads and the negative impacts of this use are not captured sufficiently within a Planning context and would suggest consideration of more clarity in the relevant Policies. Once again we would prefer as a Parish Council to be involved early in discussions should development occur along this corridor.
A2142B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Agree	Policy DP9 sets out how the Council believe that the "step change" in capacity and productivity of the local economy might be achieved – by the identification of "strategic corridors", which are corridors served by the principal rail network and strategic and principal road networks in Shropshire. Bridgnorth is included within the Eastern Belt Strategic Corridor. However, Policy DP9.2 says that development within the strategic corridors through the Green Belt will be subject to appropriate national and local policy. The concept of focusing employment development along major transport routes is supported, as is the requirement that there should continue to be regard for national and local policies that relate to the Green Belt. However, land at Stanmore (Sites S57 and S58) is proposed for allocation for employment purposes, though the town has relatively poor links to the M54 and the Principal road network that runs through Shropshire and into the West Midlands. This land is located in the Green Belt, and transport links to Bridgnorth town are difficult, and very difficult for pedestrians and cyclists. National and local Green Belt policies restrict development in the Green Belt unless it comprises certain specified types of development (general industrial classes not being of such types) or in exceptional circumstances. No exceptional circumstances have been advanced by the Council that would justify removing the proposed employment sites at Stanmore from the Green Belt.
A2321B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	Policy DP9: Strategic Corridors 4.5 The Shropshire Economic Growth Strategy identifies the 'M54 growth corridor' as one of the key strategic corridors and growth zones. It is recognised as a: "...key road and rail transport corridor which reinforces Shropshire's close proximity to the West Midlands and the growth potential that will develop from the Land Commission as part of the Combined Authority structure". 4.6 The report enclosed at Appendix 2 provides further interrogation and consideration of the importance of the M54 growth corridor and the significance of the role which it plays within the County. Specifically it acknowledges that reports such as the Shropshire Economic Growth Strategy identify this important corridor as having potential for significant employment growth focusing on key sectors linked to the advanced manufacturing opportunities to create a hub maximising the opportunity of i54 and RAF Cosford. 4.7 In considering the implications of the strategic M54 growth corridor for Albrighton, the 'M54 Growth Corridor – Strategic Options Study' (June 2019), identifies RAF Cosford as one of the key strategic sites considering the existing levels of employment it provides and also future expansion and opportunities. 4.8 With regards the current use of the site, it notes that between 2,500 and 3,000 people are located on the site at any one point in time, excluding visitors to the museum where it is noted that there are in excess of 100,000 visitors annually. There are also more than 400 dwellings on the site accommodating over 1,700 people. The study confirms that the MOD is planning a £40 million ten year investment programme for the site to develop a hub for training, skills and development aligning with the rationale for its allocation as a Strategic Site within the draft plan. 4.9 Significantly, it is also noted as having the potential to draw further investment into Shropshire and raise its profile as an innovative and self-sustaining economy. It is equally suggested that the realisation of investment, in the context of the existing concentration of advanced manufacturing/ engineering excellence, 'may lead to the development of a cluster of businesses in this sector', similar to how i54 is recognised as one of the most desirable places to invest within the West Midlands with key occupiers including Jaguar Land Rover, Eurofins and Moobs. 4.10 It is apparent that there is a significant degree of strategic support from a national to a local level for realising the economic growth potential of the M54 corridor. There is already evidence of the corridor's impact in attracting investment and development. Existing strategies provide assurance that this will be sustained. It is also evident from the Strategic Allocation of RAF Cosford, and the infancy of the MOD's plans to move its No.4 School of Technical Training to the site that the draft plan is not yet able to fully consider the full potential of RAF Cosford, and the potential increased need for market and affordable housing within close proximity. This is a significant risk to both the success of RAF Cosford, and the creation of sustainable communities. 4.11 Albrighton's location on the growth corridor in close proximity to RAF Cosford, and the also its strong connectivity to Shropshire, Cosford, Wolverhampton and Birmingham by sustainable means, makes it ideally places to accommodate more housing growth now and through land safeguarded for future. Vistry's site is well placed to provide new market and affordable housing in close proximity to existing services and facilities and also within close proximity to RAF Cosford
A2323B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9		Support the purpose of this policy to enable Shropshire to respond positively to demand from new businesses attracted into District as inward investment and note that the Council recognise that such inward investment needs to be supported by the delivery of new housing. The proposed allocation of a large employment site in Shifnal is strongly supported as a means of sustainably accommodating inward investment and enabling local business to grow building on the advantages of the M54 corridor. This will offer the opportunity to create a more sustainable balance between housing and employment in Shifnal over the plan period.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2475B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP9	Disagree	As well as considering the direct impact of possible strategic corridor development within the AONB, the indirect impacts on the AONB of this policy overall need to be considered. This would include development in the corridor outside the AONB but within its setting, but also the impact of increased road traffic along the corridor. The noise road traffic on the A49 has been shown to be the major factor affecting tranquillity in the AONB, one of the special qualities and key attractions to visitors and inward investment. 4.91e Shropshire Hills AONB not Shropshire AONB. Craven Arms is not within the AONB. 4.93 "Very special circumstances" – if this refers to NPPF's "exceptional circumstances" for major development in AONBs, the same wording should be used
A0295B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP10		Consideration of the use of town centres to make them an experience - to compete with the internet.
A0306B031	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP10	Agree	We support town centre development proposals which promote ethical, sustainable, and low-carbon consumer opportunities
A0430B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP10	Agree	Support DP10(8) as it provides some support for local facilities to be delivered to support significant new residential developments. The Council may also wish to consider including a monitoring / 'Plan B' policy in the plan to refer to these sites.
A0642B34	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP10	Disagree	We support town centre development proposals which promote ethical, sustainable, and low-carbon consumer opportunities.
A0972B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP10	Disagree	Para 1 & 2 Impact of the Covid19 pandemic crisis, is that the UK and world economy is and will continue struggling. town centres have lost business as a result of home working from home and businesses are failing. The Local Plan should utilise empty office, shops and other buildings/land in town centres to regenerate and revitalise our town centres to bring residential properties to town centres. This would solve the problem of empty buildings and would bring a consumer base directly to town centres which would help to revitalise existing businesses, such as cafes and restaurants. Residents would not need to use a car thus reducing carbon emissions Para 4 : need to be vigilant with regards to Retail Parks on employment land sites and creating out of centre locations which take business from the real town centre e.g. Merry Hill Retail Park impact on Dudley. Para 8: If the Local Plan distributed housing around the town rather than in one area it would bring more businesses to the High Street and there would be less need for neighbourhood based local shopping. Already too many charity shops in Bridgnorth town centre. We could use housing expansion to drive the revitalisation of the High Street if it were in the right locations distributed across the Bridgnorth place, not centralised in a single Garden Village model.
A0984B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP10	Agree	Support Part 8 of the draft policy which provides some support for local facilities to be delivered in order to support significant new residential developments. However, it is noted that the retail hierarchy excludes planned local centres at strategic sites such as BRD030. Given that the delivery of a local centre is a requirement for BRD030 (as set out in draft Policy S3.1), it is recommended planned local centres and included in the hierarchy within draft Policy DP10, to provide appropriate policy support for the uses, as well as protection from future out-of-centre proposals which could affect the viability or deliverability of a local centre at this location.
A0997B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP10	Agree	The content of this policy is noted and would offer opportunities to conserve and enhance the historic environment including projects such as Oswestry High Street Heritage Action Zone
A0020B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	This supports regeneration and tourism development proposals of canals and specifically lists the Shropshire Union Canal and its Llangollen and Montgomery branches. The Shrewsbury Canal needs to be included.
A0020B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	6. "The Policies Map identifies the canals and lines to be protected against other forms of development that conflict with their use as a multifunctional resource or potential for restoration or regeneration. "Although under the sub-heading "Canal side facilities and new marinas", this is the key policy supporting restoration of canals. The Draft Policies Map clearly shows the Shrewsbury "Canal Line" in the key and on the map, and the Policies Map Inset S16 Shrewsbury Town shows that section on a detailed OS map, which is identical to the current Site Allocations and Management of Development (SAMDev) Plan adopted 2015, where it is part of Policy MD11: Tourism facilities and visitor accommodation. I support this policy but suggest that the sub-heading be changed to "Canal side facilities, new marinas and canal restoration". The identified "Canal Line" on the Shrewsbury Inset Plan stops at the boundary along the A5112 although the canal clearly continues west through Ditherington and beyond. Please therefore continue this Canal Line along its full historic length.
A0159B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	It is astonishing and unacceptable that DP11 fails to recognise the importance of shifting tourism car trips as much as possible to public transport and bikes.
A0167B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11		Welcome support growth and expansion of new and existing tourist related developments within Shropshire, but would draw attention to comments made in relation to draft policy SP9 in relation to the matter of potential relocation.
A0306B032	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer. DP11 (f) The natural environment has been recognised as the major draw for tourists to the county. Retaining and enhancing natural features is therefore key to the long term success of the tourism industry. Stronger wording is recommended.
A0642B35	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer. (f) The natural environment has been recognised as the major draw for tourists to the county. Retaining and enhancing natural features is therefore key to the long term success of the tourism industry. Stronger wording is recommended.
A0997B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Agree	Reference to the historic environment within this policy is welcomed and offers opportunities to conserve and enhance the cultural and historic environment while linking with natural environment (including green and blue infrastructure) and well being elements too.
A1124B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	Generally support the main cruxes that DP11 seeks to achieve - sustainable tourism development. Concerned over the reluctance to allow new tourism development in the rural areas. The draft policy wording creates a 'catch-22' scenario in that 1(a) seeks to support new and extended tourism development, with 1(f) supporting rural diversification. However, in contrast 1(g) restricts new tourism development in the rural areas to either be close to or within a settlement, or be part of an established and viable tourism enterprise. In supporting rural diversification, it is somewhat accepting that locations outside of, and neither adjoining, settlements will be acceptable, by virtue of most farmsteads being far removed from settlement confines. Equally, you support established tourism enterprises in the rural areas, but then restrict and limit any new enterprises from establishing themselves. Of considerable concern is the requirements of para 10 within DP11 and the requirement for new holiday let accommodation to meet the test of exceptional quality as outlined at para 79 of the NPPF. As is commonly known, this is an exceptionally high test and one which would far outweigh the viability of a small-scale tourism enterprise establishing themselves. Furthermore, para 79 is to be applied on new "homes", not holiday accommodation. It also seems somewhat juxtaposed that in order to allow a holiday let, separate to a residential unit, this needs to meet the test of exceptional quality, but it then goes on to say that conversion to residential would be resisted; however, the test of para 79 has already been met in granting the holiday let and by virtue, the LPA would be unable to resist its change of use to a dwelling. Points 10 and 11 of DP11 are going far above and beyond the requirements of a positively worded planning policy and would fail to be in conformity with the NPPF. It is our opinion that there should be greater support for new, small-scale tourism development in the rural areas, away from settlements and that support rural diversification. This is not to say that the general principles of sustainable development (landscape, amenity) be forgotten, but that a greater degree of allowance be had on the location of new tourism development. The provision of new tourism development, in the rural areas and away from settlements, can have a positive impact on the protection and management of the landscapes which DP11 seeks to protect, yet fails to recognise the intrinsic benefits of allowing. Much like new housing development, the provision of tourist accommodation is very much market-led and does not need to be so tightly controlled through the planning process as DP11 would suggest. No new or existing enterprise would be willing to install/purchase new tourism accommodation, unless there was a demand for such accommodation. Equally, should a demand cease to be apparent, it is likely that the accommodations offerings (of which are mostly temporary and transportable, in accordance with 9) will also cease and the landscape would be reverted back to its former state
A1143B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	If Policy DP15 is relevant then surely DP13 is equally relevant and in this instance failure to include DP13 significantly erodes the integrity of including DP15 as both policies are mutually supportive. To include DP 15 only is a contradiction suggesting that DP13 is of no or little value in this instance
A1161B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Agree	Strongly support this. We have recently lost significant bed space as result of reversion to residential use. This has not been the result of a down-turn in the market but other non related factors. This policy is required to ensure beds are retained and this important part of our economy strengthened.
A1616B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	We suggest that the sub-heading under which this paragraph falls should be changed to read, "Canal side facilities, new marinas and canal restoration".
A1844B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	May be useful to include need for applicants to undertake pre-application discussions with Canal and River Trust to demonstrate that the canal network is capable of accommodating the proposal. The policies map needs to be updated to show the correct canals and lines to be protected against other forms of development. Para 4.109 should be updated to read 'The restoration of the canal from Frankton Junction to near Newtown is fully supported by the Canal and River Trust. The Montgomery Canal Partnership may also be able to provide updated information about the restoration works on the Montgomery Canal.
A2394B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	Please amend to read "Shropshire Union Canal – Montgomery Branch. To realise the potential benefits from full restoration, the Council supports the aim of the Montgomery Canal Partnership to re-open the Canal." Reason: This would bring the Policy into line with Para TD3 (Montgomery Canal and associated development) of the Powys LDP. A copy of that policy is attached.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2403B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	The Estate supports the objectives of Policy DP11 to deliver high quality, sustainable tourism and leisure offers including those which are sensitive to but also respond to the opportunities presented by the natural and built, including historic, environment of the district. The acknowledgment of the value of these sectors to the local economy is also welcomed. The Estate already contributes to the leisure opportunities in the district, being an important enabler of access to the countryside through the public access available to a network of rights of way and areas of woodland at Haughmond Hill, which provide a major amenity for Shrewsbury. There is potential to further enhance this, which will be explored as part of the Whole Estate Plan process. The Estate is therefore pleased to see support for new tourism, culture and leisure developments in the district, including appropriate development in rural areas. The Estate also supports the acknowledgment of the appeal to people of rural locations for holiday stays and supports the opportunities for the delivery of new visitor accommodation in rural areas. Point 1 g) should remove the reference to 'existing' viable tourism enterprises, to allow new proposals for visitor accommodation, to be brought forward where appropriate, in conjunction with new, well evidenced tourism proposals. We would suggest the criteria under point 9, in relation to the legal caravan definition, is possibly too restrictive a requirement, and may not allow for innovative accommodation offers to come forward. It would be helpful for the policy to clarify whether this reference is made purely in relation to the permanence tests of the legal definition and not for example size, which would be better judged by way of consideration of impacts in each particular case.
A2441B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	have ticked disagree because of what is missing from the information. I would like to see more cycling opportunities in Shropshire promoted / enhanced / developed. There is very little promotion of cycling in Shropshire. I would like to see more cycling proposals in the Local Plan and more concrete definitions when they are mentioned as part of policies.
A2475B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP11	Disagree	The focus from the start on sustainable tourism is welcomed. This can be explained further and covered more fully, as in comments below along with some improved wording in places. 1b. Suggest 'engagement' rather than 'connections' and access to 'high quality nature and heritage sites' rather than 'heritage trails and parkland'. 1c. Suggest 'rivers, meres and mosses'. 1e. The heritage is what should be preserved rather than the brand. 1g. Suggest the 'reputation' of Shropshire rather than the 'role'. Rural areas sentence – should cross reference DP26 – appropriate scale and character is key for tourism development in the AONB. Suggest 'or to an established...' Text is ambiguous – but is assumed to mean proposals should be close to rather than be an established enterprise. Para 3 Screening has too much prominence here – suggest 'well designed and sited...' Tranquillity can also be threatened by inappropriate development or activities. The policy should also refer to tranquillity and the need to take into account noise and light pollution. Para 7. Camping sites have the least impact of any tourism development, due to their limited built development and temporary occupancy. They are an under-represented feature of the holiday accommodation offer in the county and should not be unduly discouraged. Para 8. Cumulative impact is much more likely to be an issue for caravans, chalets and cabins than for campsites (which are unlikely to be clustered in a small area). Reference should be made to limiting caravan, chalet and cabin development for reasons of capacity and scale (including cumulative impacts) as well as referring to landscaping and design. The policy paragraphs should recognise other aspects of sustainable tourism - energy efficient (cross reference to DP12), sustainably sourced materials, actively supporting conservation, access to recycling, public transport, waste reduction/management, local employment, low pollution (noise, light, emissions, waste) strong retention of benefits in the local economy, social benefits – to local community, and addressing needs of diverse range of visitors. Explanation There is a need for greater explanation of sustainable tourism. One definition is: The aim of sustainable tourism is to increase the benefits and to reduce the negative impacts caused by tourism for destinations. This can be achieved by: •Protecting natural environments, wildlife and natural resources when developing and managing tourism activities •Providing authentic tourist experiences that celebrate and conserve heritage and culture •Creating socio-economic benefits for communities through employment and income earning opportunities 4.106 Suggest 'humans' in place of 'man'. Add 'nature' before produce. 4.107 Offa's Dyke Path National Trail, and suggest add 'and the Shropshire Way'. 4.108 Suggest mention Montgomery Canal. 4.109 British Waterways is now the Canal and River Trust. The depth of content on railways and canals in the policy is not matched by that on the natural environment which probably has a broader appeal and this balance should be redressed.
A0026B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Agree	The Residents of Cross Houses and Berrington recently completed a Community Led Plan which showed that a significant number of residents have concerns for the environment and development within that. The Parish Council therefore strongly support the proposal to achieve 19 % increased improvement over the current building regulations: Ensuring all proposals for 10 or more dwellings achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations, until such time as the Building Regulations are increased to a level which exceeds this uplift and: c. Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources. d. Strongly encouraging all proposals for one or more dwellings and in particular residential development of 50 or more dwellings to: i. Achieve zero net-carbon emissions; ii. Maximise the use of on-site district heating and cooling systems, especially where these utilise renewable energy and iii. Maximise opportunities to connect to wider heating and cooling networks both for energy supply and export, especially where these utilise renewable energy
A0101B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Agree	Para 1a: Fully support Para 1b: should be amended to require all developments to comply with the requirements of the Building Regulations prevailing at the time
A0117B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Para 1a: Fully support Para 1b: should be amended to require all developments to comply with the requirements of the Building Regulations prevailing at the time
A0159B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Point 1 in DP12 does not mention the carbon emissions that arise from the transport choices made by residents when they move into new homes. Locations with no or poor public transports would increase the need for car usage. The Local Plan states that transport carbon is responsible for 33% of Shropshire's total carbon but transport is not used to support policies that explicitly and tangibly reduce car use. Para 4.114 mentions the 2008 Climate Change Act and not the 2019 "net zero by 2050" published on 27th June 2019.
A0238B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Agree	(Document Reference BTC21)Generally supportive of identified policies for controlling aspects of development related to carbon emissions, the natural environment, water, the historic environment, the Green Belt and AONB. For DP12: would support relaxing restrictions in Conservation Areas to explicitly allow any energy-efficient glazing that is reasonably consistent with local fenestration.
A0250B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12		The draft policies will increase development costs significantly, of which £246,689/ha of additional costs derive from climate change measures as calculated by the Council's Delivery & Viability Study The list of evidence relating to Policy DP12 in Appendix 3 (Key Evidence Informing Local Plan Policies) fails to mention the Council's Delivery & Viability Study in relation to policy DP12. Welcome acknowledgement in section 4 of Policy DP12 that requirements may make some development unviable, in particular the delivery of affordable housing. Support in general the measures to minimise carbon emissions but note that the explanatory text makes insufficient reference to the impact of the policy on viability and deliverability. In the interests of honesty and transparency, the explanatory text should note that the development industry is being asked to make significant sacrifices to achieve these higher standards and as a consequence some developments will be difficult to deliver. It will be necessary for the Council to recognise that a higher proportion of sites may not come forward, which will have a knock-on effect on land supply requirements. This consequence of the policy should be explicitly recognised in the Plan. The explanatory text does not explain how the policy will be implemented. Appendix 4 implies that this will be through condition, it is assumed planning officers will consult building control officer on whether compliance is achieved, but question whether building control (including private sector building control practices) have the resources to respond to such requests. If building control officers are required to check the detailed building designs of every new development, the Council must be able to evidence that the policy will not lead to undue delays, which in turn affect both the viability and delivery of development. <u>Given the potential for the operation of this policy to impose delays at the discharge of conditions stage, greater clarity is required over how the policy will be implemented in practice</u> This policy essentially serves as a counterpart to Policy DP3 and sets out various construction standards for both residential and commercial properties The policy provides a range of suggestions on the way new buildings can be as energy efficient as possible, including designing them to maximise fabric energy efficiency including such measures as: building orientation; high levels of insulation of roofs, floors and walls; maximising airtightness and using solar gain through window/door orientation whilst avoiding overheating. Specifically, the policy requires all new non-residential development of 1,000m ² or more floorspace or with a gross site area of 1ha or more will achieve the BREEAM Excellent rating. Please also see comments on proposed allocation SHR197VAR.
A0268B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12		This policy essentially serves as a counterpart to Policy DP3 and sets out various construction standards for both residential and commercial properties The policy provides a range of suggestions on the way new buildings can be as energy efficient as possible, including designing them to maximise fabric energy efficiency including such measures as: building orientation; high levels of insulation of roofs, floors and walls; maximising airtightness and using solar gain through window/door orientation whilst avoiding overheating. Specifically, the policy requires all new non-residential development of 1,000m ² or more floorspace or with a gross site area of 1ha or more will achieve the BREEAM Excellent rating. Please also see comments on proposed allocation SHR197VAR.
A0306B033	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Shropshire Wildlife Trust welcome this policy but feel that it needs both greater ambition and strength. DP12 (1c) We welcome this but we would like to see a commitment to an increased level of on-site renewable energy sources. DP12 (2) We believe large commercial/industrial developments must have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources. DP12 (4) Disappointing that when reducing carbon emissions and addressing climate change is balanced against profit, profit wins.
A0311B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is not enough, and 'low carbon energy sources' needs defining
A0323B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is not enough, and 'low carbon energy sources' needs defining (respondent ref; Form 13)
A0356B14	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is not enough, and 'low carbon energy sources' needs defining (respondent ref; Form 13)
A0413B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Part 1 c the minimum level of 10% renewable energy should be raised to 25%. Part 4 should state 'strongly demonstrate' and also 'show that there are no alternative solutions for the development'. The developers are responding to the need for higher standards and the provision of renewables, eve charging points and energy efficiency in their new designs for developments. It is important to build for the future and not provide slums that will need retrofitting. Part 5 should be added to support renewable energy schemes that are in line with national policies. The criteria for applications should be made clear and may need to be a separate Development policy (or DP 12 part one and two.)
A0430B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Object to DP12 as these are matters solely for Building Regulations and are not matters that should be included in the plan. DP12(1)(c) requires new residential development on sites of one or more dwellings to ensure that 10% of the predicted energy needs of the development be delivered from on-site renewable and low-carbon energy sources. DP12(1)(d) strongly encourages all proposals of 50 dwellings or more to achieve zero net-carbon emissions. Support the need to minimise carbon emissions and commend the Council's efforts towards creating a zero net-carbon emission society. But the Deregulation Act 2015 removed the provision set out in the Planning and Energy Act 2008 which allowed a local planning authority to include in their plans energy efficiency standards that exceeded the energy requirement of Building Regulations. The Written Ministerial Statement (March 2015) is clear in that local planning authorities should not set in their emerging Local Plans any requirements relating to the performance or construction of new dwellings. PPG is also clear that local planning authorities only have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. DP12(2) states that all non-residential developments of 1,000sqm or more will achieve BREEAM 'excellent' rating, and whilst buildings should be well-designed, this is not a matter for the plan.
A0486B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	DP12, Paragraph 4.114 contains an incorrect reference to the Climate Act and the need for 80% reduction in greenhouse gas emissions although the Act was amended in June 2019 to require net zero emissions by 2050. Paragraph 4.121 refers to District Heating schemes. It should be possible for these to obtain much of their heat from renewable resources in most cases using heat pumps sourcing heat from air, water or ground, waste, biomass and solar with batteries.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0642B36	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	This only talks about minimising emissions – not road to net zero. It is astonishing that the information in the Local Plan that transport carbon is responsible for 37% of Shropshire’s total carbon, transport is not used to support policies that explicitly and tangibly reduce car use. Transport carbon reduction is not mentioned in 1a-1d or sections 2, 3 and 4. Bearing in mind what has happened regularly with affordable housing, this leaves far too much scope for backtracking. 1c: We welcome this but we would like to see a commitment to an increased level of on-site renewable energy sources. 2: We believe large commercial/industrial developments must have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources. Comment on 3.108 is referenced: There is a contradiction within a single sentence! Development should “respond positively” but refer to environmental assets as “constraints”! Further definition on the meaning of a ‘positive response’ needed. This should include as a minimum actively enhancing biodiversity, as required by the NPPF, and supported by the Nature Recovery Strategy and Biodiversity Net Gain. 4. Disappointing that when reducing carbon emissions and addressing climate change is balanced against profit, profit wins!
A0647B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12:“ Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources.”10% is not enough, and ‘low carbon energy sources’ needs defining (respondent ref; Form 13)
A0648B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12:“ Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources.”10% is not enough, and ‘low carbon energy sources’ needs defining (respondent ref; Form 13)
A0696B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Don’t know / no opinion	An additional part should be added to the draft policy, supporting renewable energy schemes that are in line with national policies The criteria for applications should be made clear, this may need to be expressed in a separate/part 2 of the draft policy. Para 3.30 of the Explanation to SP3 relating to The Shropshire Council: Climate Change Strategy Framework can be read as only setting out carbon reduction technology to be used in the Shropshire Council estate. This draft policy needs to make it clear that the Theme and Example measures therein are available for use in all development within the scope of this draft Local Plan. The draft policy should also make clear that air-source and ground source heat systems are included and that other new technologies that may arise during the period covered by this plan will be considered for adoption
A0698B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12:“ Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources.”10% is not enough, and ‘low carbon energy sources’ needs defining (respondent ref; Form 13)
A0853B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Object to DP12(1)(b) and (1)(c) and (1)(d) which are well intentioned but inconsistent with national planning policy and guidance, which make clear that only the optional technical standards in NPPG can be sought in planning policy and so, these sections of DP12 should be deleted. In addition, DP12(1)(d) suggests that achieving zero net-carbon is not obligatory but paragraph 4 then goes on to state that: “The requirements expressed in this policy will apply unless it is demonstrated through open book accounting that they would make the development unviable, having regard to the policy requirements of the Local Plan, in particular the delivery of affordable housing”. This requirement indicates that DP12(1)(d) will apply in every case unless a developer can prove an exception to the policy.
A0862B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12		Support in general the measures to minimise carbon emissions. Explanatory text should note that the development industry is being asked to make significant sacrifices to achieve these higher standards. The list of evidence relating to Policies SP3 and DP12 in Appendix 3 (Key Evidence Informing Local Plan Policies) fails to mention the Council’s Local Plan Delivery & Viability Study in relation to either policy SP3 or DP12. The implications of reducing carbon emissions are estimated in the Local Plan Delivery & Viability Study. Draft policies will increase development costs significantly, of which £246,689/ha of additional costs derive from climate change measures as calculated by the Council’s Delivery & Viability Study. The significant costs deriving from draft Policy DP12 should be explicitly acknowledged by the Plan and reflected in reduced developer contributions in other areas, such as education and other s106 contributions. It will require higher densities in order to achieve viable developments. The explanatory text does not explain how the policy will be implemented. Local Plan Appendix 4 (Delivery and Monitoring Local Plan Policies) suggests measuring, “the proportion of planning consents in which the policy is referenced in planning conditions consistent with the policy criteria” (p321 of the Plan). The implication is that the policy will be applied through planning conditions. When applications to discharge those conditions are made, we can only assume that planning officers will consult building control for confirmation that buildings comply with the policy. We question whether building control (including private sector building control practices) have the resources to respond to such requests. If building control officers are required to check the detailed building designs of every new development, the Council must be able to evidence that the policy will not lead to undue delays, which in turn affect both the viability and delivery of development. Given the potential for the operation of this policy to impose delays at the discharge of conditions stage, greater clarity is required over how the policy will be implemented in practice
A0896B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Galliers Homes generally support Policy DP12 and measures to minimise carbon emissions but note that the explanatory text makes insufficient reference to the impact of DP12 on viability and deliverability. In the interests of honesty and transparency, the explanatory text should note that the development industry is being asked to make significant sacrifices to achieve these higher standards and as a consequence some developments will be difficult to deliver. It will be necessary for the Council to recognise that a higher proportion of sites may not come forward, which will have a knock-on effect on land supply requirements. This consequence of the policy should be explicitly recognised in the Plan although DP12(4) acknowledges that these requirements may make some development unviable, in particular the delivery of affordable housing. The list of evidence relating to Policy DP12 in Appendix 3 (Key Evidence Informing Local Plan Policies) fails to mention the Council’s Local Plan Delivery & Viability Study in relation to policy DP12. The implications of reducing carbon emissions are estimated in paragraph 12.63 of the Local Plan Delivery & Viability Study and draft policies will increase development costs significantly, of which £246,689/ha of additional costs derive from climate change measures as calculated by the Council’s Delivery & Viability Study and summarised in table 12.8 on page 233 of that study. The significant costs deriving from policy DP12 should be explicitly acknowledged by the Plan and reflected in reduced developer contributions in other areas, such as education and affordable housing. The explanatory text does not explain how the policy will be implemented. Local Plan Appendix 4 (Delivery and Monitoring Local Plan Policies) suggests measuring, “the proportion of planning consents in which the policy is referenced in planning conditions consistent with the policy criteria” (p321 of the Plan). The implication is that the policy will be applied through planning conditions. We can only assume that planning officers will consult building control for confirmation that buildings comply with the policy, but question whether building control (including private sector building control practices) have the resources to respond to such requests. If building control officers are required to check the detailed building designs of every new development, the Council must be able to evidence that the policy will not lead to undue delays, which in turn affect both the viability and delivery of development. Given the potential for the operation of this policy to impose delays at the discharge of conditions stage, greater clarity is required over how the policy will be implemented in practice. In light of the above, we suggest an additional explanatory paragraphs below paragraph 4.121 of the policy stating: “In recognition of the significant impact of policy DP12 on the viability of development and on the proportion of sites that may in consequence not be deliverable, the Council will apply a 20% buffer to its housing land supply in order to prevent any negative impact on housing delivery. The Council will ensure that the policy does not lead to delays in processing applications, including applications to discharge conditions”.
A0897B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Draft policies will increase development costs significantly. £246,689/ha of additional costs derive from climate change measures (Table 12.8 of the Council’s Delivery & Viability Study). Welcome the acknowledgement in section 4 of draft Policy DP12 that these requirements may make some development unviable, in particular the delivery of affordable housing. The Council’s Delivery and Viability Study shows the effect of the proposed policies on the viability of different types of sites. A site is considered viable if the residual land value exceeds ‘benchmark land value’. For large greenfield sites this is £425,000/ha, for small greenfield sites it is £500,000/ha and for brownfield sites it is £600,000/ha. The Study’s concludes a high proportion of sites coloured red are ‘not viable’ and that “The results clearly show a challenging viability context in Shropshire.” The list of evidence relating to Policy DP12 in Appendix 3 fails to mention the Council’s Delivery & Viability Study. Given the vital importance of the Delivery & Viability Study, it should be referenced in Appendix 3 of the Plan. Generally support measures to minimise carbon emissions but note the explanatory text makes insufficient reference to impact on viability and deliverability. Explanatory text should note that the development industry is being asked to make a significant stretch to achieve these higher standards and as a consequence some developments will be difficult to deliver without a reduction in affordable housing to compensate for the additional costs. Other developments will simply be rendered unviable. The Council should recognise a higher proportion of sites will not come forward, which will have a knock-on effect on land supply requirements. It may be necessary to identify 133% of the land needed in order to be able to deliver 100% of the housing required. Consequences should be specifically recognised in the draft Local Plan. The Policy Explanation does not explain how draft Policy DP12 will be implemented. Appendix 4 suggests measuring, “the proportion of planning consents in which the policy is referenced in planning conditions consistent with the policy criteria”. Given potential for this to impose delays at discharge of conditions stage, greater clarity is required over how the policy will be implemented in practice. It is currently far from clear whether the policy is viable or achievable.
A0984B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12		Part 1c of this draft policy requires new residential development on sites of one or more dwellings to ensure that 10% of the predicted energy needs of the development are delivered from on-site renewable and low-carbon energy sources. Whilst supportive of the need to minimise carbon emissions, there is a need to be aware that energy requirements for new housing development are a matter solely for Building Regulations. Part 1d of this draft policy strongly encourages all proposals of 50 dwellings or more to achieve zero net-carbon emissions. Use of the words ‘strongly encourages; suggests flexibility, and that this would not be a requirement for all such development. Support the flexibility within this policy, given that this may not be possible for all sites and the end of the plan period is some 12 years from 2050 (Governments target date for net zero greenhouse gas emission housing) which will allow further time for different building materials to be uncovered which make such aspirations more achievable. Suggest the wording is amended to state ‘encourages’ and opposed to ‘strongly encourages’ to ensure that zero net-carbon emissions are achieved where possible. Part 2 of this draft policy requires all non-residential developments of 1,000m2 or more will achieve BREEAM ‘excellent’ rating. Whilst supportive of the delivery of sustainable and well-designed/constructed buildings, to achieve BREEAM excellent the building would be within the top 10% of the UK’s new non- domestic buildings. This is considered to be a very high bar for developments of over 1,000m2 to achieve. Suggest achieving a minimum BREEAM rating of ‘very good’ to be more appropriate and where possible/appropriate, an excellent rating. As noted within the viability assessment, the additional cost of building to BREEAM ‘Very Good’ standard is negligible however there are significant additional costs to achieving BREEAM ‘Excellent’ standard. Part 4 notes that the requirements expressed within the policy will apply unless it is demonstrated through open book accounting that it would make the development unviable. Support recognition that some requirements may not be deliverable/viable on all schemes and welcome the flexibility to provide a reduction in the requirements where appropriate.
A1106B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Policy DP12. ‘Minimising Carbon Emissions’ states that it is expected “all proposals for 10 or more dwellings achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations.” Although we support that this policy doesn’t exceed the 2013 regulations, it should be noted that those regulations are not permanent. The ‘Future Homes Standard’ consultation on Part L of the Building Regulations ended in February 2020. The Future Homes Standard is targeted for publication by 2025 and therefore it will be unlikely to have any bearing on this local plan’s policies. However, it does, demonstrate that the regulations are subject to change. It is important that Shropshire ensure that local policy aligns with national guidance. The ‘Future Homes Standard’ consultation noted that the energy performance requirements increase the costs for home builders and goes on to propose removing the ability of local planning authorities to set higher energy efficiency standards than those in the Building Regulations. DP12. also states that it will be expected that “all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources”. Although the aspiration of the council to promote more sustainable methods of extracting and creating energy, the cost to install the required technologies is often financially costly, this cost can significantly impact on viability making this policy unworkable for some developments. The DLP does state that these measures can be avoided by demonstrating via “open book accounting” that they would make the development unviable. We support this clause but submit that it would be helpful if further guidance was given with regard to the relationship between affordable housing, climate change measures and viability; namely which matter should be prioritised within viability assessments.
A1116B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	The details of DP12 seem to have been framed along the right lines, including building orientation which has been overlooked for too long. There needs to be encouragement for innovative approaches to design that can create a sense of place as well as achieving energy efficiency e.g. there are examples of recent designs where dwellings have been linked to achieve a high architectural standard combined with energy efficiency. Also, PassivHaus must be a development requirement from individual to any number of new dwellings if we are to meet the need to reduce carbon emissions well before 2050 - as set out in the Centre for Alternative Technology’s (CAT) Zero Carbon Britain Report (www.cat.org.uk) PassivHaus is seen and promoted as a requirement for all new development by the majority of those who are climate-aware.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments																
A1143B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	<p>There appears to be two fundamental flaws in this policy (Climate Change):</p> <p>(i) This policy appears to focus entirely of domestic development, and if it is intended to include industrial and agricultural developments it should clearly say so.</p> <p>(ii) The policy identifies the need to adapt and mitigate against the emission of green house gases (GHGs) that contribute to climate change and then focuses only on CO2 with the complete exclusion of comment on the other important GHGs. Policy SP3 identifies Shropshire's 2017 GHG emissions as being 1.76 million tonnes CO2e. In this statement the (e) is presumed to stand for CO2 and other greenhouse gasses (CO2 + CH4 + N2O etc) but the policy makes no reference to the other green house gasses many of which cause equally disastrous effects to CO2:</p> <table border="1"> <thead> <tr> <th>Greenhouse gas</th> <th>Global Warming potential</th> </tr> </thead> <tbody> <tr> <td>Carbon dioxide (CO2)</td> <td>1 (20-20 years in atmosphere)</td> </tr> <tr> <td>Methane (CH4)</td> <td>25 (12-15 years in atmosphere)</td> </tr> <tr> <td>Nitrous oxide (N2O)</td> <td>298 (>100 years in atmosphere)</td> </tr> <tr> <td>Hydro fluorocarbons (HFCs)</td> <td>124-14,800</td> </tr> <tr> <td>Perfluorocarbons (PFCs)</td> <td>7,390-12,200</td> </tr> <tr> <td>Sulphur hexafluoride (SF6)</td> <td>22,800</td> </tr> <tr> <td>Nitrogen trifluoride (NF3)</td> <td>317,200</td> </tr> </tbody> </table> <p>IPCC Source – (2007).IPCCFourthAssessmentReport:ClimateChange2007.IntergovernmentalPanelon Climate Change. Cambridge University Press, Cambridge.</p> <p>For Shropshire as an agricultural county methane and nitrous oxide are of particular relevance and should not be ignored in this policy or in policies SP3 SP9(d) & paragraph 3.84.</p> <p>E.G of England GHG emissions for agriculture 2017: m tonnesCO2e CO2 - 5.6 N2O - 14.3 CH4 - 25.7</p> <p>Agriculture accounts for about 10% of total UK GHG emissions. development of agricultural in the county should be seen to seek to reduce more than just CO2 reductions. I disagree with this policy because it is not complete and fails to address the wider issue.</p>	Greenhouse gas	Global Warming potential	Carbon dioxide (CO2)	1 (20-20 years in atmosphere)	Methane (CH4)	25 (12-15 years in atmosphere)	Nitrous oxide (N2O)	298 (>100 years in atmosphere)	Hydro fluorocarbons (HFCs)	124-14,800	Perfluorocarbons (PFCs)	7,390-12,200	Sulphur hexafluoride (SF6)	22,800	Nitrogen trifluoride (NF3)	317,200
Greenhouse gas	Global Warming potential																			
Carbon dioxide (CO2)	1 (20-20 years in atmosphere)																			
Methane (CH4)	25 (12-15 years in atmosphere)																			
Nitrous oxide (N2O)	298 (>100 years in atmosphere)																			
Hydro fluorocarbons (HFCs)	124-14,800																			
Perfluorocarbons (PFCs)	7,390-12,200																			
Sulphur hexafluoride (SF6)	22,800																			
Nitrogen trifluoride (NF3)	317,200																			
A1152B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Agree	<p>Agree but it does not go far enough.</p> <p>Strongly agree on the need to minimise carbon emissions, and the hierarchy shown in para 4.116. However, the fact remains that until zero carbon new builds (housing and employment), all development will continue to contribute to making the problem of global warming worse, not better. The hope embedded in the policy is presumably that before the zero-carbon deadline of 2030 is upon us, costs of the technology will somehow have reduced such that the provisions in para 4 of the draft policy and 4.4.120 of the explanation as to viability (i.e. profit) will not need to apply.</p>																
A1629B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	<p>I agree in principle with PP12 but object to the potential weakening of the policy by Paragraph 4. To quote "The requirements expressed in this policy will apply unless it is demonstrated through open book accounting that they would make the development unviable, having regard to the policy requirements of the Local Plan, in particular the delivery of affordable housing."</p> <p>This paragraph is unnecessary and should be deleted as it provides a potential loophole in the policies set out in Paragraphs 1 to 3 which should be applied with rigour if emissions are to be minimised.</p> <p>The policy should not be influenced by, or traded off against, a separate policy aimed at provision of affordable housing.</p> <p>The policy should include measures to ensure that housing development will not unduly increase transport emissions, by location close to public transport, cycleways and walkways, and by the provision of electric car hire facilities. Also low cost housing should be available to those willing to forego parking space, thereby reducing the cost of such provision.</p>																
A1630B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	<p>The NFU has recently set out is aspiration for the farming sector to achieve net zero by 2040. The three pillars are outlined in the NFU's net zero plan: productivity, carbon storage and renewables and bioenergy. We are involved in a number of initiatives nationally and locally which focus on this aspiration.</p>																
A1634B04	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	<p>It is encouraging to see some commitment to renewable energy in SP3 and DP12, with passing reference in DP35. As stated in DP12: "Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources." 10% is not enough, and 'low carbon energy sources' needs defining (respondent ref; Form 13)</p>																
A2163B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	<p>Requirements for fabric energy efficiency, minimum energy performance requirements and low carbon energy systems should not undermine the deliverability of the Plan, as stated in para 34 of the NPPF. This draft policy seeks to achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations, and that 10% of predicted energy needs is from on-site renewable and low carbon energy sources.</p> <p>It also strongly encourages that new dwellings, particularly those for 50 or more dwellings, achieve zero net-carbon emissions, utilise district heating and cooling systems and connect to wider heating and cooling networks both for energy supply and export.</p> <p>There is no justification for why 10% of energy needs is required to come from onsite renewable and low carbon energy sources. As long as power comes from renewable and low carbon sources, it should not matter whether this is sourced on or off-site. Para 151 of the NPPF promotes use and supply of renewable and low carbon energy and heat, but does not specify that these must be met onsite. Therefore, this policy is not justifiable as the delivery mechanism should be flexible to enable developers to provide their own solutions rather than providing onerous requirements that are too prescriptive and may stifle development from being delivered.</p> <p>District wide heating/cooling systems, may be unsuitable as they may be unreliable, expensive and may also attract high management and repair costs. Also, the current predominant technology for district wide heating is gas combined heat and power (CHP) plants, with over 90% of district networks being gas fired. Furthermore, some heat network consumers do not have comparable levels of satisfaction as those on standard gas and electricity networks, and pay a higher price. Given that there are other options such as solar and alternative off-site generations of carbon neutral energy, which may be more reliable maintenance free options, there is no justification for an emphasis on on-site district heating.</p> <p>The policy should be flexible, not prescriptive, so that it can keep pace with technology which is dynamic, whilst the local plan process is not.</p> <p>The broad principles of this draft policy should be further refined as changes have already been made to Building Regulations to achieve energy efficiency standards. Building Regulations already considers the energy efficiency of buildings and this policy, as worded, adds no material value and will potentially stymie development that accords with government/building regulation standards. Any requirement that goes beyond building regulations should be informed by detailed evidence, as to viability, when evidenced with the objectives of the Plan when read as a whole.</p> <p>This draft policy should be amended in order to be found sound, as it needs to be fully justified and compliant with national policy.</p>																
A2177B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	<p>Draft Policy requires: maximising fabric energy efficiency ;</p> <ul style="list-style-type: none"> all proposals for 10 or more dwellings achieving a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations, until such time as the Building Regulations are increased to a level which exceeds this uplift ; all proposals providing a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources ; and encouraging all proposals in particular residential development of 50 or more dwellings to achieve zero net-carbon emissions, to use on-site district heating / cooling systems, and to connect to wider heating / cooling networks both for energy supply and export, especially where these utilise renewable energy. <p>The Council is committed to an overall goal of making Shropshire net greenhouse gas neutral by 2030. Consider the Council's policy approach to climate change should reflect the Government's proposals on levels of energy efficiency, heat networks, electric vehicle charging points (EVCP) and water efficiency.</p> <p>Government's Future Homes Standard consultation (ended 07/02/2020), indicated the UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The consultation addressed:</p> <ul style="list-style-type: none"> options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations ; transitional arrangements to encourage quicker implementation; and clarifying the role of Councils in setting energy efficiency standards. <p>Government estimated Future Homes Standard increased costs by circa £2,557 - £4,847 per dwelling. The Council's own viability assessment identified viability challenges across the County and the cumulative impact of proposed policy requirements threatens housing delivery (see HBF response under Viability).</p> <p>The Council is also referred to the consultation on Heat Networks: Building A Market Framework (ended on 1st June 2020). To meet the Government's legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.</p> <p>Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means future price regulation is required to protect domestic consumers. The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.</p> <p>Council's proposed policy approach is unnecessary because of the Government's Future Homes Standard proposals. Before the pre-submission LPR consultation, Draft Policy SP3 Bullet Points 1f, 2a, 2b & 4d and Draft Policy DP12 Bullet Points 1a, 1b, 1c & 1d should be deleted.</p>																
A2180B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	<p>We would urge Planners to look at the Stroud and (now approved) Oxford Local Plans and their ambitions for minimising carbon emissions. Both aim high by setting the reduction in emissions from the Building Regulations target and allowing achievement to be achieved through higher fabric standards, onsite renewables and offsetting contributions. Shropshire currently only sets fabric condition as is now common (+19%) + 10% Merton Rule. Oxford also sets a sliding scale which increases the demand over time in line with the requirement to move towards zero carbon and as the technology gets cheaper and more widespread. All London development now requires an Energy Statement explaining how the development, in actual use, will achieve targets, and Oxford is now requiring this too. We ask that the Shropshire Local Plan does this also. The wording should be strengthened in this area. The Shropshire Plan says 'strongly encouraging' whereas Stroud states 'should' and Oxford says 'will'. That this is possible in Shropshire is shown by the inclusion of 'will' when it comes to non-residential large developments achieving BREEAM excellent standard. Additionally this policy should be requiring no gas usage on new development sites.</p>																

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2194B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	The paragraph in DP12 states: a. Being designed to maximise fabric energy efficiency including such measures as: building orientation; high levels of insulation of roofs, floors and walls; maximising airtightness and using solar gain through window/door orientation whilst avoiding overheating and: b. Ensuring all proposals for 10 or more dwellings achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations, until such time as the Building Regulations are increased to a level which exceeds this uplift and: c. Ensuring all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources. These stipulations for buildings are significantly lacking in ambition. All such buildings should be carbon neutral in future., and the aspiration should be that ALL energy needs are from renewable and low carbon energy sources, to ensure Shropshire meets its aspirations in relation to the climate emergency. Furthermore, it should be ensured that provision for electric vehicle charging is included within the energy efficiency concerns of the development, with attention to economies of scale
A2308B36	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Would like to see this draft policy recognise that there are appropriate alternative environmental performance assessment tools, equivalent to BREEAM. Specifically, would like to see reference to the Defence Related Environmental Assessment Method (DREAM) which is an environmental assessment tool developed by the Defence Infrastructure Organisation for new build and refurbishment projects on the defence estate. The draft policy contains references to renewable energy sources but provides no criteria against which applications for generation would be assessed. Wind turbines have the capacity to have a considerable impact on both aviation safety and operation of radar and technical assets. Recommend that the draft policy echoes Government's Planning Practice Guidance and makes clear that MOD will be consulted where a proposed turbine is 11 metres to blade tip or taller, and/or has a rotor diameter of 2 metres or more. This will allow the impacts of the turbine(s) to be assessed and appropriate guidance provided.
A2321B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	As set out above, the 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020. Policy DP12 should therefore be deleted as it will be a duplication of national guidance.
A2323B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12		The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be futureproofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020. Therefore, Building Regulations will require developers to build more resilient homes to assist the Council in achieving their targets. Consider that Policy DP12 is not required due to the fact that the Council's ambitions to minimise Carbon Emissions are set out in draft policy SP3 and any new homes will have to be in compliance with the proposed changes to Building Regulations. This policy should therefore be delete
A2398B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	Draft Policy SP3 and related draft Policy DP12 discuss the need to integrate renewable and low carbon energy systems into residential development. DP12 expands on this by stating that 10% of the predicted energy needs of a development needs to come from these two sources on-site; with it also requiring a minimum 19% improvement in the energy performance requirement of the 2013 Part L Building Regulations. Para 4.116 of the policy Explanation describes the five stages of the energy hierarchy and that energy options should be pursued in the following order: a. Reduce the need for energy; b. Use energy more efficiently; c. Use renewable energy; d. Use low carbon sources; and e. Use conventional energy. Council is correct to use the energy hierarchy but they appear to circumnavigate it by jumping straight to renewable and low carbon sources. Primary aim should be to reduce energy use; it should not matter if that can be achieved through a fabric first approach. A more sophisticated approach is needed than is currently being suggested.
A2406B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Disagree	This draft Policy requires a BREEAM assessment for all new non-residential development of 1,000sq.m or more floorspace, or with a gross site area of 1ha or more and that such developments achieve a BREEAM Excellent rating The draft Policy states that the requirement will apply unless it is demonstrated through open book accounting that they would make the development unviable. Whilst supportive of sustainable design and seeking opportunities to minimise carbon emissions, the blanket requirement to achieve BREEAM Excellent is onerous and not supported on the basis that it is unviable and not deliverable. In accordance with para 16 of the NPPF, consider this draft policy requirement would not be deliverable by many organisations (particularly charitable and not-for-profit organisations) due to significant viability implications. Consider the draft policy should be amended to ensure all charitable and not-for-profit organisations are exempt from this requirement, without having to produce a full open book viability assessment at the planning application stage.
A2407B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP12	Agree	We note that the plan has a strategic policy SP2 specifically around climate change and Natural England would support this. We also consider that addressing climate change is a theme throughout the plan and that there are specific development management policies (DP12) to minimise carbon in new developments. Natural England supports this approach, especially with regard to the climate emergency and climate change running as a thread throughout the whole plan.
A0101B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Agree	No comment
A0187B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	This policy does not go far enough to encourage land use change to reduce CO2 emissions. It needs to set targets, deadlines and publish baseline data.
A0189B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	This policy does not go far enough to encourage land use change to reduce CO2 emissions. It needs to set targets, deadlines and publish baseline data (respondent ref form 16).
A0198B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Disagree with Para 8 d as the only clause in the policy that is prefaced with "Encouraging" rather than "Ensuring" i.e. "Encouraging new development to plant new trees, woodland, and hedgerows" "A suitable and effective new clause would read," Ensuring that all new developments will achieve at least 20% Tree Canopy Cover (TCC). This would allow application of respected & widely used Tree Canopy Cover approach pioneered by Wycombe Council. This requirement sought by tree team also for many of the Shropshire Council's planning application approvals. TCC is easy to assess using Google Earth mapping and would transform and give environmental benefits, character to all new developments and prevent bland treeless building estates as well as increase house values. TCC could be a valuable part of the requirement of 10% net gain to the environment.
A0198B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Biodiversity Net Gain. Welcome the adoption of Net Gain in policy derived from the New Environment Bill 2020. However, disagree with policy, as it is incomplete. Suggested new policy- Degradated Habitats as a result of stronger requirement for Net Gain "The Local Authority will address concerns about new Net Gain driving habitat degradation prior to planning applications, through suitable provision in legislation. Decision makers will be supported with clear guidance on using appropriate base line data" Shropshire Local Plan needs to reference how the LA will respond to the Governments promise of legislation and support reflected in Government response to consultation replies Environment Bill : "The Government will address concerns about net gain driving habitat degradation prior to applications through suitable provisions in legislation Decision makers will be supported with clear guidance on using appropriate baseline data". A new policy with its legislation and implementation should discourage new unlawful acts of wilful destruction of trees, habitats and wildlife prior to a planning application
A0238B35	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Agree	Document Reference BTC21 :Generally supportive of identified policies for controlling aspects of development related to carbon emissions, the natural environment, water, the historic environment, the Green Belt and AONB.
A0238B40	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Agree	This policy does not go far enough to encourage land use change to reduce CO2 emissions. It needs to set targets, deadlines and publish baseline data (respondent ref form 16).
A0266B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The plan does not reflect what we now know about the dangerous decline in biodiversity. It reads as something written prior to the widespread recognition of the scale of the challenge, and of the economic and carbon-capture opportunities available through best practice UN agreed targets look for 30% of land and sea to be protected. Shropshire currently 'protects' (to varying degrees) 15%. The plan should be looking to ensure 30% of the land is protected. So a 10% increase in biodiversity contained in the plan falls far short of what is required. Shropshire should be aiming for a doubling of protected habitats, especially considering the potential for biodiversity gain in a largely rural county and the lack thereof for many other planning authorities. Possible biodiversity loss mitigation seems to include the possibility for unspecified financial contributions that do not immediately identify opportunities for compensation. Good practice elsewhere is that compensation schemes are identified and put in train as a condition of development, rather than as a yet-to-be-determined schemes, by which time further biodiversity loss may well have occurred. The dated nature of the plan is reflected in the lack of reference to a range of national and local policies and strategies that relate to the environment: the 25 year plan for the environment; the Environment Act; nature recovery networks or nature recovery strategies; the marches woodland strategy. Whilst reference is made to EU protected sites (SACs, as legally obliged) there are no policies for protecting and enhancing SSSIs, local nature reserves or wildlife sites. The Shropshire Council identified Environmental Network is hardly mentioned and some settlement policies and site allocations will conflict with this. Indeed some sustainability appraisals overlook SSSI and wildlife sites in site assessments (for further detail see submission from Shropshire Wildlife Trust). Low ambition is evidenced in the wording throughout; many policies are expressed as aspirations rather than as requirements; environmental features are described as 'constraints' rather than as assets. The plan aims low in many areas: for example, BREEAM 'Good' standard for water is expected, not 'excellent' or 'outstanding'
A0306B034	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	(3) The ambition of 10% gain for nature is not ambitious enough; both the Wildlife Trusts and the UN have identified a need for 30% of land to be protected and in recovery for nature. Government proposals are for at least 10% gain, why are we only looking at the minimum figure? The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan. DP13 (4) Add areas within any future Nature Recovery Network to the list to be assessed. DP13 (5) Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed should be refused. Exceptions should only be made in the most exceptional circumstances and there would need to be a clear methodology for how you compare the value of a natural asset to economic or social benefit. DP13 (7) The 'bigger' element of the Lawton principle is missing here. Policies should seek to maximise the size of environmental assets. DP13 (8) We would like to see reference to the Marches Woodland Strategy. DP13 (8c & 8e) We would like to see greater emphasis on protecting existing trees/woodland/hedgerow assets. Using phrases such as 'overriding reasons/benefits for development to proceed' is unclear and will result in the loss of existing trees and hedgerows. Replace hedgerows with hedgerows at least as diverse, or ideally more, in conjunction with biodiversity enhancement and gain
A0306B035	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 4.124 Both priority habitats and species, as outlined by Natural England should be added to the list of triggers for assessment.
A0306B036	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 4.129 There is a high level of subjectivity and scope for how biodiversity net gain will be determined. For most schemes the Local Authority ecologists will be able to determine biodiversity net gain however, in some circumstances partner organisations, such as Natural England and SWT, should be consulted. We would assume the biodiversity net gain assessments will be done using the latest Defra metric. We feel there needs to be explicit mention of how biodiversity net gain will be monitored and assessed to ensure long-term net gain is delivered.
A0306B037	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 4.131 We understand that the Nature Recovery Network under the Local Nature Strategy will be superseding the SEN. We would like this to be clear in this wording.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0306B038	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 4.133 How are public benefits and the value of effected assets going to be measured and assessed against each other? Para 4.133 (c) Include reference to biodiversity net gain as part of compensation measures.
A0306B039	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 4.136 Whether on or off-site mitigation/compensation is proposed, the measures need to be delivered in a timely manner in accordance with biodiversity net gain principle (CIEEM). We view a 'timely manner' to be measure in place prior to the loss of assets. This gives us particular concern in para 4.137 where the delivery of measures is unclear.
A0306B040	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 4.137 It should be made clear that this is very much an option of last resort. Given both best practice and the current state of the natural environment
A0306B041	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 4.140 We would like to see greater emphasis on protecting existing trees/woodland/hedgerow assets. Using phrases such as 'overriding reasons/benefits for development to proceed' is unclear and will result in the loss of existing trees and hedgerows. Replace hedgerows with hedgerows at least as diverse, or ideally more, in conjunction with biodiversity enhancement and gain.
A0311B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting
A0323B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting (respondent ref; Form 16)
A0341B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting (respondent ref; Form 16)
A0398B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Biodiversity I strongly support 4.156 However, p92 DP13 1, 4.122 ignores Shropshire natural assets of trees, hedgerows and pastures which re the first thing newcomers notice on our beautiful landscapes. Far too much emphasis in this document on protecting designated sites which account for only 6% of Shropshire. Only one of the many walks in and round Much Wenlock which draws many tourists, actually includes a designated site. The document includes ambitions to increase habitat with tree and hedge planting. DP13, 3, promotes this but a hedge of mixed species will promote higher diversity than privet, cypress or laurel. (Such a hedge on Walton Hill along with undergrowth including nettles which are the food plant of many insects including 5 common butterflies annually results in a spectacular diversity and number of butterfly species). Offering potential buyer and option of a fence or mixed hedge, might add to peripheral hedging to new estates, tree planting or other measures to achieve the 10% In the Natural Environment section, 4.13 biodiversity onsite is to be encouraged. I suggest:- a) our dwindling number of hedgehogs can be encouraged to include new build sites in their nightly rambles of around 2 miles, by incorporating access between properties. A CD sized hole in or under boundaries facilitates this. b) retention of front gardens of new builds. 20% of front gardens are subsequently tarmacked or hard landscaped. Provision of a garage and drive o accommodate two cars should be encouraged in new builds but remaining vegetation left to encourage biodiversity. DP11 promotes the connection between visitors and Shropshire's natural environment. Hedgerows, trees, pastureland and views and accessibility to numerous paths are the main attraction, not just designated sites. Most people walking for their health and pleasure seek out the quieter routes. Please preserve the existing hedges and trees and walking routes. DP16 lacks promotion of biodiversity which is easy to include on playing pitches, playgrounds and public parks. Include mixed hedging with undergrowth including nettles, job done. Or do a Jmie Oliver and build a meadow bank.
A0430B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Support DP13 but ask that certain matters are kept under review. DP13(1) and (2) are supported, which seek to protect designated sites and priority species and habitats. DP13(3) requires all development to deliver at least 10% net gain for biodiversity. The NPPF says that planning policies and decisions should minimise the impacts on and provide net gains for biodiversity (paragraph 170) and that in order to protect and enhance biodiversity and geodiversity, plans should identify and pursue opportunities for securing measurable net gains for biodiversity (paragraph 174). Whilst the NPPF does not refer specifically to a 10% net gain, the Environmental Bill is due to be enacted towards the end of year which will require developers to ensure habitats for wildlife are enhanced with a 10% increase in habitat value for wildlife. On this basis, there is no issue with DP13(3) but suggest that the Council monitor progress of the Environmental Bill and any policy reforms and ensure that the policy reflects the latest guidance prior to examination. DP13 (4) to (7) seek to protect natural assets within the County, which include Local Wildlife Sites, Local Geological Sites, Local Nature Reserves and Local Green Spaces, and sets the hierarchy of avoidance, mitigation and compensation. These are fully supported. DP13(8) seeks to retain trees, woodland and hedgerows where possible and increase the extent and distribution of trees and hedgerows. The retention and planting of trees will assist in delivering the Council's vision for the green infrastructure within the County and there is no issue with this.
A0447B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	It is madness that crops grown in an area are not consumed locally. Need to encourage communities to grow their own produce, establish shops selling local produce (which could subndent many modern functions not previously available – cafés, parcel delivery centres, home working facilities, walking, and bike hire and transport hubs etc.) Transport and housing is important in this context. Proposals are predictable there needs to be creativity too. The context of the profound emergency that the world is and will increasingly experience as a result of pollution of land, sea and air and destruction of the natural world the plan is in general shockingly inadequate, not to say feeble in general tone.
A0450B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Policy DP13 needs to consider whether a 10% net gain in biodiversity is a good target or whether it is too low. The Policy must then identify measures to assess whether significant housing developments are actually achieving this net gain in biodiversity given the disruption and destruction of habitats during the construction of the development.
A0501B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting (respondent ref; Form 16)
A0642B37	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	References Shropshire Green Infrastructure Strategy – but I don't think that this is publicly available/exists? A contract was let for its development and the document quotes it as 2020. The ambition of 10% gain for nature is not ambitious enough; both the Wildlife Trusts and the UN have identified a need for 30% of land to be protected and recovery for nature. Government proposals are for at least 10% gain, why are we only looking at the minimum figure? The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan. 4: Add areas within any future Nature Recovery Network to the list to be assessed. 5: Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed should be refused. Exceptions should only be made in the most exceptional circumstances and there would need to be a clear methodology for how you compare the value of a natural asset to economic or social benefit.
A0647B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Desire to conserve, enhance and restore Shropshire's natural environment is welcome. However it appears at odds with practices at a local level including cutting down trees without permission, planning new roads over sensitive areas and prioritising building over environmen Land use is one of the four key net zero strategies. Currently almost 40% (or more) of our food and around 70% of fruit and vegetables are imported. We could become more self-reliant in food, (reducing imports from 42% to 17%) and reducing the impact of food production/consumption elsewhere in the world. Health would also be improved by eating a better and more balanced diet and 75% of the land currently used for grazing livestock could be repurposed, freeing up space for a range of other uses, which could also offer new income streams to farmers. Making these changes would release enough land in the UK not only for producing food but to offer new potential income streams. UK sourced biomass can be used as a fuel and combined with hydrogen from surplus renewables to make carbon neutral synthetic gas and liquid fuels, which increases the amount of fuel produced per acre of land. These are 'carbon neutral' as the greenhouse gases they contain were initially captured by the biomass as it grew, resulting in no net increase in the atmosphere. Forest area is doubled to 24% of the land area of the UK, roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas. Local Plans needs to be down to earth and set targets & deadlines, publish baseline data and present clear plans. The Oswestry Place Plan is particularly proactive in seeking re-planting of woodlands, tree surveys and setting a target: "A survey of trees in the town in order to inform future planting and to provide a baseline. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%) (Oswestry Town)". Other Place Plans also seek to restore verges as well as increasing tree planting. The support exists in the county, and the county local plan needs to take the lead. I disagree with this policy because it is incomplete.
A0648B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Desire to conserve, enhance and restore Shropshire's natural environment is welcome. However it appears at odds with practices at a local level including cutting down trees without permission, planning new roads over sensitive areas and prioritising building over environmen Land use is one of the four key net zero strategies. Currently almost 40% (or more) of our food and around 70% of fruit and vegetables are imported. We could become more self-reliant in food, (reducing imports from 42% to 17%) and reducing the impact of food production/consumption elsewhere in the world. Health would also be improved by eating a better and more balanced diet and 75% of the land currently used for grazing livestock could be repurposed, freeing up space for a range of other uses, which could also offer new income streams to farmers. Making these changes would release enough land in the UK not only for producing food but to offer new potential income streams. UK sourced biomass can be used as a fuel and combined with hydrogen from surplus renewables to make carbon neutral synthetic gas and liquid fuels, which increases the amount of fuel produced per acre of land. These are 'carbon neutral' as the greenhouse gases they contain were initially captured by the biomass as it grew, resulting in no net increase in the atmosphere. Forest area is doubled to 24% of the land area of the UK, roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas. Local Plans needs to be down to earth and set targets & deadlines, publish baseline data and present clear plans. The Oswestry Place Plan is particularly proactive in seeking re-planting of woodlands, tree surveys and setting a target: "A survey of trees in the town in order to inform future planting and to provide a baseline. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%) (Oswestry Town)". Other Place Plans also seek to restore verges as well as increasing tree planting. The support exists in the county, and the county local plan needs to take the lead. I disagree with this policy because it is incomplete.
A0670B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. At a local level it appears at odds with the practices commonly seen of cutting down trees without permission, planning new roads over sensitive areas and prioritising building over environment. Moving beyond this, the way we use land is one of the four key net zero strategies. We currently import almost 40% (or more) of our food and around 70% of our fruit and vegetables. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. Our health would be improved by eating a better and more balanced diet and 75% of the land currently used for grazing livestock could be repurposed, freeing up space for a range of other uses, which could also offer new income streams to farmers. Making these changes would mean that we have enough land in the UK not only for producing food but to offer new potential income streams. As well as being used directly as a fuel, UK sourced biomass can be combined with hydrogen from surplus renewables to make carbon neutral synthetic gas and liquid fuels, which increases the amount of fuel produced per acre of land. These are 'carbon neutral' as the greenhouse gases they contain were initially captured by the biomass as it grew, resulting in no net increase in the atmosphere. Forest area is doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas. A recent study: "Sheep farmers could make more money by growing trees instead" https://www.edp24.co.uk/business/farming/university-of-sheffield-studies-sheep-and-woodlands-1-6821180As in so many areas the local plans needs to be down to earth and set targets & deadlines, publish baseline data and present clear plans. The Oswestry place plan is particularly proactive in seeking re-planting of woodlands, tree surveys and setting a target: "A survey of trees in the town in order to inform future planting and to provide a baseline. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%) (Oswestry Town)" Other place plans also seek to restore verges as well as increasing tree planting. The support exists in the county, and the county local plan needs to take the lead. I disagree with this policy because it is incomplete.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0698B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting.
A0853B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Object to DP13(3) requiring a 10% biodiversity net gain. The requirement for a biodiversity net gain is consistent with national planning policy but the NPPF does not specify the level of net gain to be achieved. The only justification for the 10% figure is the emerging Environment Bill that is still subject to consultation and government response and this might not be enacted in law and so the 10% requirement should be deleted from DP13. It appears that the implications of applying 10% BNG on development within Shropshire, including the impact upon the developable areas of site allocations, and potentially development yield have not been assessed. Paragraph 10.28 of the Council's Viability Study assumes the development cost of achieving a 10% BNG would be £31,000, but it is not clear how this is derived. This figure may be very conservative if the developable area is reduced on sites, as we would expect in some cases. Furthermore, if 10% BNG is to be required by policy, there is likely to be a need for off-site compensation and offsetting measures to be in place from the adoption of the plan. This would be necessary to ensure that development proposals are not delayed, and to ensure that negotiation is not required with third party landowners. This should be set out and secured within the plan to provide the necessary levels of certainty for developers and the Council that off-site mitigation is available, and that development will not be unduly delayed. Where the requirement for 10% BNG is introduced through the Environment Bill, this would be part of separate legislation and would provide further clarity to the Local Plan requirement.
A0970B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. At a local level it appears at odds with the practices commonly seen of cutting down trees without permission, planning new roads over sensitive areas and prioritising building over environment. I disagree with this policy because it is incomplete.
A0972B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 2 & 4 Pam's Pools SWT wildlife site and Thatcher's Wood and Westwood Covert SSSI are close to the proposed Tasley Garden Village site. In addition there are several veteran trees at the nearby The Leasowes
A0984B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13		Fully support this policy which seeks to avoid harm to Shropshire's natural assets and ensure the assets are conserved, enhanced and restored Support parts 1, 2 and 4-7 given their intention to protect designated sites and priority species and irreplaceable habitats and protection for the natural assets within the County, which included Local Wildlife Sites, Local Geological Sites, Local Nature Reserves and Local Green Spaces. Note that Bridgnorth contains a number of open spaces in and around the settlement, as well as a local wildlife site and a regional important geological site to the north east of the settlement, development around these assets which would have an adverse impact should be prevented. Part 3 requires 10% biodiversity net gain, which is fully supported. Currently the NPPF includes a strong recommendation to achieve biodiversity net gain, but the Environment Bill will establish a legal framework for a mandatory biodiversity net gain
A1116B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Designated Sites & Priority Species & Habitats: 1. In my view permission for development should be refused in all cases. The presumption now, in the climate crisis, must be to retain all vegetation, which added together forms a natural carbon sink. Mitigation is not a substitute for retaining existing vegetation and habitats which have evolved over centuries and even millennia. If habitats are irreplaceable, they are irreplaceable. 2. There should be no development within an SSI, or near it where proximity will have an impact on the SSI Natural Assets 5. & 6. The presumption now, in the climate crisis, must be to retain all vegetation, which added together forms a natural carbon sink. Mitigation is not a substitute for retaining existing vegetation and habitats which have evolved over centuries and millennia. Compensation would never be adequate and would be a confession of failed oversight of vegetation and habitats. Developers are not a privileged group in our society; they must become part of the urgent measures required to save the earth and everything on it. Trees, Woodland & Hedgerows 8. There must be no exceptions to the retention of trees and hedgerows. Developers must be required to reduce the number of dwellings that they try to squeeze onto sites where this would have an adverse impact on the trees and hedgerows
A1143B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The statement "Where appropriate, replacement trees or mitigation measures will be sought through the imposition of planning conditions". Is well intentioned but leaves developers with an argument for putting off details for tree planting until after a site layout has planning consent; assessments by Shropshire Council's own Tree Team have identified that a high percentage of trees on development sites (domestic and commercial) fail to thrive, die or are removed within a short period (<10 years) of most developments completion, this is generally due to poor layout, lack of healthy above and below ground space, poor standards of planting and after care, and planting into corrupted and confined growing mediums. Successful and sustainable tree planting (Trees that thrive and can reach their full potential) on development sites can only be secured through the inclusion on approved layouts of appropriate space both above and below ground for trees to thrive. In the absence of this space all the conditions under the sun will not deliver sustainable tree planting. In the light of the consideration section 4.140 might be significantly improved if the last sentence read it read as follows: "Where appropriate, replacement trees or mitigation measures will be sought / secured primarily through sustainable design agreed prior to the determination of the application and subsequently consolidated through the imposition of planning conditions"
A1143B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	In principle I support the statement as it stands but on the basis that LPAs are expected to act upon The Natural England's & Forestry Commission's standing advice on protecting ancient woodland and veteran trees this paragraph would be significantly improved by including reference to that guidance (as amended). https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
A1152B27	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Agree	Agree with draft policy DP13, as a step towards helping to minimise the ecological crisis. Particularly welcome adoption of the 10% net gain for biodiversity within the Environment Act (which has yet to become law), although we foresee differences of opinion in measuring existing and augmented biodiversity.
A1170B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Agree	I agree with the tree planting policies, but they should emphasise that tree planting stock should be 'of British native origin, and preferably local origin, and not simply of British provenance' since there is much plant stock that is not genetically native and which does not contribute effectively to biodiversity, but which can be described as being of British provenance. For example, Quick thorn is hedging hawthorn of Italian origin, and has different seasonality to native hawthorn.
A1180B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting (respondent ref; Form 16)
A1182B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting (respondent ref; Form 16)
A1630B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Farmers and landowners must be fully engaged with discussions on the natural environment and any future Local Nature Recovery Strategy as they own and manage many of the areas key environmental assets. For many farmers environmental management is a core business activity, but this is not acknowledged by the document. Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing. For many farmers the landscape management and biodiversity enhancements on their farms are a source of great pride and it does them a disservice to not have this aspect of land management recognised by this paper. The document starts to set out how Biodiversity Net gain would operate and acknowledges that there would be a need for off-site habitat enhancements. This is a potential opportunity for farmers in Shropshire. However it is very early in the process and a market for delivery of these enhancements has not yet emerged. A discussion is needed about the arrangements for delivering off site mitigation, to ensure that projects operate appropriately and that those delivering biodiversity enhancements are adequately funded for what are potentially long term agreements
A1634B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting (respondent ref; Form 16)
A1844B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Suggest that the canal network could be an appropriate recipient for the delivery of mitigation and compensation measures identified in the policy
A1896B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting The way we use land is one of the four key net carbon zero strategies. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. We have enough land in the UK not only for producing food but to offer new potential income streams such as biomass. Forest area could be doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MTCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas
A2108B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	Para 5b, which states that "the social or economic benefits of the proposal outweigh the adverse effect." should be deleted as this is highly likely to be abused as the ultimate get-out clause for developments which damage natural assets. Since it is generally impossible to put a price on such important natural assets as those listed in para 4, there is no basis for making a comparison on economic grounds, especially given that some natural assets are irreplaceable. Furthermore, any development which might invoke para. 5b would automatically fail para. 1d of The Shropshire Test.
A2110B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	There is an underlying assumption throughout this section that it is possible to implement biodiversity offsetting to mitigate losses of habitat. This argument is fundamentally flawed. The planning system must be strengthened, including by Planning policy being explicit about the priority of protecting nature and ecosystems. Ending the presumption in favour of development under planning rules if net gain cannot be proven to work on all levels. Ensuring that no offsetting can take place unless as a very last resort. This requires a planning application to fully explore avoidance of damage, including the possibility of no development taking place, or it being located elsewhere. Providing clear guidance on how any new development should incorporate nature; developers should be required to retain and create space for nature and to provide high-quality green infrastructure within and around their scheme. As a nation we have been warned of the substantial losses that have occurred in our natural capital and the impact on the wider environment and the health and wellbeing of communities. As the Council moves towards a carbon neutral future it must protect the existing natural capital and put in place plans to expand this resource throughout the county

Page 76

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2489B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP13	Disagree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting
A0238B36	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Agree	The considerable description of the desire to conserve, enhance and restore Shropshire's natural environment is welcome. Minimum standards need to be included in core planning policies regarding trees (possible minimum of 20%). Other place plans also seek to restore verges as well as increasing tree planting
A0306B042	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Agree	We welcome this policy and would not like to see it compromised in any way
A0642B38	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Agree	We welcome this policy and would not like to see it compromised in any way.
A0908B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Agree	The Policy should be justified more and re-worked to give greater surety that it will be fulfilled. The policy of nutrient neutrality for development may result in the current situation remaining as it is, but that is not a situation that will achieve the conservation objectives set out in the HRA. It should be possible, now, to estimate what rate improvement to the River Clun is taking place, and whether, in fact, the prediction that the colony might not survive past 2034 is now more likely. The Nutrient Management Plan contained proposals for monitoring the situation, and so these figures should be readily available. The reason for the delay in delivery is the issue of the River Clun SAC. The Nutrient Management Plan does not appear to have been revised to be taken into account in the LPR, and so the existing policies that have failed improve the situation for the mussels in the River Clun and which do not allow development anywhere in the catchment, persist. If that is the case, then the mussels remain under threat and still face extinction and no further development will take place for the lifetime of the current Local Plan Review. The LPR ought to be putting forward positive policies that would resolve the issue, clean up the water quality in the River Clun, safeguard the pearl mussel colony, and allow development that has been put on hold since 2006 to get underway. If this does not happen delivering the allocated housing is going to be delayed by at least another 18 years (on top of the 10 it has already suffered). At present Policy DP14 has not been positively prepared, and is not properly evidenced or justified, and therefore cannot be supported.
A1152B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Agree	See wider representations.
A1161B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Disagree	We have significant concerns that DP 14 is ossifying development. Clun Town Council with Chapel Lawn wish to facilitate and help move things forward. The need for greater clarity on the types of mitigation measure that are deemed suitable must be expedited. We would wish the policy is cast in some way more strongly to ensure that mitigation measures are made clearer. The current lack of practical mitigation measures mentioned in the explanation is stifling development in the area and on specifically on the two allocated sites in Clun Town. This is unacceptable and we would wish for more explicit guidance to be made publicly available, so larger sites can progress more readily.
A1630B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Disagree	The NFU and local agricultural business have long been engaged in the discussion around measures to reduce the nutrient and sediment load of the River Clun. The implementation of many phosphate reduction measures has already taken place either through involvement with initiatives such as Catchment Sensitive Farming, long term participation in agri-environment schemes or through individual voluntary changes in farming practice. We are concerned about the impacts of Policy DP14 and of the recently produced guidance on farmers who seek to build environmentally sustainable businesses. Often farmers need to replace farm infrastructure because they are no longer suitable for modern livestock rearing and crop production. For example, they may no longer meet environmental, animal welfare or food hygiene standards. An unintended consequence of this guidance could be that it restricts investment in new farm infrastructure which would deliver water quality improvement. This is due to the uncertainty regarding the meaning of nutrient neutrality, the outcome of applications and the considerable costs of producing evidence to support applications. The long term phosphate target of 0.01mg/l is very low and previous reports commissioned into the river (Atkins, February 2014) have questioned whether meeting this is achievable. Furthermore we query why nitrogen is now included within nutrient neutrality. Can you confirm whether nutrient neutrality for nitrate is required to meet SAC targets? The policy states that "All measures relied on to deliver either nutrient neutrality or nutrient betterment must demonstrate with sufficient certainty that they a. Meet the required nutrient reduction or improvement; and b. They can be secured and funded for the lifetime of the development's effects." Paragraph 4.145. outlines Natural England's advice on "certainty". We are concerned by "d. Not undermine the objective of restoring the site to favourable condition by making the 'restore' objective appreciably more difficult, or prejudicing the fulfilment of that objective." This could mean that Natural England could object to any development in the catchment on the basis that additional development further reduces the potential for catchment restoration, particularly in relation to translocation proposals. This is particularly concerning given that previous studies have stated that the 0.01mg/l target for phosphate cannot be met. Therefore we would urge you to look again at whether nutrient neutrality is a reasonable aspiration for development within this catchment
A2194B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Disagree	Whilst the Committee generally endorses the thrust of paragraphs 1-2, it is clear that river water quality is acknowledged as already inadequate for the pearl mussel. Hence nutrient neutrality is incompatible with development of any kind within the River Clun Catchment.2. It is therefore essential that the Local Plan is specific about what mechanisms will be put in place to improve water quality, considering both sewage and domestic water, and nutrients arising from agricultural activities. They should also specify a timescale for introduction of these measures and any other forms of mitigation, and this timescale should be compatible with the development plans, the rationale for which is amply justified in the Strategic Policies of the document. Only when nutrient betterment has been achieved can development of any kind be accepted.3. We are aware of many natural measures which may be introduced immediately to improve water quality and suggest these (e.g. introduction of 'leaky' dams, reintroducing native wildlife)4. In a situation such as this, where one policy to which Shropshire Council adheres incompletely inconsistent with another, we consider it vital that mitigation starts immediately and that local residents are kept informed about progress and monitoring. What measures will the authority have in place to monitor and publicly report on nutrient neutrality? What advice has been made available both to residents and land owners/managers? What results will be made available to the public so that they can monitor success? e.g. Will the authority fund the App currently available so that the public can do simple monthly water testing, upload results, and download locality maps and localised information to aid citizen involvement and monitoring? What links will be made with, for example, local SWT groups such as ours, to facilitate this?5. This should not be taken as expressing a view that the committee is against housing development within our settlements. We are agreed in the view that development broadly similar in extent to that proposed is important to maintain a vibrant community within the River Clun Catchment and retain amenities like shops, businesses and primary school. Thus there is an urgent need for the various works required to commence, and the vague timetable suggested within the Local Plan is inadequate in this regard.
A2407B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Agree	Natural England supports the principle of a specific policy for development in the Clun catchment. The policy currently states that "development within the catchment of the River Clun will only be permitted if it can demonstrate either nutrient neutrality or nutrient betterment." Natural England urges caution around this. The River Clun SAC is failing its water quality targets. As the site is currently failing the council needs to consider how it might permit development without compromising the ability to restore the site to favourable condition. It may be necessary first to understand what is required to restore the site and then to use that as a baseline for nutrient neutrality. Natural England is seeking legal advice on this matter and we advise the council that it may want to do the same. We look forward to continued dialogue with your authority as the plan progresses in order to achieve an solution which enables development in the catchment while protecting and restoring the site.
A2475B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP14	Disagree	The AONB Partnership has done as much practical work as any organisation on the Freshwater Pearl Mussel and water quality in the Clun Catchment, and welcomes this policy. Publicly funded work over many years to address these issues on the ground has been undermined by factors working against water quality. Should there be some clarification regarding Permitted Development? In these cases the onus is more on the developer/farmer/agent to make sure the River Clun is not impacted, but the system of PD notification should enable the importance of these issues to be flagged. Should there be some reference to indirect impacts of development? e.g. manure spread to land and ammonia deposition from Intensive Livestock Units, and exercising control through the planning system. The effects of these on the river and catchment far outweigh those from domestic developments.
A0101B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	No comment
A0198B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Disagree	Welcome the new Green Infrastructure network proposals and the new Green Infrastructure Strategy being developed. Our disagreement is that this policy is incomplete We would seek to add to proposal DP15 at 1.b 1.b " Enhances existing infrastructure assets and extends the green infrastructure network in accordance with the Shropshire Green Infrastructure Strategy Proposals also have regard to Neighbourhood Plans and other relevant strategies such as the Shrewsbury Big Town Plan and Cleobury Mortimer's seven Wildlife Corridors, where these are available. Explanation It is essential to exemplify other relevant local strategies apart from the major urban Shrewsbury Big Town Plan, in order to encourage smaller community based initiatives in rural Shropshire and their Neighbourhood plans such as those of Cleobury Mortimer. Wildlife Corridors are naturally occurring green infrastructures that play an important and vital part in achieving all the objectives of DP15 by improving and expanding habitats, biodiversity, green networks and access & open space provision. The Seven Wildlife Corridors are a vital part of Cleobury Mortimer's Neighbourhood Plan with a range of benefits as part of the open space provision relating to: greater connectivity of their existing green infrastructure and natural framework for expansion and further development; greater ease of conservation/enhancement biodiversity; support climate change awareness and adaption; improve urban air quality ; help address local health and wellbeing needs encouraging active and healthy lifestyles in line with policy DF30 .
A0238B37	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	No comment
A0260B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	I support the approach outlined in the new Green Infrastructure Strategy Policy DP 15, which states (Para 5.c) that "...Providing strong policies for Green Infrastructure, protection, enhancement and creation are fundamental to the delivery of high quality Green Infrastructure..." Para 5 also confirms that "... Development proposals that result in a significant fragmentation or loss to the green infrastructure network will be resisted..." I am particularly concerned that the Kingsland /Rad Valley which provides a priceless mature asset, should be recognised as a key element of the Green Infrastructure within Shrewsbury. This river corridor should not be vulnerable to entirely inappropriate development proposals, similar to the recent Planning application ref: 20/03270/FUL
A0268B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15		Note the requirements for strategic sites to make provision for green infrastructure improvements and a landscape scheme that strengthens local biodiversity that complement and link existing networks. Please also see comments on proposed allocation SHR197VAR.
A0268B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15		Note the requirements for strategic sites to make provision for green infrastructure improvements and a landscape scheme that strengthens local biodiversity that complement and link existing networks. Please also see comments on proposed allocation SHR197VAR.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0306B043	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	We welcome this policy and would not like to see it compromised in any way. DP15 (4) Green space should be managed and maintained for at least the lifetime of any development.
A0306B044	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Disagree	Para 4.151 We would question the infeasibility of producing a green infrastructure opportunity map. If this is purely due to a lack of resources, partnership with other organisations should be explored to develop a map. In the NPPF paragraph 174, it is suggested that maps are needed for restoration/creation areas.
A0430B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	Support DP15 to provide better green infrastructure and all new development to make a reasonable contribution wherever possible, including linking up to existing green infrastructure in the area. This also ties-in with other policy aims, including improvements in biodiversity, tackling climate change, protecting landscape, reducing recreational impact on internationally designated wildlife sites and ensuring a high-quality local environment and an enhanced quality of life. In the context of DP15 the landscape strategy for safeguarded land in Shifnal aims to maintain and enhance the existing green infrastructure network and provide a series of proposals for existing and new green infrastructure that respond to local landscape characteristics such as landform, field boundaries, tree belts etc.
A0642B39	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	We welcome this policy and would not like to see it compromised in any way. 4: Green space should be managed and maintained for at least the lifetime of any development
A0642B40	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Disagree	Para 4.151 We would question the infeasibility of producing a green infrastructure opportunity map. If this is purely due to a lack of resources, partnership with other organisations should be explored to develop a map. In the NPPF paragraph 174, it is suggested that maps are needed for restoration/creation areas.
A0981B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Disagree	Its currently unclear whether this policy is intended to provide a criteria based policy for the protection of playing fields to address para 97 of the NPPF and Sport England's Playing Fields Policy? Parts of the policy elude to potentially providing such protection, and the reasoned explanation in para 4.146 expressly states that Green Infrastructure (GI) includes playing fields, however discussions with the Council have indicated that this is not the intention for this policy. Part 1a) of the policy states that all new development will avoid the loss of, or harm to, existing green infrastructure (GI) assets, and the disruption or fragmentation of existing GI network. Part 5 of the policy states that a significant fragmentation or loss to the GI network will be resisted. In such instances mitigation and compensatory measures will be expected. Whilst this wording could be interpreted to provide protection of playing fields, it does not accord with the criteria based wording of para 97 of the NPPF and Sport England's Playing Fields Policy, which set out that there will be a presumption against the development of existing open space, sports and recreational buildings or land, including playing fields unless at least one of certain criteria are demonstrated to be met. To address this, it is recommended that a separate policy is included in the Local Plan that relates to the protection of playing fields and other sports facilities (appendix provided of Sport England's Playing Fields policy guidance to assist the Council in developing the wording of their policy). If a separate policy relating to playing fields is then included, Policy DP15 and its associated reasoned explanation can be amended to expressly state that playing fields are addressed separately. Sport England also assumes that the references to new provision of GI are not therefore intended to relate to the provision of new playing fields, which is addressed separately in Policy DP16, however it would help to make this explicitly clear for the avoidance of doubt in the reasoned explanation. Sport England supports the reference in part 1.c.v) of the policy to ensuring that new GI to be delivered on-site should address identified local health and well-being needs and encourages active and healthy lifestyles in line with Policy DP30. Subject to addressing my comments on policy SP5 regarding an Active Design policy, and appropriate cross-reference should also be included here.
A0984B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	Support the aims of this policy which seeks to provide better green infrastructure and looks to all new developments to make a reasonable contribution wherever possible, including linking up to existing green infrastructure in the area. This has been integrated into the masterplan for BRD03 Ties-in with other policy aims, including improvements in biodiversity, tackling climate change, protecting landscape, reducing recreational impact on internationally designated wildlife sites and ensuring a high-quality local environment and an enhanced quality of life. Part 1a requires a Infrastructure Assessment in support of new development proposals, would welcome clarification on what this entails and when it is required. Part 1b references the Green Infrastructure Strategy - welcome the reference and the guidance within it as to what Green Infrastructure is required within each settlement
A1152B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	Agree with draft policies DP15 and DP16. The fundamental importance of Green Infrastructure and Open Space, which has sometimes been undervalued in the world of development, has been brought home and emphasised by the Covid-19 emergency. It is important to take all opportunities to extend and enhance networks of inter-linked Green Infrastructure in particular, rather than considering each development in isolation.
A1630B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Disagree	The council should have regard to green and blue infrastructure on development sites but it should not seek to extend planning controls over agricultural and rural land. The restoration and creation of new areas of habitat in association with development must be proportionate and have regard for food production. Displacing food production from productive landscapes merely exports our food production and therefore is environmentally questionable. We need to be able to produce food locally in order to meet our own needs and those of future generations. We are concerned that moves to create large areas of habitat with bigger mitigation areas will result in higher food imports from other areas of the world who do not produce food to the same environmental and animal welfare standards as UK farmers.
A1844B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Disagree	Request that para 4.146 include canal network as part of blue infrastructure.
A2163B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15		For significant new development, including strategic sites, green infrastructure should be an integral part of a masterplan that links existing and new green infrastructure, and connects to the green infrastructure network in the surrounding area and improves that network's accessibility and linkages where possible. Support the aim of maximising green infrastructure and expanding the current network, it should be recognised that existing local strategies, such as the Shrewsbury Big Town Plan that has a vision for Green Networks across Shrewsbury, must accord with the Development Plan which takes precedent as policy. Where there is conflict, the Development Plan will provide the prevailing policy.
A2394B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Disagree	Para 4.146 defines "green infrastructure" but does not mention canals and canal towpaths. Please add in "canals and canal towpaths" Reason: to ensure that canals and canal towpaths are recognised as being part of green infrastructure
A2407B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP15	Agree	Your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space of for environmental gains, including nature based solutions to help adapt to climate change, might include: Identifying opportunities for new multi-functional green and blue infrastructure • Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient • Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape. • Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links • Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore) • Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats. Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain. Green Infrastructure has been incorporated into the plan as a strategic policy area, supported by appropriate detailed policies (DP15) and proposals to ensure effective provision and delivery. Evidence of a strategic approach is underpinned by your Green Infrastructure Strategies. We support that the provision of green infrastructure as a specific policy in the Local Plan.
A0101B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	Suggesting that a threshold for open space provision of at least 10 dwellings would be appropriate
A0238B38	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	For significant new development, including strategic sites, green infrastructure should be an integral part of a masterplan that links existing and new green infrastructure, and connects to the green infrastructure network in the surrounding area and improves that network's accessibility and linkages where possible. Support the aim of maximising green infrastructure and expanding the current network, it should be recognised that existing local strategies, such as the Shrewsbury Big Town Plan that has a vision for Green Networks across Shrewsbury, must accord with the Development Plan which takes precedent as policy. Where there is conflict, the Development Plan will provide the prevailing policy.
A0238B39	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	Para 4.146 defines "green infrastructure" but does not mention canals and canal towpaths. Please add in "canals and canal towpaths" Reason: to ensure that canals and canal towpaths are recognised as being part of green infrastructure
A0306B045	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	Para 4.155 We feel that both quality and quantity are important and perhaps need to be considered more equally.
A0430B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	Support DP16 alongside policy DP15 as both policies provide a clear emphasis for using open space provision as a means of creating and improving green infrastructure links as a priority wherever possible, and this is commended.
A0436B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		Acknowledge that the 30sqm per person requirement within the draft policy is consistent with the current SAMDev Plan policy Welcome proposed consideration of reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. Landscaping and open space can transform developments and the experiences that residents have, therefore incentivising developments to afford better quality housing is a positive step. Flexibility should be provided for development with a greater number of smaller properties, responding to demand, as opposed to a fewer larger dwellings. Subsequently it may be more practical to suggest that the lesser of 20% of the Gross Site Area should be open space or 30sqm per person.
A0438B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		Acknowledge that the 30sqm per person requirement within the draft policy is consistent with the current SAMDev Plan policy Welcome proposed consideration of reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. Landscaping and open space can transform developments and the experiences that residents have, therefore incentivising developments to afford better quality housing is a positive step. Flexibility should be provided for development with a greater number of smaller properties, responding to demand, as opposed to a fewer larger dwellings. Subsequently it may be more practical to suggest that the lesser of 20% of the Gross Site Area should be open space or 30sqm per person.
A0439B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		Acknowledge that the 30sqm per person requirement within the draft policy is consistent with the current SAMDev Plan policy Welcome proposed consideration of reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. Landscaping and open space can transform developments and the experiences that residents have, therefore incentivising developments to afford better quality housing is a positive step. Flexibility should be provided for development with a greater number of smaller properties, responding to demand, as opposed to a fewer larger dwellings. Subsequently it may be more practical to suggest that the lesser of 20% of the Gross Site Area should be open space or 30sqm per person.
A0441B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		Acknowledge that the 30sqm per person requirement within the draft policy is consistent with the current SAMDev Plan policy Welcome proposed consideration of reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. Landscaping and open space can transform developments and the experiences that residents have, therefore incentivising developments to afford better quality housing is a positive step. Flexibility should be provided for development with a greater number of smaller properties, responding to demand, as opposed to a fewer larger dwellings. Subsequently it may be more practical to suggest that the lesser of 20% of the Gross Site Area should be open space or 30sqm per person.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0442B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		Acknowledge that the 30sqm per person requirement within the draft policy is consistent with the current SAMDev Plan policy Welcome proposed consideration of reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. Landscaping and open space can transform developments and the experiences that residents have, therefore incentivising developers to afford better quality housing is a positive step. Flexibility should be provided for development with a greater number of smaller properties, responding to demand, as opposed to a fewer larger dwellings. Subsequently it may be more practical to suggest that the lesser of 20% of the Gross Site Area should be open space or 30sqm per person
A0445B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	Acknowledge that the 30sqm per person requirement within the draft policy is consistent with the current SAMDev Plan policy Welcome proposed consideration of reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. Landscaping and open space can transform developments and the experiences that residents have, therefore incentivising developers to afford better quality housing is a positive step. Flexibility should be provided for development with a greater number of smaller properties, responding to demand, as opposed to a fewer larger dwellings. Subsequently it may be more practical to suggest that the lesser of 20% of the Gross Site Area should be open space or 30sqm per person
A0446B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		Acknowledge that the 30sqm per person requirement within the draft policy is consistent with the current SAMDev Plan policy Welcome proposed consideration of reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. Landscaping and open space can transform developments and the experiences that residents have, therefore incentivising developers to afford better quality housing is a positive step. Flexibility should be provided for development with a greater number of smaller properties, responding to demand, as opposed to a fewer larger dwellings. Subsequently it may be more practical to suggest that the lesser of 20% of the Gross Site Area should be open space or 30sqm per person
A0450B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	Policy DP16 should not allow any exceptions to the open space requirement for 30sqm per person to maintain an acceptable density standard in new housing developments. The exception to the open space requirement of 30sqm per person is proposed in para 4.155 where developers provide high quality open space tailored to the needs of all residents of the development.
A0697B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	The draft policy identifies a requirement to provide at least 30sqm of open space per person assuming one person per bedroom. Question the evidence for this requirement, given the lack of any specific evidence/justification in the draft Local Plan. Suggests rather than applying prescriptive and arbitrary open space standards across all developments, a 'design-led' approach specific to the locality would be a better, ensuring appropriate access to open space as part of the wider design and layout of sustainable places.
A0981B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	The policy would seem to relate to the provision of open space and playing fields to meet the needs of new residential development. It does not relate to the protection of open space and playing fields. It is assumed that the protection of open space is addressed under policy DP15 Green Infrastructure, however if its not the purpose of the GI policy to protect open space, the wording of policy DP16 should be expanded to ensure this complies with para 97 of the NPPF in respect of open space protection. Sport England have advocated in the response to Policy DP15 that the protection of playing fields and other sports facilities should be addressed in a new policy to accord with para 97 of the NPPF and Sport England's Playing Fields Policy. Part 6) of the policy states that the outcomes of the Council's Playing Pitch Strategy will be taken into account in determining the level of need within an area, and that development will be expected to address any settlement constraints either on site or by way of a developer contribution (does this mean off site provision, this should be clarified?) The title of the assessment is the Playing Pitch and Outdoor Sports Strategy (PPOSS), and so for consistency its recommended that the same phrasing is used within the policy. Sport England generally supports the approach taken which is to use the PPOSS to inform the provision required to meet the needs of proposed developments. This could include a range of measures to best meet identified needs such as the provision of new grass pitches, improvements to existing grass pitches, securing community use of existing pitches currently unavailable for community use, provision of new Artificial Grass Pitches (AGP's) and improvements to ancillary facilities such as changing rooms and car parking, in line with the findings and recommendations sets out in the PPOSS. What the policy doesn't provide is a basis for how the quantum of provision will be determined. The PPOSS uses Sport England's Playing Pitch Calculator (PPC) to set out the demand generated by the proposed housing growth. The policy should therefore reference the PPC as a basis to inform expected developer contributions, unless the Council proposes to calculate contributions in some other way? Since the PPC provides a calculation for new provision, in circumstances where new provision is not proposed there will be a need to calculate the relevant contribution to deliver the proposed improvement works. In such circumstances, the PPC provides a useful calculation to inform negotiations for developer contributions to meet the cost of pitch improvement works in lieu of new provision. It is therefore recommended that part 6) of the policy is expanded to address the above points so that its clear how developer contributions will be calculated. The reasoned explanation should also be expanded to set out that the Council have recently completed the PPOSS as the evidence base to inform the policy, that the PPOSS will be reviewed annually to keep it up to date, and will be replaced in due course in line with SE guidance and to align with the subsequent review of the Plan. The explanation should then draw out the heading findings of the PPOSS regarding the current identified needs, including the provision of new 3G AGP's to meet needs for football, new hockey AGP provision including the need to return Market Drayton Hockey Club Shropshire, and the provision of both new grass pitches and improvements to existing grass pitches, and associated ancillary provision to meet the needs of football, cricket, rugby union, tennis, netball and crown green bowls. The explanation should also set out that the Council will consult with Sport England and relevant NGB's on playing field investment priorities arising from proposed developments to ensure that proposed investment maximises the benefits to sport and aligns with the current evidence base regarding identified needs.
A0984B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		Fully encourage and support concept of using open space provision as a means of creating and improving green infrastructure links Whilst supportive of the provision of 30 sqm of open space per person, welcome the flexibility within this policy which states that consideration will be given to reducing this level of provision where the development is able to provide high quality open space which meets the needs of all residents. Fully support the recognition of the importance of delivering good quality, useable open space which is available, accessible and appealing to all residents rather than a specific amount that is of poor/average quality that many residents may not fully utilise (part 2 of the draft policy). Part 5 of the draft policy relates to on-site provision of functional areas of play and recreation. Whilst not disagreeing with this, the policy should acknowledge the specific open space needs for each settlement (identified in The Open Space Recreation Needs Assessment (Appendix D) and Green Infrastructure Strategy (Appendix C)) and encourage development to provide the open space needed in the settlement, informed by most up-to-date evidence. For Bridgnorth the documents identify a need for accessible public open space, as such BRD030 seeks to provide function areas of play and new accessible public open space throughout the development to serve the existing and proposed residents. Part 6 of the policy refers to the outcomes of Shropshire's Playing Pitch Strategy, however this does not appear to be available
A1106B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	Policy DP16. Sets out the council's draft approach towards open space. We support that the council will apply the notion of 'quality over quantity', when it comes to open space. However, we are concerned by the specific 30sqm per person figure which is set out in part 2 of the policy. The draft DLP states: "2. There is an expectation that new housing developments provides on-site open space provision equivalent to 30sqm per person, assuming one person per bedroom. However, consideration will be given to reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents". It is our view that this approach is unjustified. The 30sqm per person figure seems to be chosen at random with no evidence provided as to how it has been calculated or come to. There is no evidence the provision of open space is an issue in Shropshire. The 'Shropshire Great Outdoors' website states: "Shropshire has many special landscapes including the Shropshire Hills Area of Outstanding Natural Beauty, the Stiperstones and Corndon Hill Country crossing the border in the south west of the county and the internationally important Meres and Mosses in the north. The Pontcysyllte Aqueduct and Canal World Heritage Site also includes part of Shropshire around Chirk in the north. (http://www.shropshiregreatoutdoors.co.uk/)" Shropshire has a range of parks and open countryside that residents will be able to take advantage of. Unlike say Birmingham City Council or a London Borough, Shropshire is not a local authority with a significant problem when it comes to open space provision. Open space which is shared should not be calculated on the same basis as an individual garden. The shared open space, of say a block of flats, would be used by multiple residents of different flats, where as a garden would be private to only that house. If the council can evidence that there is a need for a specific figure of open space per person then we request that a lower figure is designated per person when it comes to shared open space. Furthermore, we request that the policy takes a view that all open space should first and foremost be should be design-led, informed by the character and context of the development proposed. Shropshire should use flexibility in its approach towards open space, and judge each site's provision on a case-by-case basis.
A1119B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	Laird Estates welcomes the objectives of Policy DP16 (Open Space) but is disappointed that the policy does not acknowledge that there will be some sites whose existing open spaces will contribute and be available for new residents, particularly if they are subject to development expansion (such as establish residential park home sites, which are spacious and already meet, or exceed the standard). In these cases, they should be taken into account and form part of the proposed on-site open space standard of 30sqm per person otherwise it would be unfair. On this basis, the Policy is currently not fully justified so is not sound. To fix this, Laird Estates recommends the wording of Policy DP16 part 2 is amended so that it reads as follows: "2. There is an expectation that new housing developments provides on-site open space provision equivalent to 30sqm per person, assuming one person per bedroom. However, consideration will be given to reducing this level of provision in instances either where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents or, it forms an extension to an existing site that already meets or exceeds the standard." Laird Estates generally supports Policy DP17 (Landscaping of New Development) but does not believe specimen trees up to 15-20m high is appropriate in all cases, such as on sites where trees would be in proximity to single storey residential properties. For clarification, Laird Estates considers the wording of Policy DP17 part 5 is amended as follows: Hedgerow and shrub planting and other soft landscaping should include specimen trees with a mature height up to 15-20 metres within both the hard and soft landscaped areas where it is both safe and compatible with the character of the area."
A1152B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	Agree with draft policies DP15 and DP16. The fundamental importance of Green Infrastructure and Open Space, which has sometimes been undervalued in the world of development, has been brought home and emphasised by the Covid-19 emergency. It is important to take all opportunities to extend and enhance networks of inter-linked Green Infrastructure in particular, rather than considering each development in isolation.
A1630B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	The impacts of new residential development on adjacent agricultural land need to be carefully thought through. Many field parcels adjacent to housing developments suffer from repeated trespass, fly tipping (particularly of garden waste), dog worrying and concerns about disease carried in dog faeces (such as Neosporosis) and also in some areas "gentrification" where margins and hedges are cut inappropriately by urban residents and contrary to the requirement of the Basic Payment Scheme and agri-environment commitments. We welcome policy DP16 as where new housing is proposed adequate green space must be incorporated into the development in order to relieve pressure on adjacent farmland and investment must be made (with prior consultation of local farmers) in the surrounding areas access infrastructure. This is to mitigate the impact of new urban development on the surrounding farmland. We have heard of instances where farmers on the urban fringe have had to radically change their management practices in order to accommodate such pressure which often leads to a financial penalty for the business. Therefore "an appropriate off-site provision" must be carefully considered and cannot rely on existing rights of way across farmland without consultation with the adjacent farmer and investment in the network. It may also be an appropriate moment to consider a rationalisation of the local footpath network to build recreation infrastructure that is fit for purpose. Our experiences during the spring and summer of 2020, when unprecedented pressure was put on the right of way network from large numbers of new users, has demonstrated the importance of careful planning and investment.
A1655B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	Our current leisure centre is often saturated and facilities are often full and hard to book, particularly the provision of all-weather pitches, racks or facilities that could support outdoor training (athletics, rugby, football, running, taekwondo) when the weather is bad. Current Rugby facilities are often unusable when we have heavy rain due to flooding along the River Severn. Our excellent community leisure centre is a shared facility with the school and is often double booked during school performances, leaving sporting clubs without a facility. Several sporting clubs currently have no facilities for toilets, showers or refreshments which is extremely difficult when encouraging young people to engage. Ideally the town needs a community/sporting centre with a larger hall suitable for sports classes and general events, a smaller hall designated to spin and a licenced cafe, toilets, showers. Outside there needs to be parking, a picnic area, an all weather surface pitch for basketball/five a side football (could also be used by the rugby club and others for winter fitness training) and two or three community all weather bookable tennis courts. Something similar to the Severn Centre at Highley would be ideal.
A2163B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16		The delivery of quality open space is considered an essential part of new development and is supported in principle. There is an expectation in this draft policy for on-site open space for new housing development at a provision equivalent to 30sqm per person, assuming one person per bedroom. However, this level can be reduced where development is to provide a particularly high-quality area of onsite open space which meets the needs of all residents. In consideration that the policy expects 'good' quality open space, but the provision can be reduced if 'high' quality open space is delivered, clarity is required in the policy as to what defines good and high quality open space, and what developments are expected to deliver. Reference made to Epping Forest GI Strategy which recognises the importance of multi-functional open space rather than rigid definitions of typologies. It also emphasises the importance of quality rather than a pure focus on quality. It is suggested that a flexible approach is taken by Shropshire Council in the approach to open space, where quality can sometimes be a higher priority to provide than quantity of open space
A2403B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	The Estate supports the aspirations of Policy DP9 to positively deliver a step change in the local economy, and the focus on a network of strategic corridors along the principal rail and strategic road routes deliver this. The Estate is supportive of the opportunity for new sites, both brownfield and greenfield, to be brought forward for development within these strategic corridors, in addition to allowing development on sites allocated within the plan. The estate lands are well located to the direct north of the Shrewsbury gateway to the 'Eastern Belt' strategic corridor (i.e. the A5) and through existing employment hosting sites and development opportunities are well placed to contribute to the economic growth of this important strategic corridor.
A2407B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Agree	The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England's work on Accessible Natural Greenspace Standard (ANGST) may be of use in assessing current level of accessible natural greenspace and planning improved provision.
A2463B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP16	Disagree	The policy does not continue the flexibility from SAMDev as it references that new development must provide "on-site" open space provision. Mandating such a high requirement without any regard to local variation in need and provision and seemingly no option to make off-site contributions in lieu of on-site provision could have a significant effect on site capacity and therefore upon the delivery the plan's identified requirement for market and affordable housing.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0101B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Agree	We support this policy
A0306B046	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Disagree	Species for landscaping should be of local provenance wherever possible, unless there are other environmental justifications. Landscaping opportunities afforded by green roofs and facades should be encouraged.
A0430B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Agree	Support DP17 which seeks to create and maintain an attractive and well-designed environment, and development proposals will be expected to provide landscaping on site, unless the Council agrees that off-site landscaping would be more appropriate. It goes on to list a number of criteria that landscape schemes should meet. Wallace take no issue within this policy and the criteria listed therein, although asks that clarity is provided as to what 'trees within adoptable areas' means.
A0506B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Disagree	Church Stretton is known for its tree coverage. Over recent years more and more planning application have been received for trees to be felled. Replanting of trees is vital, every time a tree is removed a new one should be planted, always remembering "Right tree Right place". Boundary treatment is important in conservation areas and in the AONB. Green landscaping as opposed to 'closeboard fencing in a rural setting is important not only for its visual qualities but also for creating a feeling of wellbeing.
A0984B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17		Support this policy which seeks to create and maintain an attractive and well-designed environment, and development proposals will be expected to provide landscaping on site, unless the Council agrees that off-site landscaping would be more appropriate. Criteria that landscape schemes should meet is provided within Part 3 of the draft policy, this aligns with the NPPF and is supported.
A0997B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Agree	The reference to heritage assets and setting in Criteria 3b is welcomed
A1116B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Disagree	The policy states: To create and maintain an attractive and well-designed environment, development proposals will be expected to provide landscaping on site, unless the Council agrees that off-site landscaping would be more appropriate... (Speaking from a lifetime in Landscape Architecture), would it not be better to have a Policy title of: Landscape and Urban Design and then go on to talk about the context of site planning. 'Landscaping' is an outdated and misleading idea that perpetuates a cosmetic approach whereas we need to have a 'wholesome' approach where the site's qualities shape any development, and as the design develops there is a constant interplay among all the elements to achieve an end product that is fully integrated into the local context of vegetation, topography, and all the other aspects of a given plot or larger piece of landscape. 'Landscaping' is like an ingredient rather than a process that brings out the best of what's already there and what's proposed. In addition, where the context is urban or semi-urban, 'landscaping' becomes even more a cosmetic in the sense of having to have a certain input of plants on a project, when maybe one urban type tree or no plants at all would be appropriate. Finally, 'landscaping' gives a developer permission to mess up a plot or larger area and then stuff in some plants to 'comply' with the planning condition
A1152B27	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Agree	See wider representations.
A1170B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Disagree	Large trees are valuable, but this policy ignores the biodiversity value of smaller native trees such as field maple (and a great variety of other) and of traditional fruit trees, which are also often more suited to small sites and landscaping needs. Many landscape varieties of trees are so altered from their origins that they make little contribution to biodiversity.
A2163B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Disagree	Part 2 of the policy states that existing landscapes of ecological value or those with heritage significance should be conserved and enhanced, with schemes being designed to be sympathetic to their importance to avoid harm. Instead of avoiding harm this should be amended to require harm to be minimised. With reference to heritage and conservation, the degree of harm and the importance attached to it should be consistent with Chapter 16 of the NPPF, which requires the harm to the significance of any heritage asset to be taken into account. Part 6 of this policy states, "Trees within adoptable areas should be incorporated as part of the infrastructure planning and design stage in accordance with current best practice". Any tree planting on adoptable areas will require County Highways agreement, and therefore should be amended to read, "Trees within adoptable areas should be, where practical and in agreement with County Highways, incorporated as part of the infrastructure planning and design stage in accordance with current best practice". This policy should be amended in order to be found sound, as it needs to be fully justified, effective and compliant with national policy.
A2180B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Agree	We believe that open space allocation and green space allocation on development sites is hugely important in setting the right ambience for the site adding to the physical and mental wellbeing of its residents. We would also like to see greater reference to the planting of trees to support the Climate Emergency agenda and there should also be better rigour in ensuring that developers plant the right trees once rather than the current arrangements where it seems acceptable to replace them if they die due to poor maintenance. Every tree has a carbon footprint and we should be looking to reduce this waste.
A2307B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Disagree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike: "Landscaping schemes should, where they fall within a safeguarding zone designated to reduce the risk of birdstrike, be designed to ensure that an attractant environment is not formed for large and flocking bird species that might pose a danger to aviation safety and operational capability."
A2475B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP17	Disagree	This policy should mention the AONB in the cross-reference DP26 and also refer to guidance within the AONB Management Plan on landscaping.
A0101B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP18	Agree	We support this policy
A0430B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP18	Disagree	Support DP18 to respect, safeguard, and wherever possible, restore or enhance landscape character and visual amenity in Shropshire and refers development proposals back to the LVSS for guidance. Further Preliminary Landscape and Visual Appraisal for the safeguarded land in Shifnal finds that the proposed development complies with this policy and accommodates a sensitively designed residential scheme with only limited landscape and visual effects at a localised level and that such impacts can successfully be avoided or reduced through effective mitigation.
A0984B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP18	Agree	Fully supports this policy, which seeks to respect, safeguard, and wherever possible, restore or enhance landscape character and visual amenity in Shropshire and refers development proposals back to individual Landscape and Visual Sensitivity Assessment (LVSS) for guidance. Support the need for all major development proposals to be accompanied by an appropriate landscape/visual assessment. Agree with Part 3 of the draft policy which states that where there are visual and landscape effects, there is the opportunity to reduce the impacts and offset residual effects. There is an opportunity within major development proposals to create a landscape led development which will provide additional opportunities to access green infrastructure, open spaces, the open countryside which would offset any effects of the proposals, this is the approach taken in BRD030. This could be built upon further and dealt with through any future SPD and masterplan for the site. The Shropshire LVSS has been considered and a LVIA prepared for BRD030 which has informed the draft masterplan [appendices to representation]
A0997B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP18	Agree	The reference to the Shropshire Landscape Typology within this policy is welcomed. We are aware that the typology includes historic landscape characterisation information
A1152B28	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP18	Agree	Agree with the vital importance of draft policy DP18. Shropshire has a particularly rich variety of landscape and geological forms and it is reassuring to know that the Council places a high priority on their conservation and enhancement.
A1609B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP18	Disagree	We consider that the strategic housing and employment allocations proposed at Shifnal do not conform with provisions set out under policy DP18. We consider under the sustainability appraisal that allocations have not been properly assessed against other sites and no justification has been provided to explain the reasons for rejecting reasonable alternatives in the area. Sites SHF018b and P15b score poor for overall sustainability in their SA. It should be considered that the proposed extension of the site east of Upton Lane would be contrary to national policy, as no exceptional circumstances have been provided for its release.
A2475B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP18	Disagree	4.159 The AONB designation is mentioned but the additional protection conferred by the designation and the statutory AONB Management Plan should also be referred to.
A0167B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	Support provisions of draft policy DP19. Such provisions should be implemented in relation to the assessment of the current planning application relating to the SUE West and the upcoming application on the NWWR. Both raise significant concerns in relation to impact on the environment including air, water, light, noise and protected species. Given the importance placed on these matters in both adopted and emerging Plans appropriate safeguards should be provided to Oxon Hall Caravan Park.
A0238B41	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	Agree with the vital importance of draft policy DP18. Shropshire has a particularly rich variety of landscape and geological forms and it is reassuring to know that the Council places a high priority on their conservation and enhancement.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0241B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	The Coal Authority are pleased to see that this policy includes consideration of unstable land and identifies that appropriate information will be required to support development proposals where land instability poses a potential risk.
A0306B047	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	We welcome this policy and hope it will address some of our concerns about the number of intensive livestock unit developments in the county. SACs, other than the River Clun, and the majority of sensitive habitats are beyond critical thresholds. DP19 (4) We welcome greater protection for the county's best agricultural land. Additional consideration should also be given to peatland areas where development should be further resisted to prevent the loss of future opportunities for restoration, biodiversity gain and carbon sequestration.
A0413B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Disagree	Air quality is an important issue for our health and should be given a stronger policy separate from the other issues of pollution.
A0430B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	Support DP19 which seeks to safeguard environmental quality and public amenity; minimise pollution; mitigate adverse effects and maximise opportunities for improvements where practicable because the criteria are considered to generally reflect the aims of the NPPF to prevent development from contributing to, or being put at risk from, unacceptable levels of soil, air, light or noise pollution or land instability.
A0911B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	Representation on behalf of Hobbins Management Company covering a range of Policies relating to Bridgnorth. Broadly in support of the policies, but stress that the policy position doesn't appear to have been followed in setting the allocation of employment land at Stanmore. The response supports policy DP19 but questions its implementation in regards to Stanmore Policy DP19: Pollution and Public Amenity Policy DP19 sets out the Council's desire to reduce pollution and safeguard public amenity through development proposals. Policy DP19.1 says that development must be appropriate to its location, and the site must be suitable for its proposed use. Policy DP19.2 and.3 express concern about air quality. Policy D19.4 confirms that development should avoid, if possible, the use of Grade 1, 2 and 3a agricultural land. Policy DP19.5 says that the use of previously developed land is encouraged. Policy DP19.7 indicates that development should not create unacceptable adverse effects through increase in noise levels. The proposed employment development at Stanmore (Sites S57 and S58) would conflict with most of the issues set out in Policy DP19 because the land proposed for employment allocation is, a) In "countryside" and in the Green Belt – this is not a suitable location for operators that are engaged largely with the motor and steel fabrication, b) Is divorced from Bridgnorth town and thus is likely to encourage the use of motor cars, which will increase pollution and have a detrimental effect on public amenity. c) The local environment is relatively calm, quiet and with good air quality which would be adversely impacted by the proposed employment development at Stanmore and, d) The land proposed for allocation is not 'previously developed land' as defined in the NPPF
A0981B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Disagree	Sport England supports the wording of Part 1 of the policy that references the 'agent of change' principle as set out in para 182 of the NPPF. This will ensure that existing community facilities including sports clubs are not unreasonably constrained by having new sensitive receptor development in their vicinity that could lead to restrictions being placed upon them. Sport England supports parts 7 and 8 of the policy in relation to noise. Noise issues affecting sports facilities most often occur due to the relationship between outdoor sports facilities such as Artificial Grass Pitches (AGP's), artificial courts and other playing areas where associated sports lighting is used to maximise their use during periods when there is insufficient daylight levels to maintain player safety. Commonly, evening use until 10pm is critical to business planning to sustain the management and maintenance of the sports facility. To ensure an acceptable relationship that balances the need for sports lighting with amenity issues, Sport England has developed its own noise and sports lighting guidance, see attached links: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/artificial-grass-pitches-acoustics-planning-implications https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/artificial-lighting . In so far as parts 7 and 8 of the policy are intended to relate to noise from outdoor sports facilities, it is recommended that either the policy, or the reasoned explanation are expanded to refer to relevant industry guidance so that appropriate consideration is given to Sport England's best practice guidance when applying the policy. In respect of part 10 of the policy, Sport England considers that the policy wording should be expanded to require development proposals to demonstrate the need for and the benefits of providing the proposed lighting which should be balanced with potential impacts set out in parts a-g. This will ensure that where there is a need for new sports lighting to serve the use of existing or proposed sports facilities that this can be appropriately taken into account when applying the policy.
A0984B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	Support the policy, which seeks to safeguard environmental quality and public amenity, minimise pollution, mitigate adverse effects and maximise opportunities for improvements where practicable. Criteria are generally consistent with the aims of the NPPF. Support vision to improve air quality within the County and in particular welcome the flexibility with Part 3 of this draft policy. Recognise that there may be a number of different methods and opportunities to improve air quality as part of new development. Welcome the recognition within part 7 and 8 of this draft policy that although new developments may create additional noise and/or new developments may be sensitive to existing noise, a good standard of amenity can be achieved through mitigation measures and this is considered to be acceptable.
A1152B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	See wider representations.
A1192B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19		Support part 5 of the draft policy, which encourages re-use of brownfield land Consider the draft Policy should identify priority brownfield sites for delivery under this policy. As such the policy should be amended as follows: "The re-use of previously developed (brownfield) land is encouraged, particularly on the following sites: • Clive Barracks • Ironbridge Power Station • Former Depot, Riddings Road, Ludlow • The Eagles public house on A458, Cressage • Former Dairy Site, School Road, Ruyton XI Towns • Former Ifton Heath Primary School, St Martins • Former Oaklands School Site, Bayston Hill; and • Brownfield sites subject to saved site allocation policies of the SAMDev Plan. Alternatively, consider creating a new previously developed land/brownfield land policy. This would ensure the importance of the redevelopment of key brownfield sites is not overlooked during the draft Local Plan period. This policy would be as follows: "Brownfield/Previously Developed Land Shropshire Council is committed to maximising the number of homes built on suitable brownfield land/previously developed land. The re-use of previously developed (brownfield) land is encouraged, particularly on the following sites (include list above
A1630B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Disagree	This policy covers many areas and there is potential for it to cause duplication where it overlaps with the role of environmental regulators (Environment Agency), particularly on permitted sites. This could add unnecessary cost and complexity to the planning process We have already seen developments facing considerable uncertainty and delays due to air quality concerns. Applicants must be given consistent and clear guidance at an early stage so that they and their advisors know what information will be required in order to determine an application. Too often, this has been very unclear and has caused significant costs overruns and stress for applicants. Paragraph 4.171. sets out how agricultural development has been affected by concerns over ammonia and nitrogen deposition. We are concerned that there is still considerable uncertainty about the determination of these applications. In many cases standard figures and models are used which may overestimate ammonia and nitrogen emissions. More study is required to understand the true impacts of these developments. It should also be noted that the developments listed in paragraph 4.171 are not the only emitters of ammonia and nitrogen.
A1844B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Disagree	You may wish to consider whether the supporting text to this policy should expand on the issue of land stability and whether the policy title should be widened to include reference to ground conditions.
A2308B01 MOD	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Disagree	Shropshire includes an important operational training area at Nesscliffe and a number of sites where defence flying activities take place. Therefore, defence activities in Shropshire have potential to impact adversely on sensitive development. Shropshire is also covered by Low Flying Area 9, a dedicated helicopter training area for military helicopters. Noise sensitive development close to areas where defence activities create noise can lead to noise complaints, which in turn can result in the need to alter/stop defence operational activities/use of a site. This has the potential to adversely impact on national defence interests. Increasing volumes of development proposals could lead to an increase in noise complaints and, in many cases, the applicants fail to adequately assess noise arising from defence activities nor effectively engage with the Ministry of Defence (MOD) within noise assessments. Para 95 of the NPPF requires planning policies and decisions to ensure "operational sites are not affected adversely by the impact of other development proposed in the area". Support requirement within this draft policy for noise assessments to accompany proposals where new development would be sensitive to existing noise. However the explanation (para 4.175) should be extended to also refer to noise assessments being required for development that may be sensitive to noise given that Part 7 of the draft policy makes reference to this. Also consider that this para could refer to a requirement for appropriate noise assessment to consider noise arising from all relevant sources, including noise arising from defence activities and a recommendation that MOD be consulted by applicants proposing noise sensitive development.
A2407B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Agree	The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our well being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. Note: representation includes links to several documents which cover the functions of soils, their conservation and sustainable management, agricultural land quality, soil types, and DEFRA's Construction Code of Practice for Sustainable Use of Solid on Construction Sites. Air pollution. The proposed growth within the plan is likely to generate additional nitrogen emissions as a result of increased traffic generation which can be damaging to the natural environment. We note that policy DP19 outlines the potential requirements for air quality assessments to be submitted in support of a planning application and would support this.
A2475B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP19	Disagree	4.171 "Background levels of ammonia in the air and nitrogen loads deposited on natural habitats are generally well above the levels and loads recognised as causing damage throughout Shropshire." This is the only reference to ammonia in the whole document – it seems inadequate with regard to controls especially as we are at exceedance. There should be policy to address how ongoing development will contribute to bringing N2 and NH3 deposition down to sustainable levels. There will be in-combination effects regardless of mitigation – should this section specifically refer to Shropshire Council Interim Guidance Note GN2?
A0167B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20		Trust that the necessary assessments and mitigations concerning protection of the water environment and provision of draining required by this policy will be required of proposals associated with the SUE West and NWRR, to ensure that there will be no detrimental impacts on water storage capacity, water quality and drainage to protect adjacent land from surface water flooding.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0238B42	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Agree	Shropshire includes an important operational training area at Nesscliffe and a number of sites where defence flying activities take place. Therefore, defence activities in Shropshire have potential to impact adversely on sensitive development. Shropshire is also covered by Low Flying Area 9, a dedicated helicopter training area for military helicopters. Noise sensitive development close to areas where defence activities create noise can lead to noise complaints, which in turn can result the need to alter/stop defence operational activities/use of a site. This has the potential to adversely impact on national defence interests. Increasing volumes of development proposals could lead to an increase in noise complaints and, in many cases, the applicants fail to adequately assess noise arising from defence activities nor effectively engage with the Ministry of Defence (MOD) within noise assessments. Para 95 of the NPPF requires planning policies and decisions to ensure "operational sites are not affected adversely by the impact of other development proposed in the area". Support requirement within this draft policy for noise assessments to accompany proposals where new development would be sensitive to existing noise. However the explanation (para 4.175) should be extended to also refer to noise assessments being required for development that may be sensitive to noise given that Part 7 of the draft policy makes reference to this. Also consider that this para could refer to a requirement for appropriate noise assessment to consider noise arising from all relevant sources, including noise arising from defence activities and a recommendation that MOD be consulted by applicants proposing noise sensitive development.
A0306B048	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Disagree	DP20 (3) Proposals with any potential to effect water quality in Source Protection Zone 1 should be refused. DP20 (6) We would like to see an explicit hierarchy of measures, with management the highest priority and compensation the lowest. DP20 (6 & 7) We welcome the aims to conserve, enhance, and restore river course and riverside habitats.
A0642B41	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Agree	We agree with this policy and point out that the promotion of the NWRR in SP21 of the Shelton Water Supply within the Local Plan is inconsistent with this. We would like to see an explicit hierarchy of measures, with management the highest priority and compensation the lowest.
A0984B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Agree	Dully support this policy which seeks to ensure development does not adversely affect the quality, quantity or flow of both ground and surface water and the Council's standards to ensure there is sufficient water of a good quality to meet the needs of new development: Part 1 of the draft policy relates to water bodies covered by the WFD, support the protection of these water bodies and ensuring that development (both during construction and when operational) does not have an impact. Tiddle Brook has been fully considered and taken into account throughout the initial design and masterplanning of BRD030. Part 6 of this draft policy states proposals should help conserve and enhance existing watercourses/riverside habitats and water quality. The Tiddle Brook runs along the west/south boundary of BRD030, the masterplan has been designed and developed to create a new Country Park along the Tiddle Brook boundary which will enhance the natural environment of this watercourse and encourage additional habitats creation. This also upholds the principles of paragraph 170 of the NPPF
A1151B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Agree	Maintaining and improving water quality and the treatment of water and wastewater in the face of population growth, changing environmental legislation and climate change pressures will be an ongoing challenge for the development industry over the coming years. As our customers' expectations change, there is likely to be greater demand from customers for environmental improvements which is likely to be reflected in increased environmental standards over time. It is important that United Utilities maintains the ability to flexibly respond to environmental and growth drivers both now and in the future. Future development within the region will need to be managed to enhance the environmental quality of the immediate area and manage the effects of climate change. United Utilities would seek to encourage the use of systems like rainwater harvesting and grey water recycling that help to reduce pressure on public water supply and the public sewerage system. Additional benefits result in a reduced environmental impact by making sure that valuable resources are used efficiently, at time reducing the costs associated with improving local water infrastructure for a new development as they require less mains water. Additional benefit is that such measures will reduce future occupants' costs for both water bills and energy bills (through heating water). We therefore very much welcome the approach to the policies SP3, DP20, DP21 and DP23 and the detail in them to ensure development is delivered in the most sustainable way. One comment to make on the policies quoted above is that would wish to see a linkage between policy requirements mentioned directly to ensure that opportunities as part of any new development are not missed. It is understood that areas like green infrastructure provision will seek to ensure the sustainable management of surface water through multi-functional benefits which are part of a high quality green / blue water environment. The detail within the policy is understood but we would recommend further linkage in policies to encourage holistic approaches as development comes forward. It is important to note that as strategies come forward, like surface water management, there will an expectation for them to reference the connectivity with Green Infrastructure and how the two interact. It is important for the Local Plan to consider the approach to developing strategies and outcomes holistically and would challenge the Local Plan to encourage this approach further in policy wording to ensure opportunities for new development is not missed.
A1152B30	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Agree	Agree with the fundamental thrust of these policies in managing water resources and flood risk, in the light of the Climate Emergency and the ecological emergency. In some cases development, particularly major development, should take account of effects in other wider parts of the catchment area of which that development is part. No development should contribute to increased flood risk in other parts of the county or the wider catchment area.
A2308B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Disagree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike: "Where existing watercourses are to be enhanced within safeguarding zones designated to reduce the risk of birdstrike, they should be designed to ensure that the development/enhancement does not result in the creation of an attractant environment for large and flocking bird species that might pose a danger to aviation safety and operational capability."
A2407B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Agree	Natural England believes that the Plan considers the strategic impacts on water quality and resources as outlined in paragraph 170 of the NPPF.
A2475B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP20	Disagree	The policy and explanation should refer to Natural Flood Management.
A0101B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Agree	We support this policy
A0238B43	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Agree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike: "Where existing watercourses are to be enhanced within safeguarding zones designated to reduce the risk of birdstrike, they should be designed to ensure that the development/enhancement does not result in the creation of an attractant environment for large and flocking bird species that might pose a danger to aviation safety and operational capability."
A0240B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Disagree	3.10 Policy DP21(1) requires that 'new housing will be expected to meet the Building Regulations 110litres per person per day standard for water as recommended by the Shropshire Water CycleStudy.'3.11 In determining the standard which should be applied to new dwellings, the PPG30 confirms: 'All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.'3.12 Should the Council wish to adopt the higher optional standard for water efficiency of 110 litres per person per day, a clear need for this should be established based on the following, as also advised by the PPG:• existing sources of evidence. • consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. • consideration of the impact on viability and housing supply of such a requirement.3.13 The Shropshire Water Cycle Study (2020), which forms part of the Council's evidence base, confirms that the regions served by Severn Trent and United Utilities are areas of 'moderate' water stress and that Shropshire is not in an area of high water stress compared with the south and east of England3.14 The requirement for the higher water efficiency standard is unsound because it is unjustified and inconsistent with national policy. This policy requirement should be deleted.
A0306B049	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Disagree	DP21 (1) We would consider building regulations to be a minimum and thus proposals that don't meet these should be refused. DP21 (2) BREEAM status has 5 categories, with 'good' being the second worst classification – this is not ambitious enough. DP22 (7c) How can this be achieved? DP22 (12) We welcome this policy.
A0430B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Disagree	Support DP21(1) where the evidence for the tighter control is set out in the Shropshire Water Cycle Study. DP21(1) expects new housing to meet the Building Regulations 110 litres/person/day standard for water. PGG recognises that all new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day), but where there is a clear and evidenced local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. DP21(2) says that non-domestic buildings will be expected to reach BREEAM 'good' rating for water efficiency as a minimum, unless it can be demonstrated that this would make the development unavailable. However, the Written Ministerial Statement (March 2015) is clear in that local planning authorities should not set in their emerging Local Plans any requirements relating to the performance or construction of new dwellings. DP21(3) is supported in expecting major development schemes to provide a programme of water efficiency promotion and consumer education to effect behavioural change with regards to water use.
A0642B42	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Disagree	Para 4.183 So let's not mess ours up! References comments on DP20: We agree with this policy and point out that the promotion of the NWRR in SP21 of the Shelton Water Supply within the Local Plan is inconsistent with this. We would like to see an explicit hierarchy of measures, with management the highest priority and compensation the lowest.
A1151B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Agree	Maintaining and improving water quality and the treatment of water and wastewater in the face of population growth, changing environmental legislation and climate change pressures will be an ongoing challenge for the development industry over the coming years. As our customers' expectations change, there is likely to be greater demand from customers for environmental improvements which is likely to be reflected in increased environmental standards over time. It is important that United Utilities maintains the ability to flexibly respond to environmental and growth drivers both now and in the future. Future development within the region will need to be managed to enhance the environmental quality of the immediate area and manage the effects of climate change. United Utilities would seek to encourage the use of systems like rainwater harvesting and grey water recycling that help to reduce pressure on public water supply and the public sewerage system. Additional benefits result in a reduced environmental impact by making sure that valuable resources are used efficiently, at time reducing the costs associated with improving local water infrastructure for a new development as they require less mains water. Additional benefit is that such measures will reduce future occupants' costs for both water bills and energy bills (through heating water). We therefore very much welcome the approach to the policies SP3, DP20, DP21 and DP23 and the detail in them to ensure development is delivered in the most sustainable way. One comment to make on the policies quoted above is that would wish to see a linkage between policy requirements mentioned directly to ensure that opportunities as part of any new development are not missed. It is understood that areas like green infrastructure provision will seek to ensure the sustainable management of surface water through multi-functional benefits which are part of a high quality green / blue water environment. The detail within the policy is understood but we would recommend further linkage in policies to encourage holistic approaches as development comes forward. It is important to note that as strategies come forward, like surface water management, there will an expectation for them to reference the connectivity with Green Infrastructure and how the two interact. It is important for the Local Plan to consider the approach to developing strategies and outcomes holistically and would challenge the Local Plan to encourage this approach further in policy wording to ensure opportunities for new development is not missed.
A1152B31	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Agree	Agree with the fundamental thrust of these policies in managing water resources and flood risk, in the light of the Climate Emergency and the ecological emergency. In some cases development, particularly major development, should take account of effects in other wider parts of the catchment area of which that development is part. No development should contribute to increased flood risk in other parts of the county or the wider catchment area.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2163B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Disagree	This draft Policy seeks to introduce an optional standard for water efficiency of 110 litres per person per day. If this is wanted, then this should be justified against the criteria in National Planning Policy Guidance (NPPG). Also, under current Building Regulations, all new dwellings achieve a mandatory level of water efficiency of 125 litres per person, which is a higher standard than that achieved by much of the existing housing stock. The expectation for a programme of water efficiency promotion and consumer education is not required if minimisation of water use through the development construction is being implemented. This part of the policy requires further justification and clarity as to what this entails and how long it is expected. This policy should be amended in order to be found sound, as it needs to be positively prepared, fully justified and effective.
A2177B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Disagree	Draft policy requires new housing to meet Building Regulations 110 litres per person per day standard for water. This needs to be justified as outlined within a Written Ministerial Statement (25/03/2015 which included this standard should only be introduced "if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG" and the NPPG which states "helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand". The Housing Standards Review was explicit that this standard solely applies to water stressed areas. Current Building Regulations requires all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Shropshire Water Cycle Study (2020) reports that the Environment Agency and Natural Resources Wales assess the Severn Trent and United Utilities supply regions as areas of only "moderate" water stress (para 4.6.1) rather than an area of serious water stress. Consider that before the pre-submission LPR consultation, Bullet Point 1 should be deleted from Policy DP21.
A2308B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP21	Disagree	Would like to see this draft policy recognise there are appropriate alternative environmental performance assessment tools, equivalent to BREEAM. Specifically, would like to see reference to the Defence Related Environmental Assessment Method (DREAM) which is an environmental assessment tool developed by the Defence Infrastructure Organisation for new build and refurbishment projects on the defence estate.
A0167B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22		It is accepted that proposals to address flood risk management within Shropshire are evolving, and recent proposals for flood alleviation schemes as part of the NWRR were published following commencement of consultation, it is assumed these matters will be presented for consultation in future drafts of the Plan. It is also assumed relevant parties will be contacted by the Council to discuss these proposals and to provide assurances regarding potential impacts. Particularly concerned that any flood alleviation proposals forming part of the NWRR do not risk the future or increase flood risk of the Oxon Hall Caravan Park.
A0187B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt. Alongside this we must mitigate and reduce CO2 emissions.
A0189B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt. Alongside this we must mitigate and reduce CO2 emissions (respondent ref form 14)
A0238B44	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Agree	Document Reference BTC21: Generally supportive of identified policies for controlling aspects of development related to carbon emissions, the natural environment, water, the historic environment, the Green Belt and AONB. For DP22: We suggest that consideration be given to the option of funding residents to relocate from houses subject to a high flood risk, when this is more economic than installing high-cost flood protection for a relatively small number of houses.
A0306B050	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Para 4.190 A potential failure of the Sequential Test is that it just gives the 'least bad' option, highlighted by the fact that some of the allocated sites are in flood zone 2/3.
A0311B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A0323B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt (respondent ref; Form 14)
A0341B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt (respondent ref; Form 14)
A0356B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt (respondent ref; Form 14)
A0430B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Agree	Support DP22 to apply the sequential and exception test to ensure that the causes and impacts of flooding as well as residual flood risk, will be reduced through design measures, wherever possible. It is considered that the criteria reflect the requirements of the NPPF and PPG on this matter and confirm the development of safeguarded land in Shifnal will meet these objectives.
A0447B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	The context of the profound emergency that the world is and will increasingly experience as a result of pollution of land, sea and air and destruction of the natural world the plan is in general shockingly inadequate, not to say feeble in general tone. The draft policy needs to be more proactive/forward thinking, setting an example of how it can be done.
A0501B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Understandably, flood risk has its own strategy in the local plan. At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. Fourteen of the eighteen place plans have specific concerns with flooding and need action. The UK government guidance 'Climate Change Explained' https://www.gov.uk/guidance/climate-change-explained#the-impacts-of-climate-change warns that "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8°C warmer than the pre-industrial period by the end of this century. "As the local plan acknowledges:"...even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate." DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. The effects at 1.1°C above pre-industrial levels are already having severe impact on people and the economy. We do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A0642B54	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	NWRR and planned pseudo flood scheme will increase flood risk upstream. This aspect was not featured adequately in the public consultation and this will need to be repeated with consequent implications for timing of the scheme.
A0647B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Understandably, flood risk has its own strategy in the local plan. At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of 14 of the 18 Place Plans include specific concerns about flooding and need action. UK government guidance 'Climate Change Explained' warns: "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8°C warmer than the pre-industrial period by the end of this century". The draft local plan acknowledges "...even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate". Draft policy DP22 works on the assumption that we can continue to adapt to extreme weather and design our way around flooding. After the February 2020 floods, the Environment Agency was clear in pointing out that we cannot continue to make barriers higher. The effects at 1.1°C above pre-industrial levels are already having severe impact on people and the economy. We do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the draft Local Plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this draft policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A0648B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Understandably, flood risk has its own strategy in the local plan. At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of 14 of the 18 Place Plans include specific concerns about flooding and need action. UK government guidance 'Climate Change Explained' warns: "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8°C warmer than the pre-industrial period by the end of this century". The draft local plan acknowledges "...even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate". Draft policy DP22 works on the assumption that we can continue to adapt to extreme weather and design our way around flooding. After the February 2020 floods, the Environment Agency was clear in pointing out that we cannot continue to make barriers higher. The effects at 1.1°C above pre-industrial levels are already having severe impact on people and the economy. We do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the draft Local Plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this draft policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A0669B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	I object to the proposal for a large development at MUW012VAR, which is in contradiction to your own policies as outlined in DP22, since you are proposing to build on a site which is highly vulnerable to flooding. Worse still, residents already badly affected by flooding on the adjoining development of Hunters Gate – who have never received recompense from the developers, nor has any action been taken to address their problem by their Town Council or Shropshire Council – are now being expected to trust a partial, developer led solution to flooding on the proposed site, which could make the problem even worse. Shropshire Council has still not answered a question to Cabinet by a member of the public to say who will be liable if the developer-led flood solution doesn't work. Last time, nobody was liable! People are entitled to written assurances. They also need to know whom they should sue

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0670B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A0698B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A0970B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Understandably, flood risk has its own strategy in the draft local plan. At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. Fourteen of the eighteen place plans have specific concerns with flooding and need action. The UK government guidance 'Climate Change Explained' warns that "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8°C warmer than the pre-industrial period by the end of this century". As the draft local plan acknowledges: "... even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate". Draft Policy DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. The effects at 1.1°C above pre-industrial levels are already having severe impact on people and the economy. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the draft local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A1152B32	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Agree	Agree with the fundamental thrust of these policies in managing water resources and flood risk, in the light of the Climate Emergency and the ecological emergency. In some cases development, particularly major development, should take account of effects in other wider parts of the catchment area of which that development is part. No development should contribute to increased flood risk in other parts of the county or the wider catchment area.
A1180B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt (respondent ref; Form 14)
A1182B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt (respondent ref; Form 14)
A1609B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	This report has also identified that Shifnal had one of the highest surface water flood risks in the county and would be the most vulnerable to cumulative increases in flood risk due to new development. With most of this risk coming from Wesley Brook being a source to confluence with River Worfe. The Planning Policy Statement 25 (PPS25) requires that new development should not increase flood risk; due to this we feel that no new development should be permitted until this risk has been identified and reduced.
A1630B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Large new developments in urban areas have the potential to cause downstream impacts, even when new SUDs techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the area's watercourses and drainage infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure. The proposals for growth outlined in the document could lead to large new housing and employment developments in the urban area but despite the reference to the importance of flooding, scant information is provided on the downstream impacts.
A1634B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt (respondent ref; Form 14)
A1818B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	There should be more mention of policies upstream in river catchment areas
A1896B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A2110B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Understandably, flood risk has its own strategy in the local plan. At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. Fourteen of the eighteen place plans have specific concerns with flooding and need action. The UK government guidance 'Climate Change Explained' https://www.gov.uk/guidance/climate-change-explained#the-impacts-of-climate-change warns that: "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8°C warmer than the pre-industrial period by the end of this century." "... even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate." DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. The effects at 1.1°C above pre-industrial levels are already having severe impact on people and the economy. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A2150B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A2158B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A2163B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Part 2 a. of the draft policy requires a sequential test for development on land allocated in this plan unless the proposed use is in a More Vulnerable category (as set out in the Flood Risk Vulnerability Classification in national guidance). This draft policy establishes a blanket approach requiring a Sequential Test on sites that may only be partly in Flood Zones 2 and/or 3, even though there may not be any intention of developing these areas of a site. For allocated sites, the Development Guidelines seeks to avoid the particular development of these constrained areas. For instance draft guidelines for SHR173 state: "Development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, which will form part of the Green Infrastructure network." This draft policy should be amended to remove the requirement for a sequential test of allocated sites where they do not involve development in flood zones 2 and/or 3. This policy should be amended in order to be found sound, as it needs to be fully justified and effective.
A2167B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A2389B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Some of this policy looks to be incorrect in line with NPPG requirements e.g. ST requirements for More Vulnerable only. One part implied the sequential test would be for more vulnerable if allocated? Policies should reflect local circumstances, justified by evidence and the NPPF/G contains policy for use in determining applications so perhaps no need to duplicate locally – except perhaps fundamentally critical ones. Repeating some of the NPPG doesn't perhaps make the document unbold but it can make it longer than it needs to be and the main policy messages can be lost if it is perhaps unfocused and generates confusion.
A2407B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Agree	We believe the Plan positively contributes to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this. Support should also be given for natural flood management schemes.
A2427B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Understandably, flood risk has its own strategy in the local plan. At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. Fourteen of the eighteen place plans have specific concerns with flooding and need action. The UK government guidance 'Climate Change Explained' https://www.gov.uk/guidance/climate-change-explained#the-impacts-of-climate-change warns that: "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8°C warmer than the pre-industrial period by the end of this century." "... even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate." DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. The effects at 1.1°C above pre-industrial levels are already having severe impact on people and the economy. Yes we do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A2469B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt (respondent ref; Form 14)

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2489B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	Understandably, flood risk has its own strategy in the local plan. At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. Fourteen of the eighteen place plans have specific concerns with flooding and need action. The UK government guidance 'Climate Change Explained' https://www.gov.uk/guidance/climate-change-explained#the-impacts-of-climate-change warns that : "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8 C warmer than the pre-industrial period by the end of this century." As the local plan acknowledges: "... even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate." DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. The effects at 1.1 C above pre-industrial levels are already having severe impact on people and the economy. Yes we do need to adapt – but alongside it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt.
A2494B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP22	Disagree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. Understandably, flood risk has its own strategy in the local plan. Fourteen of the eighteen place plans have specific concerns with flooding and need action. The UK government guidance 'Climate Change Explained' https://www.gov.uk/guidance/climate-change-explained#the-impacts-of-climate-change warns that : "All these climate models tell us that under a scenario of ever-increasing greenhouse gas emissions the world could become up to 4.8°C warmer than the pre-industrial period by the end of this century." As the local plan acknowledges: "... even with concerted action, current levels of greenhouse gases in the atmosphere will lead to changes in the climate, such as increased average global temperatures, more extreme weather events and heightened flood risk. It will therefore be vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate." DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue, for instance, to make barriers higher. The effects at 1.1°C above pre-industrial levels are already having severe impact on people and the economy. Yes adaptation is needed, but along with this we need to do everything in our power to mitigate and reduce CO2 emissions. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. If the local plan does not commit to serious CO2 reductions then it is not fit for purpose. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adaptions.
A0026B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Agree	The Parish Council supports Shropshire Councils Sustainable Urban Drainage measures that Shropshire Council is proposing and feels that developers countywide need to be aware of the local issues when developing sites.
A0101B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Agree	Including urban creep as part of the drainage strategy for new developments is over and above the EA requirement - urban creep should be assessed as part of strategic modelling as undertaken by the Environment Agency and national climate change allowances amended to suit.
A0238B45	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Agree	At present, flooding is the most tangible evidence of impending climate crisis that most people in the county are aware of. It is vital to the long-term sustainability of Shropshire, and the health, safety and quality of life of its communities, that the County is able to adapt to changes in the climate. DP22 is working on the assumption that we can continue to adapt to extreme weather and that we can design our way around flooding. After the February 2020 floods the environment agency was clear in pointing out that we cannot continue e.g. to make barriers higher. Yes we do need to adapt – but along side it we need to do everything in our power to mitigate and reduce CO2 emissions. If the local plan does not step up to serious CO2 reductions then it is not fit for purpose. No amount of adaptation is going to prevent flooding and other extreme climate effects from destroying homes, livelihoods and ultimately people's lives. I disagree with this policy because it is incomplete and makes no reference to the steps that must be taken to mitigate the effects of flooding as well as adapt
A0430B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Agree	Support DP23 which requires developments to integrate measures for sustainable water management to reduce flood risk, avoid adverse impacts on water quality and quantity within Shropshire, including groundwater resources, and provide opportunities to enhance biodiversity, health and recreation. This requires major development (as defined in the NPPF) to include sustainable urban drainage systems and it is confirmed that development of safeguarded housing land in Shifnal will incorporate sustainable urban drainage systems.
A1151B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Agree	Maintaining and improving water quality and the treatment of water and wastewater in the face of population growth, changing environmental legislation and climate change pressures will be an ongoing challenge for the development industry over the coming years. As our customers' expectations change, there is likely to be greater demand from customers for environmental improvements which is likely to be reflected in increased environmental standards over time. It is important that United Utilities maintains the ability to flexibly respond to environmental and growth drivers both now and in the future. Future development within the region will need to be managed to enhance the environmental quality of the immediate area and manage the effects of climate change. United Utilities would seek to encourage the use of systems like rainwater harvesting and grey water recycling that help to reduce pressure on public water supply and the public sewerage system. Additional benefits result in a reduced environmental impact by making sure that valuable resources are used efficiently, at time reducing the costs associated with improving local water infrastructure for a new development as they require less mains water. Additional benefit is that such measures will reduce future occupants' costs for both water bills and energy bills (through heating water). We therefore very much welcome the approach to the policies SP3, DP20, DP21 and DP23 and the detail in them to ensure development is delivered in the most sustainable way. One comment to make on the policies quoted above is that would wish to see a linkage between policy requirements mentioned directly to ensure that opportunities as part of any new development are not missed. It is understood that areas like green infrastructure provision will seek to ensure the sustainable management of surface water through multi-functional benefits which are part of a high quality green / blue water environment. The detail within the policy is understood but we would recommend further linkage in policies to encourage holistic approaches as development comes forward. It is important to note that as strategies come forward, like surface water management, there will an expectation for them to reference the connectivity with Green Infrastructure and how the two interact. It is important for the Local Plan to consider the approach to developing strategies and outcomes holistically and would challenge the Local Plan to encourage this approach further in policy wording to ensure opportunities for new development is not missed.
A1152B33	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Agree	Agree with the fundamental thrust of these policies in managing water resources and flood risk, in the light of the Climate Emergency and the ecological emergency. In some cases development, particularly major development, should take account of effects in other wider parts of the catchment area of which that development is part. No development should contribute to increased flood risk in other parts of the county or the wider catchment area.
A2163B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Disagree	Part 5 of this policy requires an additional, but unspecified, allowance to reduce the impact of urban creep and notes that guidance for this is provided by the Lead Local Flood Authority (LLFA). However, it is not clarified what the guidance is and places an onus upon the LLFA to engage with developers at the pre-submission stage. Clarity should be provided by more specific reference to the guidance within the draft policy. This policy should be amended in order to be found sound, as it needs to be fully justified.
A2308B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP23	Disagree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike: "Where Sustainable Drainage Systems are to be created/installed within safeguarding zones designated to reduce the risk of birdstrike, they should be designed to ensure that the development/enhancement does not result in the creation of an attractant environment for large and flocking bird species that might pose a danger to aviation safety and operational capability."
A0020B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Disagree	This policy applies to "non-designated heritage assets" which are set out in the Shropshire Historic Environment Record. It therefore needs to cover the whole of the Shrewsbury Canal, its water channel and towpath as well as all remaining structures.
A0238B46	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Agree	The Parish Council supports Shropshire Councils Sustainable Urban Drainage measures that Shropshire Council is proposing and feels that developers countywide need to be aware of the local issues when developing sites.
A0306B051	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Disagree	Weak wording - Remove 'wherever possible'
A0430B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Agree	Support DP24 to protect the heritage assets in the County. The heritage assessment that has been undertaken so far for the Wallace site and provided in Appendix 1 confirms there are no heritage constraints that would prevent the Site coming forward for housing.
A0573B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Disagree	Object to DP24 to protect and conserve heritage assets and to make balanced judgements about the benefits of proposals which may have impacts causing loss or harm to heritage assets. DP24(4) simply requires the benefits of a scheme to clearly outweigh the loss or harm to a heritage. This would conform with NPPF para 196 in making judgements about impacts on a designated asset. DP24(4) would not also conform with NPPF para 197 which requires a balanced judgements about impacts on non-designated assets to consider the scale of any harm and the significance of the asset. DP24 must distinguish between the tests for designated and non-designated assets and DP24(4) should reflect the tests in NPPF para 197. The tests in DP24 require the removal from the Plan of proposed allocation SHF032 to be reviewed in relation to its proximity to Grade II* Aston Hall based on the submitted Heritage Assessment. This should consider the significance of the setting and the potential impacts of residential development on the asset. At present, SHF032 makes a moderate positive contribution to the significance of the asset as part of its wider rural setting but the significance of Aston Hall relates to high quality architecture, historic fabric and immediate setting which are not impacted by SHF032. Suitable mitigation measures are also possible - landscaping the north and north-west boundary adjoining the Hall and Garden, tree planting in the north sector of SHF032 to soften the appearance of development, restraining the scale and massing of development in the north to two storeys, restraining dwelling design in the north to more traditional architectural forms with prominent dwellings using local details in their design and avoiding repetitive dwelling sizes and design. This has public benefits from contributing to housing supply in Shifnal following a long period of restraint to meet Black Country needs and support the new standard methodology. Sites SHF032 with SHF018b - SHF018d will contribute to the economic growth objectives: increasing productivity, delivering jobs, balancing housing and employment.
A0672B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24		Agree with the draft policy of Conserving and Enhancing the Historic Environment.
A0957B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24		Draft policy DP24 seeks to conserve and enhance designated and non-designated heritage assets. This draft policy recognises the importance of Shropshire's heritage assets. However, it lacks the specification or illustration that is needed to clarify issues such as degrees of harm to an asset and loss of significance. It states how proposals that will deliver positive benefits to heritage assets will be supported. However, it lacks a robust refusal where harm will affect the asset and instead discusses mitigation measures. This policy is not strong enough to overcome the poor environmental husbandry of Shrewsbury's buildings alone. Nevertheless, there is reference to more detailed supplementary planning guidance. However, the Shrewsbury Place Plan makes only passing reference to the Town's precious, architectural and heritage richness. This Place Plan has categories concerning housing development, retail improvement, industry and employment, etc., but none for heritage enhancement and protection – the very aspects that make the town an enduring visitor destination. Reflecting this, Shropshire Council owns several of the town's heritage asset buildings that are in poor repair. Too many of Shrewsbury's buildings are allowed to stay in poor condition. The advice from the LA concerning the juxtaposition and alterations to heritage assets lack conservation rigour
A0984B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Agree	Fully agree with this policy and the protection of Shropshire's heritage assets. Support recognition within Part 3 of this draft policy that the likely loss, or harm to, the significant of a designated heritage assets should be determined in line with the NPPF.

Page 86

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0997B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Agree	The inclusion of this policy is welcomed. The additional information on Heritage Assessment requirements set out in the explanatory text following the policy is clear, as are expectations set out in paras. 4.208 and 4.209.
A0997B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Don't know / no opinion	It remains unclear how impact on the historic environment has been considered as part of the Plan process. On this basis it seems that the Plan puts forward a number of sites which, if developed, have the potential to affect the significance of one or more designated heritage assets in their vicinity. Without clarity of any assessment of the degree of harm which the proposed site allocations might cause to the historic environment or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, at present, the authority cannot demonstrate that the sites it is putting forward for possible development is compatible with the draft policy for the protection of the historic environment set out in the draft Plan or the requirements set out in the NPPF. We would welcome opportunity to discuss whether assessment information has been produced but not shown as part of the current evidence base at this time, and to discuss sites which are of particular concern to use at this time without such assessment information
A1152B34	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Agree	Agree with all measures designed to protect, conserve, enhance and restore Shropshire's Historic Environment, including the setting of its historic assets.
A1161B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Agree	We support the policy regarding Heritage assets such as listed buildings, but this needs to be strengthened and extended to include impacts on designated conservation areas. This would assist in ensuring the impact from CLU002 and CLU005 are minimised in regard to the impact on the character of the Town of Clun from its eastern approach.
A1609B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Disagree	No reasoning is provided to justify why other sites have rejected in the area and Shropshire Council's exceptional statement (para 8.74) indicates that opportunities for industrial development within neighbouring Telford have not been considered. There are contradictions under Shifnal's Development Strategy – at point 7 which contradicts point 4 in relation to special circumstances. Shifnal does not require 1,500 new dwellings and 41 hectares of employment land and therefore the release of land is not justified, as very special circumstances outlined are not applicable. The proposed housing sites total 13 Ha and the LPR suggests that 230 homes will result from these sites. This seems to be an unusually low housing density particularly if the housing is to be affordable. The average housing density in the strategic sites consultation was 28.6 homes per Ha and if this is used for these 3 sites then they are more likely to provide 372 more homes in Shifnal.
A1844B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Disagree	We would welcome recognition that the canal network is an important part of Shropshire's industrial heritage in the explanatory text to this policy.
A2163B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Disagree	Heritage policy is clearly set out on the NPPF, with an emphasis on avoiding harm to the significance of designated heritage assets, with more flexibility provided to non-designated heritage assets. There is a significant risk that the local plan is seeking to reframe the language of national policy, through parts 1-4. Whilst there is a need for a historic environment policy as part of the local plan, this need only comprise parts 2 and 3 of the draft policy. Part 7 of the draft policy states that applications for development affecting designated or non-designated heritage assets are to be determined in line with more detailed supplementary planning guidance where applicable. From the wording, it is clear that this guidance has not yet been published and it is assumed that it will be produced alongside the local plan review. However, applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise, i.e. the NPPF/supplementary guidance. Decisions made on applications can only be made in accordance with relevant policies of the development plan that have gone through the scrutiny of public examination, with supplementary planning guidance being a material consideration. This part of the policy is vague and imprecise, and it is not clear how the supplementary guidance will differ from the NPPF. There would be no justification for supplementary guidance to depart from NPPF policy, which has been scrutinised and clarified by courts in a number of high profile cases, and should therefore be removed. This policy should be amended in order to be found sound, as it needs to be fully justified, effective and compliant with national policy.
A2394B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Disagree	1. There is no mention here of 5 106 contributions (or money from CIL payments) from developments in the area of heritage assets (e.g. new housing beside a canal) being used to assist to restore or repair heritage assets. We should like to see an extra policy being added along the lines of "Developments near to heritage assets should be the subject of Section 106 (or CIL) payments which should be used to restore/repair the heritage assets, recognising the added value of such new properties due to their being close to the heritage assets". Anecdotal evidence suggests that the value of Canalside properties can be 20% higher than similar properties which are not canal side. Reason: to provide funding (from the increased sale prices developers can achieve) for restoration/repairs 2. Para 4.203 which describes non-designated heritage assets should be amended to include "canals, canal towpaths, canal locks, tunnels, aqueducts, bridges, houses, warehouses and similar structures" Reason: to ensure that canals and related structures are included in the list of non-designated heritage assets 3. The area in Llanyrnech shown as a heritage area is, we believe, only the area covered by the Scheduled Monument designation for the historic limekilns etc. We ask that the area including the Montgomery Canal itself (including the towpath), the canal yard to the west of the designated area and the canal loading basins and wharves to the east of the designated area, be protected from unsuitable development - not added to the Scheduled Monument area Reason: When the restoration of the Montgomery Canal gets to Llanyrnech, there will be a need for a boat based hub, including for visitors arriving by boat, bringing increased economic activity to the area. This would also enable sympathetic treatment of the waterside parts of the Scheduled Monument which are at present quite neglected.
A2403B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24	Agree	The Estate acknowledges the need to ensure the areas heritage assets will be protected, conserved, enhanced and restored as appropriate. The Sundorne Castle Estate is an important part of Shropshire's history and remains responsible for a number of county's heritage assets. The Estate takes its heritage responsibilities seriously and is focused on the conservation of significant heritage assets, as well as taking opportunities to breathe new life into historic structures. It is therefore pleased to see that the policy encourages development which would bring positive benefits to heritage assets. This should include giving weight in the consideration of proposals to where public access and appreciation of a heritage asset would arise as a result of a development.
A2479B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP24		DP24: Conserving and Enhancing the Historic Environment (pgs. 120-122) The following are responses to the numbered paragraphs in this section of the Local Plan. DP24 is a key component of the Local Plan as regards the Bishop's Castle Key Centre. DP24 is highly significant as regards future development in the town as the Conservation Area constitutes a significant portion of the settlement. It is also one of Shropshire's significant heritage assets and thus is defined by DP24 as needing to be "protected, conserved, sympathetically enhanced and restored." A Character Assessment (CA) of the Bishop's Castle Conservation Area (BCCA) has recently been produced jointly by the Bishop's Castle Community Partnership (CP) and the Bishop's Castle Town Council (TC): the former as part of the annual update of their Community Led Plan; and the latter in preparation of the Bishop's Castle Neighbourhood Development Plan. The CA which forms Appendix 1 of the Neighbourhood Development Plan (NDP) (currently in Draft Regulation 14 Stage) identifies and evidences critical issues that need to be addressed if this significant heritage asset is to be "protected, conserved, sympathetically enhanced and restored." The DP24 Policy includes 7 actions required to address the Policy. As regards the BCCA, to realise the 7 actions, the following is required: 1. Ensuring that wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings. The boundary of the BCCA is that of the original Norman planted town. The current settlement and its infrastructure mirror the original 12th century settlement. Hence the Historic Environment Record lists 267 separate heritage assets, within the BCCA including: 1 Scheduled Monument; 5 Grade II* Listed properties; 100 Grade II Listed premises; and 161 non-designated heritage assets. Through the following 8 centuries the town has prospered and developed, enhanced by the impact of its Tudor and Georgian edifices and its position as a Rotten Borough. It has also retained its original form, street pattern and buildings, including the medieval thoroughfares with premises hard up against the carriageway or narrow pavement. The consequence of this in the 21st century is the difficulty of accommodating the demands of modern traffic and parking requirements without "harm or loss of significance to designated or non-designated heritage assets, including their settings." The CA provides evidence of both harm already done to heritage assets within the BCCA and the ongoing dangers that are regularly occurring to assets and their settings because of the conflict between traffic and parking demands and the medieval street pattern that exists within the Conservation Area setting. The traffic conflict is exacerbated by the fact that the A488, which lies immediately to the east of the town provides the only access to the English hinterland and to major centres along the Welsh borders to the south. The rural lanes leading out of Bishop's Castle on the western side access only the rural Welsh hills and the Montgomery Road, the B4385 leads only to Welshpool and Newtown and then to distant towns and their hinterland in north and west Wales. The A488 therefore is by far the major route for both commercial and residential journeys to and from the town. Consequently, all traffic including commercial deliveries to and from premises on the western side of the Conservation Area, must travel through the Conservation Area to access the hinterland either via the A488 or the B4385. To satisfy DP24 1. It is essential that no future development of sites outside the development boundary that would require to use a Conservation Area street(s) to access the A488 either by School House Lane or Brampton Road is permitted. 2. Ensuring that proposals which are likely to affect the significance of a designated or non-designated heritage asset, including its setting, are accompanied by a Heritage Assessment. The level of detail in the Heritage Assessment should be proportionate to the asset's significance. The CA includes a detailed analysis of what constitutes the character of the Conservation Area and each of the 9 zones that were surveyed within it. This includes architectural design features and decorative embellishments through the ages. To satisfy DP24 2. The Heritage Assessment should be required to always reference consideration of the CA (NDP Appendix 1) document including the appropriate zone analysis and acknowledge any relevant architectural or setting features that may be appropriate. 3. Ensuring that proposals which are likely to result in any loss of, harm to, the significance of a designated heritage asset, including its setting, either directly or indirectly, are determined in line with the National Planning Policy Framework. To satisfy DP24 3. When undertaking Local Plan Reviews to accommodate the required, ongoing 5 year supply of housing land, a priority rating must be given in the assessment process to eligible sites that do not require access to the A488 via a street(s) in the Conservation Area. 4. Ensuring the proposals which are likely to result in loss of, or harm to, the significance of a non-designated heritage asset and/or its setting, either directly or indirectly, will only be permitted if it can be clearly demonstrated that the benefits of the proposal outweigh that loss or harm. In making this assessment the following will be taken into account: a. The degree of harm or loss of significance to the asset and/or its setting; b. The importance of the asset; and c. Any potential beneficial use. 5. Where such proposals are permitted, measures will be required to: a. Mitigate and record the loss of significance to the asset and/or its setting; and b. Advance understanding in a manner proportionate to both the asset's and/or its setting's importance and the level of impact. The CA identifies the collective nature of the BCCA in that the footprint of the settlement today mirrors that of the 12th century settlement and its medieval street pattern. The Conservation Area setting is in itself part of the significance of each of its assets and is inseparable from them. The fact that in this small area there are 267 separate heritage assets, tightly packed together, including a Scheduled Monument, 5 Grade II* Listed properties and 100 Grade II Listed premises as well as 161 non-designated heritage assets confirms that the area as a whole is a unique heritage asset of great significance. Damage to a single asset within it, regardless of whether it has a designated or non-designated status, impacts therefore on the whole setting and as such is of equal importance (Point 4.b.). To satisfy DP24 4. and 5. It is necessary when assessing "loss of or harm to the significance of a non-designated heritage asset and/or its setting" to take account of the fact that in the case of this 12th century settlement and its footprint, the interrelationship between the designated and non-designated assets and between the setting as a whole and a non-designated asset are significant factors in the overall character of the BCCA. Thus, a property's significance is greater than its non-designated status would imply. 6. Encouraging development which delivers positive benefits to heritage assets. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor condition. The CA identifies 9 sensitive sites, 5 of which are within the BCCA boundary and 4 immediately adjoining it. Development on all these sites could either enhance or harm the heritage asset that is the Conservation Area.
A0142B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	No need or special or exceptional circumstances justification to remove from Green Belt or alter Green Belt boundary and land should not be taken out of the Green Belt. The Council's Green Belt Review is not an "exceptional circumstance" and the Review undertaken did not identify a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0158B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Don't know / no opinion	The Council notes that the only parcels of Green Belt land which it is proposed to release for housing or mixed use are in Alveley. This increases the obligation on Shropshire Council to ensure that future developments are appropriate and adequately supported by infrastructure improvements.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0238B47	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	We support the policy regarding Heritage assets such as listed buildings, but this needs to be strengthened and extended to include impacts on designated conservation areas. This would assist in ensuring the impact from CLU002 and CLU005 are minimised in regard to the impact on the character of the Town of Clun from its eastern approach.
A0240B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Don't know / no opinion	3.15 Policy DP25(1) confirms that 'safeguarded land, being land removed from the Green Belt for future development needs beyond the current Local Plan period, is shown on the Policies Map.' 3.16 As set out in its response to Policy S15 (Shifnal Place Plan Area), L&Q Estates consider that the existing safeguarding of 'land between Revells Rough, Lamedge Lane and the eastern rail line is inappropriate and should instead be allocated for housing to meet an increased housing requirement necessary for the delivery of Policy SP2 (Strategic Approach). 3.17 A Vision Document has been prepared and is submitted alongside these representations. This demonstrates that the land at sites SHF022 and 23 is capable of delivering 100 dwellings, with the safeguarded land able to deliver a further 240 dwellings, alongside open space and necessary highway infrastructure.
A0261B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Green Belt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0261B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A0306B052	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Our concerns relate to the loss of green belt. Given the green belt review and classification of green belt areas, we find it unacceptable to develop (or 'safeguard') where a release of greenbelt would cause a moderate or above risk of harm.
A0357B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0397B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Green Belt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0397B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A0413B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Don't know / no opinion	The green belt must be protected and developments restricted.
A0430B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Support DP25(1) and reference to Policies Map to identify the extent of the Green Belt and safeguarded land for future development needs beyond the plan period. Table DP25.1 in the supporting text identifies the locations of Green Belt release and whether it is proposed to be allocated for housing or employment or safeguarded. Comment on the decision to release land from the Green Belt, particularly at Shifnal, but note that the Green Belt release does not include any housing allocations in Shifnal or the M54/A5 Strategic Corridor and there is a compelling case to allocate the Site for housing in the plan period rather than safeguard for the future. There is a sound justification for allocating safeguarded housing land in Shifnal or at least providing a monitoring / 'Plan B' policy for safeguarded sites. DP25(2) to (7) are recognised setting out when development in the Green Belt would be considered appropriate or not inappropriate.
A0507B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Comments concern a range of issue around policy DP 25 Green Belt land at RAF Cosford. Removal of the strategic site from the Green Belt is welcomed although its considered that the site allocated in inadequate to meet the requirements of the Local Plan. Issues raised include - Remaining undeveloped land at the site is very small when existing use is considered (S21.4); Consideration must be given to the fact that much of the open area is green space alongside the runway and hangers which limits future use if the runway is to remain operational; allocation of land should also consider the needs of the annual Air Show and expansion of the RAF Museum and should not detract from these important existing uses; any loss of accommodation on land east of the A41 and north of Sydnal Lane could impact on the sites future growth as a training centre which is estimated to expand in the next 10 years.; The constricting nature of the land allocation is further demonstrated by the need to remove 15 hectares of land at Neachley Lane to accommodate the formation of a new headquarters for the Midland Air Ambulance Charity referred to in S21.3. The existing site area obviously could not accommodate this fairly insignificant proposal without requiring the removal of this additional land from the Green Belt; In conclusion while the removal of land from the Green Belt in Policy DP25 is welcomed it fails to meet the Councils own requirements and those of the NPPF require the Green Belt review to considered both Shropshire's current Plan development requirements as well as the need to safeguard land to accommodate future development needs beyond 2038. To meet this shortfall the Council should re-examine the site to the west of the A41 bounded to the north by Sydnal Lane and to the west by Shackerley Lane. This would provide an additional 16 hectares of land for future development without significant impact on the aims of the Green Belt and by retaining an element of open Green Belt between Cosford and Albrighton to maintain a strategic gap.
A0538B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	As per DP25, if the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no exceptional circumstances have been advanced that would justify the development of the land at Stanmore, and it would represent inappropriate development, cation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A0539B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	As per DP25, if the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no exceptional circumstances have been advanced that would justify the development of the land at Stanmore, and it would represent inappropriate development, cation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A0540B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	As per DP25, if the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no exceptional circumstances have been advanced that would justify the development of the land at Stanmore, and it would represent inappropriate development, cation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A0566B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Green Belt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified no exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as exceptional circumstances in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0697B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Support proposal to remove ALB014 from the Green Belt, However consider the site should not be proposed as safeguarded land but allocated for residential development in the draft Local Plan. See wider representation Long considered there was a need to review the Green Belt given it constrains growth in east Shropshire (including Albrighton). The SAMDev Plan inspector instructed a Green Belt Review to occur as part of an early Local Plan Review. Comments on the Green Belt Review are addressed in the response to the Sustainability Appraisal Site Assessment process. With regard to the Exceptional Circumstances Statement, recent legal judgements need to be considered. The judgments clarify that if Green Belt is to be released, it should happen as part of a two-stage process. First 'strategic' level exceptional circumstances for release need to be justified; and second site-specific exceptional circumstances need to be justified. Justification for release is primarily under draft Policy DP25 supported by an Exceptional Circumstances Statement. Broadly support the approach to the release of Green Belt as it relates to Albrighton: At the strategic level, broadly agree that there are exceptional circumstances to justify release of Green Belt at Albrighton. Clearly the needs of Albrighton (and thus the development strategy as a whole) cannot be achieved simply by redeveloping and intensifying the existing built-up area of the settlement (completions since 2006 have been very low, primarily as a result of the constraint provided by the Green Belt). At the site specific level, agree that ALB014 is suitable for removal from the Green Belt. However, the case made is to remove ALB014 from the Green Belt to safeguard for future development, object to this as exceptional circumstances exist to release the site for development now. This is supported by the Council's own evidence, including conclusions that release of this land from the Green Belt would not undermine the purposes of the Green Belt (although consider additional evidence submitted in support of this representation shows likely harm to the Green Belt of developing ALB014 would be 'low-moderate' rather than 'moderate', as claimed by the Council). An illustrative masterplan also submitted as an appendix to this representation demonstrates compensatory measures are capable of being delivered in accordance with the NPPF, principally through open space on adjacent land to south of ALB014, that would be available and accessible to residents of the site and the wider community. These factors taken together provide sufficient benefits to support site specific exceptional circumstances of ALB014. Consider the draft Local Plan should go further and allocate additional land at Albrighton, and the only way of doing this is to release land from the Green Belt. ALB014 offers a great opportunity to deliver additional growth at Albrighton on a sustainable site that would not undermine the purposes of the Green Belt in this location if developed as such consider ALB015 should be allocated rather than safeguarded for development beyond the proposed Local Plan period. A Landscape Appraisal and Green Belt Assessment of ALB014 are submitted as appendices to the representation. These support the proposed changes to the Green Belt boundary in Albrighton. The Green Belt Assessment concluded the release of ALB014 from the Green Belt would have low-moderate harm to the Green Belt, rather than the moderate harm concluded within the Shropshire Council Green Belt Review. The Landscape Appraisal concluded that the overall landscape character of ALB014 is more enclosed than typical Sandstone Estate lands Landscape Type (which it is considered within the 2006 Shropshire Landscape Typology), with well-defined hedgerow/hedgerow tree field boundaries. There are no statutory/non-statutory landscape designations and no public access, although likely valued at a local level for its openness. Landscape quality is influenced by proximity to the settlement edge and overlooking from a number of properties. Overall considered to have medium landscape quality and value and not considered a valued landscape. With regard to visibility, ALB014 is well contained from its surroundings by established boundary vegetation. There are only limited opportunities for views of ALB014, beyond its immediate surroundings. Both reports conclude that the removal of this site from the Green Belt would result in limited harm to the Green Belt and that it would be consistent with national policy and is fully justified.
A0836B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	DP25.1 No necessity to alter Green belt boundary. Land proposed for employment should not be taken out of green belt. No exceptional circumstances have been put forward to justify or evidence this action. Other reasonable options exist for the development within the vicinity. DP25.2 developing the land would be regarded as "inappropriate development" as it conflicts with the aims of the green belt and no special circumstances have been shown. Support SP11.2.e but the proposal to remove land from the green belt is in conflict with this aim.
A0864B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Greenbelt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0864B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be indirect conflict with Policy DP25.2.
A0888B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	With regard to draft Policies DP25 (Green Belt and Safeguarded Land) and S21 (Strategic Site RAF Cosford) or S1 (Albrighton Place Plan Area), proposed an amendment to the policies to allow the allocation (or safeguarding) of land at Newport Lane, Cosford which should be removed from the Greenbelt and allocated for housing development to support the strategic growth objectives of RAF Cosford. See wider response.
A0911B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Representation on behalf of Hobbins Management Company covering a range of Policies relating to Bridgnorth. Broadly in support of the policies, but stress that the policy position doesn't appear to have been followed in setting the allocation of employment land at Stanmore. In regards to DP25 the client supports Policy DP25.2 Policy DP25.2 which says that the Green Belt will be protected against inappropriate development, as defined by national policy. However there is great concern, however, that this Policy is not being properly applied with regard to Stanmore. A detailed review of why its considered exceptional circumstances have not been submitted is included in the response, and concludes that It is clear that "exceptional circumstances" sufficient to justify the removal of Green Belt designation from the land at Stanmore do not exist and the allocations should be deleted from the Plan.
A0911B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Representation on behalf of Hobbins Management Company covering a range of Policies relating to Bridgnorth. Broadly in support of the policies, but stress that the policy position doesn't appear to have been followed in setting the allocation of employment land at Stanmore. In regards to DP25 the client supports Policy DP25.2 Policy DP25.2 which says that the Green Belt will be protected against inappropriate development, as defined by national policy. However there is great concern, however, that this Policy is not being properly applied with regard to Stanmore. A detailed review of why its considered exceptional circumstances have not been submitted is included in the response, and concludes that It is clear that "exceptional circumstances" sufficient to justify the removal of Green Belt designation from the land at Stanmore do not exist and the allocations should be deleted from the Plan.
A0928B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The approach to Green Belt Review is noted as part of the plan. However, the exceptional circumstances to justify the need to amend Green Belt boundaries to accommodate development needs must have regard to the significant availability of non-Green Belt land within Shropshire to accommodate needs as a first and important priority. It is noted that only a limited amount of Green Belt is lost to meet housing needs, and most Green Belt loss is associated with employment needs, but either way the Plan needs to provide for the exception circumstance justification to make these changes. Paragraph 137 of the Framework states that "before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development." Green Belt should only be released if the development strategy demonstrates growth at certain locations/settlements should/needs to take place to provide a sustainable approach to the distribution of development. If no Green Belt alternatives exist at such a settlements, then such an approach may lead to exceptional circumstances
A0956B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	In light of opportunities for further development at non-Green Belt locations at the Strategic and Principal Centres consider whether the case for 'exceptional circumstances' for the release of Green Belt proposed is fully justified. Draft Policy identifies areas that are to be removed from the Green Belt and it identifies areas of 'safeguarded land' for future development (subject to a further Local Plan Review, in line with the NPPF, paragraph 139). Given that safeguarded land can only be released for development following a further Local Plan review that proposes the development the Council should consider the need for further flexibility beyond the plan period via the identification of sites which could come forward in a more timely manner to respond to future market circumstances. The NPPF (paragraphs 136-137) requires the Council to fully demonstrate 'exceptional circumstances' exist to justify amendments to the Green Belt. As such the draft SLP is supported by an 'Exceptional Circumstances Statement' (August 2020). This has utilised the Green Belt Assessment (Part 1, 2017) and Green Belt Review (Part 2, 2018) alongside other pieces of evidence to inform its conclusions. In relation to the proposals for Green Belt amendments (particularly those at Shifnal where over 90ha of safeguarded land are identified for potential housing and employment development) the Exceptional Circumstances Statement provides a summary for each settlement on how the provisions of the NPPF (paragraphs 136-137) are met. This includes an assessment of all other 'reasonable options' to the release of Green Belt land. It is queried if the release of Green Belt land is fully justified in this context. For instance, in relation to Shifnal the Exceptional Circumstances Statement (paragraphs 8.73-8.81) it is noted that there are potential alternative non-Green Belt options at other urban locations along the strategic growth corridor, including Shrewsbury, which could mean that in the balance a case for exceptional circumstances is not fully justified. The case for exceptional circumstances should be fully justified as per the NPPF. The Council should consider the appropriateness of non-Green Belt housing land supply options for beyond the plan period within the context of its urban focused strategy to ensure the SLP is effective.
A0981B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Sport England supports part 7) of the policy which identifies that outdoor sport and recreation development are permitted exceptions to the principle of inappropriate development in the Green Belt, in accordance with para 145 of the NPPF, where this relates to the construction of new buildings and also para 146 in so far as this relates to changes of use of land. In this regard, it is recommended that the wording of the policy be amended to make this explicitly clear that part 7) of the policy relates to both construction of new development and changes of use of land to be consistent with national Green Belt policy. In respect of part 4) of the policy that relates to development on previously developed sites, it is noted that local community uses are included within the range of permitted uses, however to ensure consistency with part 7) of the policy and national Green Belt policy, it is recommended that the wording is clarified to make it clear that such local community uses can include outdoor sport and recreation uses for the avoidance of any doubt.
A1101B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	This draft policy is a development management policy designed to guide decision making. However, the explanation is about the Green Belt review (reasons for it, methodology and outcomes) and includes a schedule of proposed Green Belt release. Consider the Green Belt Review methodology is too limited and falls short of testing all five purposes of Green Belt. Consequently it does not provide sufficient detail to consider overall performance of parcels assessed. Specifically in respect of Purpose 3 - to assist in safeguarding the countryside from encroachment. A Green Belt Position Note (including a landscape character led approach) has been submitted (Appendix to this Rep) in relation to Stanmore Garden Village. The assessment concludes that given the reduced size of the site (it now excludes much of Parcel P54), the function of the site relative to Green Belt Purpose 3 actually diminishes in certain areas due to the effect of limited representation of key characteristics of the countryside, urbanising features and recreational access to the wider Green Belt. It considers that Parcels P56 (Hermitage Farm) and P57 (north west Stanmore Business Park) make no more than a 'moderate' contribution to Green Belt Purpose 3, not a 'strong' contribution as in the Council's evidence. The Council's Green Belt Review also identified high levels of harm to the Green Belt is P54 were released (south of the A454 and Swancote), this parcel is primarily excluded from the revised boundary for Stanmore Garden Village. Stanmore Garden Village can readily provide defensible, durable boundaries to west, south, north and east and through delivery of Public Open Space and new planting could reinforce the defensible boundary and buffer to the wider Green Belt. These factors ensure the site is an isolated parcel of land with functioning Green Belt buffers established by an arc of existing development. In respect of other Green Belt purposes, the Council's assessment shows the site to make either no contribution or a weak performance.
A1135B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	We do not accept the conclusions of the 2018 Green Belt Review. That review takes a cell-based approach to the assessment process and it is evident that the subject site has been assessed as part of a much wider whole (cell P36). We do not understand how certain cells have been conveniently sub-divided to allow more detailed critique of particular field parcels. Had a similar exercise been undertaken in respect of the Harp land/ALB023, a different conclusion would have emerged. None of the sites identified as safeguarding are known to be available. Inclusion of the Harp Land in P36 is not logical nor reasonable and its allocation / release would neatly "round off" the settlement pattern in this location. If the Harp land is developed, it would not undermine the characteristics of the countryside and the "limited urbanising development" characteristic of parcel P36. By the Council's own evidence the development of the Harp Land would give rise to limited harm to the Green Belt as it presently fulfils only 2 of the 5 Green Belt purposes. By our own assessment it fulfils none. We have reservations about Policy S1.1 sub paragraph 8 and the long-term locations for growth beyond the Albrighton development boundary that are proposed to be safeguarded from the Green Belt to meet future development needs. Comparably, release of the Harp Land would have a lower level of harm than the proposed safeguarded areas P32a, P35 and P36. P36/ALB014 protrudes into the open Green Belt and does not comprise a logical extension to the settlement boundary in this location.
A1152B35	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25		Agreement with the overall thrust of the policies. Disagreement with particular proposals. Agree with all measures designed to protect the Green Belt and the AONB against inappropriate development. Endorse comments made to this consultation by the AONB partnership. On the whole we welcome the increased recognition of the importance of the AONB and references to it and its Management Plan in a number of the draft policies, particularly draft policy DP26. The proof of Shropshire Council's commitment will come in future responses to planning applications, which in the past have sometimes paid scant attention to the importance of this designation. In the long term we would like to see adopted at the policy stage the recommendations, in the Glover report, that the AONB should become a statutory consultee for applications within the AONB. Disagree with para 4 of draft policy DP25, as do not think it will be appropriate for Affordable Exception Sites of more than one house to be allowed in the Green Belt or the AONB. Do not agree with the proposals for release of Green Belt land as set out in para 4.218. Do not think that a sufficient exceptional circumstances case has been made for these releases. At the Strategic Sites stage of consultation argued that there is no need to release the RAF Cosford land from the Green Belt because existing policies allow for the type of development being proposed by RAF Cosford. The new area of release proposed for the Midlands Air Ambulance Charity is significantly larger than MAAC's identified need for its proposed operation there.
A1195B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1280B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1280B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1281B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1281B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1282B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1282B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1641B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A1653B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The Green Belt boundary should not be amended at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out. No exceptional circumstances have been put forward. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.
A1653B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A1654B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The Green Belt boundary should not be amended at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out. No exceptional circumstances have been put forward. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.
A1654B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A1823B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The Green Belt boundary should not be amended at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out. No exceptional circumstances have been put forward. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.
A1823B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A1842B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The Green Belt boundary should not be amended at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out. No exceptional circumstances have been put forward. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.
A1842B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A1851B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The Green Belt boundary should not be amended at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out. No exceptional circumstances have been put forward. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.
A1851B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A1860B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The Green Belt boundary should not be amended at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out. No exceptional circumstances have been put forward. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.
A1860B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A1875B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The Green Belt boundary should not be amended at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out. No exceptional circumstances have been put forward. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.
A1875B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt. No very special circumstances had been advanced. An LPR should not be used to justify inappropriate development in the Green Belt.
A2119B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A2119B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2. say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A2123B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Our clients Dugdale, Main, Inglis and Orr are owners of the northern part the proposed safeguarded site in Shifnal south of Stanton Road. The family are supportive of the Regulation 18 proposal to remove the land and adjoining land owned by others from the Green Belt and safeguard it for development post 2038. Accordingly these representations are supportive of that proposed policy. The removal of my clients and adjoining land from the Green Belt would allow the new Green Belt boundaries of Stanton Road, the railway line and the eastern edge of the proposed Shifnal Local Plan Employment allocation SHF018d to be well defined and permanent as required by the NPPF para 139f. On behalf of our clients in June 2018 we submitted a fully detailed SLAA representations proving that our clients land is suitable, available, deliverable and viable and could come forward for development when needed post 2038. Accordingly we support the Reg 18 policies that are related to allocating new employment land to the east of Shifnal and removing the adjoining land to the west from the Green Belt and safeguarding it for development post 2038. Hence my clients support the following proposed policies: DP25. Green Belt and Safeguarded Land. Table DP25.1 Employment land allocation of 39 ha and safeguard land at Shifnal 92.8 ha. Schedule S15.1(i). Residential Allocations: Shifnal Key Centre. That allocates new residential sites in the town. Schedule S15.1(ii). Employment Allocations: Shifnal Key Centre and specifically employment allocations at: Land east of Shifnal Industrial Estate, Upton Lane, Shifnal (SHF018b & SHF018d) Schedule S15.1(iii). Safeguarded Land: Shifnal Key Centre. Safeguarded Land adjoining junction of Stanton Road and Lamledge Lane 4.5 hectares. My clients site. And land adjoining Shifnal Hillcrest School and Shifnal Industrial Estate 9.4 hectares. (adjacent to my client's site and part of 'a whole')
A2130B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Shropshire's current Local Plan reads as something written prior to the widespread recognition of the scale of the challenge, and the capacity to restore nature available through best practice, and of the economic and carbon-capture opportunities this enables. UN agreed targets look for a minimum of 30% of land and sea to be protected and this has been assented to by the UK Government. Shropshire currently 'protects' (to varying degrees) 15%. So the Local Plan should be looking to ensure that, at least a minimum of 30% of the land in Shropshire is protected. A 10% increase in biodiversity contained in the plan falls far short of what is required. Shropshire should be aiming for doubling of protected habitats, especially considering the potential for biodiversity gain in a largely rural county and the lack thereof for many other planning authorities. Whilst reference is made to EU protected sites (SACs, as legally obliged) there are no policies for protecting and enhancing SSSIs, local nature reserves or wildlife sites. The Shropshire Council identified Environmental Network is hardly mentioned and some settlement policies and site allocations will conflict with this. Indeed some sustainability appraisals overlook SSSI and wildlife sites in site assessments. We note that low ambition is evidenced in the wording throughout; many policies are expressed as aspirations rather than as requirements; environmental features are described as 'constraints' rather than as assets.
A2140B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	I strongly object to the use of Green Belt land for further housing - which seems to be in direct contradiction to DP15; where the Plan seeks to encourage a 'green infrastructure'. This needs a complete re think and it is a sad comment on Local Government that the willingness to remove 'green belt' land from Shropshire has reached this stage.
A2142B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	Whilst in agreement with the policy the statement sets out a contradiction between the Policies of DP25 and their implementation in policy in relation to Bridgnorth. Detailed response on why there is a lack of evidence for the change in Greenbelt policy;
A2156B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Green Belt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2156B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2
A2169B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	We are pleased to see part five of policy DP25 allows for the delivery of affordable housing on rural exception sites within the Green Belt, where there is a proven need, in line with national policy.
A2177B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	As set out in NPPF, where fully evidenced and justified Green Belt boundaries can be altered in "exceptional circumstances" through the preparation or updating of Local Plans (paras 136 & 137). The HBF supports the findings of the Council's Green Belt Release Exceptional Circumstances Statement dated August 2020, which justifies the release of Green Belt land for allocation and safeguarding at locations in Albrighton, Alveley, Cosford, Shifnal and Stanmore.
A2181B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Greenbelt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A2181B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be indirect conflict with Policy DP25.2.
A2193B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Greenbelt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A2193B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be indirect conflict with Policy DP25.2.
A2281B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore to allow the two proposed employment allocations. The NPPF indicates Green Belt boundaries should only be re-drawn and land excluded where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to the NPPF.
A2281B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and draft Policy DP25.2 state the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in Green Belt – it harms openness. If land proposed for allocation as employment land at Stanmore were the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A2284B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore to allow the two proposed employment allocations. The NPPF indicates Green Belt boundaries should only be re-drawn and land excluded where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to the NPPF.
A2284B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NPPF and draft Policy DP25.2 state the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in Green Belt – it harms openness. If land proposed for allocation as employment land at Stanmore were the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.
A2308B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Support reference to RAF Cosford being a strategic site inset within the Green Belt. However, consider that paragraph 4.225 is confusing as it states RAF Cosford is a strategic site within the Green Belt, this needs to be clarified to ensure it is clear that the site is being removed from the Green Belt.
A2321B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Policy DP25: Green Belt and Safeguarded Land 4.14 Paragraph 136 of the NPPF states that where necessary, Councils should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching beyond the plan period. 4.15 The role of safeguarded land is not just to ensure that Green Belt boundaries are enduring, but also to provide a 'contingency' of land in sustainable locations, outside the Green Belt, which can come forward for development to meet housing needs. It assists in 'de-risking' the plan, should any of its allocations not come forward or if there are any significant delays. 4.16 Albrighton is one of the most sustainable settlements within the district and also one of only a small number which is constrained by the West Midlands Green Belt given its proximity and functional relationship with the built up area of Wolverhampton. As such unlike other more rural and less sustainable settlements, there are limited instances within which windfall sites can come forward to meet local need. 4.17 Table DP25.1 'Green Belt Release by Location and Type', identifies the mechanisms for the release of land from the Green Belt to meet the identified housing and employment needs. This table underlines a fundamental concern around the limited release of land from the Green Belt to facilitate new housing development. Apart from sites ALB017 / ALB021, which were previously safeguarded in the SAMDev (2006) (Some 14 years ago), and are now proposed to be allocated (which we contest in Section 4), there are no other proposed sites to be removed from the Green Belt, and only a small number of sites proposed for safeguarding. 4.18 While we comment on the site specific limitations of sites identified for allocation / safeguarding in section 4 of these representations, in the context of our wider comments in response to Policy SP2, we consider that a higher level of growth should be directed to Albrighton through allocations as a priority to both address a significant period of suppressed growth (commentated on within Appendix 2), and to assist in recognising the strategic importance and opportunities presented by RAF Cosford.
A2323B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25		Whilst the draft policy title makes reference to Safeguarded Land, the only text relating to safeguarded land within the policy states: "Safeguarded land, being land removed from the Green Belt for future development needs beyond the current Local Plan period, is shown on the Policies Map". There is an opportunity to make this policy more robust by including a mechanism for when the safeguarded land could come forward within the plan period. It would also be beneficial to allocate site reference numbers to each of the safeguarded sites so that the Policies Map can be cross referenced at the appropriate points within the Local Plan Review.
A2379B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Greenbelt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A2379B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be indirect conflict with Policy DP25.2.
A2380B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Greenbelt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A2380B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstances" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be indirect conflict with Policy DP25.2.
A2412B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	Object to Point 4 of the Policy. This does not comply with paragraph 145 (g) which does not limit redevelopment of a PDL Green Belt site to affordable housing rather than market homes. There is significant case law to substantiate this. The merits of such sites and the form of development proposed should be considered on the balance/test of openness and other policies in the plan and not limit the tenure of housing on such. Again as demonstrated in case law, 145 g does allow for up to substantial harm in the Green Belt where affordable homes are being provided in an area of affordable housing need. I'd be happy to discuss this further with the Council.
A2484B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is no necessity to alter the boundary of the Green Belt at Stanmore. The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The National Planning Policy Framework indicates that Green Belt boundaries should only be re-drawn and land excluded from the Green Belt where there are exceptional circumstances that are fully evidenced and justified. No exceptional circumstances have been put forward in the Pre-submission Draft Local Plan that would justify the proposed action. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy. Stanmore Green Belt contains Stanmore Country Park which is a valued resource for the local community. It is easily accessible and well utilised, thus improving the health and wellbeing of many local residents. It is also a rich habitat and resource for wildlife.
A2484B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The National Planning Policy Framework 2019 and Policy DP25.2 say that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt- it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be the subject of a planning application it would be regarded as "inappropriate development" as it would conflict with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt. As no "very special circumstance" have been advanced that would justify the development of the land at Stanmore, and it would represent "inappropriate development", allocation of the land at Stanmore for employment purposes would be in direct conflict with Policy DP25.2.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2485B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Disagree	There is not a necessity to alter the boundary of the GREEN BELT at Stanmore. The land that is proposed for employment use at Stanmore lies within the GREEN BELT and should not be taken out of the GREEN BELT. THE NATIONAL PLANNING POLICY FRAMEWORK indicates that GREEN BELT boundaries should only be redrawn and land excluded from the GREEN BELT where there are exceptional circumstances that are fully evidenced and warranted. No exceptional circumstances have been put forward in the PRESUBMISSION DRAFT LOCAL PLAN that would justify the proposed action. The GREEN BELT REVIEW that the council commissioned does not qualify as an 'exceptional circumstance' and in any event the REVIEW undertaken did not demonstrate or suggest that there was any necessity for change to the GREEN BELT boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the GREEN BELT, in the near vicinity. The proposal is contrary to NATIONAL PLANNING POLICY. Stanmore Country Park, which is in the GREEN BELT is of notable natural status and is a well used public resource for leisure which enhances health and the environment
A2485B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP25	Agree	The NATIONAL PLANNING POLICY FRAMEWORK 2019 and POLICY DP25.2 say that the GREEN BELT should be protected against inappropriate development. Development of Industrial Estates is 'inappropriate development' in GREEN BELT – it harms the openness of the area. If the land that is proposed for allocation as employment land at Stanmore were to be subject of a planning application it would be regarded as 'inappropriate development' as it would conflict with the aims of the GREEN BELT and no very special circumstances had been advanced. A LOCAL PLAN REVIEW should not be used to justify inappropriate development in the GREEN BELT. As no 'very special circumstances' have been advanced that would justify the development of the land at Stanmore, and it would represent inappropriate development allocation of the land at Stanmore for employment purposes would be in direct conflict with POLICY DP25.2
A0506B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Disagree	Page 128 DP26 Shropshire Hills AONB This policy is the most important in relation to Church Stretton, Little Stretton and All Stretton, where the majority of the development lies in Conservation Areas. The whole parish lies in a particularly sensitive area of the AONB, surrounded as it is, to the west and east by many heritage assets some of which are designated. Appropriate development in the AONB is necessary for the economic and social wellbeing of those who work and live there. However, it is important for the planning system to protect the qualities which people value about the area, and some forms of development which may be appropriate elsewhere should be controlled in the AONB. The Town Council has some concerns about the policy explanation in paragraphs 4.227 to 4.237. Paragraph 4.230 implies that development which causes some harm might be acceptable and paragraph 4.235 merely says development, "likely to have a significantly negative effect" will be "very carefully considered." This seems to imply that some negative effect is acceptable in the AONB. The Town Council considers that more emphasis should be given to seeking protection and enhancement of the area, rather than appearing to accept a degree of harm. This is stated in NPPF para172 where it says, "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." Policy DP26 has two main implications. First, it says 'minor' development will be resisted. This could be a problem for obtaining certain development such as infill housing in the town itself. It also seems to conflict with S5.1.3 where it says, new residential development will be delivered through, "...small-scale windfall development within the Church Stretton development boundary.." The Town Council asks that this position be clarified. Second, the policy does not rule out 'major' development which may be allowed in exceptional circumstances. These include the need for the development, the cost of, and scope for developing outside the designated area, or meeting the need for it in some other way and any detrimental effect on the environment, the landscape and recreation. The Snatchfield Farm, proposed site, represents a major development in the AONB and as such is subject to the tests for 'exceptional circumstances' (NPPF Para 172). These are addressed in our submission on Schedule S5.1 (i) Site allocation – Land at Snatchfields Farm.
A0609B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Agree	To protect the setting of the AONB and raise design standards.
A0961B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Agree	Para 1 & 2 To protect the setting of the AONB and raise design standards
A1152B36	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26		Agreement with the overall thrust of the policies. Disagreement with particular proposals. Agree with all measures designed to protect the Green Belt and the AONB against inappropriate development. Endorse comments made to this consultation by the AONB partnership. On the whole we welcome the increased recognition of the importance of the AONB and references to it and its Management Plan in a number of the draft policies, particularly draft policy DP26. The proof of Shropshire Council's commitment will come in future responses to planning applications, which in the past have sometimes paid scant attention to the importance of this designation. In the long term we would like to see adopted at the policy stage the recommendations, in the Glover report, that the AONB should become a statutory consultee for applications within the AONB. Disagree with para 4 of draft policy DP25, as do not think it will be appropriate for Affordable Exception Sites of more than one house to be allowed in the Green Belt or the AONB. Do not agree with the proposals for release of Green Belt land as set out in para 4.218. Do not think that a sufficient exceptional circumstances case has been made for these releases. At the Strategic Sites stage of consultation argued that there is no need to release the RAF Cosford land from the Green Belt because existing policies allow for the type of development being proposed by RAF Cosford. The new area of release proposed for the Midlands Air Ambulance Charity is significantly larger than MAAC's identified need for its proposed operation there.
A1154B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Disagree	An alternative model for planning within the AONB The current planning system does not deliver what is needed by local communities. At the previous informal consultation, the Preferred Options stage, there was very strong local opposition to the development of Snatchfield and, many other sites which had been put forward because they were in conflict with the landscape protection principles of the NPPF and DP 26 of the Local Plan for an AONB. Only 9% of respondents accepted the allocation of Snatchfield for housing and just 11% agreed with the overall housing and employment guidelines for the town, so there is little public support for the Council's plans and aspirations. Nor is the situation better in the wider, less contentious, parts of the AONB, which is classified as open countryside, where development is exceptional, but where a few affordable homes would be welcomed. The Shropshire Hills AONB Management Board has made a proposal to Shropshire Council that a separate Development Plan Document (DPD) should be drawn up for the area. This would effectively withdraw the AONB from the Local Plan and provide scope for a rational examination of housing and employment provision which would meet local needs and maintain the principles of landscape protection within the designated area. This approach has been successfully adopted in the Arnsdale and Silverdale AONB where the DPD for the area was adopted in 2019 and won an Award for Planning Excellence from the Royal Town Planning Institute. The two AONBs are very different in size and character but the precedent is sound and its adoption should produce better outcomes for local communities in the Shropshire Hills, for Shropshire and Telford & Wrekin Councils and for the landscape of the AONB.
A1630B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Disagree	Farmers are largely responsible for maintaining the special features that are valued in landscapes like the Shropshire Hills. These features have developed as a result of generations of farming activity and there have been many changes over time. Farming businesses and techniques will no doubt continue to change and therefore the challenge is to grow sustainable and profitable farming businesses whilst also safeguarding the special qualities of the landscape. Farming businesses face many challenges and are currently in a period of unprecedented uncertainty. AONB's need to take account of the long term ambitions of the people who live, work and maintain the protected landscapes. They need to address the wider economic challenges, including the socio-economic issues, to be effective. For farmers to deliver high quality produce meeting high welfare standards and to reduce environmental risk they need to be viable businesses. They need to be able to adopt new technologies or implement new approaches to animal welfare. Equally they need to respond to changes in legislation and update infrastructure to be compliant. Farm workers, or a son or daughter returning to the farm business, need to be able to access housing near the farm. We have raised a number of concerns about the content of the AONB Management Plan in relation to agriculture and have an ongoing dialogue with the AONB team. Our particular concern is the ability of farmers to invest in new technology, buildings and infrastructure that will enable them to build sustainable businesses for the future.
A1818B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Disagree	There should be a paragraph stating that the presumption in the AONB should be against development
A2407B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Agree	We note that the plan includes a policy, DP26 specifically relating to the Shropshire Hills AONB. Natural England supports the policy and considers it should protect the AONB if the policy is implemented alongside the AONB management plan. The National Planning Policy Framework (NPPF) provides the highest level of planning protection for protected landscapes (National Parks, the Broads and Areas of Outstanding Natural Beauty). We advise you to take into account the relevant AONB Management Plan for the area. For Areas of Outstanding Natural Beauty, you should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 172 of the National Planning Policy Framework (NPPF). The NPPF does not refer to the settings of protected landscapes but NPPG paragraph 42 states that land within the setting can often make an important contribution to natural beauty and poorly located or designed development can do significant harm, especially where long views from or to the protected landscape are identified as important or where the landscape character is complementary. Para 42 makes clear that development within settings should be handled sensitively. All public bodies have a "duty of regard" to National Park/AONB purposes in exercising their functions. The duty applies to planning advice provided by Natural England and to LPA planning decisions. Further guidance on statutory purposes of protected landscapes and the duty of regard is set out in the paragraph 39 of the NPPG. Note: Response includes excerpts from NPPF on AONBs, notably paragraph 172, footnote 55, footnote 6 to paragraph 11, paragraphs 170 and 171. It also includes para 41 of the NPPG: How should development within National Parks, the Broads and Areas of Outstanding Natural Beauty be approached? and draws attention to paragraphs 36-42.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2475B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP26	Disagree	<p>This is the first time in planning policy under Shropshire Council there has been a specific and distinct policy for the Shropshire Hills AONB, and this is welcomed. We feel however there are areas where this policy can be improved. Para 1. Development should "contribute... towards the policies and actions set out in the AONB Management Plan". The positive framing of this section is understood, but the aspiration that developments governed by the planning system 'contribute to' the actions as they are set out in the Management Plan seems unrealistic. Similarly, developments should comply with the Management Plan policies, but 'contributing to' the policies seems the wrong phrasing. The important thing is that development contributes to conserving natural beauty. It may on occasions enhance natural beauty. But in reality how much development in the rural context of the AONB actually enables better management of wildlife sites, heritage assets or the wider countryside and how would it enable this? This part of the policy could be used to justify harmful developments on the basis that profit generated may be used to invest in this sort of conservation activity. The sections on design and enhancing sense of place and character are valuable, but this section about better management adds little and should probably be removed. Seeking betterment or improvement of the AONB from development is a laudable aim, but minimising harm should come first. Intrusive developments are sometimes claimed to 'improve' the landscape through add-on bits of tree planting, etc, when the actual built development is harmful to landscape character. In the AONB statutory purpose 'conserve' comes first, 'enhance' second. Adapted text from part 1 should be moved lower down the policy and the first section should be used to set out overall policy for protection of the AONB applicable to all development. This should be consistent with the wording of AONB Management Plan Policy P1 Protection of the AONB. This should include the wording 'great weight' being given to the purposes of designation in planning decisions' – that is all decisions. References to the Management Plan should not just be about 'contributing to' and about special qualities. Reference should be made to 'having regard to guidance within the AONB Management Plan' (those narrative parts of the Plan which are not policy or actions).</p> <p>Suggested wording All development in the AONB should be sustainable, consistent with the primary purpose of the designation to conserve and enhance natural beauty, and support the Special Qualities of the AONB as set out in the AONB Management Plan. 'Natural beauty' encompasses the natural and human elements that make the AONB distinctive – geology and landform, climate and soils, wildlife and ecology, the history of human settlement and land use, archaeology and buildings, cultural associations and people. In line with national policy, great weight will be given in planning decisions to the purpose of AONB designation, and account taken of the policies and guidance within the AONB Management Plan as a material consideration.</p> <p>Para 2 – The wording is ambiguous – does the 'significant adverse effect' bar apply just to development proposals outside the AONB or also to minor developments within it? This ambiguity can best be resolved by separating out consideration of development outside the AONB into a new clause (probably moved down to before the current para 4). This should make reference to the 'setting' of the AONB, the established terminology in relation to development outside an AONB, as introduced within the most recent Management Plan, and align with Management Plan Policy P1 viii). 'Significant adverse' is the highest category of impact and it is quite easy for assessments to judge impact to be less than this. Applying this high bar to minor developments does not provide the AONB with adequate protection. The problem in practice for the AONB from minor developments is small scale cumulative change through lack of quality of development, and this will not be addressed by a policy which only restricts developments with 'significant adverse' effects. The policy needs to also cover developments with lesser degrees of impact – these may not necessarily be refused but they should be adapted to minimise impact. Location, form and massing should be considered within 'design' as well as architectural aspects of building design and materials. Specifically mentioning 'minor development' may not be necessary (major development being the exception to which extra provisions apply), and the remainder of this section could be rolled into an improved section 1 covering protection of the AONB with regard to all development.</p> <p>Para 3 This policy must be seen in the context of contentious casework in recent years – large scale housing proposals, large scale agricultural developments, and the history that since the 2012 NPPF, the vast majority of major developments within the AONB have been recommended by the Council for approval. This cannot be seen to be 'exceptional circumstances' and has been flagged in published reviews by national bodies as a poor record of protection of the AONB by Shropshire Council through planning control. This new policy must drive a new approach to major development in the AONB by the Council. The need for better protection from major development is a key reason the AONB Partnership has expressed interest in following new national best practice for a bespoke AONB planning policy document (such as a DPD). If the Local Plan is to serve instead of an AONB specific policy document, it must address this need. The final sentence of section 3 "Permission will be granted in exceptional circumstances." does not reflect the strength of the NPPF policy, and the NPPF wording should be quoted directly "Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest." Other policies in the Plan will be quotable in support of certain types of development and will be used against this policy – so it needs to be clear, as with NPPF, that the AONB policy is a geographically specific one which in that limited area is an exception to policies supporting certain kinds of development. The definition of major development in Annex 2 of NPPF is excepted by footnote 70 specifically with regard to paras 173 and 173 of the Framework – para 172 being the AONB policy. This definition does not therefore apply universally for development within AONBs, though it may be used as a guide. The policy needs to make provision for developments falling out with this definition to be classed as 'major', which could be smaller developments than those in the NPPF definition. The AONB Management Plan on p33 sets out some criteria to guide judgements of whether a development affecting the AONB is major, and these should be referenced in the policy.</p> <p>Suggested additional text: Whether a proposed development constitutes major development will be a matter for the relevant decision taker, taking into account the individual characteristics and circumstances of the proposal and the local context. In determining whether a proposed development constitutes major development the Councils will consider whether by reason of its location, scale or massing, form, character or nature, the proposal has the potential to have a significant adverse impact on the natural beauty of the AONB. Criteria set out in the AONB Management Plan will be used as a guide. The nature of the AONB landscape means that even some smaller-scale proposals may be considered to be major development depending on the local context.</p> <p>Comments on explanatory notes: 4.227 Suggest 'and are deemed in government policy to have equal landscape quality and protection to National Parks'. The statutory primary purpose is to 'conserve and enhance natural beauty'. 4.229 The AONB Partnership prepares the Management Plan but both local authorities formally approve it. 4.231 Section 87 – this duty applies to AONB Conservation Boards only, not to AONB Partnerships, and should be omitted here. Similarly in the last lines of this section – the secondary functions are not statutory for AONBs without a Conservation Board and so this part of the Act is not applicable to the Shropshire Hills AONB. 4.235 Mention 'setting' of the AONB as above. Views into the area are also important. The wording "developments... likely to have a significantly negative effect" will be "very carefully considered" is not really adequate, or consistent with the policy para 2 where it says these will be 'resisted'.</p>
A0010B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>Object to the absence of recognition for the emergency services within the list of infrastructure types specified in paragraph 4.23:</p> <p>Development in the Local Plan will lead to greater demand on emergency services. This demand should be planned for in advance and be supported by developer contributions. Greater demand will be in the form of more 999 and 101 calls, increases in numbers of incidents that need a response and day to day community policing. The largest schemes may need a police post whilst more development generally may need police station expansion or additional equipment. Suggest para 4.239 is amended to "...They include a focus on local needs such as highways, flood defences, educational facilities, medical facilities, emergency services, sporting and recreational facilities and open spaces...". Such amendment would be consistent with NPPF paras 8, 26, 32 and 92 and para 20 in particular. Paras 16, 26, 28, 32 and 38 envisage this through partnership working through all parties concerned with new development. Para 95 states up to date information should be obtained from the police. WMP thus ask Shropshire Council to engage in constructive discussions as to what emergency services infrastructure is required to support new development across the County</p>
A0238B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>Document Reference BT4: Whilst policy covers the provision and funding of infrastructure covered policy fails to address cases where significant infrastructure investments are required that cannot be funded from the development e.g. funding for major highways improvements, from sources such as the Highways Agency. Local Plan should be self-consistent and identify the infrastructure and investment that will be required to implement proposals e.g. Adequate plans for infrastructure needed for Bridgnorth</p>
A0240B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Don't know / no opinion	<p>Supports the Council's proposed approach to Policy DP27, and particularly the requirement that 'new development only take place where there is sufficient existing infrastructure capacity available. In this respect, L&Q Estates considers that its land interests at Shifnal are well situated to accommodate residential development, as new dwellings would be located close to existing green spaces and the proposed site layout will promote walking and cycling. Additionally, the proposed development is well located to employment opportunities, community facilities and transport connections, and should therefore be considered favourably in the context of Policy DP27. A Vision Document supporting these representations is enclosed at Appendix 1, and further outlines how the proposed development in well placed to align with the objectives of Policy DP27</p>
A0306B053	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>We would like to see inclusion of policy preference for sustainable infrastructure, e.g. active/public transport over road, renewable energy over fossil fuels.</p>
A0306B054	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>Para 4.241 Local strategic highway improvements should be aimed at improving provision of public transport, walking and cycling.</p>
A0430B27	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Agree	<p>Support DP27(1) which effectively only allows development to come forward where existing capacity allows or where any shortfall can satisfactorily be addressed through reasonable contributions. Developers will work with the Council on a timetable for infrastructure delivery particularly for safeguarded housing land in Shifnal and would be willing to consider how this could be embedded into an allocation policy should the Council decide there is justification and merit to allocate the land released from the Green Belt rather than safeguarding the land for the future.</p>
A0450B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>Policy DP27 needs to require approval of any off-site infrastructure improvements at the same time as approving a proposed development, in addition to securing the funding for the infrastructure improvements. This will ensure that proposed developments do not create further infrastructure constraints.</p>
A0573B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>Support policy objective to locate development where there is sufficient infrastructure capacity. Shifnal Place Plan advocates development to the east of town with access to A41 / M54 Junc 3 where sites SHF032, SHF018b, SHF018c, SHF018d are located. These sites are in a single ownership unlike the safeguarded land to the south-west offering simpler provision of infrastructure investments. Preferred sites to south-west now have limited capacity to by-pass town following removal of site P17a. Sites to east direct traffic away from town centre, have good access to schools and rail station offering realistic opportunities for sustainable travel options. SHF018c could also offer health/medical facility and day nursery.</p>
A0972B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>What plans are in place to set out contributions from the Tasley Garden Village development</p>
A0981B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Agree	<p>Sport England supports the wording of the policy to require new developments to meet their needs for infrastructure, and to fund any necessary improvements where there is a lack of capacity to accommodate the development proposed. Sport England notes the contents of para 4.239 which sets out the range of infrastructure needs that include sport and recreation facilities. This term is taken to mean both playing pitches and built indoor and outdoor sports facilities, though it would be beneficial to expand upon the explanation to make this completely clear. Sport England supports the approach taken to use both CIL and section 106 agreements dependent on the circumstances as set out in parts 2-5 of the policy and notes that the Shropshire Place Plans and Shropshire Infrastructure Plan will set out the identified infrastructure needs. Sport England considers that it would be appropriate to refer to the evidence base in the reasoned explanation which for sport includes the Playing Pitch and Outdoor Sports Strategy (PPOSS) and the Built Sports Facilities Strategy (BFS). Sport England notes the contents of para 4.241 that refers to the prioritisation of the use of CIL funds. Given the findings of the PPOSS and the BFS regarding the need for sports facilities investment to meet the needs of planned housing growth, and bearing in mind the overall vision for the Plan to develop healthy and safe communities, particularly at this time where the impacts of COVID-19 have elevated the importance of mental and physical health and well-being, Sport England considers that the investment in sport and recreation facilities should also be referenced as critical provision. This would then tie in with policy DP30 relating to Health and Well-Being.</p>
A0984B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Disagree	<p>Support Part 1 of the policy which allows development to come forward where there is existing infrastructure capacity or any shortfall can satisfactorily be addressed.</p>
A1152B37	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27	Agree	<p>Agreement is as far as it goes. Agree new development should only occur where there is sufficient existing infrastructure capacity available. Provisions as to CIL and Section 106 contributions may be overtaken by proposals in the Government paper 'Changes to the current planning process' (which was released as this consultation began), to replace them with a single new Infrastructure Levy. It is vital that measures to promote good infrastructure and design are brought into the Local Plan in a way that gives them real teeth and the prospect of implementation. Efforts need to be targeted at infrastructure which will mitigate against Climate Change. Better provision is also needed for social facilities, and for rural broadband and public transport. Argue that the Local Plan should incorporate master plans. The separate Place Plans are largely concerned with the provision of infrastructure. Regrettably, a lot of the funding for this infrastructure is to come from CIL. The trouble with CIL is that (1) it is made available only after housing developments that require infrastructure have been constructed, and (2) it takes years to decide how to spend it. Infrastructure provision therefore lags behind development, rather than being in place to facilitate it. That is one of the reasons why a masterplan would be a good idea. Para 3b of draft policy DP29 provides for protection, extension or improvement of footways, cycleways, public rights of way and bridleways. That is welcome, but it is much more important to have a fully integrated Transport Strategy that discourages transport using fossil fuels and which positively encourages, and more importantly facilitates, active travel like walking and cycling. Presently, there is no such integrated policy</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1192B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP27		Fully support need for development to deliver/fund any critical or statutory infrastructure required as a result of a proposed development. However, CIL and Section 106 contributions need to be at a level that enables development to take place and does not challenge viability. In addition, need to ensure there is no double counting e.g. infrastructure delivered by the developer, but also counted for through CIL. Note part 1 of draft Policy DP27 includes the words "other means" for funding infrastructure. Clive Barracks will need to provide infrastructure for the scale of development proposed, this should only be paid for once, not multiple times through a developer building the infrastructure, via CIL payments or S106 obligations. Similarly, part 2 of draft Policy DP27 notes the hierarchy of CIL expenditure. If CIL is to be used to provide the infrastructure for Clive Barracks, and avoid double payment for this, then this is acceptable. Part 4 of draft Policy DP27 advises Section 106 contributions will be used to 'top up' additional infrastructure spend. Whilst acceptable in principle, reiterate that strategic sites should not pay for infrastructure through multiple methods or pay for infrastructure not necessitated by their development. Draw attention to the Local Plan Delivery and Viability Study and the initial brief which states (para 4.48): "Viability should not compromise the quality of development. But it is important to ensure that the total cumulative cost of relevant policies, local and national standards, design requirements, any site-specific considerations and development contributions are not of a scale that will make development unviable." Consider the blanket approach within the draft Local Plan, with no mention of a CIL review or real flexibility on CIL/Section 106 and other planning obligations is not appropriate for Strategic Sites, which require greater flexibility. Consider that the draft Local Plan should commit to a CIL review, to ensure a more appropriate level of contribution is sought across the Authority, and that Strategic Sites are excluded from CIL payments in the Local Plan (in line with other Authorities). This is also recommended within the Local Plan Delivery and Viability Study. Whilst noting the Council's "preference" to continue to receive CIL at the current rates (as stated within the Local Plan Delivery and Viability Study), it is already at a level which challenges viability of many sites in the area, as their own viability consultant acknowledges. In light of the above, consider draft Policy DP27 should be updated to reflect an immediate commitment to undertake a detailed review of CIL. In addition, the wording should provide for S106 agreements alone for the Strategic Sites.
A0026B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Agree	The Parish Council strongly supports this policy for the following reasons.The Parish Council is based in a rural area and there have been a few accidents in the agricultural community where there have been delays getting emergency treatment due to the lack of a mobile phone signal. This needs to be drastically improved.There are a number local people who work from home and the need for decent and reliable broadband provisions and mobile signals is vital to their livelihood. Again this needs to be improved for the outlying areas where there is not always a good reception or signal.
A0101B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Agree	Paras 3a and 3b goes beyond the requirements of Approved Document R of the Building Regulations, and requires the 'development' to deliver 'Gigabit-capable broadband infrastructure' when the physical network in most areas is not able to deliver that speed and is dependent on third parties to upgrade it in order to do so. The policy should be re-worded such that broadband provision must be provided on developments in accordance with the Building Regulations at the time or the maximum download speed available from the local supporting network.
A0238B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Agree	Document Reference BTC5 : Support the policy and the aim to deliver gigabit-capable broadband infrastructure which is a necessary requirement for growth around Bridgnorth.
A0240B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Disagree	3.22 Policy DP28(3) requires that residential development will be expected to deliver 'gigabitcapablebroadband infrastructure using 'fibre to the premises' technology wherever practical' or 'alternative gigabit-capable technologies where justified for reasons including viability,distance from the network or other constraints preventing "fibre to the premises".3.23 DP28(4) requires residential development to deliver 'passive ducting wherever possible, tofacilitate the delivery of competitive fibre broadband services'.3.24 L&Q Estates consider the Council should not impose new electronic communicationsrequirements beyond the provision of infrastructure as set out in the statutory BuildingRegulations.3.25 In the Budget 202032, the Government confirmed future legislation to ensure that new buildhomes are built with gigabit-capable broadband33.3.26 The Department for Digital, Culture, Media and Sport subsequently outlined its intentions onthe practical workings of this legislation through 'Press Release: New-build homes to come with gigabit-speed ready'34.3.27 'The government will amend building regulations to guarantee that all new homes have theright infrastructure to support gigabit broadband and housing developers must work withnetwork operators to install internet speeds of over 1,000 megabits per second (Mbps) in newbuildhomes, up to a cost cap of £2,000 per dwelling.'3.28 The Press Release confirmed the requirement will apply to all to new builds development, andthat the new measures will place responsibilities on both developers and network operators. Italso confirms that the legislation is to be laid as soon as parliamentary time allows and will be laid as secondary legislation so that it can be introduced quicker.3.29 As a result, the proposed requirements of Policy DP28 are unnecessary and repetitive ofBuilding Regulations and should therefore be deleted.
A0306B055	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Agree	We welcome this to help us move away from less sustainable practices (reducing need to travel, etc.).
A1106B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Disagree	Discusses broadband infrastructure and states that developments should "ensure access for all to high speed broadband and on-line services". This may be interpreted as meaning residential developers would be expected to provide broadband and mobile communication infrastructure. Developers should not be expected to ensure access to on-line services, as this is beyond their remit, and future residents are likely to want to choose their broadband provider.
A1152B38	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Agree	Agreement is as far as it goes. Agree new development should only occur where there is sufficient existing infrastructure capacity available. Provisions as to CIL and Section 106 contributions may be overtaken by proposals in the Government paper 'Changes to the current planning process' (which was released as this consultation began), to replace them with a single new Infrastructure Levy. It is vital that measures to promote good infrastructure and design are brought into the Local Plan in a way that gives them real teeth and the prospect of implementation. Efforts need to be targeted at infrastructure which will mitigate against Climate Change. Better provision is also needed for social facilities, and for rural broadband and public transport. Argue that the Local Plan should incorporate master plans. The separate Place Plans are largely concerned with the provision of infrastructure. Regrettably, a lot of the funding for this infrastructure is to come from CIL. The trouble with CIL is that (1) it is made available only after housing developments that require infrastructure have been constructed, and (2) it takes years to decide how to spend it. Infrastructure provision therefore lags behind development, rather than being in place to facilitate it. That is one of the reasons why a masterplan would be a good idea. Para 3b of draft policy DP29 provides for protection, extension or improvement of footways, cycleways, public rights of way and bridleways. That is welcome, but it is much more important to have a fully integrated Transport Strategy that discourages transport using fossil fuels and which positively encourages, and more importantly facilitates, active travel like walking and cycling. Presently, there is no such integrated policy
A1630B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Agree	We welcome the policy support for rural broadband and mobile infrastrucure. It is vital for all types of rural businesses. Mobile phone coverage has reduced in quality in some areas of Shropshire. It remains important for farming businesses and for the health and safety of all people living and working in rural areas.
A2163B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Disagree	Part 3 of the policy requires residential developments to deliver gigabit-capable broadband infrastructure using 'fibre to the premises' technology wherever practical. The capacity to deliver gigabit-capable broadband is determinate upon broadband providers and cannot be guaranteed by developers. Approved Document R: Physic Infrastructure for High-Speed Electronic Communications Networks is a consideration for Building Regulations and requires in-building infrastructure for copper or fibre-optic cables or wireless devices capable of delivering broadband speeds greater than 30 Mbps to be installed. Broadband infrastructure is already covered by Building Regulations and the requirement of this policy that is well above 30 Mbps, is not justified. This policy should be amended to require broadband installation without being more specific about the type of broadband required
A2177B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Disagree	Bullet Point 3 states residential developments will be expected to deliver gigabit-capable broadband infrastructure using "fibre to the premises" technology wherever practical (provision in residential developments of less than 10 dwellings may be subject to viability constraints) or alternative gigabit-capable technologies where justified for reasons including viability, distance from the network or other constraints preventing "fibre to the premises". Bullet Point 4 states residential developments will also deliver passive ducting wherever possible, to facilitate the delivery of competitive fibre broadband services. The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. Government will amend Part R "Physical Infrastructure for High Speed Electronic Communications Networks" of the Building Regulations 2010 to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. By taking these steps, the Government intends to overcome any existing market failure. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy. The policy will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. The new measures will require: -Developers to ensure new homes have gigabit broadband. This includes ensuring that the physical infrastructure necessary for gigabit-capable connections is provided on site for all new build developments and homes are connected by an operator to a gigabit-capable connection. Unless the cost to the developer of providing connectivity exceeds £2,000, or the operator declines to provide a connection. Developers must seek a second quote from network operators, where the first quote suggests gigabit-capable broadband cannot be installed within the cost cap. -If gigabit broadband exceeds the cost cap, developers must provide connectivity to other technologies, which can provide at least superfast connection within the same cost cap, unless the operator declines to provide a connection and a commitment to contribute to the costs of connection by network operators. Virgin Media has committed to contributing at least £500, rising in the case of some larger sites to £1,000. Openreach has committed to a combined Openreach and Developer Contribution of £3,400, with a maximum developer contribution of £2,000. Government intends to lay the legislation to amend the Building Regulations as soon as Parliamentary time allows. Supporting statutory guidance will also be published as soon as possible. Consider the Council's approach in Policy DP28 is unnecessary and repetitive of Building Regulations. Before the pre-submission LPR consultation, Bullet Points 3 and 4 should be deleted from Policy DP28
A2308B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Disagree	Would like to see additional wording within the policy to protect defence interests: "Where new mobile communications infrastructure is proposed within a designated safeguarding zone that preserves operational capability or the operation of technical assets it should be referred to MOD Safeguarding to ensure that any impacts are mitigated or designed out."
A2412B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP28	Disagree	We welcome the aspirations of the Council to improve Broadband capacity. However, we object to point 3, as it is hard for developers to deliver such requirements as it has to be delivered by infrastructure providers who developers have little influence/control over.
A0131B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Strongly disagree with the suggestion that "The sub-regional role of Shrewsbury is to be enhanced by the delivery of the North West Relief Road to extend the A53 around the north and west of Shrewsbury". Supporting evidence against this proposed is provided within the Consultation Document itself, for instance: - Paragraph 4.254 within the Explanation of Policy DP29 states "Key objectives are to reduce our dependency on private motor vehicles and fossil fuels by using 'active' travel opportunities by walking, 'wheeling' (using all forms of mobility devices or aids for the very young and the very old) or cycling wherever possible before using public transport or 'shared' vehicles and before using private vehicles". - Figure DP29.1: Hierarchy of Sustainable Transport within the Explanation of Policy DP29 lists private cars at the bottom of the list. - Paragraph 4.255 within the Explanation of Policy DP29 states "This process of managing change starts with the decision whether we need to travel at all. The most sustainable travel option is to access work, goods, services, leisure and social interaction remotely using electronic communication media or to achieve key elements of these activities in this way, as our first choice, irrespective of age or technological ability. The response to the Coronavirus restrictions shows how we might respond positively to the effects of global challenges on our lives and realise tangible benefits for ourselves and our local, national and global communities". - Paragraph 4.252 within the Explanation of Policy DP29 states "Shropshire will continue to promote and support improvements to the communications and transport infrastructure serving the County. This is central to the delivery of sustainable economic growth and the creation of sustainable patterns of development in the settlements, 'strategic corridors' and 'strategic sites' of the County.This will still require everyone to consider how they contribute to the process of reversing the adverse changes to our climate, global temperature and to our seas and oceans". Page 8 of the Sustainability Appraisal and Site Assessment Environmental Report should be considered as should Sustainability Objective: SO6 Reduce the need of people to travel by car. The council needs to be doing everything it can to promote walking and cycling, not building another expensive, environmentally damaging road.
A0159B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	There is no content around "widen travel and transport choices". Only vague statements not backed by tangibility of any kind. Does the demolition without replacement of Shrewsbury bus station as announced by the leader of the Council contribute to widening transport choices? The least important thing in the Transport Hierarchy is the private car. Shropshire Council has demonstrably reversed this hierarchy in every way possible by spending approximately £17 million on the NWRR and trivial amounts of walking, cycling and buses. It has cut bus funds and now wishes to close the bus station.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0238B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Document Reference BTC6: Para 4.258 Agree with the objectives set out in point 3, which are consistent with the existing Local Plan. However little/no investment in footways and cycleways in the Bridgnorth area. A funded action plan contributing to sustainability urgently needed to progress this before the Local Plan is finally approved.
A0266B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	As we know at least a third of the counties CO2 emissions come from transport and somewhere between a third and a half of car journeys are sufficiently short to have the potential to be replaced by walking or cycling journeys. The government has released detailed strategies for this including 'Gear Change'. The transition to active travel has seen a significant boost during the pandemic, with widespread agreement that this needs to be captured and built upon. The pre-submission report does not rise to this challenge. The plan refers to a Local Transport Plan, however there is no current plan in place and the development of a new plan is in the early stages. Similarly, there is no Local Cycle and Walking Infrastructure Plan as recommended by government. Consequently, planners will have no recourse to robust local policies on transport when dealing with development proposals. There is significant risk that, without strategies that include detailed strategic active travel networks, opportunities will be lost as they have been in recent years (see the Spring Gardens development where land that could have provided an ideal off-road cycle route was lost to the development). Such losses need to be prevented in policy. Similarly routes within developments are little use unless joined up to networks. Active travel needs further robust support and encouragement in design features. An example is the integration of secure accessible bicycle storage as now adopted in the Oxford local plan. There is no reference to this here. Alongside active travel both the climate emergency and equity in accessibility require appropriate public transport to be in place for new development. This should be in place as soon as sites are begun to ensure workers travel plans during construction can promote active and public transport. SP3 states the transition to a zero-carbon economy will be supported by... 'e. Encouraging new development to link to and where possible integrate public transport'. 'Encouraging' and 'where possible' fall far short of what is needed to ensure new developments do not increase car dependency, especially when coupled with the explanation in DP29 that 'Developer contributions to improvements in our transport networks and infrastructure will be encouraged wherever possible'. By contrast Oxford Local Plan states (policy M1) 'development that will add to demands on public transport should contribute towards improvements to bus network infrastructure including pedestrian and cycle routes to bus stops, shelters, passenger seating, waiting areas, signage, timetable information and infrastructure relating to zero emissions.'
A0295B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Policy DP29 (para 4.261, page 138) lists proposed enhancements to the Strategic and Local Highway Networks, none are around Bridgnorth. This would imply that there are no plans to improve connections between Bridgnorth and the A5/M54 strategic corridor, or to Wolverhampton, Stourbridge or Kidderminster. Welcome investment on footpaths and cycleways (DP29, point 3, page 136) in and around Bridgnorth. However there have been past commitments that have not been achieved.
A0306B056	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	(2 & 3 d, e & g): We agree we should respond positively to the climate problems, but we feel the focus on unsustainable transport should be reconsidered. For example, DP29, 3 d, e & g still promotes road and other unsuitable transport links, i.e. HS2 and NWRR.
A0306B057	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Para 4.261 The NWRR would be contrary to a number of policies in the plan including, SP3, DP1, DP5, DP15, DP16, DP17, DP18, DP20, DP23, DP24. The inclusion and support of the NWRR in the draft local plan compromises any attempt at sustainability or of addressing the climate and ecological emergency.
A0311B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete
A0323B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A0341B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A0356B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A0413B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Don't know / no opinion	These two issues should have separate improved policies.
A0430B28	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Agree	Support DP29 to promote and support improvements to the communications and transport infrastructure serving the County as it is central to the delivery of sustainable economic growth and the creation of the sustainable pattern of development in Policy SP2.
A0447B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The context of the profound emergency that the world is and will increasingly experience as a result of pollution of land, sea and air and destruction of the natural world the plan is in general shockingly inadequate, not to say feeble in general tone. Can see nothing locally that looks like integrated transport. Integration of transport is the 'right thing to do' and would be cheaper than building roads and mass car parks the 'wrong thing to do' in the present crisis. Agree with draft policy DP29 with regard to the need for "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure", required for a sustainable and active transport system. All 18 Place Plans references some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A0450B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Policy DP29 needs to determine whether the requirements of paras 4.254 and 4.261 should be enforced differently: requirement in para 4.254 for walking and cycling should be rigorously enforced in housing developments especially larger schemes to reduce dependency on private vehicles delivery of NWRR in para 4.261 should not be promoted in order to achieve the broader objective of delivering a net zero carbon economy
A0484B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Paragraph 4.253 Policy DP29 Communities and Transport Site MUW012VAR The proposed development site is too far from the town centre for easy access without a car for most residents and many will therefore drive to the local shops (as is already the case from Hunter's Gate and Forester Avenue) or further afield, adding to the congestion of the town's streets. Even now, locals are parking on Barrow Street and St Mary's Road when visiting the town centre which makes access for public and community buses difficult. The large number of additional motor vehicles passing through the town to places of work, recreation and shops will cause greater congestion through the town particularly at the junction around the Gaskell Arms public house. This junction would require a major upgrade and there is limited space to achieve this.
A0486B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	If the aim of the Policy is to encourage a switch from car travel to public transport, there will be a need for an expanded bus station, not its elimination. We support the Policy, but doubt the Council's intention to carry it out. We would urge the Council to incorporate a specific Policy to support and improve Shrewsbury's bus station, either as part of this Policy or within the Place Plan for Shrewsbury. As drafted, the Policy is inadequate to ensure that integrated bus and rail services are maintained and developed at the heart of the County's public transport network.
A0501B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. Every single one of the eighteen place plans include references to the need for some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates to make it happen. There are no statements of urgency, priority or commitment to make active travel an inclusive part of Shropshire transport planning. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A0501B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. Lower car speed makes walking and cycling safer and therefore facilitates increasing the amount of active travel throughout the county. Making people feel safe to walk in high streets brings economic benefits; the improved footfall when streets are closed to traffic and shoppers are safe to browse and buy is evident in many towns. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. I disagree with this policy because it is incomplete.
A0501B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim - and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated. "I disagree with this policy because it is incomplete.
A0573B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Support DP29 to improve communications and transport networks and promote access to sustainable transport modes. Support DP29 to manage environmental impacts of travel on climate change, air quality and public health. Land east of Shifnal at SHF032, SHF018b, SHF018c and SHF018d all appraised in relation to these objectives and will improve network connections in the town including National Cycle Route 81. Travel strategy for sites will ensure long term delivery and promotion of sustainable travel initiatives prepared in accordance with DP29 and NPPF para 103.
A0642B43	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	There is no content at all in the Local Plan around "widen travel and transport choices". This is an astonishing omission and vague aspirational statements not backed by tangibility of any kind are worthless. Does the demolition without replacement of Shrewsbury bus station as announced by the leader of the Council contribute to widening transport choices? 5: the Business Case for the NWRR needs to be substantially reworked compared to the Outline Business Case to take into account falling rather than growing levels of traffic.
A0642B44	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Para 4.253 Note that the strategic developments are not located on existing rail infrastructure and so this implies additional road building which is not consistent with the need to address the Climate Emergency
A0642B45	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Para 4.254 The hierarchy is a prioritisation tool setting out important principles that will inform overall public policy including the policies of Shropshire Council. The hierarchy is very clear about the most important things (the top 3 lines) and the least important thing, the private car. Shropshire Council has demonstrably reversed this hierarchy in every way possible by proposing to spend approximately £17 million on the NWRR and trivial amounts of walking, cycling and buses. It has cut bus funds and now wishes to close the bus station. It is astonishing that the Council quotes the hierarchy when important decisions (20mph and bus station) have ignored the hierarchy.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0642B49	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	the business case for the NWRR is built around forecasts of increasing traffic whereas the Climate Emergency and Net Zero CO2 target require national and local government to adopt policies that will see traffic levels drop steadily over coming years. The business case for the NWRR therefore needs to be completely re assessed in the light of this falling demand. We do not see how the cost of the road can be justified against a poorly stated and quantified case that it will enhance the sub regional role of Shrewsbury. Adoption of the NWRR in the plan is contrary to the national objectives of net zero carbon by 2050 i.e. to prioritise "development opportunities" above reducing carbon emissions. It is not acceptable that this reference to the largest capital expenditure on transport ever undertaken in Shropshire is not explicitly linked to its impacts on carbon emissions. The NWRR has not yet got planning permission and may be subject to a public inquiry. A Local Plan written in the months following the declaration of a climate emergency must not remain silent on the carbon impacts of NWRR. If it is the view of independent experts that the NWRR will reduce carbon then this must be stated in the Local Plan, with evidence, so we can evaluate the robustness and fitness for purpose of the Local Plan. If it is the view of independent experts that the NWRR will substantially increase carbon emission in 2 ways (1) embodied carbon from the whole life cycle of raw materials, earth disturbance, construction etc and (2) in use carbon associated with the very well documented evidence that "new roads generate new traffic" then this must be stated and fed into a realistic assessment of whether or not Shropshire Council can contribute to the achievement in net zero carbon by any deadline. New roads like the NWRR generate new traffic (additional to current totals) and this increases transport's carbon emissions. This is well understood and summarised in a UK government report published in 1994 (link provided in rep).
A0647B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Agree with recognition in draft Policy DP29 a sustainable and active transport system requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure". All 18 of the Place Plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the draft Local Plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The draft Local Plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. Another item in all 18 Place Plans is the need for speed limits and/or traffic calming measures. As well as safety, reducing traffic speeds, reduce carbon emissions and increase walking and cycling. This draft Local Plan makes no reference to strategies to reduce speed limits or provide more traffic calming measures, despite the obvious requirement throughout the County. This indicates a real lack of joined up thinking on active and sustainable transport systems. The need for electric vehicle charging points is acknowledged in a number of places. Hope the Council understands that electric cars are not the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this draft Local Plan. Recent examples in the UK include Surrey and Maidenhead Councils. Government is making it easier and more convenient to take the bus through a new £20 million fund to encourage development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for Local Authorities to help improve current bus services or restore those that have been lost. Every Local Authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." Disagree with this draft policy because it is incomplete.
A0648B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Agree with recognition in draft Policy DP29 a sustainable and active transport system requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure". All 18 of the Place Plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the draft Local Plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The draft Local Plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. Another item in all 18 Place Plans is the need for speed limits and/or traffic calming measures. As well as safety, reducing traffic speeds, reduce carbon emissions and increase walking and cycling. This draft Local Plan makes no reference to strategies to reduce speed limits or provide more traffic calming measures, despite the obvious requirement throughout the County. This indicates a real lack of joined up thinking on active and sustainable transport systems. The need for electric vehicle charging points is acknowledged in a number of places. Hope the Council understands that electric cars are not the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this draft Local Plan. Recent examples in the UK include Surrey and Maidenhead Councils. Government is making it easier and more convenient to take the bus through a new £20 million fund to encourage development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for Local Authorities to help improve current bus services or restore those that have been lost. Every Local Authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." Disagree with this draft policy because it is incomplete.
A0661B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	DP29 states that Shropshire will continue be an attractive place to live and work by improving its communications and transport networks and supporting the infrastructure and services to widen travel and transport choices. The planned developments in Ironbridge, Bridgnorth, Cressage, Cross Houses, Shrewsbury and Much Wenlock will have a big impact on the town of Much Wenlock especially the traffic congestion and pedestrian crossing for school children at the Gaskell Corner The provision of a roundabout on the A458 described in the preferred option site MUW012VAR will not ease the flow of traffic or ease the congestion at the Gaskell Corner. This roundabout will increase the level of noise and pollution close to the Primary School and it is ideally positioned for further developments along this stretch of the A458.
A0669B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Objects to the site on grounds that it is too far from the main centre of Much Wenlock and so would encourage people to use their cars to access these services - in contradiction of policy DP29.
A0670B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29		A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A0670B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29		An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. I disagree with this policy because it is incomplete
A0679B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	As DP29 states, improving transport routes for pedestrian, bicycles and other active forms of transport are key in encouraging a healthier, safer and greener population. The plan includes great ideas on this front, but no concrete plan to achieve these goals. This is what is lacking
A0696B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Don't know / no opinion	Transportation is a significant issue in Shropshire because of its scale and low density It is vital for job mobility and healthcare that provision of green public transport must be much enhanced. Reliance on CIL and developer input is not sufficient, it must be accepted that direct funding is required. No development should be permitted unless adequate public transport is already available or part of the development. Adequate means access to employment, leisure, state services such as DWP and NHS and social travel comparable to that possible with private transport. Reliance on market forces to provide public transport is clearly not working
A0698B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A0970B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Para 2.12 of the introduction references bus and train links. Do not agree with the assertion that Shropshire has an 'extensive' bus network. Seven Place Plans specifically mention the need for more or improved public transport by bus for their area. The need to link up neighbouring communities by bus was frequently mentioned and one Place Plan calls for a train halt to be re-instated (Baschurch). The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. Draft Policy DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Shropshire Council has made considerable cuts to the county's bus service in recent years is NOT in line with aims to provide a transport service that reduces the need to use private cars. In addition, the information coming out from the council about closure / demolition (carbon footprint implications) of the existing bus station is contrary to the principle of a sustainable transport system for the county. It also invalidates claims to link up public transport systems (it's a short walk from the bus station to the train station) which is key to making it possible for people to stop using cars. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions. A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This draft local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." I disagree with this policy because it is incomplete.
A0972B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	– para 1-3 Reducing car dependency in Bridgnorth could be achieved by delivery of a new railway station linking to the national network, as would cycle lanes, walkway, and support for electric transport such as scooters, bicycles.
A0981B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Agree	Sport England supports the wording of part 3b) of the policy relating to protecting and improving existing networks for active travel, and notes and supports the associated explanation in para 4.258 that references the benefits of walking and cycling for health and well-being. However, the policy does not make it clear how this will be delivered? Can the policy be expanded to explain how the Council propose to invest in extending the opportunities for active travel?
A0984B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Agree	Fully support the Council's efforts to improve transport networks, improve connectivity and accessibility, reduce car dependency and manage the impacts of transport movements. We agree that this can be achieved by delivering a sustainable pattern of growth and development with the County which is endorsed within Chapter 9 of the NPPF. Support the flexibility provided in Part 3d of the draft policy (supported by para 4.260 of the explanation) regarding the approach to changes in transport technologies. The policy promotes the movement to more sustainable modes of transport, without enforcing specific requirements which we fully endorse. Enforcing a blanket requirement would create capacity issues within the network. Encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure which meets needs whilst avoiding over provision. Fully support parts e and f of this draft policy, which promotes investment in the strategic and local highways and also the networks where economic activity will take place. Investment in the highway network and in employment areas will facilitate economic growth of individual settlements/economies and the County as a whole.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1116B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Can something be included about the development of a County-wide bus service that serves all people, and identifies bus stops that are well located in both rural and urban areas to attract the maximum number of people, as well as times and frequencies that don't leave big gaps between buses, and as part of integrated public transport with co-ordinated connection times. Can bus companies be required to provide facilities to carry bikes on buses.
A1143B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	At the time of this consultation the environmental and climate change implications of the Shrewsbury bypass extension had in no way been shown to represent sustainable or necessary development. It is not clear that given the current changes in travel and work practices that equal / better benefits might not be achieved through better investment in alternative sustainable transport options as identified in the hierarchy of sustainable transport. The statement of support for the bypass extension is presumptuous and should be diluted to identify that support is subject to evidence that the impacts of the development can be justified in line with the hierarchy of sustainable development, the aspirations of the 25 Year Plan on the Environment and the coming Environment Bill and commitments to the climate change mitigation.
A1152B39	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Agree	Agreement is as far as it goes. Agree new development should only occur where there is sufficient existing infrastructure capacity available. Provisions as to CIL and Section 106 contributions may be overtaken by proposals in the Government paper 'Changes to the current planning process' (which was released as this consultation began), to replace them with a single new Infrastructure Levy. It is vital that measures to promote good infrastructure and design are brought into the Local Plan in a way that gives them real teeth and the prospect of implementation. Efforts need to be targeted at infrastructure which will mitigate against Climate Change. Better provision is also needed for social facilities, and for rural broadband and public transport. Argue that the Local Plan should incorporate master plans. The separate Place Plans are largely concerned with the provision of infrastructure. Regrettably, a lot of the funding for this infrastructure is to come from CIL. The trouble with CIL is that (1) it is made available only after housing developments that require infrastructure have been constructed, and (2) it takes years to decide how to spend it. Infrastructure provision therefore lags behind development, rather than being in place to facilitate it. That is one of the reasons why a masterplan would be a good idea. Para 3b of draft policy DP29 provides for protection, extension or improvement of footways, cycleways, public rights of way and bridleways. That is welcome, but it is much more important to have a fully integrated Transport Strategy that discourages transport using fossil fuels and which positively encourages, and more importantly facilitates, active travel like walking and cycling. Presently, there is no such integrated policy
A1180B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A1180B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. 20mph should be considered as a rule for residential areas. I disagree with this policy because it is incomplete.
A1180B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated ((respondent ref; Form 12)
A1182B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A1182B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated ((respondent ref; Form 12)
A1633B3	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Agree	generally in agreement with the aims - there is not enough management of freight movements that use the unsuitable roads. E.g. travelling via Much Wenlock rather than use the motorways and Major A roads. The lorry park at Much Wenlock is a bad idea. Building more housing in Shropshire will increase road traffic as most will commute to workplaces in the West Midlands. This may be tempered by more home working but it is not know if that will on a long term or just be temporary. If it is more permanent then you need to look at local hubs with a short distance of new settlements that can be used for on line work. your comments on environmentally friendly vehicles make no comment on the pollution both plastic and other chemicals that come from tyre wear and eventually end up in water courses. The need for housing needs better consideration concerning future employment patters and new houses are where they are needed and not to make up numbers to satisfy a central government diktat.
A1634B2	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A1818B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Traffic calming and carbon reduction should be included in all Place Plans (form 2). A electric bus should be included (form 5)
A1844B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The wording of the policy seems to suggest that canals are somehow different to other routes. Suggest amendment to read ' b. Protection, extension or improvement of footways, cycleways, public rights of way, canal towpaths and bridleways....We ask that para 4.257 also reference canal towpaths. We welcome the recognition given to the canal network in para 4.258.
A1896B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete
A1896B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system
A1896B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated
A2130B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Don't believe that the plan does enough to reduce travel by car, and so won't be in a position to reduce carbon created by transport which accounts for 30% of Shropshire's output. Plan should consider allocation more housing in sustainable areas and must include active travel options. Greater links to the Local Transport Plan need to be made. There is nothing in the Local Plan that gives substance to the aspiration of "maximising the ability to make trips by sustainable modes of transport". It is possible to produce substantial increases in walking, cycling and bus use
A2150B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A2150B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. I disagree with this policy because it is incomplete.
A2150B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated. "I disagree with this policy because it is incomplete.
A2158B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A2158B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. I disagree with this policy because it is incomplete.

Page 101

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2177B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Draft Policy DP29 requires provision of infrastructure investment including domestic charging points in dwellings. DfT held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) which set out Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2020. Inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976. Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive (EPBD) requirements should be applied. Consider electric vehicles will be part of the solution to transitioning to a low carbon future but there are practical and financial challenges associated with the Government's proposed approach, which goes beyond the requirements of EPBD. The supply from the power grid is already constrained in many areas across the country. Concerned about the capacity of the existing electrical network in the UK. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. The cost of infrastructure reinforcement and additional sub stations has not been considered. These costs can be substantial and can drastically affect the viability of developments. Under Government's proposal the capped figure of £3,600 would automatically be levied on developers therefore this figure should be included in any impact assessment. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. Introduction of EVCPs along with other electric demand technology could lead to problems with capacity not only in the grid but inside the dwelling too. The proposals place an undue burden on new build dwellings without making any inroads into provision of EVCPs in the existing housing stock. Consider that the physical installation of fixed EVCPs is not necessary. The evolution of this automotive technology is moving quickly therefore a cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A cable and duct only approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies. The Council's proposed policy approach is unnecessary because of the Government's proposals to change Building Regulations. Before the pre-submission LPR consultation, Policy DP29 Bullet Point 3d should be deleted.
A2180B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The word 'should' is not used: instead we see 'Shropshire will continue to promote and support. We would also like to question why there is no reference to cycle storage as in the Oxford Plan: "Planning permission will only be granted for development that complies with or exceeds the minimum bicycle parking provision as set out in Appendix 7.4." This relates to Minimum Bicycle Parking standards of Houses and flats up to 2 bedrooms at least 2 spaces per dwelling; Houses and flats of 3 or more bedrooms at least 3 spaces per dwelling; Student Accommodation at least 4 spaces for every 4 study bedrooms unless site specific evidence indicates; HMOs At least 1 space per occupant.
A2308B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Would like to see additional wording within the draft policy to protect defence interests: "Development that might compromise the operation of MOD airfields within Shropshire will not be permitted. Development will be expected to either be located outside designated Safeguarding Zones or be designed to minimise impact. The input of MOD Safeguarding should form a fundamental part of the application process."
A2323B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29		This draft policy recognises that the following objectives will be achieved by delivering a sustainable pattern of growth and development, investing in the necessary communications and transport infrastructure and services, providing remote access to services and employment and making available accessible, safe, reliable, low carbon transport modes and active travel choices: "Shropshire will continue to be an attractive place to live and work by improving its communications and transport networks and supporting the infrastructure and services to widen travel and transport choices, to improve connectivity and accessibility, to reduce car dependency and manage the impacts of transport movements on communities and our environment." "Responding positively to changes in our climate will require access to better communications infrastructure and more sustainable travel options offering choices about the need to travel and the best transport modes. This will help to manage the environmental impacts of travel on climate change, air quality, network noise and public health contributing to the sustainability of communities and protecting our environment."
A2365B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A2372B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete (respondent ref; Form 10)
A2394B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Line 2, please delete "canals" and insert "canal towpaths". Reason: it is the towpath, not the canal channel, which provides the capacity for people to walk alongside canals. If towpath is omitted, then the Policy is not clear and towpath improvements might not qualify for support
A2407B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Agree	Natural England notes that the Plan includes policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF (policy DP29). Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities
A2423B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	This response concerns the issue of Active Travel, which covers walking and wheeling, including adapted cycles for people with disabilities, cargo cycles, tricycles, scooters, wheelchairs. This response is mainly with reference to Shrewsbury. All of the suggestions that follow can be achieved without building a North West Road. The road should be cancelled for many reasons including the fact that it will increase carbon emissions. There are two main reasons why the local plan should prioritise measures that make active travel safer and more convenient: 1. About 40% of carbon emissions in Shropshire come from travel so we need to move quickly to achieve a much greater percentage of journeys being zero-carbon 2. The measures would be cheap and easy to implement, more so than carbon-reducing measures in other sectors, and so represent a "quick win" in Shropshire Council's plan to achieve zero carbon. The local plan makes reference to "sustainable travel" (active travel and public transport) in various places but shows little understanding of the detailed policies needed to make a real change in transport options. The following objectives of the Sustainability Appraisal need significant increases in active travel, if they are to succeed in their aims: SO4 Promote access to services for all sections of society SO5 Encourage the use of sustainable means of transport SO6 Reduce the need of people to travel by car SO7 Support active and healthy communities SO11 Conserve and enhance Shropshire's air quality and reduce the risk of air pollution SO12 Reduce carbon dioxide emissions SO13 Promote adaptation and mitigation to climate change SO16 Conserve and enhance landscape character and local distinctiveness : – this cannot be done while promoting the North West Road and other road building schemes. The LTP should sit alongside the Local Plan and provide guidance and policy statements on transport decisions. However Shropshire Council has no adopted LTP and work has only recently started on drafting the LTP4 (summer 2020) This means that there is currently no strategy for transport in the county. A new LTP is urgently needed, which takes into account the changes of recent years and particularly the council's commitment to zero carbon. Shropshire Council should draw up a Local Cycling and Walking Infrastructure Plan (LCWIP) as recommended by the Department for Transport (DfT). This should include protection from development for the future, so that opportunities to build safe active travel routes are not lost in future planning decisions as they have been many times in recent years. This is a serious omission from the Draft Local Plan A strategic network plan should also include a requirement for developers to create access points for walking and cycling on to new developments, to provide more direct and safer access, away from traffic and linking to local quiet routes and rights of way. This almost never happens on new developments but is often a very low-cost way of encouraging walking and cycling. The Local Plan lacks commitment to active travel. Policies to ensure a large increase in active journeys are needed to contribute to health and welfare, social equality, cleaner air and reduction in carbon emissions. The lack of a Local Transport Plan or Local Cycling and Walking Infrastructure Plan means there are no targets and no action plan to achieve progress on active travel.
A2427B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A2427B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. I disagree with this policy because it is incomplete.
A2427B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future "The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." I disagree with this policy because it is incomplete.
A2427B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Para 4.261 NWRR To deter heavy traffic flow and to encourage pedestrians and cyclists into the centre of Shrewsbury, the temporary calming measures introduced during the pandemic to make provision for social distancing should be made permanent. There has been obvious economic benefit to hard-pressed shop and café owners as a result of the colonisation of pavements by diners and coffee drinkers throughout July, August and most of this month. However, this is a minor aspect in relation to the issue of greatest significance ever faced by humankind which is the almost unprecedented changes to the bio-sphere on which we depend that are now occurring as a result of the radical and uncontrolled experiment we are conducting with our planet's atmosphere. If the Thwaites glacier in Antarctica were to collapse, sea level rise would be so great as to inundate all our port cities, including London. The New Scientist and The Washington Post have reported very recently that this massive volume of ice is now unstable because of infiltration by sea-water from beneath. We need urgently to implement massive reductions in greenhouse gas emissions now, not in the next two decades. Steel manufacture emits 1.85 tonnes CO2 per tonne of steel made. Cement production causes 0.82 t CO2 per tonne to be released to air. Projects dependent on huge consumption of these materials must be halted until their carbon impact can be reliably off-set. Regrettably, the draft plan not only fails to reflect this urgent need, it runs counter to it by having the proposed North Relief Road as a centre piece. In addition to the great CO2 emission impact caused by its construction, the extra traffic such a project would inevitably generate would contribute its part, as a consequence of the CO2 emissions from the increased traffic volume, in the destruction of our native islands by encroachment of the rapidly rising seas surrounding them.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2432B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated. "I disagree with this policy because it is incomplete.
A2432B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A2469B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A2469B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. I disagree with this policy because it is incomplete.
A2469B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." I disagree with this policy because it is incomplete.
A2471B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system (respondent ref; Form 11)
A2471B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated (respondent ref; Form 12)
A2489B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	Paragraph 4.261 I disagree with the strategic objective of building the North West Relief Road for many reasons including <ul style="list-style-type: none"> * It is a financially risky venture * The money could be better spent on developing a truly future-fit sustainable transport infrastructure and promoting and enabling active travel. * It poses a risk to Shrewsbury's water supply. * It would lead to increased traffic elsewhere (even by the admission of the planners). * Any benefit in terms of reduced congestion/faster journey times is likely to be short-lived due to the phenomenon of "induced traffic". * It would have huge embedded carbon due to the vast quantities of concrete involved as well as energy expended in construction. * It would be hugely damaging to local wildlife, habitats and landscapes. * It cannot be justified given the over-riding need to rapidly reduce carbon emissions and design and plan for a future with vastly fewer cars on the road
A2489B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. HOWEVER, it is vital that the Local Plan acknowledges that electric cars are NOT the solution to sustainable transport, although they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." I disagree with this policy because it is incomplete.
A2489B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic also (a) reduces carbon emissions and air pollution, (b) reduces congestion e.g. around schools at drop-off/pick-up times and (c) leads to an increase in the amount of walking and cycling (as safety increases). This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measures, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. I disagree with this policy because it is incomplete.
A2489B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. I agree with this. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. For example, local residents in the Cross Houses area have been exploring the possibility of an off-road cycle path into Shrewsbury, making use of the disused railway line. Council support and financing for such a project would be a suitable concrete action to promote more active travel. I disagree with policy DP29 because it is incomplete.
A2490B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	I disagree with this policy as there is no mention of speed restrictions or traffic calming measures. Many Shropshire towns suffer from vehicles exceeding the speed limit. This is not only an issue of safety but also of carbon emissions and pollution. Obviously slower traffic speeds mean less fuel and consequently less carbon emitted. Reduced speed limits also increase the take-up of Active travel. The North West Road will not do anything to decrease traffic in the long term, due to the increased number of houses proposed to be built along its route, all adding to the existing traffic, and carbon emissions. Many of the vehicles will take the exit for Shrewsbury town, so increasing the traffic congestion entering the town centre.
A2490B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable, they are, at least, part of an interim solution. However, converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated." I disagree with this policy because it is incomplete
A2494B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	A sustainable and active transport system also requires: "Protection, extension or improvement of footways, cycleways, public rights of way and bridleways for active travel and canals to provide local transport routes to home, work, services and leisure;" as DP29 states. Every single one of the eighteen place plans include references to some or all of the above items. This is clearly a very widespread and deeply felt need that requires support from the local plan with details, timetables for action, targets and dates. A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen. I disagree with this policy because it is incomplete.
A2494B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. I disagree with this policy because it is incomplete.
A2494B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP29	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. I hope the council fully understands that electric cars are NOT the solution to sustainable transport, but while public transport and active transport methods are unavailable they are, at least, part of an interim solution. However converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? https://www.gov.uk/government/news/britains-first-all-electric-bus-town-to-pave-the-way-for-green-communities-of-the-future The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated. "I disagree with this policy because it is incomplete.
A0010B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Agree	Support para 5b of DP30. By encouraging applicants to use the police initiative within the Design and Access statement, it will help to promote crime free and safe environment and reduce opportunities for antisocial behaviour. Policy is wholly compliant with NPPF paras 91 (b) and 127 (f) and NPPG Paragraph: 010 Reference ID: 53-010-20190722 Revision Date: 22 07 2019. Shropshire Council can be assured that Secured by Design is recognised by government and the police Design Out Crime Officer's role is endorsed in NPPF para 95 and NPPG paragraph 012, reference ID: 53-012-20190722 revision date 22 07 2019.
A0159B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	The Council has adopted a clear policy of worsening public health outcomes. Its rejection of 20mph is a clear decision to worsen the incidence of obesity, diabetes and cardio vascular disease and it also reduces the potential for carbon-reducing barbers to walking and cycling. It is also contrary to public health advice
A0187B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" then a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. I disagree with this policy because it is incomplete (respondent ref form 15)
A0189B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" then a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. I disagree with this policy because it is incomplete (respondent ref form 15)

Page 103

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0240B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Don't know / no opinion	3.30 L&Q Estates supports the Council's proposed approach to Policy DP30, and particularly the requirement that 'new development should ensure the health and well-being of individuals, communities and places.'3.31 In this respect, L&Q Estates considers that its land interests at Shifnal are well situated to accommodate residential development, as new dwellings would be located close to existing green spaces and the proposed site layout will promote walking and cycling.3.32 Additionally, the proposed development is well located to employment opportunities, community facilities and transport connections, and should therefore be considered favourably in the context of Policy DP30(3).3.33 A Vision Document supporting these representations is enclosed at Appendix 1, and further outlines how the proposed development in well placed to align with the objectives of PolicyDP30.
A0306B058	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	DP30 (2) It is well-established that access to natural greenspace is beneficial for health and well-being. We feel high quality accessible greenspace should be included in 'external space standards' DP30 (4) Weak wording. In addition to promotion, the provision of walking and cycling routes and infrastructure should be included in development. There should be a defined 'walking distance', e.g. NE Access to Natural Greenspace standard. DP30 (6b) A hierarchy of action is required, with 'enhance' as a high priority. There should also be recognition of the value of 'natural play' and the need to enhance, retain and protect areas where this can occur. DP30 (8c) Should include the promotion of local food supply, in the form of allotments/garden space/farmers markets.
A0311B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels
A0323B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A0341B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A0356B16	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A0501B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health. In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" then a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. We continue to import meat and analysis shows that while meat and dairy provide just 18% of calories and 37% of protein, it uses the vast majority – 83% – of farmland and produces 60% of agriculture's greenhouse gas emissions. Simply because we do not see in the UK, the enormous cattle herds of other countries, does not mean that we have no part to play in Shropshire, or that we are not contributing to these agricultural carbon emissions. We simply import meat that has been obtained through climate destructive practises. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels. " https://www.cat.org.uk/info-resources/zero-carbon-britain/ disagree with this policy because it is incomplete.
A0642B46	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	The Council has adopted a clear policy of worsening public health outcomes. Its rejection of default 20mph zones is a clear decision (and contrary to the hierarchy) to worsen the incidence of obesity, diabetes and cardio vascular disease and it also reduces the potential for carbon-reducing barbers to walking and cycling. It is also contrary to public health advice. 20mph is supported by major public bodies and public health professionals e.g. •The House of Commons Select Committee on Transport •The World Health Organisation of Directors of Public Health •The National Institute of Health and Care Excellence •Public Health England •Public Health Wales (20mph is now accepted as the default speed limit throughout Wales) •The Royal College of Paediatrics and child health. 20mph also reduces carbon emissions because it smooths the flow of vehicles (less acceleration and less braking) and it reduces road traffic danger which boosts walking and cycling. Shropshire Council has rejected a key measure that improves public health and reduces transport's carbon emissions.
A0647B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	Encouraging to see inclusion of walking and cycling as important to health. In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" a strategy on health and wellbeing needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. We continue to import meat and analysis shows while meat and dairy provide just 18% of calories and 37% of protein, it uses the 83% the vast majority of farmland and produces 60% of agriculture's greenhouse gas emissions. Simply because we do not see enormous cattle herds of other countries in the UK, does not mean we have no part to play in Shropshire. We simply import meat that has been obtained through climate destructive practises. Paragraphs 2.2 and 2.3 make it clear that the draft Local Plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". Dietary change, food waste reduction and improved agricultural practices could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels. Disagree with this draft policy because it is incomplete.
A0648B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	Encouraging to see inclusion of walking and cycling as important to health. In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" a strategy on health and wellbeing needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. We continue to import meat and analysis shows while meat and dairy provide just 18% of calories and 37% of protein, it uses the 83% the vast majority of farmland and produces 60% of agriculture's greenhouse gas emissions. Simply because we do not see enormous cattle herds of other countries in the UK, does not mean we have no part to play in Shropshire. We simply import meat that has been obtained through climate destructive practises. Paragraphs 2.2 and 2.3 make it clear that the draft Local Plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". Dietary change, food waste reduction and improved agricultural practices could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels. Disagree with this draft policy because it is incomplete.
A0679B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	carbon foods. This is essential not only for the health and wellbeing of our population, but also to reduce our climate impact. A reduction in high-impact animal products is key in reaching net-zero. Meat and dairy uses 83% of farmland and produces 60% of agriculture's greenhouse gas emissions. This is wildly disproportional to the nutritional benefit we gain from it, and is simply too inefficient to maintain on the current scale of consumption. Much of the UK's meat is imported from countries with significantly lower environmental standards, resulting in the UK meat industry having very high environmental impact. Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels. " https://www.cat.org.uk/info-resources/zero-carbon-britain/ disagree with this policy because it is incomplete
A0698B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels.
A0970B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels
A0972B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	Para 1 Designs for the Tasley Garden Village development demonstrate little relationship with the historic town of Bridgnorth and its environs, are pedestrian and the proposed development looks the same as any in UK. Whilst existing farm buildings will be retained, designs need to reflect local architectural style ad character of existing traditional & historic buildings. Site size proposed for Garden Villages, too large to be absorbed into a historic town the size of Bridgnorth, and it will change the character which is central to it as a tourist destination. Highlight that there are already 500 dwellings allocated in Tasley & query whether development on Westgate site and the residential park homes at Park Hollins Estate off the A442 at Quatford, have been considered with their impact on the town's facilities & infrastructure. Deep concern regarding rational for overall figures and 9% dwelling requirement uplift which is not supported locally. This ignores role of Shropshire Council in representing the electorate. New housing for the area is welcomed, but it needs to be of a volume compatible with, and sensitive to, the town and all inhabitants. Para 4 The A458 is a fast and dangerous road and one footbridge insufficient to access Bridgnorth Town & if not achievable, as subject to ground investigations and available land, no footbridge would be dangerous. At least three footbridges regularly spaced out along the Tasley Garden Village frontage with the A458 required to ensure residents crossing safely. Ideally, the A458 would be moved to incorporate the Tasley Garden Village into the town to facilitate safe pedestrian & cyclist access to Bridgnorth high street. Para 6 Unclear how Shropshire Council will ensure sufficient primary health care delivery for the increased population given that GP surgeries are private enterprises, Amenities services & infrastructure – should be provided as needed and not after 9 years as Taylor Wimpey proposes. Reference DP30 para 7 query how SC ensure retention of community services such as local shops given that they are private enterprises? Reference DP30 para 9 Query What measures would be put in place to reduce the effects of pollution on residents of Tasley Garden Village from the busy A458 & airborne pollutants emitted by intensive livestock installations such existing or proposed Industrial Poultry Unit's .
A0981B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	Sport England is generally supportive of this policy. The reference in part 1) of the policy to good design should be strengthened so that there is a more direct reference to designing places and spaces that stimulate physical activity for all generations within the local community. The policy wording should require developments to demonstrate how the proposal accords with the 10 active design principles put forward in the model Active Design policy as set out in Sport England's representation for policy SP5. In respect of part 4) of the policy, it is recommended that the wording of the policy is strengthened to refer to high quality routes for walking and cycling that are safe and well lit as this influences peoples active travel choices. The provision of safe and secure cycle parking and secure changing and locker provision at destinations such as places of work should also be referenced as such provision is important to making active travel choices. Whilst the reference to new developments being within walking distance of open space is supported as a general objective, the wording of the policy is currently too imprecise to be applied consistently. If the Council are proposing an include an accessibility standard to open space, this should be more clearly defined and set out in policy DP16, with cross reference to it in policy DP30. This should be informed by the Council's open space needs assessment. In relation to part 6) of the policy, Sport England supports the intention to protect existing and promote new community infrastructure that promotes healthy and active lifestyles, and in particular part b) as this relates to sports and recreation facilities to meet existing needs. However, the wording of the policy is not consistent with para 97 of the NPPF which sets out the permitted exceptions in respect of development proposals that result in the loss of sports and recreational buildings or land. As set out in Sport England's representations on Policies DP15 and DP16, it is recommended that a separate policy is included in the plan that provides protection to such sport and recreation related community facilities to ensure consistency with para 97 of the NPPF. The promotion of new sport and recreation related community facilities could then also be addressed in this new policy. In respect of part 7) of the policy, its not clear how this differs from part 6) as they seem to relate to the same point in terms of protecting local community facilities and so there seems to be some duplication between parts 6) and 7) of the policy? It is therefore suggested that parts 6 and 7 are re-drafted to relate to the protection and development of non sport and recreation related community facilities, where the protection and development of sports and recreation related community facilities is addressed in a separate new policy. Policy DP30 could then cross-refer to this new policy accordingly. Part 9) of the policy misses the opportunity to cross refer to policy DP19. Whilst the reference to requiring Health Impact Assessments in part 11) of the policy is noted, the policy does not seem to be sufficiently detailed to be clear how this is proposed to be applied consistently. Does this need to be developed further? The reasoned explanation for the policy should be expanded to refer to the Council's evidence base which includes the Playing Pitch and Outdoor Sports Strategy (PPOSS) and Built Sports Facilities Strategy (BFS). The priorities for investment should be appropriately referenced in the explanation for the new policy that relates to provision of new sports and recreation facilities, to include for instance, the need to invest in improving the Council's stock of swimming pools, sports halls, health and fitness suites and other built sports facilities and to reference that these investment priorities will also be prioritised in the Council's Place Plans and Infrastructure Plan. This would then accord with para 96 of the NPPF which requires LPA's to assess their needs and to plan positively to meet those needs.
A0984B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Agree	Supports this policy which states that new development should ensure the health and well-being of individuals, communities and place. Part 9 of the policy relates to implementation of the Council's Air Quality Action Plans, however this has not been published.

Page 104

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1117B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	Section 8. "Ensuring access to healthy food by: a.Ensuring good access to appropriate food shops; and b.The need to promote healthy eating through taking into consideration the cumulative impact of A5 uses (hot food takeaways)." a. would benefit from expansion and detail, as I'm not sure what you mean by "appropriate food shops". I understand the plan promotes local shops, which is good, but perhaps consideration needs to be given to community owned shops where people can bulk buy and thereby reduce plastic and packaging waste. This kind of community shop might also provide more 'affordable' produce and goods for those on lower incomes which could encourage healthy eating if a range of fairly priced local produce was available through not-for-profit schemes. It could also support local sustainable farming practices. b. What do you mean by this paragraph? Again, perhaps it could do with more explanation in terms of what constitutes healthy eating e.g. reduction in meat consumption to help mitigate climate change?
A1152B40	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Agree	Agree new development should ensure health and well-being of individuals, communities and places, and agree with the intention that permission will be refused for development proposals that would adversely affect or prejudice the health and well-being of individuals, communities and places. In practice such matters are difficult to pin down. The Council currently has such applications on its books, where the presumption in favour of development means that the tests for a valid refusal on health or other environmental grounds are set at a level which is higher than merely precautionary.
A1180B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A1182B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A1634B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A1844B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	Waterways have the potential to make a real difference to the health and wellbeing of local communities. Point 4 should be amended to indicate that development should not only promote walking and cycling but also provide or enhance existing opportunities for such use.
A1896B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels
A2150B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels
A2163B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	This draft policy lists a variety of requirements that new developments should achieve to ensure the health and well-being of individuals, communities and places; and that major applications must be accompanied by a Health Impact Assessment (HIA). However, HIAs require a screening and scoping process, and not all developments will require one. An HIA can be in the form of an Intermediate HIA or Rapid HIA. Therefore, the policy should make clear that major developments would be required to screen/scope the need for a HIA and that these can either be intermediate or rapid submissions. This policy should be amended in order to be found sound, as it needs to be fully justified.
A2177B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	Draft Policy Bullet Point 7b ensures access for all to high speed broadband and on-line services. Draft Policy DP28 already requires residential developers to provide broadband and mobile communication infrastructure. The developer should not also be expected to ensure access to on-line services, which is beyond the control of a developer. This Bullet Point is inappropriate, before the pre-submission LPR consultation, Bullet Point 7b should be deleted from Policy DP30. Draft Policy DP30 Bullet Point 11 requires major development proposals (more than 10 dwellings) to be accompanied by a Health Impact Assessment (HIA) including details of ongoing management or mitigation of issues where necessary. NPPG confirms that a Health Impact Assessment (HIA) can serve a useful purpose at planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon wellbeing that development proposals will have on existing health services and facilities. Any requirement for a HIA should be based on a proportionate level of detail in relation to the scale and type of development proposed. The requirement for HIA without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the NPPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to mitigate the impact. Before the pre-submission LPR consultation, draft Policy DP30 Bullet Point 11 should be re-considered and modified by the Council.
A2194B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	SWT Clun and BC Committee endorse the broad aims of DP 30 but as elsewhere, these are unambitious and non-specific in relation to the needs of the wider rural area including the settlements of Bishop's Castle, Clun and Bucknell, and lack attention to the detail of need in these communities. General points :1) All development in an area lacking significant public transport will lead to greater use of cars and all use of cars will, at present, lead to more emissions of noxious gases, particulates etc. Increasing use of deliveries at home increases this and this transport is often large, in a hurry and unfamiliar with the area. All the villages lack of 20mph limits, and in Clun particularly, lack adequate pavements and have no specialised provision for cyclists . All increases in car, van lorry transport make cycling more dangerous and less confident cyclists less likely to cycle. Tolerance of parking within villages and the expectation of parking close to home has not been addressed and as a result village centres are cluttered with dangerously parked vehicles making walking and cycling uncomfortable at times and downright dangerous at others. Thus no development of further housing in South West Shropshire is compatible with the objectives of DP30 without extra work in mitigation.2) The mitigation required to achieve DP30 will be substantial and should not only include an aggressive approach to the reintroduction of significant public transport in the form of buses, but include review of village pavements, parking , cycle routes, and consideration of the development of cycle paths between the settlements and major hubs e.g. between Craven Arms and Clun. Substantial work will be required to change the behaviour of village residents but also to address the physical infrastructure and parking patterns within villages. (This is not trivial or idealistic, it is a long overdue issue and would be welcomed by many village residents especially those on foot or on bicycles.) If Shropshire Council is serious about their plan, they must begin this work throughout the county but it is most urgently required in those areas which have least public transport, are most rural and most at the mercy of the car but are tourist venues.3) Walking is a major reason for coming to the area to live or for tourism, but in order to achieve the Health and Wellbeing objectives, footpaths require both development and constant attention. In relation to Social Prescribing and the health of the population (especially considering the population distribution in Shropshire as laid out in the plan, heavily weighted to older citizens), many more footpaths could be developed, allowing for less strenuous walking (and cycling), (e.g. between Clun and Clunbury or The Hurst, along the river). Developing such paths would also increase opportunities for development of habitats both riparian and other, helping to create more Stepping Stones to help join up wildlife corridors. (A joint cycle path and footpath up the valley between Clun and Newcastle could link with routes to Craven Arms). The point is that although the DP30 objectives are excellent, that considering road vehicle pressure and population ageing, together with housing development, that there needs to be a major investment in more level and accessible footpaths and more cycle paths and work within village infrastructure, if the population is to become more active and these objectives , achieved.4) These comments should not be taken as opposing development of further housing in BC, Clun and Bucknell. But, as with our statements about the incompatibility of development and water quality, it is essential the actions in reparation are taken before development occurs. We support the development proposals as essential to maintain the health of our villages. But specific monitoring of walking, cycling and air quality issues should be undertaken together with significant improvements and change.
A2365B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health. In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" then a strategy on health and well-being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. We continue to import meat and analysis shows that while meat and dairy provide just 18% of calories and 37% of protein, it uses the vast majority – 83% – of farmland and produces 60% of agriculture's greenhouse gas emissions. Simply because we do not see in the UK, the enormous cattle herds of other countries, does not mean that we have no part to play in Shropshire. We simply import meat that has been obtained through climate destructive practises. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels. " https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete. (response ref form 15)
A2427B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health. In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" then a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. We continue to import meat and analysis shows that while meat and dairy provide just 18% of calories and 37% of protein, it uses the vast majority – 83% – of farmland and produces 60% of agriculture's greenhouse gas emissions. Simply because we do not see in the UK, the enormous cattle herds of other countries, does not mean that we have no part to play in Shropshire. We simply import meat that has been obtained through climate destructive practices. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels." https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.
A2469B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A2471B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health but a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels (respondent ref; Form 15)
A2475B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	The policy should refer to the proven benefits of contact with nature for health and wellbeing, and the need therefore to protect and provide and maintain high quality natural areas as well as local greenspace sites.
A2489B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health. In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" then a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. We continue to import meat and analysis shows that while meat and dairy provide just 18% of calories and 37% of protein, it uses the vast majority – 83% – of farmland and produces 60% of agriculture's greenhouse gas emissions. Simply because we do not see in the UK, the enormous cattle herds of other countries, does not mean that we have no part to play in Shropshire. We simply import meat that has been obtained through climate destructive practices. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in " ... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels." https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2494B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP30	Disagree	It is encouraging to see the inclusion of walking and cycling as being important to health. In order to deliver on the NPPF requirement of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" then a strategy on health and well being needs to include proactive measures to move people's diets towards more plant based and low carbon foods. This is not a suggestion to force everyone to become a vegan, but a recognition of the fact that our meat and dairy consumption needs to be reduced; this is a key requirement for reaching net zero. We continue to import meat and analysis shows that while meat and dairy provide just 18% of calories and 37% of protein, it uses the vast majority – 83% – of farmland and produces 60% of agriculture's greenhouse gas emissions. Simply because we do not see in the UK, the enormous cattle herds of other countries, does not mean that we have no part to play in Shropshire. We simply import meat that has been obtained through climate destructive practices. Paragraphs 2.2 and 2.3 make it clear that the local plan has a major role in moving the county towards net zero in "... all facets of sustainability ...". " Through dietary change, food waste reduction and improved agricultural practices we could provide a healthy, sustainable diet for the whole UK population. These changes would mean that greenhouse gas emissions from agriculture would be reduced by 57% from 2017 levels." https://www.cat.org.uk/info-resources/zero-carbon-britain/ I disagree with this policy because it is incomplete.
A0241B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP31	Agree	Agree
A0984B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP31		Part 1 of the policy confirms that applications for non-mineral development within any MSA and which could have the effect of sterilising mineral resources will not be granted unless at least one of the three named criteria is relevant. Criterion c. confirms that an exemption policy will apply in accordance with the rest of the policy wording. However the policy wording does not reference sites allocated to deliver development. It is recommended that this policy is amended to include allocated sites within the exemptions and remove the requirement to submit any Mineral Assessment with an application on an allocated site.
A2308B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP31	Disagree	Would like to see additional wording within the draft policy to reduce risk of birdstrike: "Where a proposed development would result in mineral working or extraction falling within a designated safeguarding zone (Birdstrike Zone/Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for the extraction, restoration and post restoration phases. It would also be necessary to agree details of the restoration of extraction sites to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."
A1648B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP32	Don't know / no opinion	We note that Table DP32.1 includes a sand and gravel windfall allowance of 10.5 million tonnes, and it would be helpful to clarify through further discussion how this anticipated windfall level has been established
A2308B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP32	Disagree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike: "Where an application would result in sand and gravel working or extraction falling within a designated safeguarding zone (Birdstrike zone/Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for the extraction, restoration and post restoration phases. It would also be necessary to agree details of the restoration of extraction sites to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."
A0306B059	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP33	Disagree	There is no justification for the winning and working of coal when we are facing a Climate Emergency.
A0984B27	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP33		Support Part 1 of this draft policy regarding the need for mineral development to demonstrate that potential adverse impact on the local community and the natural/historical environment can be satisfactorily controlled. Although supportive of sustainable mineral working, it is important that mineral sites are not detrimental to residential receptors or the natural/historical environment. Part 1c of the draft policy is particularly important, regarding cumulative impact of mineral working sites. Bridgwalton Quarry (active) and Morville Quarry (inactive) are in close proximity (800m), if both are fully operational at the same time there is risk of an adverse impact on the natural and historic environment. Support Part 2 of this draft policy regarding restoration of mineral sites to an agreed after use state, following completion. This should occur at the earliest opportunity.
A0997B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP33	Agree	We note the minerals safeguarded areas and site allocations carried forward in DP32 and welcome the reference to the historic environment in Policy DP33 in respect of development proposal impacts and considerations.
A2308B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP33	Disagree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike: "Where an application would result in mineral working or extraction falling within a designated safeguarding zone (Birdstrike zone/Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for the extraction, restoration and post restoration phases. It would also be necessary to agree details of the restoration of extraction sites to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."
A2389B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP33	Disagree	This looks like it could be improved and have a greater emphasis on the need for a HRA and groundwater assessment (which causes issues at some sites if not undertaken/monitored sufficiently upfront) – look at the adopted Gloucestershire minerals plan.
A2475B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP33	Disagree	There are some significant mineral sites and reserves within the AONB, and this policy should cross-reference the AONB and policy DP26.
A0501B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP34	Disagree	With the emphasis on reducing CO2 emissions it is disappointing to see that carbon from the Veolia Battlefield site has increased each year from 2015 to 2018. Reference : https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 Final sheet headed 'Pollution Inventory'. Whatever the reason for this increase, action is required to understand and reverse this trend. The local plan should include a commitment to require waste management of every kind to reduce carbon emissions. I disagree with this policy because it has ignored rising CO2 emissions from the waste management service employed by the county.
A2308B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP34	Disagree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike: "Where an application would result in waste management or processing development within a designated safeguarding zone (Birdstrike Zone/Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."
A2308B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy DP35	Disagree	Would like to see additional wording within the draft policy to reduce the risk of birdstrike along the lines of: "Where an application would result in landfill or landraising sites falling within a designated safeguarding zone (Birdstrike zone/Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for the landfill / landraising process, restoration and post restoration phases to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."
A0399B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Agree	Support the identification of Land bounded by Kingswood Road, High House Lane and the By-pass, Albrighton, as Safeguarded Land. Our client, landowner of part, has confirmed that the land is suitable, available and achievable for development.
A0400B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Agree	Support the identification of Land bounded by Kingswood Road, High House Lane and the By-pass, Albrighton, as Safeguarded Land. Our client, landowner of part, has confirmed that the land is suitable, available and achievable for development.
A0697B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	See wider comments, particularly those relating to draft Policy S1.1 and the Sustainability Appraisal.
A0888B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	See wider response.
A0897B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Agree	Draft Policy S1.1 seeks to deliver 500 dwellings in Albrighton over the plan period 2016-2038, equivalent to an average of 22.7 dwellings per annum Support the proposed growth of Albrighton in the draft Local Plan and specifically the proposed allocation of ALB017. However concerned that the draft Local Plan period has been extended by 2 years, but this is not reflected in the proposed housing requirement. A proportionate increase to reflect the longer timescale, namely 550 dwellings, would be appropriate. Government recently published proposed changes to planning legislation and NPPF. This include ensuring 300,000 new homes are delivered nationally per annum, a level that is significantly higher than recent delivery rates. To keep the draft Local Plan in step with forthcoming changes to the NPPF would welcome a higher housing guideline for Albrighton. A higher housing guideline would also be consistent with the strategy to direct development to urban area and strategic corridors (the M54 is a key strategic corridor as noted in the M54 Growth Corridor - Strategic Options Study). Given Albrighton's strategic location, good range of services and excellent rail links to a wide range of employment opportunities, a higher housing guideline of at least 700 dwellings would be appropriate. The housing market in this area is very strong and capable of delivering this. For the above reasons, would support an increase in Albrighton's housing guideline. Strongly support the allocation of site ALB017 together with site ALB021 for around 180 dwellings. The site represents a sustainable, deliverable and suitable development option for housing delivery in the early years of the plan period. ALB017 is 450m from Albrighton Railway Station, making it consistent with paras 102/103 of the NPPF and within walking distance of all services and facilities in Albrighton. Technical evidence has been provided in support of the site. Development guidelines stipulate ALB017 is served from a roundabout off Kingswood Road. However, this is considered unnecessary on highways grounds as a priority junction is able to provide the required capacity to serve the development. This avoids land take associated with a roundabout junction and minimises impact on the mature tree belt along Kingswood Road. All development guidelines are achievable. Confirm that the site is viable and deliverable, having regard to the policy requirements in the draft Local Plan. Confirm the delivery timescales for this site shown in Appendix 7 of the draft Local Plan are appropriate. The site is able to deliver in the early years of the draft Local Plan period and an outline application will be submitted at the earliest opportunity once the plan has reached an advanced stage.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0935B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	To provide long-term locations for growth, three areas of land beyond the Albrighton development boundary, totalling 19.9ha, are safeguarded for Albrighton's future development needs beyond the current Local Plan period. The Council's Green Belt Release: Exceptional Circumstances Statement (2020) comments in reference to two of these sites (totalling 12.9ha) that, 'the availability of the site is currently unknown however given that it is proposed for safeguarding for future development beyond the Local Plan Review period it is considered that this will change in the future'. Consider this cannot be relied upon to be a source of future housing or employment land. Furthermore, it is unlikely that substantial growth at Albrighton would be appropriate. A more appropriate solution would be the inclusion of a 'Strategic Settlement' at Land at J3 as this would allow for greater distribution of growth along the M54 corridor. The majority of the Land at J3 site falls within the Albrighton Place Plan Area.
A0985B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	In broad agreement with draft Policy S1.1 and support inclusion of ALB021 as a housing allocation. Discussions with a housebuilder to commence shortly to ensure the site is delivered in a timely manner. However, consider an amendment to the wording of the draft site guidelines should be made to ensure ALB017 does not unduly delay delivery of ALB021 and ensure the whole site contributes to housing delivery within the draft Local Plan period. This amendments should state that full vehicular access will be provided into ALB21 before any dwellings are occupied on ALB017, in order to ensure the site is delivered in a timely manner. If this amendment is not made, there will be a need to explore the possibility of creating a new access off Beamish Lane to serve ALB021. Do not consider this would prejudice delivery of a holistic masterplan for ALB017 and ALB021 – committed to working with the promoters of ALB017. Consider a second access would not prevent Beamish Lane from being largely protected from through traffic via an appropriate TRO. Initial advice from a highways engineer is that a single access into ALB021 is entirely possible and in light of the lack of accidents or obvious issues with the existing junction, there is scope for an appropriate design to work. Indeed, pedestrian and cycle links would still exist between the site and the railway station/wider site. Supporting evidence for ALB021 is to be prepared to support an eventual Planning Application, which will align to the development plan examination process and having regard to an indicative masterplan for the wider site, which should involve the promoters of ALB021. Once agreed, it is expected this masterplan will support the development plan, as an addendum to the proposals map.
A1135B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	We object to the proposed development boundary as drawn on the pre-submission draft proposals map for Albrighton and are disappointed to see that the Harp Land has not been proposed for allocation. It lies adjacent to the existing housing allocation ALB003 at 'White Acres' which at the time of the assessment was considered by the Council to be "well located for the active retired market, being within easy walking distance of Albrighton centre's services and facilities". This land has not been brought forward for development despite its status as an adopted allocation since 2015. It is not clear whether the land is available; it does not appear to have been reviewed in any way for its suitability going forward. Over five years of no action in a buoyant market would suggest not.
A1834B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area		Consider that proposed site allocation ALB017 & ALB021 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: ALB017 & ALB021: traffic; M54 J3. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A2308B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: ALB017/ALB021: Safeguard Zone - RAF Cosford Plan AT 15.2m (small section at extreme east of site in 10.7m).
A2321B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Don't know / no opinion	Vistry (who have previously engaged with the Local Plan Review under their former trading name, Bovis Homes) is promoting approximately 11.7 hectares of land to the west of Albrighton (the site), which represents a sustainable and deliverable residential land opportunity for around 218 new market and affordable homes, and public open space. Throughout the promotion of the site Vistry have developed a site specific evidence base to inform the masterplanning of the site and underpin its deliverability. This site specific evidence base was submitted in support of Vistry's representations to the Issues and Options Consultation in April 2017 and then compiled into a 'Vision Framework' which supported their representations to the 'preferred sites' consultation in February 2019. The proposed growth of Albrighton 3.11 Policy S1.1 states that: 3.12 "Albrighton will act as a Key Centre and contribute towards strategic growth objectives in the east of the County, delivering around 500 dwellings and around 5 hectares of employment development" 3.13 While we go on to comment on the specific proposed allocation in response to Policy S1.1 in section 4 of these representations, the 'Technical review of the need for new homes in Albrighton' report prepared by Turley demonstrates that the level of growth directed to Albrighton may have been artificially suppressed, particularly for the reasons set out in paragraph 3.2 of these representations. 3.14 Specifically the report has identified that Albrighton is exhibiting the consequences of a long-term limiting of its growth, despite sustained need and demand. Principally this is illustrated by a long-term decline in its population and a more recently static picture which is materially changing the demographic profile of the town. Where historically it has demonstrated a notably sustainable profile, including a high proportionate share of those of working age, it is rapidly seeing an ageing of its population. Where the ageing of its population is an inevitable consequence of earlier growth, this is compounded by a sustained reduction in younger people including children. 3.15 Where the absence of new supply is an important contributing factor – with Albrighton having seen one of the lowest rates of housing delivery of the key centres in Shropshire – this is compounded by high demand for homes. There is evidence of an acute worsening of market conditions, with consequences for the affordability of housing. This is further limiting the ability of younger households to access housing in the settlement, which is further inhibited by the lower representation of smaller homes in Albrighton. 3.16 Albrighton has demonstrated relatively strong connections between home and work, with this influenced in part by its proximity and accessibility to RAF Cosford as a significant employer, and also with its wider alignment with key strategic corridor along the M54 / A5. Insufficient consideration has been given in the draft plan to the relationship between the planned level of new homes in Albrighton and the anticipated creation of a substantial number of new jobs, associated with the supported growth of this strategic site. Where new jobs materialise in the plan period, it is reasonable to suggest that these will place increased demand for housing in Albrighton. Indeed the draft plan goes as far as acknowledging that the: "...relationship between Albrighton and the nearby Strategic site at RAF Cosford, with many employees and personnel based at RAF Cosford choosing to live in Albrighton and/or use the facilities within the settlement and certain facilities at RAF Cosford being available for residents of Albrighton". 3.17 Clearly the full extent of the employment growth and corresponding increase in the numbers of jobs at RAF Cosford has not yet been fully realised (as set out in response to Policy S21 in Section 5 of these representations), and Vistry consider that the level of growth directed to Albrighton will not allow it to respond to existing issues in affordability, social structures, first-time buyer affordability, and more significantly, will prevent the village from being able to provide sustainably located new housing within close proximity to the significant employment development at RAF Cosford and the wider M54 growth corridor. 3.18 In light of the above and our response to Policy S1 and S21 below, a greater quantum of growth should be directed to Albrighton to ensure the LPR is positively prepared, effective and justified. Vistry's site to the west of Newport Road can make a significant contribution to this, as well as the wider county's housing needs. The Vision Framework (enclosed at Appendix 1) demonstrates that the land east of Newport Road, Albrighton is sustainable, deliverable and appropriate for release from the Green Belt to provide around 218 dwellings (market and affordable) and public open space. The Vision Framework demonstrates that the site could deliver new homes in a sensitive and highly responsive manner to the local context and character, including significant green infrastructure which will link into the existing Donnington and Albrighton Local Nature Reserve, creating an attractive place where people will want to live, and a new northern gateway to Albrighton. The site has been previously promoted through the Site Allocation and Management of Development Plan (SAMDev), and more recently the Issues and Strategic Options Paper in March 2017, the consultation on preferred scale and distribution of development in December 2017 and consultation on the preferred sites in April 2019. The site is located to the east of Newport Road, adjacent to the existing built up area of Albrighton. It is bounded by Newport Road to the west, the railway to the north and Rectory Road to the east. Sandy Lane runs through the northern area of the site connecting Newport Road to Rectory Road, although in part it is an unmade track. The site's peripheral boundaries and the internal field boundaries are formed by maintained native hedgerows. The Albrighton and Donnington Local Nature Reserve lies directly to the south of the site set within a small, shallow wooded valley. It contains a historic pool, Willow Carr woodland, a series of ponds and informal pathways running through areas of woodland and meadow. The whole site is located within the West Midlands Green Belt. The site is located adjacent to the Albrighton and Donnington Conservation Area which includes St Cuthbert's Parish Church, St Mary Magdalene Church, St Cuthbert's Well, Albrighton Pool and the Old Rectory. Both churches are grade II* listed buildings. Albrighton is a very sustainable location for housing growth with a wide range of local shops, restaurants, facilities and services as detailed within the 'Technical review of the need for new homes in Albrighton' report enclosed at Appendix 2 which has been prepared by Turley. These services and facilities are mainly centred on the High Street and can be easily reached by foot and cycle. Albrighton has very good public transport services. There are currently three bus services which serve Albrighton, providing frequent services to local higher order settlements including Telford and Wolverhampton. All three services run along the site boundary with Newport Road and serve the existing stops near to Worthington Drive. Albrighton and Cosford train stations are both within walking and cycling distance of the site (1.3km and 0.9km away respectively). Both stations are served by West Midland services which operate hourly, between Birmingham, Wolverhampton, Telford and Shrewsbury. Policy S1.1: Development Strategy, Albrighton Key Centre 5.1 As set out throughout these representations, it is right that Policy S1.1 recognises the importance of the strategic allocation of RAF Cosford, and the associated opportunities which this brings, although consider that the full extent of these opportunities has been missed. 5.2 Moreover, as set out in response to Policy SP2, the Draft Plan fails to recognise the inherent sustainability of Albrighton and years of suppressed housing growth which have led to an ageing population, rising housing prices outstripping the Shropshire average, and an inability for first-time buyers to get onto the housing market. 5.3 Vistry consider that these matters require a considered response to respond to both the historic under provision of housing and the opportunities which RAF Cosford proposes through new housing allocations and identification of safeguarded land including sustainable and deliverable sites such as land to the east of Newport Road which Vistry are promoting. Schedule S1.1 (parts i & ii) Residential Allocations and Safeguarded Land 5.4 Notwithstanding wider comments on the need for more housing growth to be directed to Albrighton, when considering the proposed allocation and land identified for safeguarding, Vistry do not agree that the sites identified are the most sustainable as well as having deliverability concern.
A2321B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	The preferred housing allocation at ALB017 adjoins the existing allocation 'ALB1' of the BDL. ALB017 would need to take access from Kingswood Road, given that Beamish Lane to the east of the site is a single track road. The Council's Strategic Land Availability Assessment (SLAA) (Site Assessments: Albrighton Place Plan Area) (SLAA) dated November 2018 identifies "concerns related to the bend in Kingswood Road" and identifies that development of ALB017 should consider the provision of a roundabout junction into this parcel to resolve the access issues.
A2321B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	5.13 Site ALB021 adjoins proposed allocation ALB017 and is bound by the railway to the north and A41 to the east with Beamish Lane to the south east. The SLAA is clear that site ALB021 cannot be accessed from Beamish Lane (a single track road) without significant improvements and goes on to identify that there is a need to consider the capacity of the A41 / Beamish Lane junction with consideration of whether it should be closed. Therefore by admission in the SLAA, ALB021 can only be developed in conjunction with ALB017 and will be wholly reliant upon ALB017 for access into the site. As a result, any delays in the delivery of ALB017 will have an impact upon ALB021. In addition to our concerns relating to the access into ALB017 and ALB021, the SLAA identifies that ALB017 should seek to link to the existing undelivered allocation to the west to facilitate sustainable travel means into the village centre. 5.14 ALB021 (which is approx. 1ha in size), is heavily constrained by the railway and A41 to the north and east, an ecological corridor to the north, and a number of mature hedgerow and trees on site which are likely to limit the net developable area on site. 5.15 The Council's SLAA identifies that site ALB017 has an accessibility rating of 11 / 24 (based upon accessibility to Primary School, GP surgery, convenience store and public transport). Site ALB021 scores 15 / 24, yet it is further away from services and facilities than ALB017 and is reliant upon ALB017 for its access. The SLAA does not explain the methodology behind this assessment of accessibility. Vistry has reviewed the scoring for a number of other sites and it appears a higher score indicates better accessibility and sustainability. Vistry contend that ALB021 cannot be assumed to be accessible to services and facilities given its location, isolated from the village centre and reliant upon ALB017 for access. In any event, it certainly cannot be scored as being more sustainable than ALB017 and this inconsistency should be amended. 5.16 Given the well evidenced deliverability issues with existing allocation ALB1, Vistry strongly object to the Council's preferred direction of growth to the east of the village, which is heavily reliant upon an existing allocation which has not delivered any meaningful residential development within the fourteen years which it has been allocated. In addition, similarly to the existing allocation, there is no evidence the site is controlled by a housebuilder or promoter with a track record for delivery. The proposed allocations at ALB017 and ALB021 therefore represent a significant risk to the delivery of Albrighton and the wider County's housing needs. They are neither justified nor positive prepared.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2321B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	<p>5.17 In addition to the above, Vistry is concerned that proposed safeguarded site P35 will significantly alter the form and character of Albrighton. The site is on the periphery of the village and any development will materially change gateway views on a key approach route into the village, impacting upon the setting of the Albrighton Conservation Area, within which part of the site is located within. The Council's Green Belt Assessment (September 2017), assesses a wider parcel of land to the south and east of Albrighton which includes P35. In the assessment of this parcel, it is considered that the Green Belt in this location is relatively open "with the openness of the land playing a major role in its setting". Indeed the Green Belt Assessment considers that "the openness of the land within the parcel is considered to contribute positively to the historic significance of Albrighton and to its special character".</p> <p>5.18 The topography of P35 plays an important role in enclosing the village from the surrounding countryside. Development here would be prominent on the rising slope when approaching Albrighton along Kingswood Road from the southeast. Works to High House Lane or Kingswood Road necessary for development would adversely affect their rural character, views experienced from them, and is likely to result in the loss of mature vegetation.</p> <p>5.19 In addition the gross site area identified within Site P35 (some 6.3ha) includes approximately 14 existing dwellings in separate land ownership to the wider site. It is not clear if these dwellings would form part of any future development at the site, should it come forward following its removal from the Green Belt.</p> <p>5.20 Furthermore, the Council's SA is overly simplistic in respect to the proposed safeguarded sites and does not provide a robust appraisal of accessibility. The SA fails to consider sustainable travel options of bus and train and instead focuses on a simplistic approach of access to specified facilities (primary school, GP surgery, library, leisure centre, children's playground, outdoor sports facility, amenity green space and accessible natural green space).</p> <p>5.21 For example, the SA identifies that site P35 is within 480m of a Primary School, GP Surgery, Library, Leisure Centre and Outdoor Sports Facility. This is not correct. Using the Council's methodology of measuring a straight line from the boundary of the site, the distances are:</p> <ul style="list-style-type: none"> • Primary School, 510m; • GP Surgery, 650m; and • Library, 980m. <p>5.22 When the actual walking / cycling distances are considered, the distances are all well in excess of 1km from the site. The straight line distances used by the SA are therefore not a robust measure of a site's sustainability. In addition, it is not just length of route which should be considered, but also its quality. Site P35 is disconnected from Albrighton and there are currently no safe routes for pedestrians to access the facilities of the town or public transport facilities.</p> <p>5.23 Vistry therefore consider that the site should remain in the Green Belt given the adverse impacts it would have upon the setting of Albrighton and the Albrighton Conservation Area. In addition, even if the Council were to release this site from the Green Belt, it is considered that the actual contribution the site would ultimately make to the Council's supply of housing should it be allocated at any point, would be minimal.</p>
A2409B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	<p>The Local Plan proposals provide for an additional 165 houses on land to the east of the existing developments approved to the north of Kingswood Road plus 30 to the north of Beamish Lane and a further allowance for windfall development during the plan period. In addition it is proposed that further land between Kingswood Road and the A41, between the railway line and A41 be released from the Green Belt for future development together with the area south of Cross Road between Newhouse Lane and Patshull Road which was approved some years ago by the Parish Council and Bridgnorth District Council but rejected by the Secretary of State in favour of the existing development off Kingswood Road. It is recommended that the Council raises no objections to the above proposals. There is concern that there is little reference in the Local Plan to the infrastructure requirements which will arise from the developments referred to above apart from a mention of priorities identified in the Albrighton Place Plan and to the need for a roundabout in Kingswood Road at the access point to the development to the north which appears to have been overlooked. In particular, apart from a brief reference to the existence of areas flood risk, there is no reference to any proposals for flood defence measures apart from a brief statement that there will be sustainable drainage within the site and that "water measures must not displace water elsewhere". There is also no reference to the need to alleviate local parking problems apart from a statement that the residential allocation east of Shaw Lane will "help provide additional parking in the vicinity of Albrighton railway station" which now seems to be increasingly unlikely. Although there is no proposal for employment land development at Albrighton within the Local Plan Review there is reason for concern that "the need for additional employment land will be assessed in the context of proposals for the development of a strategic development site in the M54 corridor which will be addressed within a future stage of consultation. Strategic Site Policy – RAF Cosford</p> <p>The only contentious issue relating to developments proposed for RAF Cosford, most of which are to be welcomed, is the proposal for release of 36 acres of land bounded by the railway line in the south, Neachley Lane in the east, woodland in the west and agricultural land in the north for provision of a headquarters for the West Midlands Air Ambulance Charity. While the development of this headquarters is to be welcomed it is not understood why it would require 36 acres which is roughly the same size as the whole of the officers' married quarters, officer's mess and sergeant's mess to the east of the A41 or the area which accommodates all of the hangars and the main museum building on the airfield.</p>
A2409B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	<p>This statement in 5.15 is not correct:- "Recognising the relationship between Albrighton and the nearby Strategic Site at RAF Cosford, with many employees and personnel based at RAF Cosford choosing to live in Albrighton and/or use the facilities within the settlement and certain facilities at RAF Cosford being available for residents of Albrighton, new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site. "...certain facilities at RAF Cosford are NOT available for residents of Albrighton..."</p>
A2409B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	<p>There is no reference to the need to alleviate local parking problems apart from a statement that the residential allocation east of Shaw Lane will "help provide additional parking in the vicinity of Albrighton railway station" which now seems to be increasingly unlikely. There is a need for SC to commission an independent Professional Comprehensive Review of Traffic Issues in Albrighton and District. This is an urgent matter and this request is strongly supported by residents and Albrighton Parish Council</p>
A2409B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	<p>Over the last 15 years Albrighton Village has suffered several flooding events resulting in properties being damaged to a point where residents have had to leave their homes to allow repairs etc to be carried out. During these events the village also gets isolated with Surface water and Highway Drainage causing flooding under both of the Railway Bridges on Station Road and Newport Road.</p> <p>As a result of recent investigations (including Section 19 report re May 2018 event) it has been established that the main causes of flooding are Surface Water, Ground Water, associated saturated land, and topography of the village. These three factors combine to surcharge completely the current drainage infrastructure resulting in excess water flooding properties. Clearly this needs to be given careful consideration in future developments and in particular make sure that any studies are carried out independently rather than being led by the developers representatives.</p> <p>A local community led flood action group has been working with all the main agencies and whilst some mitigation of risk has been made progress is very slow.</p> <p>In the SC Plan there is very little reference to flood mitigation apart from in Schedule 51.1 (i) where it mentions water management measures in relation to development ALBO17 and O21.</p> <p>The SC Plan for Albrighton needs to recognise the critical nature of effective management of surface water and ground water during storm events to minimise risk of property flooding There also needs to be an acceptance that climate change is producing more isolated storm events and that housing numbers should be based on this. Climate change needs to be an integral part of the planning process to ensure any future development puts in place the right level of infrastructure to manage today's storm events with enough spare capacity to manage predicted future climate change storms, its not clear in the SC plan as to whether future developments will implement water management infrastructure based purely on the predicted life of the development or in actual fact on say 100+ years? Within the SC plan there should be some more specific reference to effective, future proofed water management and flood prevention. By way of example below are a few recommendations of what should be included:</p> <p>An independent flood risk and outline drainage plan needs to be carried out which is holistic in approach and considers more than just the development. The flood risk investigation must consider three main aspects, modelling, local resident or community group knowledge, and other forms of evidence e.g. water table height . Modelling alone rarely leads to an accurate assessment.</p> <p>An explicit reference to consideration of impact of any future development on Riparian ownership. This is particularly relevant when SUDS discharges into a watercourse that runs adjacent to properties.</p> <p>Local planning authorities to ensure that appropriate professional expertise (including local expertise) is involved early enough in the process to ensure the right decisions are made in particular where there are known surface water, ground water, and flooding issues.</p> <p>One final point there doesn't appear to be any reference to "Rain Water harvesting" on future developments? This clearly would help in places like Albrighton.</p>
A2409B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy CS5 states that limited defence related development will be permitted, SAMDev policy MD6 not only permits additional development for military uses, but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MoD at RAF, but also that required for the Museum and the proposed Aviation Academy..</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities, there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the future.</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MD6 in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military, museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future development proposals to those specifically stated in the Plan, proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that "economic growth and investment will be supported in...strategic sites"; "windfall Class B employment development... will be supported... if located on a Strategic Site"; "the Council's objective is to prioritise significant new development into ...identified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a "significant location in the Shropshire Green Belt" in respect of two of these corridors.</p> <p>1.9 The Plan also states that "Shropshire Economic Growth Strategy seeks to promote a 'step change' in the capacity and productivity of the local economy. The 'strategic corridors' have the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified 'Strategic Sites' at RAF Cosford ...".</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at...RAF Cosford...". And "future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt"; "new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non-site related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of I54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt..</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site, refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p> <p>2.3 It is noted that there was no mention in the Strategic Sites consultation response summary that any comment had been received from MAAC regarding a new site. No indication or evidence has been published as to when MAAC submitted details that led to Shropshire Council allocating this site subsequent to the Strategic Site</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2413B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	There is no reference to the need to alleviate local parking problems apart from a statement that the residential allocation east of Shaw Lane will "help provide additional parking in the vicinity of Albrighton railway station" which now seems to be increasingly unlikely. There is a need for SC to commission an independent Professional Comprehensive Review of Traffic Issues in Albrighton and District. This is an urgent matter and this request is strongly supported by residents and Albrighton Parish Council
A2413B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	This statement in 5.15 is not correct:- "Recognising the relationship between Albrighton and the nearby Strategic Site at RAF Cosford, with many employees and personnel based at RAF Cosford choosing to live in Albrighton and/or use the facilities within the settlement and certain facilities at RAF Cosford being available for residents of Albrighton, new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site. "...certain facilities at RAF Cosford are NOT available for residents of Albrighton..."
A2413B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	The Local Plan proposals provide for an additional 165 houses on land to the east of the existing developments approved to the north of Kingswood Road plus 30 to the north of Beamish Lane and a further allowance for windfall development during the plan period. In addition it is proposed that further land between Kingswood Road and the A41, between the railway line and A41 be released from the Green Belt for future development together with the area south of Cross Road between Newhouse Lane and Patshull Road which was approved some years ago by the Parish Council and Bridgnorth District Council but rejected by the Secretary of State in favour of the existing development off Kingswood Road. It is recommended that the Council raises no objections to the above proposals. There is concern that there is little reference in the Local Plan to the infrastructure requirements which will arise from the developments referred to above apart from a mention of priorities identified in the Albrighton Place Plan and to the need for a roundabout in Kingswood Road at the access point to the development to the north which appears to have been overlooked. In particular, apart from a brief reference to the existence of areas flood risk, there is no reference to any proposals for flood defence measures apart from a brief statement that there will be sustainable drainage within the site and that "water measures must not displace water elsewhere". There is also no reference to the need to alleviate local parking problems apart from a statement that the residential allocation east of Shaw Lane will "help provide additional parking in the vicinity of Albrighton railway station" which now seems to be increasingly unlikely. Although there is no proposal for employment land development at Albrighton within the Local Plan Review there is reason for concern that "the need for additional employment land will be assessed in the context of proposals for the development of a strategic development site in the M54 corridor which will be addressed within a future stage of consultation. Strategic Site Policy – RAF Cosford The only contentious issue relating to developments proposed for RAF Cosford, most of which are to be welcomed, is the proposal for release of 36 acres of land bounded by the railway line in the south, Neachley Lane in the east, woodland in the west and agricultural land in the north for provision of a headquarters for the West Midlands Air Ambulance Charity. While the development of this headquarters is to be welcomed it is not understood why it would require 36 acres which is roughly the same size as the whole of the officers' married quarters, officer's mess and sergeant's mess to the east of the A41 or the area which accommodates all of the hangars and the main museum building on the airfield.
A2413B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S1 Albrighton Place Plan Area	Disagree	Over the last 15 years Albrighton Village has suffered several flooding events resulting in properties being damaged to a point where residents have had to leave their homes to allow repairs etc to be carried out. During these events the village also gets isolated with Surface water and Highway Drainage causing flooding under both of the Railway Bridges on Station Road and Newport Road. As a result of recent investigations (including Section 19 report re May 2018 event) it has been established that the main causes of flooding are Surface Water, Ground Water, associated saturated land, and topography of the village. These three factors combine to surcharge completely the current drainage infrastructure resulting in excess water flooding properties. Clearly this needs to be given careful consideration in future developments and in particular make sure that any studies are carried out independently rather than being led by the developers representatives. A local community led flood action group has been working with all the main agencies and whilst some mitigation of risk has been made progress is very slow. In the SC Plan there is very little reference to flood mitigation apart from in Schedule S1.1 (i) where it mentions water management measures in relation to development ALB017 and 021. The SC Plan for Albrighton needs to recognise the critical nature of effective management of surface water and ground water during storm events to minimise risk of property flooding. There also needs to be an acceptance that climate change is producing more isolated storm events and that housing numbers should be based on this. Climate change needs to be an integral part of the planning process to ensure any future development puts in place the right level of infrastructure to manage today's storm events with enough spare capacity to manage predicted future climate change storms, It's not clear in the SC plan as to whether future developments will implement water management infrastructure based purely on the predicted life of the development or in actual fact on say 100+years ? Within the SC plan there should be some more specific reference to effective, future proofed water management and flood prevention. By way of example below are a few recommendations of what should be included: An independent flood risk and outline drainage plan needs to be carried out which is holistic in approach and considers more than just the development. The flood risk investigation must consider three main aspects, modelling, local resident or community group knowledge, and other forms of evidence e.g. water table height . Modelling alone rarely leads to an accurate assessment. An explicit reference to consideration of impact of any future development on Riparian ownership. This is particularly relevant when SuDS discharges into a watercourse that runs adjacent to properties. Local planning authorities to ensure that appropriate professional expertise (including local expertise) is involved early enough in the process to ensure the right decisions are made in particular where there are known surface water, ground water, and flooding issues. One final point there doesn't appear to be any reference to "Rain Water harvesting" on future developments? This clearly would help in places like Albrighton.
A0003B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Within Lydbury North Community Cluster the best land for affordable housing not put forward.
A0007B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Whilst not opposed to development, farmer needs access for livestock to have safe DAILY access to get from field to yard, the ONLY alternative route which is unsafe is 'higher up at the Whittery junction which would be incredibly hazardous to both cars, lorries and the livestock being moved.' Asks that planners preserve the current safe access via fields, safely crossing road straight into yard.
A0027B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Site BKL008a local objection to site but support for site at old timber and coal yard
A0055B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	In SAMDev Bucknell agreed to be a hub and accept up to 100 new dwellings by 2026 mainly on the former coal yard area. Mr Nutting assured us during the Bucknell Parish Council meeting on 11/9/2018 that until the above brownfield sites and any other 'windfall sites' had been delivered, no other sites would be considered. He also assured us that the Wishes of the villagers are paramount. Site BLK008a is not supported. Myself and other residents are therefore appalled that comments conveyed in 2018/9 have been totally ignored and our trust in Shropshire Council has therefore been seriously undermined. I have been assured that Parish Council previous comments still stand, i.e. that the brown field site must come first in any development of the village and site Buck 008a must now be excluded from the latest Local Plan revision as per the wishes of the village.. Please respect the views of Bucknell residents and remove site BKL008A from the Local Plan Revision now
A0055B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Duplicate of A0055B1
A0102B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Limited employment opportunities in Bucknell, should not build on greenfield or AONB, dangerous blind corners at the site
A0102B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The housing guideline/site guideline for Bucknell is too large. There are no employment opportunities for the new houses. The brownfield site should be extended, there should be no build on green belt or AONB.
A0111B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	No comments other than confirmation site viable and deliverable
A0118B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area		Newcastle on Clun Parish would like to "opt in" the village of Newcastle and also Whitcott Keysett as a 'cluster settlement' in the Local Plan. Newcastle functions as a 'hub' for the area west of Clun with its pub, school, community centre and church and there are locations where renewal of permissions have been refused.
A0127B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Support sustainable housing but not the site identified. The Timber Yard (brownfield site) should be developed first not this greenfield land. We need to focus on more sustainable solutions - the village has been drastically affected by flooding this year and there are increased threats to biodiversity and climate change.
A0169B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Object to greenfield development in the village of Bucknell (BKL008a). Any development should be on brownfield sites (including BUCK001 the current SAMDev allocation). This is particularly important given the current climate crisis Native hedgerows should be planted and existing ones protected. The rate of development proposed in Bucknell is too high and would equate to a 30% increase in the size of the village. Views of local residents have been ignored. In the past, the Parish Council agreed to be a Community Hub subject to determining the location of development, this is no longer the case
A0184B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Site is not suitable. The road crossing is dangerous, even with a pelican crossing. The B4386 adjacent floods. Footpaths are inadequate and difficult to change. The site is at the edge of the village and more isolated from facilities that WBR010.
A0184B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	Prefer this site to WBR007 & WBR008. Its closer to services and facilities, is a more natural infill and will provide residents with a more pleasant view.
A0233B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	CHR001 site is deliverable and available. It is a natural extension to the built form of Chirbury village hub. It will be the gateway to the village and good design will be expected from the landowner. Chirbury Village is in need of more housing in order to support the various business and other enterprises of the settlement hub, not least the church, pub, village shop and post office, the school, the nursery and all other local business

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0233B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area		CHR002 site is deliverable and available. It is a natural extension to the built form of Chirbury village hub. It will be the gateway to the village and good design will be expected from the landowner. Chirbury Village is in need of more housing in order to support the various business and other enterprises of the settlement hub, not least the church, pub, village shop and post office, the school, the nursery and all other local business. However unimplemented consented residential building plot (18/00497/OUT) immediately adjacent to the north/west between CHR002 and the village ought to be included within the Local Plan Allocation of CHR002 in case the current planning consent lapses.
A0259B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	There is a need for 2 and 3 bedroom housing for families, however 25 properties would cause a negative visual impact on the landscape. Poor roads in the village to access services. WBR010 is situated at the top of a field that drains down towards Millstream and Worthen Brook.. There are ongoing drainage issues with Worthen Brook which continues to flood. Further properties on WBR010 will exacerbate the situation. This inadequate sewage system will not be able to cope with another 55 properties. WBR010 would be intrusive and would have an adverse visual impact particularly because of the sites elevation. Site would affect wildlife. The consultation process is unfair and flawed due to Covid and people being unable to attend meetings or do not have the facility to complete your paperwork online or print out the forms for completion.
A0273B2	Viability and Deliverability of Proposed Site	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	From the demand that we have had we consider that the site could be delivered within the short term (2021/20214/2025) period.
A0317B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Housing numbers are fine, but may be issues with safe pedestrian access to site and nearby facilities and affordable houses
A0317B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Principle of housing here is fine. But safe pedestrian access from the site to all the village facilities is problematical, houses need to be affordable, there are sewage issues, new houses should be in-keeping with the existing properties.
A0327B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Development of all 3 sites, WBR007, WBR008 and WBR010 would result in a significant over development of the village for the faculties that the village has. The lack of pavement provision in that area of the village (WBR010) would reduce the safety of pedestrians in that part of the village, coupled with no current provision of safe crossing to places such as the school and doctors surgery. The number of proposed housing would impact on the already inadequate sewage provision in the village and the site already has a flooding issue to it nearby. If the land is allocated for development then there will be far more houses developed on the site than those specified which is unacceptable on many fronts including safety and a strain on local amenities and services. If development in WBR007/8 goes ahead plus infill in Worthen AND Brockton, then that would be adequate for the village to take. If there is going to be any development in Worthen this is the preferred site as long as there is provision in the plan for improved vehicular access (not out onto the double blind bend off Back Lane) and a significant improvement in the footpath provision for pedestrian safety through the village, with additional traffic calming measures.
A0472B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Object to BKL008a land adjoining Redlake Meadow as it is outside the current development boundary in the countryside adjoining Bucknell. Development of BKL008a will be a precedent for extending the village into the countryside to provide new housing. It is accepted that Bucknell is a Community Hub but the preferred development option is to further extend the existing proposed development at the Timber Yard (from 70 dwellings to 90 dwellings). This site is located on the southern edge of the village and the development will address the contamination on the site and create a better gateway feature for Bucknell. There is a need to address the service capacity constraints in the village and to respect the landscape setting of Bucknell, partially within the AONB. The willingness of Social Landlords to dispose of affordable homes in Bucknell to fund investments in larger settlements will result in a never ending cycle of developing affordable homes in Bucknell.
A0491B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Development of this site combined with other expands village by 1/3, changing its character. There is no pavement from this site, the road floods, it is dangerous and additional traffic will not help. Expansion of the village will increase demand for a new doctor's surgery. Parking for the school is already dangerous. Pavements are inadequate. Hardstanding on this site will exacerbate existing flood problems. The sewage treatment plant does not have capacity. The bus service does not allow people to get to work for 9am in Shrewsbury so this development will increase car use. This site is inappropriate - we need housing for families who would support the local community.
A0491B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Development of this site combined with other expands village by 1/3, changing its character. There is no pavement from this site, the road floods, it is dangerous and additional traffic will not help. Expansion of the village will increase demand for a new doctor's surgery. Parking for the school is already dangerous. Pavements are inadequate. Hardstanding on this site will exacerbate existing flood problems. The sewage treatment plant does not have capacity. The bus service does not allow people to get to work for 9am in Shrewsbury so this development will increase car use. This site is inappropriate - we need housing for families who would support the local community.
A0551B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Object to development on this site. The Old Timber Yard should be developed instead.
A0565B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Worthen needs more housing but there are issues with these sites. 2-3 bedroomed houses are needed to support the school, pub shop village hall church and doctors. But road safety in Worthen is poor and narrow footpaths and fast vehicles and a blind corner at the junction of back lane onto the B4386 are an issue. The high density of housing proposed is also an issue because Worthen has problems with capacity of sewerage. Large houses are not needed. A roundabout to slow traffic and improvements to sewerage capacity and narrow footpaths are also needed
A0565B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Amount of housing proposed for site is too much for the village and would create problems for sewerage capacity. Footpaths through the village are narrow and speeding traffic makes pedestrian safety an issue. New developments in the village should be starter homes, 2-3 bed homes or bungalows not large 4-5 bed properties
A0569B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Worthen needs more housing but there are issues with these sites. 2-3 bedroomed houses are needed to support the school, pub shop village hall church and doctors. But road safety in Worthen is poor and narrow footpaths and fast vehicles and a blind corner at the junction of back lane onto the B4386 are an issue. The high density of housing proposed is also an issue because Worthen has problems with capacity of sewerage. Large houses are not needed. A roundabout to slow traffic and improvements to sewerage capacity and narrow footpaths are also needed
A0569B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Site previously been turned down for housing development; against linear layout of the village; sewerage capacity in village can't cope; sets precedent for further development; pavements are narrow and unsafe; environmental issues shouldn't be overlooked. Flooding is also an issue on the site and surrounding area. Concern consultation took place during Covid restrictions so community discussion on sites wasn't possible
A0592B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Total of 55 houses is too big for this small community; access from Back Lane is poor; improved pavements and crossings on the B4386 are essential if there was increased traffic movement in the village; space and gardens are important especially since the Covid outbreak - 55 houses on these sites would be over crowded and more green space is needed; concern about increase in flood risk if the site is developed
A0592B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	75 homes on this site is far too many especially if WBR007 and WBR008 are also developed
A0597B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The site has already been turned down for development by Shropshire Council and the planning inspector; The size of the site should be reduced; there is a major issue with sewerage drainage in the village which should be addressed before new development is allowed; B4386 is a dangerous road with HGV's, farm traffic and has narrow pavements so pedestrian safety is an issue. New development would add to traffic issues. We, like other residents are not against new homes but feel they should be on smaller scale sites and focused on bungalows, starter homes and small family homes
A0597B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	If site is allocated the following issues need to be addressed - flooding on main road needs to be looked at; traffic calming in main road and especially at the junction to Aston Rogers; a safe crossing for pedestrians needs to be developed in the village; the original 30 homes designated to the site seems sensible but increasing to 55 will make it difficult for the village to absorb these and there will be an impact on local infrastructure
A0604B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Concerned at the extension of the village envelope to include green belt land for housing. Full use of brownfield sites near the station is much more sensible. Priority should be given for housing for local young people so that a more balanced demographic is obtained for the village. Concerned previous consultations with local people have been ignored regarding housing numbers.
A0608B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Planning Permission has previously been refused on WBR010 as it was considered out of character with that part of the village The extent of the site is such that it could be of a scale that significantly increase the size of the village with all of the associated sustainability, environmental and infrastructure issues. It is located on a busy road without a pedestrian crossing - there has been one fatality several near misses on the village road. There would be a need to provide substantial safe pedestrian pavements to access local amenities including the school, doctors, shop and pub. Lack of public transport means more cars/traffic which is not environmentally friendly. There is a need for 2 to 3 bedroom affordable housing in this area. The area is prone to flooding and sewage issues, development of WBR010 may add to this issue. There are existing parking issues outside the school at drop-off/pick-up time, associated road safety factors will be added to.
A0608B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The initial allocation of 30 dwellings seemed reasonable compared to the existing 148 dwellings. However, this has now increased to 55 dwellings, which is a lot for an area of this size, given its existing services, infrastructure and communication links Need for 2 to 3 bedroom affordable housing in this area. It is located on a busy road without a pedestrian crossing - there has been one fatality several near misses on the village road. There would be a need to provide pedestrian access to local amenities including the school, doctors, shop and pub. Lack of public transport means more cars/traffic which is not environmentally friendly. There is a need for 2 to 3 bedroom affordable housing in this area. The area is prone to flooding and sewage issues, development of WBR010 may add to this issue. There are existing parking issues outside the school at drop-off/pick-up time, associated road safety factors will be added to.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0610B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Planning Permission has previously been refused on WBR010 as it was considered out of character with that part of the village The extent of the site is such that it could be of a scale that significantly increase the size of the village with all of the associated sustainability, environmental and infrastructure issues. It is located on a busy road without a pedestrian crossing - there has been one fatality several near misses on the village road. There would be a need to provide substantial safe pedestrian pavements to access local amenities including the school, doctors, shop and pub. Lack of public transport means more cars/traffic which is not environmentally friendly. There is a need for 2 to 3 bedroom affordable housing in this area. The area is prone to flooding and sewage issues, development of WBR010 may add to this issue. There are existing parking issues outside the school at drop-off/pick-up time, associated road safety factors will be added to.
A0610B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The initial allocation of 30 dwellings seemed reasonable compared to the existing 148 dwellings. However, this has now increased to 55 dwellings, which is a lot for an area of this size, given its existing services, infrastructure and communication links Need for 2 to 3 bedroom affordable housing in this area. It is located on a busy road without a pedestrian crossing - there has been one fatality several near misses on the village road. There would be a need to provide pedestrian access to local amenities including the school, doctors, shop and pub. Lack of public transport means more cars/traffic which is not environmentally friendly. There is a need for 2 to 3 bedroom affordable housing in this area. The area is prone to flooding and sewage issues, development of WBR010 may add to this issue. There are existing parking issues outside the school at drop-off/pick-up time, associated road safety factors will be added to.
A0612B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Opposes allocation of the two sites, reasons given - Planning application previously refused on the site; there are pre existing issues with sewerage and waste water in Worthen and this development would increase pressure on the system; pavements through Worthen are narrow and traffic is fast flowing - safety of pedestrians from new properties walking to services would be an issue; traffic volume through the village will increase as a results of the development. Not against new housing but needs to be on a smaller scale with more delivery for local need and affordability
A0618B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Objects: Site won't provide 2-3 bedroomed homes needed; access issues are a problem due to narrow roads in Worthen with high-volume of speeding traffic next to narrow footpaths; flooding on and near the site is an issue along with sewerage capacity in the village. Density of development on these sites is too much
A0618B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Community recognises need for new homes but not to this scale and need more affordable and smaller 2-3 bedroomed homes; Roads in the village are narrow and speeding traffic is an issue so has concerns about pedestrian safety and junction s onto the main road will be dangerous; run off water and sewerage issues exist inn this area and development will put a strain on already struggling services
A0619B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Whilst there is a need for development in Worthen the scale of this development is too big for the village, and will make it difficult to absorb this number of people into the community. Additionally there are problems with speeding traffic and narrow pavements through the village which makes safe access to shops and services unsafe for pedestrians. The road where this development is located also floods and development would add to this problem
A0619B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Obviously some housing is needed to continue to maintain the numbers of people in the village to allow the school, doctor's, pub, shop, village hall and pub to thrive, but the scale of this development would be too much for the village to absorb. I am also concerned the site won't deliver homes we need such as 2-3 bedroom and starter homes. The development would also generate more traffic in the village where speeding is an issue, and narrow pavements make pedestrian safety an issue. Traffic calming safe crossing places would be needed to help people walk to school, shop and medical practice. The area also has issues with the sewerage system which would need significant capacity increase to address the issue. Safety and environmental issues should not be overlooked
A0631B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	The Hereford Diocesan Board of Finance supports the inclusion of land (orchard and garden) to the west of The Vicarage, Vicarage Road, Clun (CLU003), together with land south of The Vicarage, Clun (CLU004) within the village's proposed development boundary.
A0680B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	In early 2019 Shropshire Council held a local election with intention of creating a 'HUB' combining Worthen & Brockton, (a Local Government Classification, with no obvious local advantage), despite the fact that these remain 2 distinct separate villages with little demographically or visually in common. The two local communities voted a majority at the time to reject the Council's 'Hub' jurisdiction over them as not being in the best interests of the residents of either. Shropshire Council, however, chose to ignore the result of the poll, rendering the referendum pointless, and instituted a 'HUB' status - fait accompli for Worthen/Brockton, and also including two pre-acquired housing development land sites - WBR007/8 and WBR010 (previously subject to the planning application 14/00398/out - inspector refusal, and then on appeal, refused again!). There is quite clearly no mandate here for a Hub or any intended development of 55+(why?) houses, so when the Council offers their 'Open Market' opportunity to any outside developers' housing schemes, - the bigger, far more profitable 4/5 bed luxury properties will benefit just those developers. These types are irrelevant white elephants in these villages. Unsuitable and unaffordable for local people who specifically need 2/3 bed family homes. - Or they might just throw max bricks and mortar into the spaces for the greatest return per hectare. We'd soon find out! Needless to say, there has been no consultation with the Parish Council or the local community on what number, architectural style, size or landscape design of any such new properties. Local residents will have no say in what happens in their 'backyard'. Just what some speculative developer thinks he can get away with! This would be a completely unacceptable disregard of local democracy! This now shows all the characteristics of local government intervention by diktat, tuckbox driven, little concerned with local issues or well-established community requirements. Worthen has remained a neglected South Shropshire village for many years. Still no mains gas supply, broadband pathetically slow, roads poorly maintained, traffic speeding uncontrolled, footpaths dangerously narrow, major flooding issues annually (including raw sewage in gardens,) - Situations that should have been addressed years ago by Shropshire general maintenance protocols. As of September 2020 Worthen requires no more than 30 new 2/3 bed family homes. (there are still numerous village properties for sale, but unsold for months). A compact rural community, the last thing Worthen needs now is the addition of two inappropriate developer driven mass-housing suburban style cracker box estates, or mini stockbroker piles, drawn up far away, just to fulfil a Shropshire Local Plan quota! Shropshire Council, please reconsider the quite disproportionate scale of your Local Plan as currently scheduled to be imposed uncontested on Worthen.
A0704B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Object to the increase in the housing guideline for Bucknell to 110 dwellings from 100 dwellings in the SAMDev Plan.
A0704B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Object to BKL008a land adjoining Redlake Meadow because this is a greenfield site. The suggested footway from the proposed new development into Redlake Meadow will affect the amenity and safety of existing residents. Provision of a new highway access onto the B4367 will increase existing safety issues on the B4367 and at the existing junctions and river bridge. It was agreed the preferred site for new housing is the brownfield Timber Yard, adjoining the B4367 on the southern edge of the village, currently proposed for 70 new homes. These proposals are worrying in relation to the government proposals to change the planning system in England (see attachment) to relax the need for planning permission for new housing .
A0707B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Object to WBR007 and WBR008 because rural land should not be used for large scale housing. Farmers should be encouraged / subsidised to keep land in food production.
A0707B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Object to WBR010 for the following reasons: proposed number of houses does not respect the rural character of the village, circumstances have not changed since the recent refusal of applications to develop in the village, build on brownfield sites to improve accessibility between work and home and reserve farm land for food production.
A0829B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	We need affordable housing for local people in Brockton at the junction adjacent to Brockton Hall. The farmhouse and yard would be an infill providing a terrace and avoiding the need to build on greenfield land. The roads are not good enough to accommodate additional traffic in Worthen and Brockton and the road to Shrewsbury is dangerous. The allocation of 30% more houses in a small village is too much.
A0850B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	concerns - Narrow footpath along main road, more traffic and large lorries, motorists ignore the 30 mph signs and parked cars by the school. The number oh houses proposes would change the character of the beautiful village and make the sewage problem worse
A0886B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Against allocation of three sites in Worthen; reasons given are - scale of development is inappropriate for a village of Worthens size; the lack of adequate footpath provision through Worthen will make accessing services by foot unsuitable, making people reliant on cars; traffic speed and volume through the village is an issue and impacts on peoples ability to use roadside pavements. Its is essential that if permission is given for these sites that the developer provides adequate and convenient footpath provision is secured to service existing residents and the proposed village growth. Where housing is developed a supply of smaller affordable properties available to local people is essential
A0887B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Against allocation of three sites in Worthen; reasons given are - scale of development is inappropriate for a village of Worthens size; the lack of adequate footpath provision through Worthen will make accessing services by foot unsuitable, making people reliant on cars; traffic speed and volume through the village is an issue and impacts on peoples ability to use roadside pavements. Its is essential that if permission is given for these sites that the developer provides adequate and convenient footpath provision is secured to service existing residents and the proposed village growth. Where housing is developed a supply of smaller affordable properties available to local people is essential
A0908B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	BUCK001 is a site for 70 dwellings. This allocation is supported. Site BUCK001 was allocated for development in the SAMDev Plan - and despite a planning application having been under consideration for seven years, planning permission has not yet been issued because of the restrictions imposed by the situation relating to the water quality in the River Clun. It is clear that the development at Bucknell is going to make very little difference to the water quality in the River Clun, and a much greater effort ought to be made by the public authorities involved to come up with a workable solution to the River Clun rather than clinging to an unsatisfactory status quo that is of no advantage to anyone.
A0914B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Agree with the designation of Clun as a community hub within the Bishop's Castle Place Plan area. But disagree with the development guideline of 95 dwellings in the settlement and the reliance on small scale windfall development to meet this requirement. The level of growth identified for Clun, together with a significant reliance on windfall development, is therefore considered inappropriate given the role of the settlement and its unique natural and historic built environment. Given the above, it is contended that our client's site (Clun Garage) should be allocated for residential development, with a potential site capacity of 9 dwellings. A current planning application has been submitted for this development (ref. 18/05270/FUL) which is supported by the Council subject to a section 106 agreement relating to the provision of Affordable Housing (a site plan is attached which illustrates how 9 dwellings will be accommodated on site). The allocation of this site would result in a greater level of certainty that the growth needs of the settlement and surrounding hinterland, and therefore the aims and objectives of the Plan, will be met over the Plan period. In addition, the site's redevelopment will provide significant benefits, including enhancing the character and appearance of Clun's built environment.
A0914B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Clun as a Hub settlement accords with the Local Plan's vision in this regard, given Clun's historic significance and role as a service centre for a wide rural hinterland. Nonetheless, we consider part 2 of Policy SP2 undermines its own aims to meet the county's needs because its proposals for only 1,400 dwellings per annum amounts to a reduction in the amount of housing in the adopted Core Strategy, which plans for 1,530 dwellings per annum from 2021. There is a danger that the Plan will fail to be consistent with the National Planning Policy Framework, specifically the requirement in paragraph 60 to determine the minimum number of homes needed using the standard method in national planning guidance. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, replacing the current housing target of "around 30,800 dwellings" to "at least 46,700 new dwellings" over 22 years 2016-2038. The above change to policy SP2 should be reflected in the Community Hub policies, including policy S2.2 in relation to Clun, which can accommodate a higher residential guideline figure

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0914B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Agree with the designation of Clun as a community hub within the Bishop's Castle Place Plan area. But disagree with the development guideline of 95 dwellings in the settlement and the reliance on small scale windfall development to meet this requirement. The level of growth identified for Clun, together with a significant reliance on windfall development, is therefore considered inappropriate given the role of the settlement and its unique natural and historic built environment. Given the above, it is contended that our client's site (Clun Garage) should be allocated for residential development, with a potential site capacity of 9 dwellings. A current planning application has been submitted for this development (ref. 18/05270/FUL) which is supported by the Council subject to a section 106 agreement relating to the provision of Affordable Housing (a site plan is attached which illustrates how 9 dwellings will be accommodated on site). The allocation of this site would result in a greater level of certainty that the growth needs of the settlement and surrounding hinterland, and therefore the aims and objectives of the Plan, will be met over the Plan period. In addition, the site's redevelopment will provide significant benefits, including enhancing the character and appearance of Clun's built environment.
A0915B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	Agree with allocation of site in the plan on behalf of clients, for which there is an outstanding outline planning application. 13/03440/OUT for construction of 38 dwellings including affordable homes and a new vehicular access. Outlines the issue of the "Dutch case" and need to manage nitrogen neutrality and improvement from development along with suggestions on how this issue can be resolved in the Clun Catchment however additional land will need to be allocated to meet the requirements.
A0937B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Regarding land adjacent to Lavender Bank: we were pleased to see it had been identified within the development boundary of Bishop's Castle during the Preferred Sites consultation. However, it is no longer within the boundary in the Reg 18 consultation. We would like this changed back immediately. The site is available for development and the other half of the field has been developed for housing. The allocated site BISH013 has been marketed for some time and not delivered the housing needed for Bishops Castle so we believe it would be advantageous for BISH014 to either be allocated or included in the development boundary.
A1003B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Worthen is a village accessed by a minor road the B4386 . This is a narrow road with many sharp bends and short straight sections marked with double white lines to stop the traffic overtaking , and keeping the speed limit to 60 mph . The speed limit is invariably ignored . This is because Worthen has become a commuter village with people needing to get to and from work, and they are in a hurry. I counted that your proposal is for more than 130 houses to be built , and each one will need at least one car. I cycle the road , which I have very right to do , but I am becoming more and more aware of the danger I am putting my self into . Nothing has been done to help . Finally there is a problem with the A488 from Shrewsbury which has a railway bridge North of Pontesbury which is too low for large trucks to use , so they are directed onto the B4386 . I often use the bus to go into town and invariably we have to stop and back into a drive to allow these trucks to pass. The road is too crowded, and too narrow. Has anyone from your planning department ever checked on the traffic using this road ? Do the traffic conditions matter to you ? And does putting this application in now , while we are in the middle of a pandemic , mean that fewer people will have the freedom to challenge your proposal ? I suspect you are using this opportunity to get what you want without being challenged
A1004B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Response raises concerns about the volume and speed of traffic passing through Worthen on the B4386, including large agricultural vehicles. Adding more traffic onto the road would only make problems worse. There is a well used shop and church in Worthen which people access by foot and increased traffic would affect these facilities
A1005B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Try to develop an integrated transport plan. The road could be used 70,000 times more per annum. HGV's cause excessive wear using the B4396 as a back door to Welshpool and Craven Arms. Infrastructure first then housing
A1006B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	WBR007 & WBR008 Problem with access. Dangerous for pedestrians and cars. I personally would not live up this lane for the reasons given WBR010 I understand there is extensive flooding at times and therefore problems with sewage and very difficult access. This would create difficulty for emergency services
A1007B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Raises concerns about speed and volume of traffic through Worthen, which already makes cycling and horse-riding on the road unsafe. Concern about access onto the B4386 from new development. Concerns also raised that flooding exists on the site. Doesn't want to see character of Worthen change and feels that development at nearby Pontesbury has changed the character of the village and new homes are non descript and of poor vernacular design. Also concern raised that consultation took place during pandemic when no public meetings could be held.
A1008B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Response raises concerns about the volume and speed of traffic passing through Worthen on the B4386, including large agricultural vehicles. Adding more traffic onto the road would only make problems worse.
A1009B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	WBR010 - This site was previously rejected by a planning inspector so should not be included in the plan. Reasons for opposing the site inclusion include the impact on views from the AONB; flooding in the area particularly on Mill Bank Road which causes sewage to flow into the fields and backs up to Brockton; the road through Worthen is narrow and already has a lot of traffic using it including HGV's and pavements are narrow which causes concern for pedestrians who walk to the school, shop, pub, village hall, church or doctors, especially children and the elderly
A1010B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	I have only one disagreement with this housing policy and that is that the safety of the pedestrians. The village is "dead" and needs more housing of all descriptions to keep it "alive" otherwise we will have a "ghost village". There is very little life in it at the moment
A1147B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Increasing the size of the village by this amount of house is madness. We do need up to 10 local need affordable 2/3 bedroom houses, & bungalows for local families to either rent or buy. 10 being the maximum across all sites put forward in the local plan. What we do not need is executive 3/4/5 bedroom homes which will be unaffordable to the majority of local people who have been brought up in the area, attended local schools and want to continue living in the area. If these sites are included and obtain outline planning the developers will cram as many houses as they can on the site and build as many large houses as they can for maximum profit. I also see within these sites the number of proposed houses are guidelines only which means they will be exceeded. Also mentioned in the document is an extra 10 houses due to infill sites, so effectively this means 65 new houses, this increases the size of the village by over 40%! A lot of heritage buildings in the vicinity of the proposed site, these need protecting. This will completely change the character of the village of Worthen, if houses continue to be built in these small villages none of the infrastructure will cope. There are no safe footpaths to walk up or down Worthen Bank, there has recently been a fatality with a pedestrian crossing the road there. Increase in cars, road maintenance is appalling now but with extra vehicles it will decline even further Flooding problems in both Worthen & Brockton, homes were flooded several times last year, and previous years have also been flooded, to date nothing has been done to improve the situation. Worthen & Brockton are within Worthen and Shelve Parish Council area, the majority of which is within Shropshire Area of Outstanding Beauty, if you look at how many plots have received planning permission within this area within the last 3 years it is approx. 140 plus. These permissions have irreversibly changed the character of some of the clusters, namely Pentirvin, The Gravels, Shelve, yes we need the odd house here and there but not the quantity & size that have been built
A1147B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Residents voted against increasing houses numbers and did not want to be a hub Increasing the size of the village by this amount of house is madness. We do need up to 10 local need affordable 2/3 bedroom houses, & bungalows for local families to either rent or buy. 10 being the maximum across all sites put forward in the local plan. What we do not need is executive 3/4/5 bedroom homes which will be unaffordable to the majority of local people who have been brought up in the area, attended local schools and want to continue living in the area. If these sites are included and obtain outline planning the developers will cram as many houses as they can on the site and build as many large houses as they can for maximum profit, the total area of this field is large and extends to the bottom of Millstream, I assume once outline is approved for this site it will only be a matter of time before the rest of the field is included. I also see within these sites the number of proposed houses are guidelines only which means they will be exceeded. Also mentioned in the document is an extra 10 houses due to infill sites, so effectively this means 65 new houses, this increases the size of the village by over 40%! A lot of heritage buildings in the vicinity of the proposed site, these need protecting. This will completely change the character of the village of Worthen, if houses continue to be built in these small villages none of the infrastructure will cope. There are no safe footpaths to walk up or down Worthen Bank, there has recently been a fatality with a pedestrian crossing the road there. Increase in cars, road maintenance is appalling now but with extra vehicles it will decline even further Flooding problems in both Worthen & Brockton, homes were flooded several times last year, and previous years have also been flooded, to date nothing has been done to improve the situation. Worthen & Brockton are within Worthen and Shelve Parish Council area, the majority of which is within Shropshire Area of Outstanding Beauty, if you look at how many plots have received planning permission within this area within the last 3 years it is approx. 140 plus. These permissions have irreversibly changed the character of some of the clusters, namely Pentirvin, The Gravels, Shelve, yes we need the odd house here and there but not the quantity & size that have been built.
A1159B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Consultation should not have been carried out during Covid restrictions when public meetings were not possible. Parish residents have shown they would rather Worthen is designated as open countryside, as there has been significant housing delivery in the parish in recent years and this has impacted on the village character and its place within the AONB. Should development take place it needs to be sympathetic to the character of Worthen and key issues of climate change and habitat loss need to be addressed. In specific reference to the sites concerns about flooding, vehicle and pedestrian access, road safety, sewerage capacity and the type of homes needed in Worthen also needs to be considered.
A1159B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Consultation should not have been carried out during Covid restrictions when public meetings were not possible. Parish residents have shown they would rather Worthen is designated as open countryside, as there has been significant housing delivery in the parish in recent years and this has impacted on the village character and its place within the AONB. Should development take place it needs to be sympathetic to the character of Worthen and key issues of climate change and habitat loss need to be addressed. In specific reference to the sites concerns about flooding, vehicle and pedestrian access, road safety, sewerage capacity and the type of homes needed in Worthen also needs to be considered.
A1161B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	In the case of Clun the Conservation area covers the whole of the old town, the two designated areas for development CD002 and CD 005 are out side this area but in view of the overall size of the development it will have a significant and substantial impact on the sense and character of whole of the Town. We request that specific reference be made to the requirements to adhere to the design principles laid out in the Clun Design Statement which provides clear guidance on new development. We wish to see specific mention of the need to comply with SP4 on building design and the requirement to use of environmentally sustainable materials, energy conservation, energy generation, electric charging points and sustainable drainage etc.
A1161B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The current development boundary as proposed follows the boundary of CLU005 and CLU002. We would wish the potential for employment development to the E of the boundary either as windfall opportunities or SAMDEV savings. This area is directly opposite the Current employment area and business units and we envisage with more housing that more employment land will, be required. We support the essential principles, however development on CLU002 and CLU005 will stretch our already challenged infrastructure. We wish for specific reference under S2.2 that development needs to ensure and support improvement to public transport access, connection to the Town Centre and Medical facilities that does not require the use of car. In addition that the Sewage works has sufficient capacity to take the additional housing to the quality of discharge required. Also required, the mix of use on the site maximises the range and types of property available, including single story dwellings, the range of affordable dwellings as well as provision for home based working through good internet provision and space within properties. The current lay out and volume of traffic in Clun creates a number of highway and traffic related issues we ask that this Section includes expressed reference to the fact that development with not increase these problems and actively help to reduce them. This could include support for the development of other off street parking in Clun, and encouragement for the use of non car connections to the public transport network.
A1161B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	We support the essential principles, however development on CLU002 and CLU005 will stretch our already challenged infrastructure. We wish for specific reference under S2.2 that development needs to ensure and support improvement to public transport access, connection to the Town Centre and Medical facilities that does not require the use of car. In addition that the Sewage works has sufficient capacity to take the additional housing to the quality of discharge required. Also required is mix of use on the site maximises the range and types of property available, including single story dwellings, the range of affordable dwellings as well as provision for home based working through good internet provision and space within properties. Current lay out and volume of traffic in Clun creates a number of highway and traffic related issues we ask that this Section includes expressed reference to the fact that development with not increase these problems and actively help to reduce them. This could include support for the development of other off street parking in Clun, and encouragement for the use of non car connections to the public transport network

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1162B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Regarding the following statement in paragraph 5.37 "there is a need to continue to support the sustainable growth of Bucknell." Sustainable growth is an oxymoron.
A1162B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Contrary to the perception created in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan 2016-2038 document, Bucknell has been identified elsewhere as a remote rural community and it is still a village not a town as stated in Paragraph 5.38. The development's visual impact - The area for the proposed development, BKL008a will have a detrimental visual impact. It adjoins the South Shropshire Hills Area of Outstanding Natural Beauty (AONB) and is outside the village envelope. The likely effect of the development on the residential amenity of neighbours is clearly an important consideration as it will further degrade the visual impact of the village. 2006 and 2009 Parish Plans 87% of respondents said local environment in Bucknell was important or very important. Parish Plan 2017 - Bedstone and Bucknell Parish generally has good quality environment with surrounding countryside being largely in AONB. Established base for walking, cycling, bird/wildlife watching and fishing attracts visitors and contributes to local economy. Protecting and improving the environment is important to nearly everybody. The development's effect on the character of a neighbourhood - As can be seen in the attached graph (Figure 1), the number of proposed dwellings already imposed on the village in the SAMDev Plan with the resultant massive increase in the population of the village will significantly affect the character of the village. The additional expansion in housing, evidenced by the proposed development, BKL008a, is a further example of overdevelopment and a lack of regard for the opinion of local residents and disregard of the character of the neighbourhood. The additional housing guideline of around 100 dwellings that have already been proposed in the SAMDev Plan will increase the village population to over 1000, which will result in an obvious negative change in the character of the neighbourhood. That is an increase of nearly 40% in the population in probably less than 10 years with associated cars, etc. It is a massive increase to be absorbed over a relatively short period and will obviously have a significant impact on the character of this small village. A further 20 houses and associated families and cars, as proposed, will have an additional detrimental effect and provides further evidence of the systematic overdevelopment of the village. NOTE - GRAPH ATTACHED TO RESPONSE INFORMATION.
A1164B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	I responded to an advisory consultation on 2019 about the future status of the settlement, I was in favour of the village returning to open country side. I own Grade II listed Worthen Hall and farm opposite and adjacent to the proposed sites and witness the speeds vehicles are travelling as they pass the farm, which is located in a 30 mph zone. Cars, buses and Lorries travel in excess of 40 mph. There are a huge number of vehicles using this once rural road. The B4386 is now a main route for all vehicle types including HGVs. I find it is dangerous to exit or enter the farm due to the speed of traffic and dangerous overtaking. The roads are congested, the poorly maintained B4386 will not cope with extra traffic. Additional people living in Worthen will increase vehicles on the roads and more pedestrians on the inadequate pavements. Busy farm, working unsociable hours, we move livestock to fields across this road next to the site on a daily basis. A new urban housing estate with associated cars and vehicles will make this difficult. More people and more vehicles will make it more difficult for farming and other rural land based businesses. More housing development will mean more surface water run-off, likely to cause more flooding to roads and agricultural land. I am very concerned about the flooding of the B4386 in this location. Our weather patterns are such that this is a regular occurrence. WBR007 & WBR008 are located at the bottom of a hill and when it rains heavily the track next to the site turns into a river, flooding the road. I am concerned that a new development will cause further flooding of the road and potentially the farm buildings at Worthen hall farm. The site is not only on higher ground but the road drain passes under the farm yard and water is discharged into a pool on the farm. The Cellars at Worthen hall have flooded twice in 12 months due to the excessive water on the B4386. Worthen lacks the infrastructure to cope with new developments there is already insufficient capacity in the sewage system with raw sewerage appearing in householders drains. The building of any new housing estates will change the character of Worthen from a rural village in open countryside to suburbia.
A1164B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	I was somewhat surprised about the size of the new site WBR010, which has been included in the Draft Local Plan. It has been suggested that this site has "capacity" to provide 20 new dwellings. The site can accommodate many more as much as 50. WBR010: a portion only of this site was the subject of a planning application in 2014 (14/00398/OUT) for the construction of 25 dwellings. This was refused at Southern Planning Committee Stage, the parish council objected and indeed when the applicant appealed the decision of Shropshire Council. The Planning Inspector upheld the refusal of this application. Road Safety – The condition of the poorly maintained B4386 is a concern, there has been a dramatic increase in the usage, type and excessive speed of traffic in recent years. To exit onto the B4386 when there are speeding cars flying down the hill towards a blind bend will be interesting especially as almost all homes have at least two cars and if they follow the pattern of other residents who seem to prefer having goods delivered these days. The sites put forward will increase road usage in the village considerably. Sewerage - whilst Severn Trent have a duty to connect new dwellings to the already over capacity facilities they do not have a duty to upgrade. There is already a significant sewage problem in this part of the village which backs up towards Brockton and beyond. Sewage enters residential gardens and homes in Brookside. Flooding – The Worthen Brook is subject to flooding. When the brook floods residents are effectively cut off and this site has the potential to exacerbate this problem, neighbouring farmland is flooded in this location too. When it floods, the sewerage system backs up and raw sewerage enters gardens and homes.
A1165B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	I was about the size of the new site WBR010, which has been included in the Draft Local Plan. It has been suggested that this site has "capacity" to provide 20 new dwellings. The site can accommodate many more as much as 50. WBR010: a portion only of this site was the subject of a planning application in 2014 (14/00398/OUT) for the construction of 25 dwellings. This was refused at Southern Planning Committee Stage, the parish council objected and indeed when the applicant appealed the decision of Shropshire Council. The Planning Inspector upheld the refusal of this application. Road Safety – The condition of the poorly maintained B4386 is a concern, there has been a dramatic increase in the usage, type and excessive speed of traffic in recent years. To exit onto the B4386 when there are speeding cars flying down the hill towards a blind bend will be interesting especially as almost all homes have at least two cars and if they follow the pattern of other residents who seem to prefer having goods delivered these days. The sites put forward will increase road usage in the village considerably. Sewerage - whilst Severn Trent have a duty to connect new dwellings to the already over capacity facilities they do not have a duty to upgrade. There is already a significant sewage problem in this part of the village which backs up towards Brockton and beyond. Sewage enters residential gardens and homes in Brookside. Flooding – The Worthen Brook is subject to flooding. When the brook floods residents are effectively cut off and this site has the potential to exacerbate this problem, neighbouring farmland is flooded in this location too. When it floods, the sewerage system backs up and raw sewerage enters gardens and homes.
A1165B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	I responded to an advisory consultation on 2019 about the future status of the settlement, I was in favour of the village returning to open country side. I live at Grade II listed Worthen Hall and farm opposite and adjacent to the proposed sites and witness the speeds vehicles are travelling as they pass the farm, which is located in a 30 mph zone. Cars, buses and Lorries travel in excess of 40 mph. There are a huge number of vehicles using this once rural road. The B4386 is now a main route for all vehicle types including HGVs. I find it is dangerous to exit or enter the farm due to the speed of traffic and dangerous overtaking. The roads are congested, the poorly maintained B4386 will not cope with extra traffic. Additional people living in Worthen will increase vehicles on the roads and more pedestrians on the inadequate pavements. We are a busy farm and work unsociable hours, we move livestock to fields across this road next to the site on a daily basis. A new urban housing estate with associated cars and vehicles will make this difficult. More people and more vehicles will make it more difficult for farming and other rural land based businesses. More housing development will mean more surface water run-off, likely to cause more flooding to roads and agricultural land. I am very concerned about the flooding of the B4386 in this location. Our weather patterns are such that this is a regular occurrence. WBR007 & WBR008 are located at the bottom of a hill and when it rains heavily the track next to the site turns into a river, flooding the road. I am concerned that a new development will cause further flooding of the road and potentially the farm buildings at Worthen hall farm. The site is not only on higher ground but the road drain passes under the farm yard and water is discharged into a pool on the farm. The Cellars at Worthen hall have flooded twice in 12 months due to the excessive water on the B4386. Worthen lacks the infrastructure to cope with new developments there is already insufficient capacity in the sewage system with raw sewerage appearing in householders drains. The building of any new housing estates will change the character of Worthen from a rural village in open countryside to suburbia and will not provide housing for our local families.
A1190B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	We need 2- and 3-bedroom housing for families only to keep the school, shops, pub, Village Hall and Doctors thriving. Those families need safe pedestrian access to the School, Doctors and Village Hall. Crossing the road at the Back lane turning is blind and there is a speeding issue through the village. Access to Worthen Hub Services. These sits do not provide this. Crossing the road at Back Lane has poor visibility in both directions and the traffic exceeds the speed limit. The Road Safety Partnership Camera Van has been visiting for many years. <ul style="list-style-type: none"> •There is no safe pavement to carry people to the above services. It narrows to less than half a metre in several places. •People also must cross the road to access the pavement near the old Post Office. There have been several near misses with pedestrians here and a fatality. •If at least 2 safe crossings are not installed families will be forced into cars to access school and the doctors. •There is already an issue with parked cars on the B4386 which a main access road to Shrewsbury at school times is. •Environmentally we should not force people into cars either. Highways issues <ul style="list-style-type: none"> •Speeding traffic hits Little Worthen on first and does not slow until the bend. The access to this site needs to have excellent splay but there also needs to be traffic calming installed to help prevent collisions. • Extending 30mph is useful but will not deal with the entire issue. Flooding <ul style="list-style-type: none"> •There is a significant flooding issue on the road between this site and just before Little Worthen •This site needs not to add to this issue and needs to help ameliorate it in planning conditions within the published plan. S2 Bishops Castle Place Plan area House numbers allocated – S2.2 There were initially 30 allocated which in a settlement of 148 houses is reasonable. There are now 20 and 25 allocated on sites and a further 15 infill – total 55. This increases the settlements by one third. This is exceptionally big to be absorbed by a small rural communi
A1383B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Against allocation of this site and does not believe Worthen Should be designated as a hub. Agrees with some small scale development in Worthen to meet local need but scale proposed in the plan. Site has issues with pedestrian and car access and particular concern about safety on narrow pavements leading to the village services.
A1821B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Don't know / no opinion	Difficulty with speeding traffic – extensive traffic calming required. Blind Corners. Should be maximum of 20 houses, trouble with floodwater and drainage (from all 4 Forms submitted)
A1837B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	I am against this proposal/development for the following reasons:1. The site includes the one next to Millfield House, which was turned down on appeal in 2015as being out of character with that part of the village and impacting on the view of the AONB. Akey part of the appeal decision was whether or not the development site was deemed to be in open countryside. Paragraph 10 of the appeal decision letter dated 25 February 2015 is clear in that the inspector shares the council's view that the site is in the countryside and is a stated reason for the appeal decision. Nothing has changed and so I feel that this new proposal must also be refused.2. The proposed site now could hold 50 to 75 dwellings, so potentially triple the amount of the original proposal that was refused on appeal. The appeal decision letter (paragraph 16) refers to the original 25 dwellings being inappropriate in terms of the SAMDev and LIP. How can a significantly larger development now be conceivable? At that size, and unphased, it will have a significant impact on the village in terms of character. Paragraph 19 refers to 'up to 25dwellings' resulting in 'an urbanisation of this area of countryside which would be harmful to its intrinsic character and beauty. Further harm would be caused to the attractive landscape setting of the village that I observed on my site visit'. Again, nothing has changed and a larger development must result in an even higher degree of urbanisation and harm to the intrinsic character and beauty of the village.3. The appeal decision letter refers to affordable housing and at paragraphs 17 and 18, states that it was not clear how affordable housing would be achieved and that therefore the Framework's objective to create sustainable, inclusive and mixed communities would not be achieved. As a village, our feedback has been clear in that it is affordable housing that is required. I understand that the new proposal aims to provide more open market housing – more expensive, larger homes that will not benefit local people from an affordability or sustainability perspective. As such, this current proposal must also fail to support the Framework's objectives to create sustainable, inclusive and mixed communities.4. The appeal referred to the depth of the site itself (paragraph 19). The proposal does not respect the linear character of that part of the village as it projects into the countryside far beyond neighbouring properties. Again, nothing has changed.5. The potential size of this development could increase the volume of housing in the village by. 30%, possibly up to 50%. The infrastructure in the village is just not set up to deal with that increase without ruining the nature of the environment (points above). Specifically, road safety is a significant issue with a number of near misses, a fatality and the need for constant traffic enforcement. Dealing effectively with this, for a larger volume of traffic, will only increase the urbanisation referred to above. Traffic calming would address speed and safety issues, but within increased volume of traffic on the roads through the village but at slower speeds (meaning usually lower gears at higher revs) would have a detrimental environmental and noise impact.
A1837B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	I am against this proposal/development for the following reasons:1.The main road through the village is already very dangerous for pedestrians and beyond the village the junctions to Aston Pigott and Aston Rogers are extremely hazardous because of the speed and weight of traffic. This problem would be made worse by the substantial increase of traffic on the road caused by this development. In particular, people living in this development wanting to reach the shop, church, school or doctor's surgery by pedestrian access would have to cross the main road into places, both of which are dangerous. They would also have to use a ridiculously narrow pavement which leaves pedestrians highly exposed. This would lead either to further injury or fatalities, or increased car use for short journeys (resulting in an environmentally unsustainable development). It is vital that any development includes substantial increase in safe pedestrian routes around the village, which would add to the degree of urbanisation required a reason given in support of the refused appeal for the Millfield House site in 2015.2.Increased urbanisation – a substantial increase in the number of houses in the village will change the character of it. The increased people, cars, buildings and related infrastructure will produce a more urban environment with effects on both the character of the place and the quality of the environment.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1846B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	against the development of a green field which is outside of the development boundary. Wants to instead to develop the brownfield site within the village (BKL001) Bucknell residents and the Parish Council are extremely concerned that Shropshire Council are ignoring their previous objections to green field development in the village when we have a large brownfield site long overdue for development which has planning consent already in place I believe. Where are the assurances from former Councillor Nic Laurens and the present Council Leader Peter Nutting in particular, who both visited Bucknell in 2018 to assure parishioners that the wishes of the community will be respected because we have not seen any evidence of those assurances yet. There is very little employment in our village and very few foreseeable vacancies likely, so new properties would almost certainly only be occupied by people moving into the village either for the purpose of retirement or if they are willing to commute to a place of work. Many residents are concerned that building 70+ properties on the brownfield site will in itself cause further strain on our village infrastructure and community cohesion, yet most concede that the brownfield site needs to be developed but that it should be our only contribution to new housing in Shropshire and must include much needed additional facilities for the village. Additional housing needs for local people does exist but it is extremely minimal, just nine or so according to the latest Right Home Right Place survey, and there is certainly not the need in our community for the large number of new dwellings proposed by Shropshire Council who suggest they are needed for the community when they are clearly and most certainly not. I would imagine that the proposed house building frenzy planned for Shropshire is just a numbers game to Shropshire Council who are unlikely to have any regard for the fabric of villages like Bucknell that are being targeted with over-development. Our Parish Council has organised a petition on its website for people to object Covid-securely to green field development and they will forward these additional objections along with their own to Shropshire Council. Even our local Liberal Democrat councillor is objecting to green field development in Bucknell, so he is likely to get the support of more villagers at future elections, including myself, if Shropshire Council do not remove the threat of green field development in our village from their current and future Local Plans.
A1933B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The path between the two halves of the village is too narrow to consider adding more houses until this is put right and pedestrians can have a clear view of the road in both directions
A2152B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	The Local Plan document refers to "The Shropshire Test" which provides key principles for supportive development. Aspects of this which WBR007/008 can help to support and deliver include: Meeting local need, making settlements more sustainable, developing cohesive communities, to conserve and enhance the natural environment, raise design standards, and make efficient use of land. Overall, development of the sites can provide quality housing, especially for families, and others who aspire to rural living, and all the benefits that accrue. The "bottom line" is that people need quality housing in which to live. A recent Rightmove survey, reflecting the impact of coronavirus which has boosted the popularity of living and working in a rural environment, highlights peoples' aspirations for - bigger gardens, access to one. - to be able to live in bigger accommodation. - to live in a pet-friendly home. - to be closer to parks and green spaces. - access to parking space/garages. All of the above, in an age of increased home-working, can be delivered through a quality development such as this site could provide. Other considerations: Worthen/Brockton, is undoubtedly a Community Hub, having all the aspects such settlements provide, and deserves the residential accommodation which such a significant rural service centre requires. Worthen in particular is a very popular village, with a key primary school, GP Surgery, successful Grocery Store, an ancient and well-loved church. All of these important community assets would be underpinned and supported by residential development in the village. The site is on the edge of the village, so less disruptive in terms of positioning. The site is relatively secluded without impacting adversely on views/sightlines across the Rea Valley. It should be quite feasible for a successful development to contain inbuilt flood alleviation infrastructure (e.g. attenuation), which would need to be supported by the regular clearing of adjacent drains, culverts and drainage channels. Slowing the traffic on the B4386 via an extension of the existing 30 mph speed limit would be necessary and sensible and more likely to occur should the proposed site go ahead as there will be more houses to serve. These new houses will, as aforementioned, support vital local services as well as extending what is already a thriving community network. To include houses of varying sizes will allow for a diversity of inhabitants and will potentially allow local families to better meet their needs in more appropriate housing
A2154B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Para 2 – refers to the likely adverse effect of development on the River Clun ; there needs to be a clearer justification of this issue delaying and or causing additional costs to the essential provision of affordable housing in and around Bishop's Castle – local people in need of housing are growing tired of hearing this trotted out as an issue. Para 3 – it is crucial that the development plan is shaped by the Town Council's Neighbourhood Plan ; our Councillors whom we appoint have an excellent appreciation of what our Town needs in the way of housing needs and employment opportunities and the locations in which they should be provided. The key issues will be to preserve the historic architecture and design of the town as much as possible and to manage the flow of additional traffic which will result from any development. To reflect this it is critical to ensure that significant housing development is concentrated on land that is available close to the main trunk road the A488. Para 6 – mentions that retail development will be directed to the Town Centre ; one issue that requires urgent and overdue attention is the need for policies to address the filling up of existing empty and increasingly derelict properties – the outstanding example is the Stars Newsagents
A2194B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	We believe the plan is inadequate and fails to take account of the Climate and ecological emergencies we face, the consequences of the Covid19 pandemic, Shropshire Council's own declaration of a Climate emergency and ambition for a 'Net Zero Carbon County' by 2030. Thus the growth and development strategies for rural homes cannot be justified without much greater attention to the need to reduce carbon emitted by transport, development of alternative strategies including public transport, better conditions for walking and cycling and greater attention to the habitats within which development is proposed, so that the natural environment and biodiversity are paid far greater attention. Whilst we have written in detail elsewhere about issues in relation to the River Clun Catchment, these only add power to the arguments laid out here. We support the need for modest development within the area outlined and note the importance of this for continued vibrancy of our communities. We particularly note the rail link at Bucknell, which gives additional sustainability to development in that community. But as we have also argued elsewhere, the importance of the development of other forms of public transport is vital, and even more so given the virtual absence of public transport at present, is a much more robust strategy to encourage and promote walking and cycling within these communities. The development of 20mph limits in all village communities, as recommended by the World Health Organisation, is essential. These strategies are also required in relation to meeting our obligations in terms of the Climate Emergency - and the timescale is brief, for transport emissions must be reduced promptly - incompatible with development as proposed. But as a Wildlife Trust Organisation, our primary concern in considering these documents is to consider whether they will safeguard our area of Shropshire in terms of 'green' issues. Here too we believe the plans are inadequate. We wish to see much greater attention in to plans to the 25 year plan for the Environment, the Environment Bill, and to how these, and Nature Recovery Networks, will apply to our area. We wish to see far more attention to the solutions for the ecological and climate change emergencies. And most of all, we wish development to be considered in the context of our local natural environment - where we believe 30% of land should be under recovery for biodiversity by 2030. We want to see more attention to local green space being accessible - so, more footpaths and dedicated cycle paths, with more attention to the accessibility of these paths to the older and less mobile members of the community. More attention to verges, hedges and tree planting, with more attention to the joining up of accessible and inaccessible green spaces to give more opportunity for natural recovery. Attention to these issues, together with the vital issues of safeguarding the Clun Catchment, will provide the proper protection and natural recovery for this part of Shropshire, within which modest carbon-neutral development may be successful in achieving its goals of sustaining our community.
A2256B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	This is prime and well established farmland and should not be used for housing development. Development should only be on brownfield sites. Worthen does not require any housing: this would be unsustainable and there are problems with flooding, sewerage capacity and electricity supplies. Increased traffic flow through village would be detrimental to resident's safety. This site has already been turned down on appeal and will impact on the settlement and the view from the AONB. The whole feel and ethos of Worthen will be changed beyond repair and current residents will be uneasy, disrupted and stressed. Avoid this by choosing brownfield land.
A2257B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	This is prime and well established farmland and should not be used for housing development. Development should only be on brownfield sites. Worthen does not require any housing: this would be unsustainable and there are problems with flooding, sewerage capacity and electricity supplies. Increased traffic flow through village would be detrimental to resident's safety. This site has already been turned down on appeal and will impact on the settlement and the view from the AONB. The whole feel and ethos of Worthen will be changed beyond repair and current residents will be uneasy, disrupted and stressed. Avoid this by choosing brownfield land.
A2259B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	We support the development of an appropriate number of affordable homes in the village but the site has some issues: - sewerage Capacity would need to be increased: Road safety, turning access onto main road: Pedestrian access to School, Village Hall and Doctors involves crossing the road twice. If this is not addressed car use will increase and the existing car parking problems will worsen.
A2260B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Support affordable housing but this site has road safety issues: turning access onto the busy main road with poor visibility and pedestrian access to school, village hall and Dr's surgery involves crossing the main road twice. If this is not addressed or usage increases there will be a major problem.
A2261B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Site should be housing for families. Back Lane is dangerous and this will increase with electric cars which you can't hear. Cyclists speed on the main road. Parents with buggies and children can't walk side by side on the pavement to the school. Residents park their cars either side of Back Lane and it is in constant use by tractors. The site is universally unpopular with residents.
A2261B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The site is universally unpopular with residents. A small number of houses along the linear line of the village would perhaps be acceptable but not a large area of field. The latter would put unbearable burden on sewerage and other services. Traffic calming would be needed.
A2263B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	As a farmer who travels the local roads with large agricultural vehicles it is becoming increasingly difficult to navigate the roads with the level of local traffic. 50 or more houses will only make matters worse. There are already enough new houses being built locally for local people with young families.
A2263B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	As a farmer who travels the local roads with large agricultural vehicles it is becoming increasingly difficult to navigate the roads with the level of local traffic. 50 or more houses will only make matters worse. There are already enough new houses being built locally for local people with young families.
A2283B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	There are totally inadequate services, water poor, frequent electric cuts, no mains gas, Sewage lack of capacity. Drainage issues where new build will inevitably increase run off. The B4386 through the village is unfit for purpose. More traffic pollution. Insufficient pavement. We were promised improvements in 1994 but nothing has happened.
A2285B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The village is subject to regular flooding and further development will only make this situation worse. The traffic situation is dangerous and some traffic calming is required. We also need safe pedestrian access to village amenities. Recent development and refurbishments have increased the number of large detached houses. There is a dearth of starter and smaller family homes, which is what we need to sustain our village.
A2286B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	The village is subject to regular flooding and further development will only make this situation worse.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2289B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	Agree to this but additional access should be considered. Create new cycleway and footpath along existing path between Brockton Houses and Victoria House. This could be widened along the south side. Many of the Landowners would agree with this. It would shorten the Brockton trip to the shop by 280m. Create new cycle and footpath from Old Post Office to Millfield House, inside the field, leaving the old hedge as a natural barrier between the path and the road.
A2289B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	Out of character looking from the south, especially if it got bigger. Vehicle movements from both sides would cause confusion and danger.
A2290B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	Agree we need growth in the village, but the paved areas between the school and the village hall and from Brockton to the shop are inadequate, in places just 18" wide. There is scope to make a wide usable path behind the playing fields.
A2290B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	If developed this would be out of keeping with the area and swamp the original area.
A2325B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	WBR007&WBR008 are around a mile from the primary school and the secondary school is at Pontesbury. The footpath to the primary school is narrow - in some places too narrow for prams. There is a flooding issue on the road between the site and Worthen which needs to be resolved.
A2325B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	A previous Planning Application has been refused on the site. Reasons still apply.
A2344B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	There is a need for starter homes for young families in this area, there is no certainty in this document, that this will happen. The probability is that larger homes by developers will be built. Worthen has been listed as a hub partly due to the presence of a (limited) bus service and library van, there is no certainty that that will always be the case. If larger houses were built, the likelihood would be that higher income families, usual 2 car owners, would have no use for those services and put those services under greater threat. Young families living on the lower income employment available within the area, would be more likely to take advantages of those services. Area WBR010 is a sloping site. Access from the main road would be difficult. It would be comparable to Folly Junction, where there is a steep slope to the B4386 and which is an accident hotspot. The road below this slope, Millstream, regularly floods causing great distress to the residents, several of whom are elderly. Building on the slope above would inevitably lead to more water run-off causing greater flooding as it would not be absorbed by the soil above. The area is good quality agricultural land, it is within close proximity to the Shropshire Hills AONB. The proposed large scale development on this site would be detrimental to the character of both the village and the AONB. The pavements in this area are narrow. Direct access to the school from this site would lead to crossing the B4386 at the access to the site, as no pavement is available on that side of the road.
A2363B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	believe in regeneration of villages and sustainable growth. Unfortunately there are many issues with the current housing development proposal. It is quite apparent that the proposed development favours the developers more than the community. The amount of houses proposed has increased by 54.5% (from 30 to 55). The village simply cannot sustain such a large proposed community with the current resources at our disposal. Worthen has narrow roads, hardly any pavements, and the sewage system that is almost at capacity. A major issue for all residents in Worthen is safety. The B4386 road is a busy road where there are blind rises and bends running along the site the WBR010 site. We have issues with speeding, near hit and miss incidents and sadly, last year a fatality. The development will cause more opportunities for traffic incidences. The WBR010 site is on quite a steep incline, the east part (Worthen end) being the most problematic. The concern here would be drainage and sewage. There are four properties at the bottom of this hill immediately adjacent to this steep hill. No sewage or drainage pipes would be permitted through these properties which will prevent the latter passing through these properties. Furthermore, Millstream Bank is a private road. Access through this private road is not permitted; for this reason, sewage cannot be connected through to Millstream which leads to the centre of the village. Number 1, 2, 3 and 4 Millstream Bank all have windows facing the site; consequently any building especially double story houses will significantly reduce light and privacy. This issue is compounded due to the site being on such a steep incline. A one-story house will impact these houses and two-storey houses will dwarf them based on the steep incline. Furthermore, 30 houses were proposed on this site WBR010 five years ago in 2015. Planning permission was refused. At appeal the government appeals inspector refused to grant planning permission. In conclusion, nothing has changed and hence building on this site is not acceptable today.
A2389B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Don't know / no opinion	We have previously flagged opportunities, linking to SFRA recommendations, at some sites. The Tasley Bridgnorth area of growth has potential flood storage improvement works linked to nearby quarries for example.
A2393B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area		This site is ideally located to meet the growing housing needs of the parish through an allocation of land for residential development or an adjustment to the development boundary to incorporate the site. The site benefits from direct access off Back Lane and is not subject to any environmental constraints such as flooding or ecological issues as may be the case on other sites allocated in the village. The site would be easily accessible from Back Lane, and large enough to accommodate approx. 15 high quality dwellings of varying sizes – but predominantly 2 and 3 bedroom properties. Access into the site is more than wide enough for two vehicles to pass, and the site is relatively well screened from view being set back behind existing front frontages and landscape screening. There is an existing woodland area to the west of the site which could be used for ecological gain. The site would contribute to providing a variety of sites across the borough to cater for the wide variety of dwellings needed to foster social and economic growth, including custom build housing as required by the Framework. This site has potential for a moderately sized development in conjunction with adjoining sites. The site is close proximity to the local Londis shop (approx. 100m), 420m from the local village hall and medical practice and a similar distance to Brockton Primary School just beyond the school. This makes it a highly sustainable location that encourages walking to local services. The site lies entirely in flood zone 1 (low risk) and has low risk of surface water flooding. The site is bordered by mature hedgerows and woodland that screen it in the wider landscape. New development would achieve net ecological gain through the creation of new habitats such as new tree planting and attenuation ponds. Allocation of the site for low density, high quality development will create an attractive development that is consistent with the character of the local area. The site is available immediately with a very willing landowner and is being promoted by a local developer SJ Roberts. The site is therefore highly deliverable and would help massively to meet the demand for housing in the village and surrounding rural area. With an emerging emphasis from government on viability of development, the promotion of this site should give the council comfort that the site is deliverable and that there is strong demand for housing in this area. This won't be the case for many rural housing allocations. Whilst the proposed windfall allowance for Worthen and Brockton at this stage is quite low, it would be sensible to allocate this site for low density development providing certainty for all parties. All utilities are available in the lane and can easily be connected. The option agreement with local developer SJ Roberts combined with the strength of the market in this area means the site is likely to be built out within 2 years of obtaining planning consent. Conclusions The site is highly suitable for allocation that should be reconsidered and allocated within the draft plan under the Regulation 18 pre-submission draft local plan consultation. The site is available, deliverable and achievable. We consider the site should be identified for residential development for the following reasons: <ul style="list-style-type: none"> The site is sustainably located within walking distance of Worthen and Brockton's services and facilities; It provides a location with access to public transport; There are no environmental impacts which cannot be satisfactorily mitigated through good design and quality landscaping The site forms a natural extension of development along Back Lane; The site includes woodland that can be used for environmental mitigation and infrastructure; A safe and suitable means of access can be provided into the site without impacting directly upon the nearby B4386; The site has potential to help the Council meet its statutory requirement for housing growth in rural area at a cost that is affordable to all. The site is respectfully presented for inclusion in the emerging Shropshire Local Plan Review. Proposed block plan attached as appendix 1
A2396B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	30 allocated houses here is appropriate to the village size and facilities. House types and sizes should be mixed, i.e. suited to singles, couples and families, and should reflect local needs. A safe outdoor play area for young children should be included as there is currently none in the village of Worthen. The site gives onto the B4386 at a point where there are speeding and flooding issues. Good visibility from the housing onto this road should be ensured. The 30 mph speed limit should be extended, preferably to beyond the blind corner at Little Worthen. The issue of regular flooding on the B4386 opposite Worthen Hall needs to be addressed. There is a strong culture of walking to the facilities and in the lanes around Worthen and Brockton. There is no pavement alongside the B4386 from Worthen Hall around the blind corners to the village centre, nor is there room to provide one. A pedestrian access from any new housing should be provided into Back Lane, where vehicular traffic travels very much more slowly. The speed limit between Worthen Hall and the top of The Bank should be reduced to 20 mph; there has already been one fatality this year. Environmental mitigation to the proposed housing should include the replacement of any lost hedges by appropriate native species, e.g. at the back of the site, and alongside the B4386 if road widening is envisaged. Local hedges are of hawthorn, with blackthorn, hazel, field maple, holly and dogwood. The village and valley are short of wood, so tree planting would be appreciated: standards should be oak, ash, holly, field maple. Plants should be locally sourced and guaranteed disease-free

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2396B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>The proposed development at this very visible site is out of character with the scale of the villages of Worthen and Brockton. It would significantly impact the view from the AONB opposite. A reduced, linear development in keeping with the existing housing alongside the B4386 would have less environmental impact.</p> <p>A major concern of the residents of Worthen is the flooding of the brook that flows across the bottom of the field where housing has been proposed. Any hard landscaping, of roads, houses and their access pavements and parking areas is likely to increase the speed and quantity of water running down the hill into the stream, and hence into the village. Some mitigation may be possible through native tree and hedge planting at the lower edge (back) of the site but this needs expert consideration.</p> <p>This part of the village has also suffered from problems with sewage which need to be put right before any further development should be considered</p>
A2399B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>I do not support the designation of Worthen and Brockton as a Hub, I would prefer to see it remain a cluster and houses built in infill sites. 55 new open market dwellings is excessive and not sustainable in this rural farming area. One has to ask, who are they being built for? Agriculture and associated industry makes up 21% of Shropshire rural economy, so in theory 21% of our workforce needs to live in the rural areas! But they cannot afford to.</p> <p>I live and work on the farm opposite the proposed sites and witness the speeds vehicles are travelling as they pass my house and the farm, which is located in a 30 mph zone. Speeds in excess of 50 mph are no longer a rarity. There has been a huge uplift in traffic and the once rural B4386 is now a main route for all vehicle types including HGVs. I find it is dangerous to exit or enter the farm due to the speed of traffic and dangerous overtaking.</p> <p>We are a busy farm and often working very unsociable hours, I am not quite sure how an urban housing estate, located on the edge of a village, surrounded by working farmland is correct for this part of Worthen. I have to cross the road to access land adjacent to the site with farm machinery and livestock. The track next to the site is used by numerous farmers to farm land surrounding the site.</p> <p>I have spent nearly 40 years improving the soil structure of the farm and working in partnership with associated agencies to create a habitat for endangered British species. We have recently reintroduced a native British water vole to the farm. The Farm is on the Higher Level Stewardship Scheme and I am concerned that any development will result in flooding of our farmland as the drainage pipe discharges water into a pool which then filters to ditches and brooks which have been created and restored to offer a protected habitat for wildlife.</p> <p>I am very concerned about the flooding of the B4386 in this location. Our weather patterns are such that this is a regular occurrence. The flood waters now lap at the edge of our house and we have pulled out many stranded motorists over the years. WBR007 & WBR008 are located at the bottom of a hill and when it rains heavily the track next to the site turns into a river, flooding the road. I am concerned that the hardstanding, roads and pavements that a new development will bring will cause further flooding of the road and potentially the farm buildings at Worthen hall farm.</p> <p>I note that a pedestrian access will be through back lane and a public footpath will still be on the site and it is very apparent that any residents wishing the access services in Worthen or Brockton will walk along this very dangerous road. There is a blind bend coming out of Worthen that must be considered. There is no pavement along the road.</p> <p>Connection to the Sewerage plant, unless it is upgraded, will further overwhelm this system. There are many residents in Worthen who have raw sewerage in their gardens when the system is not working properly another 55 properties is not going to help matter:</p>
A2399B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>The new site WBR010, which has been included in the Draft Local Plan has been allocated 20 dwellings. I like other Worthen residents have personal knowledge of the land allocated and am confident it could provide many more as much as 50.</p> <p>WBR010: a portion only of this site was the subject of a planning application in 2014 (14/00398/OUT) for the construction of 25 dwellings. This was refused at Southern Planning Committee Stage, the parish council objected and indeed when the applicant appealed the decision of Shropshire Council. The Planning Inspector upheld the refusal of this application on the following grounds:</p> <p>The appeal site is deeper than neighbouring residential sites on this side of the road and it projects significantly into the surrounding countryside. Whilst acknowledging that the layout and appearance of the scheme is not before me, I am not satisfied that the size and shape of the site would allow a development that respected the linear character of this part of the village. The proposal for up to 25 dwellings would result in an urbanisation of this area of countryside which would be harmful to its intrinsic character and beauty. Further harm would be caused to the attractive landscape setting of the village. In light of my findings, I conclude that the scheme would not protect, restore, conserve and enhance the natural and built environment. This would result in the scheme being in conflict with Core Strategy Policies CS6 and CS17. There would be significant conflict with the environmental role of sustainability. The relocation of the roadside hedge and landscaping of the site would not mitigate this harm.</p> <p>Road Safety – The condition of the poorly maintained B4386 is a concern, there has been a dramatic increase in the usage, type and excessive speed of traffic in recent years. To exit onto the B4386 when there are speeding cars flying down the hill towards a blind bend will be interesting especially as almost all homes have at least two cars and if they follow the pattern of other residents who seem to prefer having goods delivered these days. The sites put forward will increase road usage in the village considerably.</p> <p>Sewerage - whilst Severn Trent have a duty to connect new dwellings to the already over capacity facilities they do not have a duty to upgrade. There is already a significant sewage problem in this part of the village which backs up towards Brockton and towards Marton.</p> <p>Flooding – The Worthen Brook is subject to flooding. When the brook floods residents are effectively cut off and this site has the potential to exacerbate this problem, neighbouring farmland and our land situated beyond the Church is flooded too now when with have all to frequent wet weather events.</p>
A2414B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>See attached document for A2414 BKL008a FINAL PDF (Plus petition) On behalf of the strongly-held views of our residents, Bedstone and Bucknell Parish Council DISAGREE with the promotion of the site known as BKL008a as part of the draft Shropshire Local Plan, 2016-2038. 2. It is unacceptable for the following reasons:</p> <p>(a) Detrimental effect on the Shropshire Hills AONB. In summary the suggested development of this site negatively effects the AONB by:</p> <p>(A) its proximity and its visibility, thus deliberately not recognizing the AONB (para 2.18); and</p> <p>(B) its failing to enhance the sense of place and local character (policy DP26.1) b) Impossible to justify the building of 20 dwellings in this proposal in addition to the saved SAMDev Plan.</p> <p>(1) It is hard to find justification for building this additional number of dwellings in Bucknell in order to meet the needs of the local communities...(para 5.38). (2) 5 completions in three years 2016-19 Build rate completions over span of Local plan to 2038 of approx. 45 max total could be justified as meeting needs of local communities, (3) Seven approvals in hand indicate 'demand' for something like 35 additional builds over life of plan. (4) However, with the already accepted SAMDev saved plan to build 70 dwellings on the brownfield site BUCK001, the bringing forward of this greenfield site runs counter to both logic (no need for any additional builds) and common sense (avoid using greenfield – use brownfield). c) Even less justification for a further build (of perhaps a further 20 dwellings) on the site.</p> <p>(1) Bearing in mind the comments above at (b), there can be no justification whatsoever that a further build on this site will meet the needs of the local communities...(para 5.38) in addition to the 20 already discussed at 2.(b) above. d) 'Gateway' development will be out of keeping in this site.</p> <p>(1) The suggestion that a 'gateway' feature development should be placed on this greenfield site is completely out of keeping and brings with it design tropes and expectations that seem unlikely to recognise the landscape and historic significance of the town (sic) (para 5.38). the site does not lend itself to the potential benefits, offered by a Gateway, of landscaping and interesting street layout. Most disappointing of all to this proposal, is the fact that this out of character development will serve simply to take away from the landscape that makes Bucknell the attractive village it is.</p> <p>Approaching from the east, the development can be expected to obstruct the natural landscaping, involving traditional fields and views – agreed as at the core of Bucknell's and the AONB's attractiveness. The development will block the Coxall Knoll/Onionhill Wood –Stannage Park/Park Bank Wood – Bucknell Wood panorama. Far from forming a 'gateway' to the village it will present an unattractive, intrusive, inorganic and irrelevant wall. Detrimental effect of village's attractiveness, devaluing effect. 5) Finally, the issues about the proposed development's relationship with the AONB, mentioned earlier in general terms, will be sharply spotlighted as an obvious example of another 'fill another field' development with little or no relationship with the mixed Redlake Meadow development. (e) Traffic and road layout issues. (1) Much is made in Schedule S2.2(i) Development Guidelines in respect of this parcel that...suitable and safe highway access with appropriate visibility onto the B4367 will be demanded (surely a sine qua non?) and there will be provision of a footway, along the site frontage with an appropriate road crossing to link to the wider pedestrian network and bus stop to the north, nevertheless the following should be noted: A) Exit from the site onto the B4367 will create an extraordinarily complicated and dangerous set of junctions and pedestrian-vehicle inter-relationships in the space of approximately 125 metres involving: a) The exit from BKL008a (b) Exit from track opposite the site (c) A new bus stop (d) A new pedestrian crossing (e) Steep slope exit from Ladywell (f) junction with Old Bedstone Road (g) Junction with Dog Kennel Lane. (B) All this on a B road, carrying significant levels of traffic (monitored by the Parish Council) and an increasing number of heavy 8-wheel articulated lorries (C) Additionally, despite a blind bend to the west and because of the straight to the east, the speed limit is often exceeded, as monitored by the Parish Council.(D) No matter the provision of splays, exiting the site to turn eastward will inherently be dangerous, 'crossing over' into the far lane, with 'short-notice' traffic emerging from the east and with traffic from the west 'putting its foot down' as the straight emerges. 2) No matter the traffic management systems that might be applied, it's fair to say that the impact of a minimum of 40 additional vehicles emerging and returning daily from this site – not to mention the growth in delivery vehicles and it is hoped the number of pedestrian movements, many with children's buggies – is not something for which the Parish Council wishes to be responsible. (f) Flooding issues (1) It is stated that provision of ...highway drainage to help address surface water flooding will be made, and that ...The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk may be managed on part of the remaining land to ensure flood and water management measures do not displace water elsewhere. (2) The site already carries an 'Ordinary Watercourse' on its western edge, draining Dog Kennel Lane, the Mynd, Ladywell and B4367 highway surface water, as well as natural run-off from the Mynd above and behind Ladywell and Park Rise, opposite the site. The Watercourse runs immediately adjacent to 9 properties and two sets of garages on Redlake Meadow. Given the now 'new normal' extreme rain events, the Watercourse, which currently 'runs full', will have no capacity to take any additional run-off from the new estate. Indeed, it may be expected that the current Watercourse in some circumstances may overflow – onto the new estate. What provision will be made for such an event? 3) Whilst the draft Local Plan statements, quoted, imply an element of self-management, separate from the existing arrangements, nonetheless the River Redlake has shown itself capable of serious flooding. The Environment Agency maps shows the southerly end of the overall BKL008 site currently to be at Medium risk of flooding, with the adjoining river-facing Redlake Meadow area to be at High risk. (4) The suggestion that the development should take place within reach of the flood plain, immediately adjacent to areas already shown to be at risk, in the river valley, unfortunately shows little regard either for environmental management issues nor, it seems, for the application of common sense. Deliberately to risk the development in this way seems to be both perverse and irresponsible. (g) Building on a greenfield site (1) It is intensely frustrating to have to state again that residents of Bucknell do not want greenfield sites developed before the large capacity brownfield site (BUCK001) has been developed. (SAMDev consultation quotes, see attachment) 3) From this it is quite clear that Bucknell has shown itself to be a constructive partner in the planning policy process. It has accepted the designation of Community Hub, recognising that above average development is implied – although the figures quoted above show such numbers cannot in logic be justified. (4) However, what has always been clear is that residents want the long-standing visual and ecological blight caused by the old Coal and Timber yards to be cleared. There is no appetite for the approach set out in para 5.38: The release of part of this larger greenfield land parcel at BKL008a, adjoining the contemporary Redlake Meadow development, will permit new housing to be delivered quickly when issues affecting development in the River Clun catchment are resolved. 5) By focussing on the 'quick delivery' of housing, plainly the draft plan's authors are in fact failing to meet the needs of the local communities (para 5.38) (strongly expressed as 'brownfield first'), as well as, as already highlighted, failing to recognise key value of the AONB, Shropshire and Bucknell landscape. (6) By popular request, these points have been put to residents in the form of the following Petition, published on the village website and in a (COVID-secure) paper version: Petition raised to OBJECT to proposed development of greenfield site BKL008a on grounds (SEE ATTACHMENT A2414 BKL008a petition pdf) 140 signatures 23% of over 16's. (C) A year ago, a Shropshire Council Housing Needs survey was run under the 'Right Home Right Place' (RHRP) initiative. It was given much publicity: a presentation at the Parish Council, posters and direct mailing to every household. Despite all that effort, a mere 74 responses were received. Nonetheless the Parish was assured that it was a statistically valid response – and better than some communities. D) Accordingly, it is strongly held that, with little publicity and a limited communication and publicity network, to have achieved double the RHRP response must, at the very least, be seen as a very strong, valid and sincere expression by residents of Bucknell that building on a greenfield (BKL008a) should not be promoted above the brownfield site (BUCK001). (7) In addition, the proposal to build on the greenfield site appears to disregard Shropshire Council's own policy and explanation guidance at: (A) Development Policy DP19.5: The re-use of previously developed (brownfield) land is encouraged, and proposals on despoiled, degraded, derelict or unstable land or on land affected by contamination will be supported...(B) para 4.173: The re-use of brownfield land... reduces the need for greenfield development. Therefore, the re-use of brownfield land should be preferred wherever possible, bearing in mind the viability of development and the potential for land to acquire biodiversity value. 3. Finally, it will be hard to understand the purpose of these consultations if Shropshire Council fails once again to take account of, and agree with, the strongly expressed mind of the village that the greenfield site BKL008a should NOT be brought forward as a developable site.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2414B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	<p>See attached document for A2414 BUCK001FINAL.pdf (Plus petition)</p> <p>OVERALL STANCE: On behalf of our residents, Bedstone and Bucknell Parish Council continues in its STRONG SUPPORT for the proposed mixed-use redevelopment of Bucknell's old Coal and Timber yards site identified collectively as BUCK001 (also, confusingly, referred to as BKL011), saved from the SAMDev process and now included within the draft Shropshire Local Plan, 2016-2038.</p> <p>2. ENVIRONMENTAL ISSUES</p> <p>The site's progress to build has been severely hampered by environmental management issues. These have involved sewage treatment mitigation measures, now understood to have been put in place by Severn Trent, along with, most recently, the implications of developing case law in respect of the EU Habitats Directive. It is understood that the usual design, layout or other 'usual planning issues' do not stand in the way of progressing this site. Additionally, it is understood that potential developers/owners have voluntarily put forward undertakings, made innovative suggestions and met Officers' demands in order to provide a range of mitigation measures to meet the various environmental management demands. Despite the constructive attitude of the owners, they have unfortunately been met with what might appear as obfuscation, designed to ensure no progress is made with the development of this site.</p> <p>3. RESIDENTS' VIEWS</p> <p>a. Residents are intensely frustrated and annoyed by the complete lack of progress in developing this site, whose redevelopment has been discussed for upwards of three decades! Residents fail to understand how Shropshire Council, whilst making claims as to the beauty of Shropshire countryside, and especially the adjacent AONB, can allow this site to be such an embarrassing blot on the village-scape. Chief among residents' many complaints are:</p> <p>(1) Unightly blight</p> <p>(a) There can be no getting away from the fact that the buildings making up the most visible part of the site – largely on the old Timber yard – are an unsightly eyesore. Mossed (asbestos) roofs, obviously worn out and collapsing buildings, muddy yards and cracked concrete roadways characterise this site. It is well past its use-by date.</p> <p>(b) Recent unfortunate surface-water flooding has revealed just how water-permeable the building serving as a village shop had become – making it, potentially, no longer fit for purpose.</p> <p>(c) Promoting Bucknell as a potential Community Hub is laughable without action being taken to clear this site. Its very presence undermines statements about Bucknell's future and role as an important element in Shropshire's development.</p> <p>2) Unintended consequence: 'promotion' of greenfield site</p> <p>(a) The longer this site (BUCK001) remains un-redeveloped, the harder it is to resist pressure from greenfield site owners/agents with 'shovel-ready' sites. Were this site to be moving forward, the reality of the rate of housing demand would be becoming clear and the hypothetical 'demand' for a 20/40 greenfield development would be tested against the market reality. The lack of progress invites a sub-optimal solution that really must not be countenanced.</p> <p>(b) So concerned were residents at the promotion of a greenfield site (BKL008a) as part of this consultation, whilst the brownfield site's progress appeared to be stymied at every turn, that a petition was raised to object to the proposed development of greenfield site BKL008a (SEE Attachment A2414 BUCK001 Petition.pdf) In response to this petition, 140 separate, verifiably local, signatures were appended – This was achieved (obviously, in these COVID times) with no door knocking, or clipboard listings in the usual community hubs. Just one list and a posting on the website achieved a signature rate of some 23% of over-16's. year ago, a Shropshire Council Housing Needs survey was run under the 'Right Home Right Place' (RHRP) initiative. It was given much publicity: a presentation at the Parish Council, posters and direct mailing to every household. Despite all that effort, a mere 74 responses were received. Nonetheless the Parish was assured that it was a statistically valid response – and better than some communities. (III) Accordingly, it is strongly held that, with little publicity and a limited communication and publicity network, to have achieved double the RHRP response must, at the very least, be seen as a very strong, valid and sincere expression by residents of Bucknell that building on a greenfield (BKL008a) should not be promoted above the brownfield site (BUCK001).</p> <p>b. On top of these points, residents are annoyed that the years of delays mean that the potential benefits of the redeveloped site are being denied them:</p> <p>(1) A village for all ages</p> <p>(a) Because of there being no movement on redeveloping the site, the potential wider housing market benefits are denied the village – and Shropshire county, too.</p> <p>b) The recent Housing Needs Survey revealed a demand for affordable housing.</p> <p>(I) A small number of affordable houses will be produced under the last proposed Planning Application for the site. That is good news.</p> <p>(II) However, without even a sniff of the redevelopment moving forward, young people will understandably move away and be lost to this part of Shropshire. This will contribute to the village 'just being for old people and in-comers': it will ossify.</p> <p>(c) More widely, as a result of the likely drain away of young people, the consequence will be that the 'organic' opportunities for a flexible housing ecology to develop in the village, with internal movement as families grow and others diminish – along with others moving to the area taking advantage of e.g. rail links – is denied this potentially key growth site in the county – a point highlighted at para 5.35 of the draft document: Bucknell is an important service centre for local communities in the surrounding rural areas of these three Counties.</p> <p>Bucknell's significance is also enhanced by its operational rail station linking with other rural stations in Shropshire and the principal station at Knighton.</p> <p>(d) Adding to this mix of housing, the Bedstone and Bucknell Parish Plan identified an aspiration for the development of a Care home facility. It is understood that Shropshire Council would accept a proposal for such a facility in place of the small Industrial Unit concept put forward many years ago. Not only would the idea contribute to the previously mentioned 'housing ecology' but it would provide employment opportunities, potentially more accessible to a range of skills and in larger numbers than the previous ideas envisaged.</p> <p>(e) Although this is a commercial matter, and in essence not for the Parish Council, there is a thriving garage workshop facility in operation on the site. Its future might well benefit from the increased population. c. In summary, the longer this site is not redeveloped in a co-ordinated way, accommodating the abovementioned elements, the greater the likelihood that these benefits – as well as others, e.g. a replacement Memorial Hall supported by CIL – will be denied to the village and to Shropshire.</p> <p>4. SHROPSHIRE'S BROWNFIELD REDEVELOPMENT PERFORMANCE</p> <p>a. On the evidence of the published Shropshire Brownfield Land Register, Shropshire's brownfield redevelopment performance cannot be rated as anything other than unimpressive. With 110 registered sites, just four redevelopments have been completed (3.6%), amounting to a total of 0.85hectares redeveloped out of a potential of 162-15 hectares – a yield of 0.5% of the potential. It's also has to be noted that the four completed sites are in the north or the east of the county – as indeed are the vast majority of the other registered sites. b. In view of that less than noteworthy performance, it seems strange that the Bucknell site, which is 12th largest in hectares and 9th largest in terms of minimum housing yield (on the basis of 70 dwellings as per the Draft Plan), is not being more actively supported. Active promotion of this site would make a not insignificant contribution to the cleaning up of dirty sites in Shropshire. c. The seemingly passive support given to the site's progress seems to run counter to Development Policy DP19.5 which states: <u>The re-use of previously developed (brownfield) land is encouraged, and proposals on derelict, degraded, derelict or unstable land or on land affected by contamination will be supported, and additionally para A.173 of the Draft Local Plan there is the statement: The re-use of brownfield land reduces the need for greenfield land.</u></p>
A2421B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>To have so many dwellings on a field that floods is very risky and likely to pollute the river, disturb wildlife and affect the doctor's surgery all for the benefit of developers. It will bring pollution and many more cars to the area, that is of outstanding natural beauty. The noise, the pollution and disturbance will affect the well being of locals, only bring more people to a place with no public transport to speak of and no jobs, which means people have to travel to work in their individual cars.</p> <p>We should protect the nature and the environment, not hurt it more.</p> <p>In times of climate change and when the rain fall has increased tremendously even here in Clun, this amount of new developments in the valley, is likely to adversely affect the future generations</p>
A2434B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Agree	<p>In Clun, I am in agreement with the proposals identified within the consultation and I think the correct land allocation has been identified by officers. This is a view shared I think with the Town Council and the majority of the community.</p>
A2434B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>In Bucknell however, I do not agree with and am strongly opposed to the proposal to allocate new greenfield land at the Gothians field adjacent to Redlake Meadow (Bu008) for an additional 20 homes.</p> <p>There exists sufficient land adjacent to the brownfield saved allocated land at the Coalyard/Woodyard site on which to site the additional 20 homes without the need to extend the development boundary of the village to develop the greenfield site next to Redlake Meadow. This is also the view overwhelmingly of the local community when surveyed and the view of the Parish Council.</p> <p>The availability of the land adjacent to the Coalyard/Woodyard site was discussed and agreed at a meeting I called and chaired at the Shirehall in June 2019. The meeting brought together both landowners of the Coalyard and Woodyard sites and their respective agents, representatives of the Parish Council and planning and environmental officers during which it was agreed that the best way forward for the village was for the main saved site to be developed as soon as possible and we resolved any remaining issues (such as bat flight lines) which had, up to that point, held back the current planning application from gaining approval. It also discussed and agreed that a small extension to the site was available for further housing if required. Since that time I have had it confirmed, as recently as a week ago, in verbal discussion with the landowners concerned that an extension to this site remains on the table.</p> <p>It was therefore a considerable surprise to all concerned when the current proposal to include land previously ruled out adjacent to Redlake Meadow was brought forward, completely at odds with the outcomes from the meeting in June 2019.</p> <p>This new proposal to include greenfield land previously rejected during the original SAMDev consultation and strongly opposed by the community also flies in the face of the Council's own policy to prioritise development on brownfield land as opposed to greenfield land and should therefore be rejected.</p>
A2439B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>I am against this proposal/development for the following reasons:</p> <p>1.The main road through the village is already very dangerous for pedestrians and beyond the village the junctions to Aston Pigott and Aston Rogers are extremely hazardous because of the speed and weight of traffic. This problem would be made worse by the substantial increase of traffic on the road caused by this development.</p> <p>In particular, people living in this development wanting to reach the shop, church, school or doctor's surgery by pedestrian access would have to cross the main road in two places, both of which are dangerous. They would also have to use a ridiculously narrow pavement which leaves pedestrians highly exposed. This would lead either to further injury or fatalities, or increased car use for short journeys. It is vital that any development includes substantial increase in safe pedestrian routes around the village.</p> <p>2.Increased urbanisation – a substantial increase in the number of houses in the village will change the character of it. The increased people, cars, buildings and related infrastructure will produce a more urban environment with effects on both the character of the place and the quality of the environment.</p>
A2439B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>I am against this proposal/development for the following reasons: 1. The site includes that next to Millfield House, which was turned down on appeal in 2015 as being out of character with that part of the village and impacting on the view from the AONB as well as being in open countryside. None of these things has changed.</p> <p>2. The proposed site now could hold 50 to 75 dwellings, as a large proportion of the current size would radically change the character of the village, turning into a more urban environment.</p> <p>3. The potential increase in population of a development of this size would cause substantial environmental impact as a result of infrastructure, waste disposal, increased traffic, increased run off in an area that already floods during heavy rain, noise etc.</p> <p>4. The main road through the village is already very dangerous for pedestrians and beyond the village the junctions to Aston Pigott and Aston Rogers are extremely hazardous because of the speed and weight of traffic. This problem would be made worse by the substantial increase of traffic on the road caused by this development.</p>
A2442B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>It is vital that existing businesses on the Woodyard site need to be relocated onto the Coalyard site before the housing development starts. If these businesses are shut down by the housing development the loss of local jobs and services will be very detrimental. As it stands the village needs more employment to justify more housing. For new residents to have to travel significant distances to employment is not sustainable.</p> <p>The extra traffic generated by such travel would also make the roads less safe and increase both local pollution and global warming. The lack of progress on this longstanding project suggests that clearly there is not at present demand for anything like 70 or more new houses in Bucknell, and this scale of development over a short period would "swamp" the village. A clearly phased development should be defined in the Plan, spread over decades, so that new residents can integrate well into the existing community. Also a more imaginative mix of new property should be defined in the plan, with a care home, sheltered housing, some live/work units, some self build units, some shared ownership units, some community led housing development and some amenity facilities for both the new (and existing) residents. Just another spec built housing estate is not good enough.</p> <p>With regard to BKL008a, it's clear that the objections from existing residents in adjoining houses are understandable. They would suffer a significant loss, both of outlook and also of overlooking of their gardens. If a new tree planting strip between the existing and proposed houses was included in the plan, with a new footpath down the centre of the strip leading from the proposed B road footpath to an amenity area on the bank of the river Redlake and also linking through to the existing estate road, this would be a good way of mitigating the situation. It would also provide a pleasant extra walk for all village residents.</p>
A2444B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>Object to development at land East of Redlake Meadow, Bucknell. This development will needlessly extend the limits of the village, already over extended along Chapel Farm Road. Bucknell is an example of Ribbon Development - which should be halted or reversed. In addition to this the old timber and coal yard adjoining the railway station is ripe and crying out for conversion into an attractive collection of homes that would be an asset to Bucknell, whereas building at Redlake Meadow would probably remove any incentive to develop the timber yard.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2459B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>I do not support the designation of Worthen and Brockton as a Hub, I would prefer to see it remain a cluster and houses built in infill sites. 55 new open market dwellings is excessive and not sustainable in this rural farming area. One has to ask, who are they being built for? Agriculture and associated industry makes up 21% of Shropshire's rural economy, so in theory 21% of our workforce needs to live in the rural areas! But they cannot afford to.</p> <p>I live and work on the farm opposite the proposed sites and witness the speeds vehicles are travelling as they pass my house and the farm, which is located in a 30 mph zone. Speeds in excess of 50 mph are no longer a rarity. There has been a huge uplift in traffic and the once rural B4386 is now a main route for all vehicle types including HGVs. I find it is dangerous to exit or enter the farm due to the speed of traffic and dangerous overtaking.</p> <p>We are a busy farm and often working very unsociable hours, I am not quite sure how an urban housing estate, located on the edge of a village, surrounded by working farmland is correct for this part of Worthen. It is expanding the settlement pattern of the village. I do not think development of this type will enhance the entrance to the village, green fields and hedgerows are preferable. If this development does proceed it must be sympathetic to the surrounding countryside and the fact it is essentially located in a workplace must be a consideration. The site also sits opposite a Grade II listed farmhouse.</p> <p>I am very concerned about the flooding of the B4386 in this location. Our weather patterns are such that this is a regular occurrence. The flood waters now lap at the edge of our house and we have pulled out many stranded motorists over the years. WBR007 & WBR008 are located at the bottom of a hill and when it rains heavily the track next to the site turns into a river, flooding the road. I am concerned that the hardstanding, roads and pavements that a new development will bring will cause further flooding of the road and potentially the farm buildings at Worthen hall farm. The site is not only on higher ground but the road drain passes under the farm yard and water is discharged into a pool on the farm. The Cellars at Worthen hall have flooded twice in 12 months due to the excessive water on the B4386.</p> <p>I note that a pedestrian access will be through back lane and a public footpath will still be on the site and it is very apparent that any residents wishing the access services in Worthen or Brockton will a: drive or b: walk along the very dangerous B4386. There is a blind bend coming out of Worthen that must be considered. There is no pavement along the road.</p> <p>Connection to the Sewerage plant, unless it is upgraded, will further overwhelm this system. There are many residents in Worthen who have raw sewerage in their gardens when the system is not working properly another 55 properties is not going to help matters.</p>
A2459B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>As already stated in response to sites WBR007 and WBR008 I am in support of new houses being built in the village but as part of a cluster and not a hub.</p> <p>I was somewhat surprised about the size of the new site WBR010, which has been included in the Draft Local Plan. It has been suggested that this site has "capacity" to provide 20 new dwellings. I own a property next door to this site and I am fully aware of the size of the land allocated and the steepness of the field. I think at least 50 dwellings could be accommodated or 20 executive 5 – 6 bedroomed houses with a high price tag to match.</p> <p>WBR010: a portion only of this site was the subject of a planning application in 2014 (14/00398/OUT) for the construction of 25 dwellings. This was refused at Southern Planning Committee Stage, the parish council objected and indeed when the applicant appealed the decision of Shropshire Council. The Planning Inspector upheld the refusal of this application on the following grounds:</p> <p>The appeal site is deeper than neighbouring residential sites on this side of the road and it projects significantly into the surrounding countryside. Whilst acknowledging that the layout and appearance of the scheme is not before me, I am not satisfied that the size and shape of the site would allow a development that respected the linear character of this part of the village. The proposal for up to 25 dwellings would result in an urbanisation of this area of countryside which would be harmful to its intrinsic character and beauty. Further harm would be caused to the attractive landscape setting of the village. In light of my findings, I conclude that the scheme would not protect, restore, conserve and enhance the natural and built environment. This would result in the scheme being in conflict with Core Strategy Policies CS6 and CS17. There would be significant conflict with the environmental role of sustainability. The relocation of the roadside hedge and landscaping of the site would not mitigate this harm.</p> <p>Road Safety – The condition of the poorly maintained B4386 is a concern, there has been a dramatic increase in the usage, type and excessive speed of traffic in recent years. To exit onto the B4386 when there are speeding cars flying down the hill towards a blind bend will be interesting especially as almost all homes have at least two cars and if they follow the pattern of other residents who seem to prefer having goods delivered these days. The sites put forward will increase road usage in the village considerably.</p> <p>It is my understanding that this site will deliver a new pavement and crossing? Have all landowners agreed to this or will it stop short at the development site?</p> <p>Sewerage - whilst Severn Trent have a duty to connect new dwellings to the already over capacity facilities they do not have a duty to upgrade. There is already a significant sewage problem in this part of the village which backs up towards Brockton and beyond. Sewage enters residential gardens and homes in Brookside and the garden of The Mount which is adjacent to this site (I have cleaned it up personally on many occasions and had to call out Severn Trent when a raw sewage fountain appeared in the layby).</p> <p>Flooding – The Worthen Brook is subject to flooding. When the brook floods residents are effectively cut off and this site has the potential to exacerbate this problem, neighbouring farmland is flooded in this location too. When it floods, the sewerage system backs up and raw sewerage is spilled out in the garden of The Mount.</p> <p>I am further concerned about given the steepness of the site and my experience working for a local builder for five years what potential impact engineering works and piling rigs will have on the stability of my property and indeed others near this site.</p>
A2460B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>Whilst I agree that additional housing is required in this area, the potential number of houses that could be built on the land identified (up to 25) would I think be too many, as it would significantly change the character of the village by increasing the dwellings by 1/3rd. In addition to this, there are currently serious issues with flooding, drainage and sewerage, and a renumber of dwellings would most likely make these matters worse unless significant costly changes and improvements are made to eliminate the current problems, and ensure that any number of new dwellings don't add to the risks associated with flooding, and poor drainage and sewerage systems. There will also be requirements to improve the road system through the village to cope with the additional dwellings and associated traffic, and access to the B4386 from Sites WBR007 & 008 would need substantial planning as traffic coming into the village does not always slow down, and the existing junction is far from safe, and also improved and safer pathways for pedestrians from the sites above and also from the proposed WBR010 sites. Currently part of the pathway through the village is not wide enough for safely pushing pushchairs/buggies and walking children/infants. It would also appear, that there may not be a requirement for any developer to seek planning permission on the type, design and size of property they could build, which I feel is totally wrong as it is important to keep the character and nature of the current village environment. With regard to the consultation process associated with the proposal, I feel it is wrong to conduct it at this time, as due to Covid-19 restrictions, members of the community cannot gather together in a group or planned meeting to hear about the proposal and discuss it in detail. As I mentioned, I feel that additional housing is required, and if it is to be on the Sites WBR007 & 008, it should be limited in number, be of an affordable type for new and young persons/families, be subject to further planning application and approval, and any development would not increase the risks associated with inadequate drainage, flooding and sewerage. It would also have to ensure that there is a safe roadway and pathway through the village.</p>
A2460B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>Whilst I agree that additional housing is required in this area, the potential number of houses that could be built on the land identified (up to 55) would I think be too many, as it would significantly change the character of the village by increasing the dwellings by 1/3rd. In addition to this, there are currently serious issues with flooding, drainage and sewerage, and a large number of dwellings would most likely make these matters worse unless significant costly changes and improvements are made to eliminate the current problems, and ensure that any number of new dwellings don't add to the risks associated with flooding, and poor drainage and sewerage systems. There will also be requirements to improve the road system through the village to cope with the additional dwellings and associated traffic, and also improved and safer pathways for pedestrians from the sites above and also from the proposed WBR007 & 008 sites. Currently part of the pathway through the village is not wide enough for safely pushing pushchairs/buggies and walking children/infants. It would also appear, that there may not be a requirement for any developer to seek planning permission on the type, design and size of property they could build, which I feel is totally wrong as it is important to keep the character and nature of the current village environment. With regard to the consultation process associated with the proposal, I feel it is wrong to conduct it at this time, as due to Covid-19 restrictions, members of the community cannot gather together in a group or planned meeting to hear about the proposal and discuss it in detail. As I mentioned, I feel that additional housing is required, and if it is to be on the Site WBR010, it should be limited in number, be of an affordable type for new and young persons/families, be subject to further planning application and approval, and any development would not increase the risks associated with inadequate drainage, flooding and sewerage. It would also have to ensure that there is a safe roadway and pathway through the village.</p>
A2479B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area		<p>Paragraph 1 When undertaking Local Plan Reviews to accommodate the required, ongoing 5 year supply of housing land, a priority 2 rating must be given in the assessment process to eligible sites that do not require access to the A488 via a street(s) in the Conservation Area.</p> <p>Paragraphs 7 and 8 DP24. Conserving and Enhancing the Historic Environment DP24 is a key component of the Local Plan as regards the Bishop's Castle Key Centre. DP24 is highly significant as regards future development in the town as the Conservation Area constitutes a significant portion of the settlement. It is also one of Shropshire's significant heritage assets and thus is defined by DP24 as needing to be "protected, conserved, sympathetically enhanced and restored."</p> <p>A Character Assessment (CA) of the Bishop's Castle Conservation Area (BCCA) has recently been produced jointly by the Bishop's Castle Community Partnership (CP) and the Bishop's Castle Town Council (TC): the former as part of the annual update of their Community Led Plan; and the latter in preparation of the Bishop's Castle Neighbourhood Development Plan.</p> <p>The CA which forms Appendix 1 of the Neighbourhood Development Plan (NDP) (currently in Draft Regulation 14 Stage) identifies and evidences critical issues that need to be addressed if this significant heritage asset is to be "protected, conserved, sympathetically enhanced and restored."</p> <p>The DP24 Policy includes 7 actions required to address the Policy. As regards the BCCA, to realise the 7 actions, the following is required:</p> <ol style="list-style-type: none"> 1. Ensuring that wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings. <p>The boundary of the BCCA is that of the original Norman planted town. The current settlement and its infrastructure mirror the original 12th century settlement. Hence the Historic Environment Record lists 267 separate heritage assets, within the BCCA including: 1 Scheduled Monument; 5 Grade II* Listed properties; 100 Grade II Listed premises; and 161 non-designated heritage assets.</p> <p>Through the following 8 centuries the town has prospered and developed but has retained its original form, street pattern and buildings, including the medieval thoroughfares with premises hard up against the carriageway or narrow pavements. The consequence of this in the 21st century is the difficulty of accommodating the demands of modern traffic and parking requirements without "harm or loss of significance to designated or non-designated heritage assets, including their settings."</p> <p>The CA provides evidence of both harm already done to heritage assets within the BCCA and the ongoing dangers that are regularly occurring to assets and their settings because of the conflict between traffic and parking demands and the medieval street pattern that exists within the Conservation Area setting.</p> <p>The traffic conflict is exacerbated by the fact that the A488, which lies immediately to the east of the town provides the only access to the English hinterland and to major centres along the Welsh borders to the south. The rural lanes leading out of Bishop's Castle on the western side access only the rural Welsh hills and the Montgomery Road, the B4385 leads only to Welshpool and Newtown and then to distant towns and their hinterland in north and west Wales. The A488 therefore is by far the major route for both commercial and residential journeys to and from the town. Consequently, all traffic including commercial deliveries to and from premises on the western side of the Conservation Area, must travel through the Conservation Area to access the hinterland either via the A488 or the B4385.</p> <p>To satisfy DP24 1. It is essential that no future development of sites outside the development boundary that would require to use a Conservation Area street(s) to access the A488 either by School House Lane or Brampton Road is permitted.</p> <ol style="list-style-type: none"> 2. Ensuring that proposals which are likely to affect the significance of a designated or non-designated heritage asset, including its setting, are accompanied by a Heritage Assessment. The level of detail in the Heritage Assessment should be proportionate to the asset's significance. <p>The CA includes a detailed analysis of what constitutes the character of the Conservation Area and each of the 9 zones that were surveyed within it. This includes architectural design features and decorative embellishments through the ages.</p> <p>To satisfy DP24 2. The Heritage Assessment should be required to always reference consideration of the CA (NDP Appendix 1) document including the appropriate zone analysis and acknowledge any relevant architectural or setting features that may be appropriate.</p> <ol style="list-style-type: none"> 3. Ensuring that proposals which are likely to result in any loss of, harm to, the significance of a designated heritage asset, including its setting, either directly or indirectly, are determined in line with the National Planning Policy Framework. <p>To satisfy DP24 3. When undertaking Local Plan Reviews to accommodate the required, ongoing 5 year supply of housing land, a priority rating must be given in the assessment process to eligible sites that do not require access to the A488 via a street(s) in the Conservation Area.</p> <ol style="list-style-type: none"> 4. Ensuring the proposals which are likely to result in loss of, or harm to, the significance of a non-designated heritage asset and/or its setting, either directly or indirectly, will only be permitted if it can be clearly demonstrated that the benefits of the proposal outweigh that loss or harm. In making this assessment the following will be taken into account: <ol style="list-style-type: none"> a. The degree of harm or loss of significance to the asset and/or its setting; b. The importance of the asset; and c. Any potential beneficial use. 5. Where such proposals are permitted, measures will be required to: <ol style="list-style-type: none"> a. Mitigate and record the loss of significance to the asset and/or its setting; and b. Advance understanding in a manner proportionate to both the asset's and/or its setting's importance and the level of impact. <p>The CA identifies the collective nature of the BCCA in that the footprint of the settlement today mirrors that of the 12th century settlement and its medieval street pattern. The Conservation Area setting is in itself part of the significance of each of its assets and is inseparable from them.</p> <p>The fact that in this small area there are 267 separate heritage assets, tightly packed together, including a Scheduled Monument, 5 Grade II* Listed properties and 100 Grade II Listed premises as well as 161 non-designated heritage assets confirms that the area as a whole is a unique heritage asset of great significance. Damage to a single asset within it, regardless of whether it has a designated or non-designated status, impacts therefore on the whole setting and as such is of equal importance (Point 4. b.).</p> <p>To satisfy DP24 4. and 5. It is necessary when assessing "loss of or harm to the significance of a non-designated heritage asset and/or its setting" to take account of the fact that in the case of this 12th century settlement and its footprint, the interrelationship between the designated and non-designated assets and between the setting as a whole and a non-designated asset are significant factors in the overall character of the BCCA. Thus, a property's significance is greater than its non-designated status would imply.</p> <p>6. Encouraging development which delivers positive benefits to heritage assets. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2492B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>Extension of pathway - The B4386 Lay-by which was originally designated to the shop, next to The Old Post Office is still currently used by citizens to park their cars and use the post box situated in the house wall of the Old Post Office.</p> <p>Both The Mount and The Old Post Office as well as visitors to the surrounding houses utilise the layby for parking for visitors because there have either shared driveways where visitors cannot park or no driveway at all for their property. We also have overspill from customers of the Village shop, Church and Village Hall utilise the layby for parking when events are taking place.</p> <p>By removing this you will move vehicles to parking on the main road and causing more traffic congestion and difficulty for cyclists having to move around the parked cars. There is already an issue with parked cars on the B4386 during school drop off and collection times which cause both hazards for pedestrians, traffic and cyclists.</p> <p>There is currently no safe pavement access for pedestrians to walk throughout the village on the main road. It is narrow and visibility is poor from the top to the bottom of the embankment of the B4386, in particular by the Mount, Old Post Office and school house. There have been several near misses where pedestrians have risked their lives crossing the road and a fatality which I attended on scene too.</p> <p>Pedestrian Crossing - Safe crossings need to be provided by the school or access needs to be implemented via another route from Little Worthen to Brocton via other parts of the village.</p> <p>Speeding - Speeding occurs in Worthen and Brockton, speed enforcement has not rectified the issue and traffic will speed over the brow of the hill next to the Old Post Office. Traffic also does not slow at Little Worthen and speeding occurs until the bend.</p> <p>Access to site need to have enforced speeding and calming measures permanently in place to help prevent collisions and pedestrian fatalities that have occurred already.</p> <p>Flooding - Worthen does have significant flooding on the road. Little Worthen floods at the site entrance and the water run off that occurs from the top of the hill has meant properties at the same level as the Old Post Office and below in Millstream have flooded. Drainage systems are not maintained and run off drainage systems are blocked.</p> <p>Drainage Systems - By increasing the number of houses, drainage systems and run off water will need to be upgraded and directed to suitable areas for both sites.</p> <p>Increase in House Numbers - The number of houses that have been allocated have increased the settled by an additional 55 houses (one third of the village). For a small rural community this will have a huge impact in transport, parking (households will have 2 or more cars, increase in carbon emissions, altered and reduction in biodiversity).</p>
A2492B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S2 Bishop's Castle Place Plan Area	Disagree	<p>Extension of pathway - The B4386 Lay-by which was originally designated to the shop, next to The Old Post Office is still currently used by citizens to park their cars and use the post box situated in the house wall of the Old Post Office.</p> <p>Both The Mount and The Old Post Office as well as visitors to the surrounding houses utilise the layby for parking for visitors because there have either shared driveways where visitors cannot park or no driveway at all for their property. We also have overspill from customers of the Village shop, Church and Village Hall utilise the layby for parking when events are taking place.</p> <p>By removing this you will move vehicles to parking on the main road and causing more traffic congestion and difficulty for cyclists having to move around the parked cars. There is already an issue with parked cars on the B4386 during school drop off and collection times which cause both hazards for pedestrians, traffic and cyclists.</p> <p>There is currently no safe pavement access for pedestrians to walk throughout the village on the main road. It is narrow and visibility is poor from the top to the bottom of the embankment of the B4386, in particular by the Mount, Old Post Office and school house. There have been several near misses where pedestrians have risked their lives crossing the road and a fatality which I attended on scene too.</p> <p>Pedestrian Crossing - Safe crossings need to be provided by the school or access needs to be implemented via another route from Little Worthen to Brocton via other parts of the village.</p> <p>Speeding - Speeding occurs in Worthen and Brockton, speed enforcement has not rectified the issue and traffic will speed over the brow of the hill next to the Old Post Office. Traffic also does not slow at Little Worthen and speeding occurs until the bend.</p> <p>Access to site need to have enforced speeding and calming measures permanently in place to help prevent collisions and pedestrian fatalities that have occurred already.</p> <p>Flooding - Worthen does have significant flooding on the road. Little Worthen floods at the site entrance and the water run off that occurs from the top of the hill has meant properties at the same level as the Old Post Office and below in Millstream have flooded. Drainage systems are not maintained and run off drainage systems are blocked.</p> <p>Drainage Systems - By increasing the number of houses, drainage systems and run off water will need to be upgraded and directed to suitable areas for both sites.</p> <p>Increase in House Numbers - The number of houses that have been allocated have increased the settled by an additional 55 houses (one third of the village). For a small rural community this will have a huge impact in transport, parking (households will have 2 or more cars, increase in carbon emissions, altered and reduction in biodiversity).</p>
A0001B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>General</p> <p>Dislikes the Part A / Part B Consultation Forms.</p> <p>Welcome the additional 'Regulation 18 Consultation'.</p> <p>Policy S3.1</p> <p>The level of development proposed within Policy S3.1 goes beyond that needed to meet local need.</p> <p>There is no assessment of the housing need of Bridgnorth to inform the development strategy.</p> <p>The housing needs of Bridgnorth beyond 2026 will be met by the current residential/mixed use allocations (BRID001/BRID020b and BRID020a) and any windfall opportunities in the town.</p> <p>The infrastructure of Bridgnorth in terms of roads, parking, power supply, sewage etc will not support the level of development proposed.</p> <p>The level of development proposed will exacerbate air quality hotspots.</p> <p>There is no confidence that sufficient jobs will be created to support the new community particularly when transport links to both local and national industrial and commercial centres are already inadequate. This will make Bridgnorth more of a dormitory town.</p> <p>BRD030</p> <p>BRD030 is too large.</p> <p>The infrastructure of Bridgnorth in terms of roads, parking, power supply, sewerage etc will not support development of BRD030.</p> <p>Development at Stanmore is located between existing housing and an industrial site, whilst this is in Green Belt, BRD030 is in countryside which should also be protected.</p> <p>BRD030 will surround the relocated livestock market, which is an important feature to a rural market town. A livestock market with all its inherent noise, smells, very early traffic and disturbance will not sit comfortably with residential development and therefore lead inevitably to complaints from residents.</p> <p>Placing this level of housing in this position outside the by-pass creates problems for access to the town for both traffic and pedestrians and will add considerable pressure to the roads and junctions in Low Town where they are already at or very near capacity.</p> <p>Other options should be considered. For instance existing school sites should be developed and a new education complex formed outside of the town (perhaps at Stanmore or Tasley).</p>
A0023B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The proposed development at Tasley breaches the natural, defensible boundary of the A458 to the south of Bridgnorth and allows development to sprawl into the open and unconstrained countryside. While this land is not Green Belt, that is a technicality. The land which is Green Belt, to the east of the town does not perform the same function as the land in question. To the south and west of Bridgnorth one moves into the gateway of the Shropshire Hills and while not in the AONB it is of the same south Shropshire character. The previous proposals to the east of the town, were much more appropriate. Not only was it well contained by existing infrastructure the surrounding landscape is of a much lower character. I further object to this allocation here due to the impact that this will have on the town of Much Wenlock. There is a pre-existing issue with the Gaskell Junction on the Telford/Bridgnorth road and putting development at Tasley will exacerbate the problem. If the development were to be placed on the east of the town at Stanmore, then there would be the much more appropriate infrastructure links to Telford where a large number of people will work, via the A422. Moreover there would be better connections to existing employment hubs at Stanmore and in the West Midlands, such as Stourbridge, Kidderminster, Wolverhampton and even Birmingham.</p>
A0025B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Don't know / no opinion	<p>However, the amount of traffic on the existing infrastructure in the village where I live – Norton, on the A442 between Bridgnorth and Telford – is already extremely high. If the proposals for new-build housing around Bridgnorth go ahead, in addition to plans for increased light industry, the amount of traffic will increase substantially. We will see further heavy traffic from increased local industry, and yet more commuter traffic between Bridgnorth and Telford from the additional housing. The A442 will have to be upgraded substantially. For the village of Norton, the only sensible proposal will be the construction of a bypass to route the traffic around the village. I am submitting this consultation form as a request for such a bypass.</p>
A0025B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Don't know / no opinion	<p>The Pre-Submission Draft of the Shropshire Local Plan contains proposals for substantial increases in housing and 'employment opportunities' around Bridgnorth – over a thousand new homes, and 22.8 Hectares (56.3 Acres) of land for industrial use. The amount of traffic on the A442 between Bridgnorth and Telford is already extremely high. When the proposals for new jobs and new homes go ahead, the amount of traffic will increase substantially. Additional heavy traffic will result from the increase in local industry, and yet more commuter traffic will flow between Bridgnorth and Telford from the additional housing. Over the past ten years there has already been a marked increase in heavy lorries travelling from distribution hubs in the Telford conurbation, down the A442 towards the M5 and the South West. The A442 will need to be upgraded substantially. For the village of Norton, where I live, the only sensible proposal will be the construction of a bypass to route the traffic around the village. I am submitting this consultation form as a request for such a bypass.</p>
A0045B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area		<p>Green Infrastructure Plans are completely insubstantial in comparison to degeneration of environment that a huge development would cause. Tasley development is adjacent to the new Nature Reserve run by SWT at Underdon development would erode beauty & wildlife value of the reserve.</p>
A0045B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Employment sites are empty already in Bridgnorth, proposed further sites may remain empty, building 1800 homes would then mean people need to commute to work, increase pollution & congestion we are in a climate emergency so find it unacceptable.</p>
A0045B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Development Guidelines This paragraph needs to be strengthened. "Development should seek to maximise the energy efficiency of all buildings" - this wording needs strengthening to "Must Seek". Also "strongly encourage zero carbon development and offset carbon emissions" - this wording needs strengthening to "this must be a zero carbon development and offset all carbon emissions". We are in a climate emergency and the council needs to hold the developers to account on this.</p>
A0045B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Increasing Bridgnorth residents by a third is too high, town centre is old & small, swamped by many it will lose its whole character, you are not listening to residents this is unacceptable.</p>
A0045B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The retail shops would not cover all the needs of the residents. residents may well drive into Bridgnorth for more shops. 1800 houses perhaps = 3,600 more cars coming into Bridgnorth causing huge congestion, pollution & parking issues & greatly reducing the enjoyment of Bridgnorth town centre to existing residents.</p>
A0045B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Paragraph 10 – a new medical surgery will definitely be needed if this development goes ahead. The current Bridgnorth surgery is already very over stretched, and the addition of 1800 more families will not be able to be cared for at all. A new medical surgery needs to be an essential to this development going ahead.</p>
A0045B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Paragraph 16 states that buffering will be provided with native trees, but with 1800 more houses and many more car journeys, along with the noise of the construction on the site, the noise and pollution will greatly increase from the A458 if this development goes ahead, making it intolerable for existing and new residents. You would need a forest to muffle the sound.</p>
A0045B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Paragraph 18 – states that an air quality assessment will take place and recommendations followed. I cannot see that any number of recommendations could take away the extra noise and pollution that this site will bring</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0135B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A0136B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A0136B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.</p>
A0136B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A0136B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A0137B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A0137B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.</p>
A0137B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A0137B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A0141B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>PC would like SPD to address housing type required to meet need in Bridgnorth Place Plan area & appropriate highway arrangement to accommodate traffic demand from new development</p>
A0142B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>NPPF requirements are not met. No need or special or exceptional circumstances justification to remove from Green Belt or alter Green Belt boundary and land should not be taken out of the Green Belt. The Council's Green Belt Review is not an "exceptional circumstance" and the Review undertaken did not identify a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0142B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment and should be removed from the Plan, because:</p> <ul style="list-style-type: none"> •There is no need for the proposed allocation. The allocation of some 49ha of land for employment purposes in Bridgnorth in order to create choice and competition in the market (para. S3.1.1), is excessive and not fully evidenced and justified. Sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without Stanmore. •Stanmore is divorced from existing & proposed main residential areas and thus workforce would need to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Draft Local Plan Policy SP4.1. and NPPF & the proposal cannot be considered sustainable development. •Stanmore Industrial Estate was established in order to make use of a former WWII military site. But there is no such justification for the present proposals. Additionally there are vacant plots on Stanmore Industrial Estate, some for months, others years.No current need or desire for business operations generated by Bridgnorth residents to locate at Stanmore. •The proposals for development at Tasley, include 16 ha of employment land within walking distance of the main residential development proposed for Bridgnorth is more than capable of supplying the additional necessary floorspace to serve all Bridgnorth's growth. •The proposed allocations at Stanmore are in 'Countryside' unrelated to any significant urban development area and thus contrary to Policy SP9 of the Draft Local Plan. •The number of long term vacant/undeveloped plots of land on existing, industrial estates in Bridgnorth shows there is no need or demand for additional land allocations such as Stanmore. •No certainty that the land at Stanmore would be developed within a reasonable timescale. Existing allocations for employment development in the Tasley area (some in same land ownership as proposed Stanmore allocation land) have yet been not been taken up. •Having several sites available for development will not necessarily increase choice for developers, will be influenced by sustainability of location and Green Belt designation. Over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place. <p>Allocation of the land at Stanmore conflicts with National Planning Policy Framework 2019, aim of sub-section 2.e. of Policy SP11 and Policy DP25. Policy says that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area and conflicts with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt.</p>
A0142B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment and should be removed from the Plan, because:</p> <ul style="list-style-type: none"> •There is no need for the proposed allocation. The allocation of some 49ha of land for employment purposes in Bridgnorth in order to create choice and competition in the market (para. S3.1.1), is excessive and not fully evidenced and justified. Sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without Stanmore. •Stanmore is divorced from existing & proposed main residential areas and thus workforce would need to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Draft Local Plan Policy SP4.1. and NPPF & the proposal cannot be considered sustainable development. •Stanmore Industrial Estate was established in order to make use of a former WWII military site. But there is no such justification for the present proposals. Additionally there are vacant plots on Stanmore Industrial Estate, some for months, others years.No current need or desire for business operations generated by Bridgnorth residents to locate at Stanmore. •The proposals for development at Tasley, include 16 ha of employment land within walking distance of the main residential development proposed for Bridgnorth is more than capable of supplying the additional necessary floorspace to serve all Bridgnorth's growth. •The proposed allocations at Stanmore are in 'Countryside' unrelated to any significant urban development area and thus contrary to Policy SP9 of the Draft Local Plan. •The number of long term vacant/undeveloped plots of land on existing, industrial estates in Bridgnorth shows there is no need or demand for additional land allocations such as Stanmore. •No certainty that the land at Stanmore would be developed within a reasonable timescale. Existing allocations for employment development in the Tasley area (some in same land ownership as proposed Stanmore allocation land) have yet been not been taken up. •Having several sites available for development will not necessarily increase choice for developers, will be influenced by sustainability of location and Green Belt designation. Over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place. <p>Allocation of the land at Stanmore conflicts with National Planning Policy Framework 2019, aim of sub-section 2.e. of Policy SP11 and Policy DP25. Policy says that the Green Belt should be protected against inappropriate development. Development of Industrial Estates is "inappropriate development" in a Green Belt – it harms the openness of the area and conflicts with the aims of the Green Belt and no very special circumstances had been advanced. A Local Plan Review should not be used to justify inappropriate development in the Green Belt.</p>
A0148B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The proximity and relationship of the Garden Village and its residential development with the relocated livestock market incompatible, would restrict its operations and threaten viability. Also contradicts Shropshire Council's requirement to separate the residential and market uses.</p> <p>The land is divorced from the town with 'deep countryside' characteristics & an open parkland feel. The development would destroy an important landscape setting.</p> <p>The development would impact on four Sites of Special Scientific interest, two listed buildings on the site and encroach on nearby Grade 1 listed Morville Hall. Location of the proposed development is on the opposite side of Bridgnorth from the major towns to the north and east (Telford, Wolverhampton and Stourbridge, would increase commuting & traffic, congestion, noise and pollution in and around Bridgnorth.</p> <p>B4364 (Ludlow Road) wholly inadequate as the sole access for the site.</p> <p>Safe pedestrian/cycle access across the A458 not achievable as the bridge over the A458 cannot be delivered as the developer does not own the land</p> <p>The developer's proposals do not follow recognised Garden Village Principles or practice., as set out in Sir Ebenezer Howard's recommendations and adopted by the Town and Country Planning Association. Unlikely to be any long-term stewardship by a major volume housebuilder. principally motivated by profit and shareholder returns and they are not known</p> <p>The scheme is not supported by local Town and Parish Councils and timing of the proposal with minimal local consultation limits opportunity for input from members of the public and local democratic representatives.</p> <p>The development represents anodyne urban sprawl of no merit and out of keeping with the special character of Bridgnorth and its setting, a primary reason people chose to visit and live there.</p>
A0153B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A0153B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2. Form 2</p>
A0153B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A0153B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A0153B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A0153B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2. Form 2</p>
A0153B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0153B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0158B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The Council would prefer site ALV009 to be retained within the Green Belt. There are ecological and hydrological issues with this site that we feel have not been taken adequately into account. However, we agree with the proposals for sites ALV006 & 007.
A0163B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0163B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0163B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A0163B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0172B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	HOUSING with 2500 new homes population will increase by 4,500 that is a 35% population increase, this needs major increase in infrastructure, where is the investment for this coming from? Taylor Wimpey only think of profit margins. Whilst growth is needed surely a Local Housing Need Assessment is needed. EMPLOYMENT 29ha of employment land allocated south of A458 outside development boundary plus 11ha in the greenbelt at Stanmore. What impact will 40ha have on the environment with added pollution & traffic. Is 40ha needed? The livestock market has to be relocated to build 500 homes, north of A458, it is incompatible with housing how can it be incorporated into Garden Village? Residents backing onto market would not tolerate noise, smell & practises. But loss of market & auction would be detrimental to Bridgnorth. Are all the business units currently occupied? What is the vacancy rate? On what grounds does SC believe predicted levels of employment growth is achievable? Coronavirus impact on our working practices how will this affect need for 40ha of employment land. What happens to designated land if target is not achieved? land nr TGBS & new petrol station is suitable for employment land better than near housing. Delay plan until outcome of SAMDev plan is known, build the needed infrastructure and understand impact of coronavirus. Bad broadband & mobile communications in Shropshire holds employment back. INFRASTRUCTURE Due to topographical restraints road connections are restricted A roads are mainly single carriageways, any plans to improve this? Approx 60% of Bridgnorth residents commute out to work & approx the same number commute into the town unlikely to change. Allowing for 1 car per household that is 2500 more cars. Taylor Wimpey say they will build a footbridge but do not own that land, is only one bridge enough? Will it be intimidating at night? Will private car use increase & will pedestrians be tempted to cross road on foot? Site is 2km from town no established cycle routes, return journey is uphill. Parking facilities and dedicated park & ride is not mentioned by Taylor Wimpey but is in local plan, where is it? Who will fund the bus? AGRICULTURAL LAND Site is grade 3. as we leave EU & try to lower our carbon footprint sites should be infill and brownfield. Encourage specialist food production and small scale farming increasing employment. ECOLOGY CPRE & SWT objected to development what's the justification? LANDSCAPE & VISUAL AMENITY profound impact, effecting the unspoilt tranquil gateway to the Shropshire Hills' has impact on tourism, walking been assessed by a professional? Pandemic meant no public meetings, timing unfortunate and should have halted plan not a proper consultation.
A0179B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	No need to change Stanmore greenbelt boundary. NPPF says it should be exceptional circumstances to remove land from GB. PreSubmission Draft gave no exceptional circumstances. There are other options on sites outside GB so proposal is contrary to national planning policy.
A0179B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	site excessive, not fully evidenced or justified. other land available. nothing to justify GB status removal. Site divorced and unsustainable so contrary to SP4.1. & NPPF. Originally WW11 military site now many sites are vacant have been for year. New housing development is 3.5miles away which is too far. Tasley site proposed 16ha of employment land within walking distance of proposed housing, no need for more at Stanmore. Stanmore unrelated to urban area proposal contrary to SP9.
A0179B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Agrees with NPPF SP11.2.e. that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). removal of land from the Green Belt at Stanmore would not protect the Green Belt & no very special circumstances to justify its removal. So is in conflict with the stated aim of sub-section 2.e. of Policy SP11, and in conflict with Policy DP25 of the Draft Local Plan and the NPPF
A0179B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	49ha excessive and not fully evidenced and justified. enough land outside of GB. no very special or exceptional circumstances have been identified that would justify removing that designation. distance from town means more car use so runs contrary to the aims of Draft Local Plan Policy SP4.1. and the main aim of the NPPF. Large number of units are empty & have been for years. Allocation at Tasley is 3.5 miles away so it is not sustainable especially as there is a 16ha employment area adj to the allocation, which is within walking distance from housing. Stanmore is in the countryside so proposal is counter to SP9. Vacant land on existing site in town has not been developed indicating there is no desire to invest so there is no need to allocate at Stanmore. Core Strategy & SAMDev sites have not yet been taken up there is no proof that Stanmore site would be developed any quicker. Stanmore has drawbacks it's in the GB & it's unsustainable so other sites are more attractive. Over-provisions of sites can fragment development opportunities making investments less attractive & less likely to happen.
A0190B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Object to the inclusion of Tasley Garden Village. The development would surround the livestock market and restrict its viability. The site is divorced from the town and has the feel of deep countryside not urban fringe and development would destroy the setting of Bridgnorth. Development impacts on 4 SSSIs, 2 Listed Buildings and encroachment on Grade 1 Listed Morville Hall. Commuter traffic from the site will increase congestion, noise and pollution. The pedestrian and cycle link is not deliverable. There is no bus service. Access along the B4364 for the first 10 years is wholly inadequate. The development does not follow Garden Village principles as set out in Sir Ebenezer Howard's recommendations and adopted by the Town and Country Planning Association. Submission of this proposal during the Covid lockdown has severely restricted consultation. The Town Council, and Tasley and Morville Parish Councils all object.

Page 123

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0196B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area		Undemocratic: Opportunistic proposal with no strategic planning consideration within the democratic scrutiny of the Shropshire Local Plan process. Undemocratic to make these major decisions, with no proper public consultation during Covid19 crisis. Online consultation is not wholly inclusive. Proposal fails the Shropshire test policy SP1 Climate and ecological impacts have not been considered: The house building and lifetime energy requirements of the households will contribute to the negative impacts of climate change contrary to Shropshire Council Climate Emergency Declaration. This is coupled with increased pressure on wildlife populations in the surrounding countryside. In the context of a growing climate, ecological and health emergency, would question the appropriateness of the proposal in a post-Covid-19 situation where desire is for a 'Green Recovery'. Significant ecological concerns. Mor Brook is a very valuable, restored and virtually continuous wildlife corridor from Much Wenlock will be compromised by loss of buffer zone land. Proposal contrary to Policies SP3, DP12. DP13 & DP15. Loss of agricultural land and character. The land is classified as Grade 3 agricultural land and would be lost from a threatened an important local food production role for which it should be safeguarded in principle despite local availability of good agricultural land . Interrelationship with Footbridge farm Intensive Poultry Unit (IPU) Whilst the Appendix 2 assessment indicates that if site allocated then Poultry units would not be built this is contradicted by the advice in the Councils regulatory services 2019 Air Quality Annual Status Report to keep residential properties at least 100 metres away and if this is the case, then no assessment is needed. As the site of the IPU is more than 100 metres from the proposed, if the Garden Village development goes ahead without the proposed employment units (which are on the site of the IPU), then there is nothing to prevent the IPU, should it be given planning permission, from being built very close to the new housing. Development of the proposed garden village alongside Footbridge Farm IPU would run contrary to Policies SP1, SP3, DP18 and DP19. Question need/demand for the employment land identified in the Bridgnorth area given existing vacant plots of land on existing industrial estates in Bridgnorth. Greater focus on urban revitalisation & brownfield sites needed: If numerous brownfield sites and empty buildings across Bridgnorth (and Shropshire and the Black Country), which should be prioritised for housing and employment development, were utilised there would no need for Tasley Garden Village. local plan should look to utilising empty buildings/land in town centres to regenerate and revitalise our town centres, all of which have been affected by the Covid 19 pandemic, to bring more residential properties to town centres. This would solve the problem of empty office buildings, shops and shopping centres & bring a consumer base directly to town centres to help revitalise existing businesses, such as cafes and restaurants, without the need to use a car thus reducing carbon emissions. Development of the graden Village would run contrary to Policies SP3, SP4, DP10 and DP12 of the Draft Local Plan. Historic Environment : Taylor Wimpey's designs for the development show little/ no regard to the historic town of Bridgnorth and its environs and do not reflect existing traditional farm or historic buildings or the local architectural style including grade II listed The Leasowes. The designs are pedestrian and lack local distinctiveness being the same as development elsewhere in the UK. Development would run contrary to Policy DP24 of the Draft Local Plan. Inadequate road network and commuting Around 60% of people in Bridgnorth travel to work outside Bridgnorth (mainly to Telford, Wolverhampton and Kidderminster) & a similar percentage of jobs in Bridgnorth are filled by travelling in to the town. This situation is unlikely to change. There are acknowledged topographical and landscape restraints in/around Bridgnorth which severely restrict development and road improvements & the main roads to Telford, Wolverhampton, Stourbridge, Kidderminster and Shrewsbury are slow single, winding carriageways. Given poor road links and lack of proposed improvement no reason why businesses would choose to locate in Bridgnorth, therefore no likelihood of meeting the stated employment targets. Development of the proposed TGV would run contrary to Policies SP11 and DP27, of the Draft Local Plan. Pedestrians and Cyclist Access:There is an essential need to cross the A458 from the site safely to facilitate pedestrian and cycle access from the site to Bridgnorth town . Only one footbridge across the A458 not be sufficient for whole site and lack of certainty that it would be built because developer does not own or control the majority of the land fronting the A458, and the footbridge is also subject to ground investigations. Three footbridges along the Garden Villages frontage with the A458 required to ensure residents are not tempted to put themselves at danger from the fast traffic. If the development approved, the A458 should be moved to incorporate the site into the town. Residents would then be able to safely access Bridgnorth high street on foot or cycle. Development would run contrary to Policies DP29 and DP30, of the Draft Local Plan.
A0197B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy. (Form 1)
A0197B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2. (form 2)
A0197B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area		Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.(Form3)
A0197B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.(Form 4)
A0205B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Agree with SP5, but not applicable to the proposed "garden village" in Bridgnorth as it is a separate entity and in open countryside on a green field site.
A0205B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The proposed design code and master plan will provide a framework and guidance on the development, but will it be robust enough to guide design should the government decide to give carte blanche to developers to go ahead and build without the need to apply for planning permission once a site is allocated for development, yet at the same time be flexible enough to allow for and encourage imaginative and creative design?
A0211B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Strongly object to proposed allocation BRD030 and references to it in Schedule S3.1(i) and paragraph 5.56. The site conflicts with policies SP1: 1a, 1b, 1c and 1d as: There is no justification for 1,050 dwellings in Bridgnorth on top of the 500 already allocated. Bridgnorth is some distance from a main employment centre such as Telford or Wolverhampton and the motorway. Limited local employment would result in increased commuting, bringing further congestion and road infrastructure would not cope. BRD030 would break a natural planning barrier, the A458. BRD030 is typical south Shropshire countryside on the route to the South Shropshire Hills, on the crest of a hill and highly visible. Landscape damage cannot be mitigated. BRD030 and existing allocations would double the size of Bridgnorth High Town, but it will be dissected by the A458. an extension to the suburban area but divided from the existing town by the A458 makes no sense. There are no details/evidence of proposals to provide extensive and attractive pedestrian links. This is crucial to avoid segregation, but unachievable - crossings on roundabouts are not safe and a footbridge or tunnel present numerous social issues. BRD030 would therefore form a separate community contrary to the Council's strategic policies. Selecting BRD030 rather than Stanmore Garden Village is convenient as it is not in the Green Belt, but the site is inappropriate for a major extension to Bridgnorth - it is much needed agricultural land. Development of BRD030 for housing/industrial estate would have a hugely detrimental impact on the local historic monuments and villages in this area.
A0224B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	No need to change greenbelt boundary at Stanmore. No exceptional circumstances have been put forward in Plan to justify removal. There are other reasonable options for meeting need outside Green Belt boundary.
A0224B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0224B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0224B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as: Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A0230B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A0230B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.</p>
A0230B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A0230B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A0238B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC1: Oppose Tasley Garden Village proposal. Physical divide created by the by pass which needs to be overcome and sustainably considerations addressed. Site location outside a fast, busy main road raises safety concern. Much additional traffic, in particular through low town, would be generated from the developer. Concerns about close proximity next to livestock market.</p> <p>Taylor Wimpey is a large national house builder who have no interest in the employment development. To maximise profitability their focus will be first bringing forward most attractive housing from sales perspective with supporting infrastructure to follow. Lack of indication how much the developer would work with all relevant Councils to ensure the needs of Bridgnorth are met. The interrelationship with the SAMDev site development also needs consideration.</p> <p>Whilst a commitment is made that "necessary improvements to the A458 Ludlow Road roundabout, the wider highway network and associated infrastructure will be informed by Strategic and Local Highway Transport Assessments," for a development of this scale to be included in the draft Plan, such an assessment should already be available as a supporting document. Similarly such assessments, which would have already considered the implications for the wider network, should have been available to support the earlier proposals for Stanmore.</p> <p>Not practical walking distance to town. Query how the deteriorating public transport provision, will ensure linkages between residential and employment areas and other local towns? The linkage of the site to the town centre, tenuous with a single bridge over the A458 bypass is proposed for pedestrian and cycle use. Significant investment in footpaths and cycleways to link to the town centre would also be required & not clear that appropriate routes for these are available. Careful consideration needs to be given to where & how children living on the site would travel to school. Inadequate parking in the town centre to accommodate demand from housing on the site & funding needed to provide this.</p>
A0238B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC2; Cover letter: Proposal for a Stanmore Garden Village preferred. Tasley Garden Village is on the wrong side of the Town relative to employment opportunities. Most local commercial/ industrial type employment is located to east of the river or on Stanmore Industrial Estate. A significant proportion of working age residents commute to neighbouring towns mostly to east side of the river, resulting in most commuters living on the western side of the town having to cross the river within the town. Proposal will generate significant additional traffic in Low Town, notably traffic to Telford. It is noted that Stanmore more divided/distant from Bridgnorth, less practical to achieve pedestrian/cycling access & will increase traffic on already problematic Hermitage. Stanmore site promoters have a long established Bridgnorth connection but need to provide firm commitment to infrastructure provision. Record of Stanmore Industrial estate in attracting new businesses not noteworthy.</p> <p>With reference to Policy S3.1 point 2, concern that the proposals for a Tasley Garden Village only presented in May 2020. No justification for housing and employment land development to occur in this single location. Other landowners have not had the opportunity to put their land forward for consideration – as no further call for proposals.</p> <p>Other options may be a better fit for Bridgnorth's needs and should be considered with a further site allocation assessment being carried out over the next five years.</p> <p>S3.1, point 8- concern relating to reserved land beyond to development boundary also only recently proposed but understand that this is provisional and not an irrevocable extension of the development boundary.</p> <p>Whilst Policy DP18 provides protection for landscape and visual amenity no adequate impact assessment relating for Tasley Garden Village has been carried out and presented in the draft Local Plan or supporting documents. Location is visible over a large area and proposal should have been explicitly assessed for visual impact and the results presented in the supporting documentation.</p>
A0238B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC8: Insufficient evidence for requirement for Bridgnorth area to deliver 1800 dwellings; 1250 dwellings is a more appropriate. The current SAMDEV 500 home site allocation at Tasley still to be brought forward. Growth in both housing and employment is needed but no up to date housing needs assessment for Bridgnorth to identify requirements. Delivery in the Bridgnorth area 2006/7 – 2018/19 lower than draft plan, 63.1 per annum compared with 87.5. Historical delivery included high proportions of affordable housing & analysis suggests the market can absorb 56 homes each year with 20% affordable. This equates to 1232 homes in the period 2016-38. 2. Shropshire Council 250 "windfall" homes from 2016-2038 is too conservative a figure in the light of recent development rates and outstanding permissions.</p>
A0238B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC8: Whilst policy is to deliver "balanced growth" between housing and employment, and to make sufficient employment land available to facilitate this there is no evidence of an ability to attract a further 1800 jobs to Bridgnorth area 2016 -2038. Success more about replacing jobs lost, rather than net gains. Therefore allocations could be reduced substantially</p>
A0238B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC8 & BTC12: The draft Plan does not identify the infrastructure needed to support the proposed development around Bridgnorth or identify sufficient investment to implement it. major concern about infrastructure capacity and any allocation must be subject to the results of the Strategic Highways Assessment and a program to address the issues raised. Investment in footways and cycleways in the Bridgnorth needed prior to allocation of sites. Adequate plans for infrastructure have not been produced for Bridgnorth.</p>
A0238B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC9: Paragraph 5.62 - agree with the general comment but strategic assessment of the highway network should already have been completed and the implication of the required investment be taken into account in finalising the Plan.</p>
A0238B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC 10; BTC11; BTC12; BTC 13: Para 5.63 Place Plan is inadequate for strategic policy making. It allocates funding after development has occurred, rather than planning & funding infrastructure in advance. Plan/evidence does not identify the infrastructure needed to support the proposed development around Bridgnorth or identify sufficient investment to implement it. Para 5.65 No controls in place to ensure that development does not progress ahead of infrastructure provision. Limits on the scale of development should be imposed until firm plans & funding in place for the significant infrastructure required to ensure sustainable growth. This could be completed in time for the next Local Plan review</p>
A0238B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC13: Plan emphasises 'Strategic Corridors'. DP29 identifies proposed enhancements to the Strategic and Local Highway Networks but not any improvements around Bridgnorth. Without improved connections between Bridgnorth and the A5/M54 strategic corridor, or to Wolverhampton, Stourbridge or Kidderminster the proposed level of growth around Bridgnorth cannot be justified.</p>
A0238B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Document Reference BTC17: All investment listed in Policy SP10 will be required for Bridgnorth but no evidence of advance planning/financing for most. Particular need for local Education and training opportunities in addition to Marches centre. Of note lack of proposals to address transport 'capacity constraints' around Bridgnorth, or enhancements to make Bridgnorth practically part of a 'strategic corridor'</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0238B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Document Reference BTC18:Reasoning behind the growth proposed for each market town in Shropshire is not explained in the Plan or supporting documents. There should be a clear explanation why second highest level of growth proposed for Bridgnorth when: it is not on a strategic transport corridor; is constrained by the Green Belt and difficult topography. Would be reasonable to expect Bridgnorth to grow by a similar amount to Oswestry and Ludlow, both of which lie on strategic transport corridors and have mainline railway stations. Consultation at community consultation meetings & carried out as part of Bridgnorth Plan preparation shows significant lack of support for proposed growth level identified.
A0238B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Cover letter additional: Number of dwellings proposed for Bridgnorth is excessive and not justified because the plan sets a high aspirational level of growth for the County with second highest percentage level of growth accorded to Bridgnorth on basis that it is within a strategic corridor when it is not. More realistic level of growth evidenced by 500 dwellings & local Housing needs assessment required. Allocations should be made only to reflect lower level of growth to 2032 only (approx. +250 dwellings additional to SAMDev) with outline targets and potential sites only beyond then to allow Shropshire Council to meet its housing land commitments and progress a site allocation review over the next 5 years which considers scope for infill in Bridgnorth & other alternative sites (to Tasley Garden Village) that are likely to come forward given the time opportunity. Concern however that no recognition of strain of major development on town centre and more generally on infrastructure or assessment of infrastructure requirements and funding
A0238B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Cover letter additional: Concern that options for development presented are single developer led and with inherent delivery risk because of lack of other options. Excludes participation by smaller developers when it is important that SME builders participate in future of Bridgnorth. To achieve this other sites need to be available and thus size of single allocation reduced
A0238B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Cover letter additional:Proposals in the Shropshire Economic Growth Strategy and in the Bridgnorth Local Economic Growth Strategy are not sufficiently robust to justify the growth in employment land (including safeguarding) and population proposed in the draft Local Plan. Unlikely based on recent experience and lack of good connections that employment growth anticipated & necessary to match Plan aspirations can be achieved. Insufficient regard given to alternative buildings available. An approach is required to limit housing growth in areas where anticipated level of job creation is not achieved
A0238B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Cover letter:Support the proposed expansion to the Stanmore Industrial Estate & exceptional circumstances proposed to remove land from the Green Belt. Would support a further Green Belt review to allow 500 dwellings at Stanmore subject to the requested site allocation review process. This would allow a more even distribution of development around Bridgnorth. Note the requirement that the proposed expansion is restricted to employment land uses with the consequence that, having been taken out of the Green Belt for that purpose, it cannot be subsequently used for housing development. Requested exceptional circumstances statement still needs to be provided for proposed changes to the Green Belt. Would continue to support housing development & employment land around Stanmore if an acceptable statement provided but safeguarded land should be reduced.
A0238B48	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Document Reference BTC9:Paragraph 5.62 - agree with the general comment but strategic assessment of the highway network should already have been completed and the implication of the required investment be taken into account in finalising the Plan.
A0256B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	The proposed sites will form the gateway into the village and therefore should be developed to the highest standards possible reflecting their prominence and location in the Green Belt. The allocations must reflect the local housing needs, firstly those identified within the Parish and also the mix of housing identified. Community benefit must be established creating new access to the Green Belt for the community at the lower side of the village. Opportunities should be explored which offers the community open space for informal exercise and places to meet, well linked by public rights of way, i.e. offsetting the loss of Green Belt.
A0256B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The community undertook a Housing Needs Survey which demonstrated a need for affordable housing including bungalows, and this can be met under current policy without the sacrifice of Green Belt. Properties should reflect existing housing densities, with useable gardens, regardless of the number of bedrooms, to support the wellbeing of residents. Also the matter regarding a caravan site which is currently being developed for 100 residential units. I appreciate the numbers are not counted in housing supply, however to me this is an anomaly within the current system. 130 houses are proposed and 100 park homes are being developed now on a former caravan site, this reflects considerable growth with additional strains on our infrastructure.
A0256B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The current proposals for the land use at Tasley to create a garden village causes concern regarding the scale of development for significant housing growth and employment land. The main concerns are in relation to the increased traffic movements particularly at peak times heading to the West Midlands, Telford and Kidderminster, which involves the use of the bypass and potentially introduces more traffic onto the original route through the town. The bypass was developed to alleviate the congestion in the town and in low town. This location is potentially the wrong side of the River Severn crossings.
A0261B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A0261B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in ‘Countryside’ and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0273B1	Viability and Deliverability of Proposed Site	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Hoping to deliver in the short term but feel medium term is more realistic.
A0288B1	Viability and Deliverability of Proposed Site	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Site is viable and deliverable, and the delivery timing is considered correct.
A0295B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The level of housing growth proposed is too high. Consider that between 800 and 1,000 new dwellings should be planned for in Bridgnorth between 2019 and 2036, as over 90% of respondents to a Local Survey undertaken by the Bridgnorth Plan Group expressed a preference for a figure below 1,000. This equates to around 900 to 1,100 dwellings between 2019 and 2038 (including around 500 dwellings already included in the SAMDev Plan). The level of employment growth proposed may be difficult to achieve, for reasons including proximity/connections to the motorway network; lack of plans to invest in local highway networks; limits to electricity network capacity (although plans are in place to address the needs of individual existing companies); lack of availability of highest speed broadband; and lack of a main line railway station/poor public transport. Furthermore there is no robust plan for job creation in Bridgnorth, this should include consideration of strengths, weaknesses, opportunities and threats (including comparison to nearby settlements); analysis and costing of necessary highway improvements; review of potential for office-based employment; relocation of some government administration to the town; and potential for starter units. Additional housing should be linked, in some way, to the provision of new jobs and housing development should not progress too far ahead of available jobs. Job creation and housing growth should be reviewed every 5 years and that additional housing may be allowed for (in subsequent reviews of the Local Plan) if the creation of new jobs justifies it. The amount of employment land allocated in the SAMDev Plan (plus space on existing employment sites and vacant premises) is sufficient to meet needs to 2036 - acknowledge some additional land may be needed for the period to 2038. Emphasis should be given to providing modern office premises, which has not been addressed in the draft Local Plan or Local Economic Growth Strategy for Bridgnorth. The draft Local Plan proposes significantly higher levels of growth in Bridgnorth and Whitchurch than other market towns, yet no justification has been provided. Given acknowledged topological and Green Belt issues facing Bridgnorth, consider its growth rate over the plan period should be no higher than other market towns, such as Oswestry and Ludlow, which are on the strategic transport corridors and have mainline railway stations. Any growth in employment and housing should only proceed once commitment and funding for necessary infrastructure improvements are made. Bridgnorth does not lie on a strategic transport corridor and that there are no published plans for any improvements. Policy DP29 (para 4.261, page 138) lists proposed enhancements to the Strategic and Local Highway Networks, none are around Bridgnorth. This would imply that there are no plans to improve connections between Bridgnorth and the A5/M54 strategic corridor, or to Wolverhampton, Stourbridge or Kidderminster. The explanation to this Policy includes reference to a strategic assessment of the highway network. The proposed level of growth for the Bridgnorth area cannot be considered sound without such an assessment having been completed and plans put in place for the implementation of any recommendations. The draft Local Plan and supporting documentation provides no assessment of the infrastructure required to support proposed growth around Bridgnorth. Without this, do not consider the proposed level of growth around Bridgnorth is sound. Emphasise the need to provide continuously faster broadband within the town if we are to achieve the economic growth envisaged. Welcome investment in footpaths and cycleways (DP29, point 3, page 136) in and around Bridgnorth. However there have been past commitments that have not been achieved. Tourism should be encouraged in the town, supported by investment in supporting infrastructure and amenities. Need to enhance Bridgnorth town centre and increase availability of parking to ensure it remains viable.
A0295B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	There are advantages and disadvantages of both BRD030 and the previous preferred option Stanmore Garden Village During a Local Survey undertaken by the Bridgnorth Plan Group, when asked about the location for new development: 25% indicated they wanted none. 42% who gave an indication of preferred locations requested it be distributed around the town (in more than one location). People voted specifically for development in Stanmore, Tasley, Oldbury and Astley Abbots in the ratio 2:2:1:1 (they could vote for more than one specific location). Responses to this Local Survey therefore preferred distribution of development around the town (in more than one location)

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0296B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Mor brook forms a valuable and virtually continuous wildlife corridor from its source near Much Wenlock, through numerous wildlife sites, before flowing into the Severn. Habitat management and restoration on this corridor has had considerable success halting/reversing decline/extinction of mammal, bird, amphibian, reptile and insect species. Current levels of access by tourists and locals is likely sustainable due to agricultural land which forms a buffer between Mor brook and Bridgnorth, this will be lost if BRD030 is developed. Shropshire Wildlife Trust objects to large scale development around Bridgnorth. BRD030 is an opportunistic proposal outside of any strategic planning consideration within the Shropshire Local Plan. There are a number of other very large developments in Shropshire, for example Tong Garden Village and Ironbridge Power Station - these will all have a cumulative impact on limited water resources in the county. The potential impact of house building and lifetime energy requirements of households will have negative impacts of climate change. This has not been considered and does not align with the Climate Emergency Declaration signed by Shropshire Council last year. Coupled with increased pressure on wildlife and a growing climate/ecological/health emergency, question whether this proposal is appropriate post-Covid-19, when there is an appetite for a 'Green Recovery' rather than business as usual. BRD030 is classified as Grade 3 agricultural land. The NFU says the UK only produces 58% of the veg consumed and 16% of fruit. At a time when local food production is under threat, why is Grade 3 agricultural land being taken for residential and employment facilities? The Local Plan proposes 2,250 new houses (at least 4,500 people) in the Tasley area, representing an increase of 35%. Whilst more dwellings are needed to meet future growth of the town, how has this been arrived at? and how has it been determined that this will make provision for the surrounding hinterland? A Local Housing Needs Assessment is required in order to establish what the needs are. This should be undertaken before determining the numbers of dwellings to be built? Can the Town support an increase of 35% to its population? The Local Plan proposes 29 ha of employment south of the A458 in the Tasley area and 11 ha of Green Belt land to extend Stanmore Industrial Estate. This totals 40 ha for employment land in the Bridgnorth area. How has the need and deliverability of 40ha of employment land been determined? Are existing units already occupied? What is the vacancy rate? What effect will coronavirus have on our work practices and how will this affect the requirement for 40 ha of employment land? What happens to this designated land if the targets are not achieved? It would make more sense to deliver existing employment allocations and delay any further decisions until the success of these allocations is known, required infrastructure improvements have taken place and impact of Covid-19 is known. Decisions should not be made until post-Covid-19. There has been no proper public consultation on these proposals. Many (particularly older people) cannot get involved online. Alternative methods need to be worked out if public meetings remain contraindicated.
A0297B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Mor brook forms a valuable and virtually continuous wildlife corridor from its source near Much Wenlock, through numerous wildlife sites, before flowing into the Severn. Habitat management and restoration on this corridor has had considerable success halting/reversing decline/extinction of mammal, bird, amphibian, reptile and insect species. Current levels of access by tourists and locals is likely sustainable due to agricultural land which forms a buffer between Mor brook and Bridgnorth, this will be lost if BRD030 is developed. Shropshire Wildlife Trust objects to large scale development around Bridgnorth. BRD030 is an opportunistic proposal outside of any strategic planning consideration within the Shropshire Local Plan. There are a number of other very large developments in Shropshire, for example Tong Garden Village and Ironbridge Power Station - these will all have a cumulative impact on limited water resources in the county. The potential impact of house building and lifetime energy requirements of households will have negative impacts of climate change. This has not been considered and does not align with the Climate Emergency Declaration signed by Shropshire Council last year. Coupled with increased pressure on wildlife and a growing climate/ecological/health emergency, question whether this proposal is appropriate post-Covid-19, when there is an appetite for a 'Green Recovery' rather than business as usual. BRD030 is classified as Grade 3 agricultural land. The NFU says the UK only produces 58% of the veg consumed and 16% of fruit. At a time when local food production is under threat, why is Grade 3 agricultural land being taken for residential and employment facilities? The Local Plan proposes 2,250 new houses (at least 4,500 people) in the Tasley area, representing an increase of 35%. Whilst more dwellings are needed to meet future growth of the town, how has this been arrived at? and how has it been determined that this will make provision for the surrounding hinterland? A Local Housing Needs Assessment is required in order to establish what the needs are. This should be undertaken before determining the numbers of dwellings to be built? Can the Town support an increase of 35% to its population? The Local Plan proposes 29 ha of employment south of the A458 in the Tasley area and 11 ha of Green Belt land to extend Stanmore Industrial Estate. This totals 40 ha for employment land in the Bridgnorth area. How has the need and deliverability of 40ha of employment land been determined? Are existing units already occupied? What is the vacancy rate? What effect will coronavirus have on our work practices and how will this affect the requirement for 40 ha of employment land? What happens to this designated land if the targets are not achieved? It would make more sense to deliver existing employment allocations and delay any further decisions until the success of these allocations is known, required infrastructure improvements have taken place and impact of Covid-19 is known. Decisions should not be made until post-Covid-19. There has been no proper public consultation on these proposals. Many (particularly older people) cannot get involved online. Alternative methods need to be worked out if public meetings remain contraindicated.
A0315B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	No evidence for scale of development. No justification for West Midlands housing being allocated to Shropshire. No assessment whether a primary or secondary school are needed. NHS should be consulted to determine whether medical developments are needed. There has been no air quality impact assessment. Unclear how the employment land need will be met. Other areas in the county are more attractive to businesses. Pedestrian crossings needed for the A458. Traffic will be generated. Will the Footbridge Farm Industrial Poultry Unit be built? Current times means that the process has not been open and transparent. Feasibility studies need to be carried out prior to allocating land.
A0328B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0328B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0328B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A0328B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0357B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0357B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A0357B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0397B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.

Page 127

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0397B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment and should be deleted from the Plan, because: 1. The allocation of some 49ha of land for employment purposes in Bridgnorth in order to create choice and competition in the market (para. S3.1.1), is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. 2. The land proposed for employment development at Stanmore is situated in Green Belt and no very special or exceptional circumstances have been identified that would justify removing that designation. 3. Stanmore is divorced from residential areas and that means that all workers would have to travel, mostly by private motor vehicles, to access the site. This runs contrary to the aims of Draft Local Plan Policy SP4.1 and the main aim of the National Planning Policy Framework, in that it cannot be considered a sustainable form of development. 4. There is no need for the proposed allocation. Stanmore Industrial Estate was established in order to make use of a former WWII military site. There is no such justification for the present proposals. A number of the plots on current Stanmore Industrial Estate are vacant, and have been for months, in some cases years. There is no current need or desire for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. 5. The main residential element of proposed expansion of Bridgnorth development in Bridgnorth, is indicated in the Draft Local Plan to take place at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. 6. The proposals for development at Tasley, include provision for some 16 ha of employment land. This will be within walking distance of the main residential development proposed for Bridgnorth in the LPR, and is more than capable of supplying the necessary floorspace to serve the proposed population growth for the town. There is no need to provide more land at Stanmore. 7. The proposed allocations at Stanmore are located in 'Countryside' and are unrelated to any significant urban development area. Development of the proposed allocations would run contrary to Policy SP9 of the Draft Local Plan. 8. There are a number of plots of land on existing, developed, industrial estates in Bridgnorth which are vacant, and have been for a long time, and which show no signs of being taken up for new development. This shows there is no need or demand for additional land allocations such as that at Stanmore. 9. The current Local Plan comprising the Shropshire Core Strategy and the Site Allocations and Management of Development Plan, shows allocations for employment development in the Tasley area which have not been taken up during the Plan period (i.e. between 2006 – 2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed by now. Some of the land included in those currently allocated sites is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the sites proposed for allocation as an employment site at Stanmore. There can, then, be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. 10. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0403B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0403B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0403B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A0403B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0404B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0404B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0404B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A0404B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0405B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0405B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0405B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0405B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0433B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0433B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0433B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A0433B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A0433B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	No evidence of local demand for even a fraction of the housing proposed at BRD030. The existing SAMDev Plan allocations would satisfy local demand for many years. Whilst some housing in needed, it should be of a volume compatible with and sensitive to the needs of the town and all of its inhabitants, both current and future. Proposals risk damaging to the attractive historic market town that is Bridgnorth. BRD030 and the future direction for growth represent good quality agricultural land which should be retained. There is negligible public transport that would be of benefit to BRD030. The description of BRD030 as a garden village is misleading, it is a vast housing estate attracting migrants from the West Midlands. There is insufficient infrastructure to support BRD030 (e.g. medical facilities). BRD030 will not address the local need for affordable housing. No reference is made to the need to improve the A442, which will be required if BRD030 is developed and is home to commuters to Wolverhampton and Telford. Further Hospital Street is subject to significant vehicle pollution. No evidence employers view Bridgnorth as an ideal location for significant employment expansion - major local business have no desire for expansion other than by way of existing plans and why would new employers base themselves in a location with poor transport links? It seems unlikely that 1,000 households could provide enough staff to service the assumed employment types (e.g. tech and IT jobs), result in increased in-commuting
A0462B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The Tasley Garden Village proposal is totally out of scale for the town to its future detriment. Until there is a credible employment plan this scale of housing should not go ahead.
A0473B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Object to BRD030 because Tasley Garden Village will ruin the character of Bridgnorth for the following reasons: (1) it is too large and will expand the town by one third; (2a) will result in the loss of greenfield/agricultural land and natural rural habitat putting wildlife at risk and (2b) affecting the community by removing rural views and footpaths which provide a valuable local amenity and replacing this with traffic and noise; (3) Telegraph Lane already floods from small levels of rainfall causing traffic to divert through the town and this development may cause more flooding; (4a) there is insufficient evidence of the local housing need to justify the development and (4b) if permitted, the development may not provide sufficient affordable housing for Shropshire residents who cannot afford to buy a property and (4c) building in Shropshire to meet Black Country housing needs seriously lets down Shropshire residents.
A0485B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The increase in housing figures for Bridgnorth from 1455 to 1800 does not fit with ONS growth forecast. When added to SAMDev the Plan proposes 2250 new dwellings. This will increase the population by 35%. This is not based on the need for Bridgnorth. The Tasley Garden Village does not adhere to Garden Village principles. Previous Garden Villages have increased traffic generation and not provided integrated employment (Transport for New Homes report). This site and land to the west towards Morville are outside the development boundary. The site will surround the livestock market. All the employment land allocated is outside the development boundary. What grounds does the Council have for the 40 ha of employment land in Bridgnorth (TGV plus Stanmore)? How will coronavirus affect employment? The employment allocation does not comply with SP11 2b, 2c or 2e. The SAMDev employment allocation should be delivered first and other allocations delayed until the success of the SAMDev site is known. Infrastructure is clearly insufficient in Bridgnorth and existing facilities can't support much population growth. New residents will travel to Wolverhampton and Telford to work and put pressure on already inadequate roads. The increase in population and traffic will deter people moving to Bridgnorth in the future. Crossing the A458 is dangerous for pedestrians and cyclists and TW do not control the land fronting the road so can't build a footbridge. A single point of access is not sufficient for this development. Doubts exist over whether the broadband access would be sufficient and in place before employers move in. Decisions on infrastructure improvements should be delayed until working practice changes from the pandemic are known. Doubts about feasibility of a Park and Ride and its location within the site. Concern that the poultry units may still go ahead. Concern that air quality will be negatively affected. Concern that the SSSI and environmental networks will not be safeguarded.
A0490B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Object to this site. Stanmore is preferable: old RAF site and grade 4 agricultural land. There is no provision for traffic calming. Housing will surround the livestock market. The existing sewerage network is not sufficient. Residents will commute to Telford, increasing traffic through Morville and Much Wenlock. Car parking in Bridgnorth will become impossible when this development is added to the houses already earmarked. This will discourage shopping in Bridgnorth. I consider this site unnecessary.
A0504B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A0504B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A0504B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework. Ref S3.1(ii) should be removed from the Local Plan due to lack of soundness as well as S3.1 point 5 and point 9 where referring to Stanmore Industrial estate.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0504B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A0504B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area		<p>SCALE OF DEVELOPMENT AROUND BRIDGNORTH (See Section 4.2, "Regulation 18 Consultation Update Report") Based upon the work carried out by the Bridgnorth Plan Group in their report "Bridgnorth Plan: Phase 1 Report", Bridgnorth Plan Steering Group, June 2020: • They recommended that 800 to 1,000 new dwellings be planned for in the revised Local Plan for the period from 2019 to 2036. Over 90% of the 155 respondents to the survey expressed a desire for housing growth to be below the upper of these figures. For the period from 2019 to 2038, they now recommend that 900 to 1,100 should be planned for, which is an additional 50 dwellings per year for each of the extra two years, as shown in their document, I support these aspirations however I do not support Shropshire Council's aspirations as highlighted in point 1. • The group expressed concern that the levels of employment growth being considered [in the draft Local Plan] may be difficult to achieve. They are still concerned that there is no robust plan for job creation in the Bridgnorth area, I do not support Shropshire Council's aspirations without clear evidence that growth expectations are achievable, especially when past history demonstrates poor take up. • The group recommended that additional housing development be linked, in some way, to the provision of new jobs. Housing should not progress too far ahead of available jobs. They recommended that job creation and housing growth should be reviewed every 5 years and that additional housing may be allowed for (in subsequent reviews of the Local Plan) if the creation of new jobs justifies it. I support this view. • The Group provided data indicating that the amount of employment land already allocated under SAMDev was sufficient, or almost sufficient, to meet needs through to 2036. They acknowledge that some additional land will probably be needed for the period to 2038. I support this view but do not support Greenbelt land being removed without clear evidence that it will be used as employment land within the plan period. I prefer to see the greenbelt being reviewed in 5 years time when the success of both Stanmore and Tasley can be compared to expectation. • I support the Groups recommendation that emphasis should be given to providing modern office premises. This has not been addressed in the draft Local Plan or Local Economic Growth Strategy for Bridgnorth. And seems to not be an aspiration for Stanmore industrial estate. In the Consultation Update Report from the Group they also provide a table showing that the draft Local Plan proposes that Bridgnorth and Whitchurch have been allocated a significantly higher growth rate than other market towns, yet no justification for this has been given in the draft Local Plan or supporting documents. Given the acknowledged topological and Green Belt issues facing Bridgnorth, I support their view that they consider that its growth rate over the period should be no higher than other market towns, such as Oswestry and Ludlow, which are on the strategic transport corridors and have mainline railway stations.</p>
A0504B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>LOCATION OF DEVELOPMENT AROUND BRIDGNORTH (See Section 4.3, "Regulation 18 Consultation Update Report") Based upon the work carried out by both the Bridgnorth Plan Group and Save Bridgnorth Greenbelt Group, in the report "Bridgnorth Plan: Phase 1 Report", Bridgnorth Plan Steering Group, June 2020: • They made no specific recommendations as to where development should be located as, at the time, the only option being offered was around Stanmore. However, Tasley Garden Village has since been proposed. • The survey asked where development should be located. 25% of respondents said there should be none. 42% of those giving an opinion on the location preferred it to be distributed (that is, not all in one location). In addition, people voted specifically for development in Stanmore, Tasley, Oldbury and Astley Abbots in the ratio 2:2:1:1 (they could vote for more than one specific location). • Overall, voting for the survey supports distributed development, rather than all in one location (155 respondents) From the Save Bridgnorth Green Belt group survey results, over 90% of the responses did not support development within the Greenbelt. This covered both industrial as well as residential development. Over 1044 residents supported this view which statistically represents the views of the whole place plan area. I do not consider the plan as proposed to be sound in terms of supporting residents views and actively taking these into account</p>
A0504B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>INFRASTRUCTURE TO SUPPORT DEVELOPMENT (See Section 4.4, "Regulation 18 Consultation Update Report", Bridgnorth Plan Steering Group, September 2020) In the report "Bridgnorth Plan: Phase 1 Report", Bridgnorth Plan Steering Group, June 2020: • They recommended that "any growth in employment and housing should only proceed once commitment and funding for the necessary improvements to the local infrastructure, road network, transport links, public facilities and services has been confirmed." • They commented that Bridgnorth does not lie on a strategic transport corridor, and that there are no published plans for any improvements. They also noted that the draft Local Plan places emphasis on 'Strategic Corridors'. DP29 (para 4.6.21, page 138) lists proposed enhancements to the Strategic and Local Highway Networks. It does not include any improvements around Bridgnorth. This would imply that there are no plans to improve connections between Bridgnorth and the A5/M54 strategic corridor, or to Wolverhampton, Stourbridge or Kidderminster. • They noted that the Settlement Policy for the Bridgnorth Place Plan area states (S3.1, para 5.62, page 175) that "a strategic assessment of the highway network will be undertaken." They consider that the proposed high level of growth for the Bridgnorth area cannot be considered sound without such an assessment having been completed and plans put in place for the implementation of any recommendations. • The draft Local Plan and its supporting documentation does not provide any additional assessment of the infrastructure that would be required to support the proposed growth around Bridgnorth. Again, without this do not consider that the proposed level of growth around Bridgnorth is sound. • They emphasised the need to provide continuously faster broadband within the town if Bridgnorth is to achieve the economic growth envisaged. • I would support investment on footpaths and cycleways (DP29, point 3, page 136). However, there is already a commitment to this under earlier plans and there has been little, if any, investment on these to date. I support the statements above and find that the Place Plan for Bridgnorth is not sound.</p>
A0538B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.</p>
A0539B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>49ha is excessive not fully evidenced and justified – enough employment land at residential expansion of Bridgnorth (at Tasley). No exceptional circumstances have been identified. Private cars needed to access site. There is no need or desire for employment there. Main residential proposal is far away from employment proposal. Allocation is in countryside. There are vacant plots in Bridgnorth which can be issued instead. There is no demand for this site.</p>
A0539B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.</p>
A0540B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>49ha is excessive not fully evidenced and justified – enough employment land at residential expansion of Bridgnorth (at Tasley). No exceptional circumstances have been identified. Private cars needed to access site. There is no need or desire for employment there. Main residential proposal is far away from employment proposal. Allocation is in countryside. There are vacant plots in Bridgnorth which can be issued instead. There is no demand for this site.</p>
A0540B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore lies within the Green Belt and should not be taken out of the Green Belt. The Green Belt Review that the Council commissioned does not qualify as an "exceptional circumstance" and in any event the Review undertaken did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.</p>
A0541B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>49ha is excessive not fully evidenced and justified – enough employment land at residential expansion of Bridgnorth (at Tasley). No exceptional circumstances have been identified. Private cars needed to access site. There is no need or desire for employment there. Main residential proposal is far away from employment proposal. Allocation is in countryside. There are vacant plots in Bridgnorth which can be issued instead. There is no demand for this site.</p>
A0576B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment and should be deleted from the Plan, because:</p> <ol style="list-style-type: none"> 1. The allocation of some 49ha of land for employment purposes in Bridgnorth in order to create choice and competition in the market (para. S3.1.1), is excessive and not fully evidenced and justified. 2. The land proposed for employment development at Stanmore is situated in Green Belt and no very special or exceptional circumstances have been identified that would justify removing that designation. 3. Stanmore is divorced from residential areas and that means that all workers would have to travel, mostly by private motor vehicles, to access the site. This runs contrary to the aims of Draft Local Plan Policy SP4.1. and the main aim of the National Planning Policy Framework. 4. There is no need for the proposed allocation. Stanmore Industrial Estate was established in order to make use of a former WWII military site. There is no such justification for the present proposals. A number of the plots on Stanmore Industrial Estate are vacant, and have been for months, in some cases years. There is no current need or desire for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. 5. The main residential element of proposed expansion of Bridgnorth development in Bridgnorth, is indicated in the Draft Local Plan to take place at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. 6. The proposals for development at Tasley, include provision for some 16 ha of employment land; This will be within walking distance of the main residential development proposed for Bridgnorth in the LPR, and is more than capable of supplying the necessary floorspace to serve the proposed population growth for the town. 7. The proposed allocations at Stanmore are located in Countryside and are unrelated to any significant urban development area. 8. There are a number of plots of land on existing, developed, industrial estates in Bridgnorth which are vacant, and have been for a long time, and which show no signs of being taken up for new development. This shows there is no need or demand for additional land allocations such as that at Stanmore. 9. The current Local Plan comprising the Shropshire Core Strategy and the Site Allocations and Management of Development Plan, shows allocations for employment development in the Tasley area which have not been taken up during the Plan period (i.e. between- 2006-2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed by now. Some of the land included in those Currently allocated sites is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the sites proposed for allocations as an employment site at Stanmore. There can, then, be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0605B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Object to the inclusion of BRD030 in the Draft Shropshire Plan as: It would surround the relocated livestock market on three sides, constricting its operations and threatening its viability. This also contradicts Shropshire Council's requirement to keep the market away from housing, as the two are incompatible. It is described as having the appearance of 'deep countryside' rather than 'urban fringe'. It is divorced from the town, has an open parkland feel and is in the foreground to the Shropshire Hills a designated AONB (development would forever destroy this setting). It would impact on four SSSI, two listed buildings on the site and encroach on nearby Grade 1 listed Morville Hall. It is on the opposite side of Bridgnorth from major towns to the north and east (Telford, Wolverhampton and Stourbridge), so commuter and business traffic travelling to BRD030 from these areas would increase congestion, noise and pollution in and around Bridgnorth. Proposals to construct a pedestrian and cycling bridge over the A458 cannot be delivered as the developer does not own necessary land, so people will be forced to walk across the busy bypass. There is no bus service and the closest bus stop is one mile away. For the first ten years, access to the development is proposed along the B4364 (Ludlow Road) a country lane wholly inadequate for this purpose. No evidence development will follow Garden Village Principles. For example, there is no evidence of the requirement for strong vision, leadership and community engagement, or of community ownership of land and long-term stewardship of assets. The developer is a major volume housebuilder, principally motivated by profit and shareholder returns and they are not known for retaining control over their developments following completion. Proposals were submitted after the deadline, during the Covid-19 lockdown and with minimal local consultation. Shropshire Council's subsequent consultation appears to be designed to raise the minimum amount of input from members of the public and local democratic representatives. Bridgnorth Town Council, Tasley Parish Council and Morville Parish Council have all objected to the proposals. Bridgnorth Town Council voted 6-2 in favour of the alternative development at Stanmore Garden Village rather than BRD030 at an extraordinary meeting in May 2021
A0624B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Stanmore is preferred to Tasley, good access and cars aren't necessarily needed and good future employment possibilities here.
A0629B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	This development proposal is opposed by the majority of people who live in Bridgnorth and the surrounding area. Housing and industrial buildings on this scale would ruin the town. It would double the size of the High Town, traffic would clog the roads, good farmland would be destroyed. The only beneficiaries would be the landowners and developer. No exceptional circumstances exist for the site. Site is far from services.
A0649B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Concerned about lack of community facility being planned for a development of this level. Current level of sports facilities and clubs are inadequate and dated. Desperate need for an additional all weather pitch away from school run leisure centre. There needs to be adequate parking, a picnic area and an all weather surface sports pitch.
A0660 B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	1 Schedule S3.1 (i) does not meet government criteria for a garden village. difficult to recognize how the proposals for BRD030, Schedule S3.1(i) are formulated to deliver a strong local vision which reflects to unique character and identity. does not offer sufficient reassurance that it would meet local needs, achieve a good fit with the existing town and community, or enhance the attractiveness of the town. 2 The town's infrastructure is not currently adequate for the scale of the proposed development S3.1 (i). The challenges of the location, which lacks close rail links and is situated across the river from existing transport links to the West Midlands, means that Bridgnorth is heavily reliant on its roads, which already suffer daily periods of congestion and poor air quality. Some of the town's key local services and amenities are not currently adequate to support the proposed additional growth, it would be detrimental to the quality of the lived experience of the existing community and also the new residents.(Ref. Draft Local Plan 2:28, Draft Local Plan The Shropshire Test 3:SP1a, b, c, g) 3 The outlined size and timescale of the proposed development in the Draft Local Plan S3.1(i). suggest an emphasis on delivery of the planned development. This emphasis could come at the expense of limiting the flexibility for Bridgnorth to evolve organically over time, and to respond sensitively to the changes affecting the community and individuals. The ability to be flexible is particularly valuable during this current period of uncertainty and change, nationally and internationally and is needed to ensure sustainability. (Ref. The Local Plan introduction NPPF 2:15) 4 The proposals do not include plans for the stewardship of the green infrastructure and the blue and green networks around and close to the site S3.1(i). The green infrastructure consisting of green spaces and a linear country park to be integrated into the development of the Draft Local Plan S3:1.(i) may result in a semi natural network such as exists on other similar local sites. While they provide useful local areas for dog walking etc, on their own they may contribute little extra to the enhancement of the local environment, the development of wildlife corridors or the increase in biodiversity. There are no specific details for how the local plan would protect the natural water course network, including Tiddle Brook, or how it would safeguard nearby local wildlife restoration and conservation projects from the dangers of adverse impacts resulting from proposed growth and development. The aspirations of the Spatial Vision and the criteria of the Shropshire Test would not be achieved without a commitment to, and investment in a sustainable long term stewardship scheme of management which reflects good ecological practice and also garners and facilitates community engagement for the whole area, around and including any proposed development. Without this the quality of the local environmental assets, which exist at the moment would decline. (Ref. S3.1(i), The Shropshire Local Plan 2:18 and SP1 the Shropshire test 1d, Draft Local Plan, Spatial Vision 2:28) (Examples of stewardship of Garden Villages - The Bournville Village Trust and 'London Assembly - At Home with Nature, Encouraging bio-diversity in new housing developments', London.gov.uk)
A0675B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The current proposals for the land use at Tasley to create a garden village causes concern regarding the scale of development for significant housing growth and employment land. The main concerns are in relation to the increased traffic movements particularly at peak times heading to the West Midlands, Telford and Kidderminster, which involves the use of the bypass and potentially introduces more traffic onto the original route through the town. The bypass was developed to alleviate the congestion in the town and in low town. This location is potentially the wrong side of the River Severn crossings.
A0688B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The policy states the importance to "reduce the need of people to travel by car" The plan proposes development in Bridgnorth on green field land which is 30 minutes by car from anywhere and an hour by bus to the nearest railway station. Garden village development like this are completely dependent on the car and with no employment growth in Bridgnorth will see people commuting to Telford, Wolverhampton and Stourbridge. Plan shows no evidence for an extra 1000 homes in Shropshire to accommodate West Midlands overspill and no rigorous study of demand has been completed. School places in Bridgnorth are full so where wil children be educated. These residential development proposals are too big. they need to be built in Telford where there is easy motorway and train access not in Bridgnorth where the infrastructure is not suitable
A0689B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Don't know / no opinion	General comments from Worfield & Rudge Parish Council - There is unfulfilled development proposals for 550 houses at land at Tasley, which includes a relocation of the Livestock Market. This development is "live" awaiting commencement. The impact of this upon completion, will be considerable. It will be felt both within Bridgnorth Town and the surrounding parishes and is likely to see an impact on services and local infrastructure. This then has to question the need for any additional housing in Bridgnorth until the impact of this development at Tasley has been undertaken and assessed. Worfield & Rudge PC would argue that there is no demonstrable need either in terms of housing, or in meeting government set targets in the context of the current Local Plan Review Process for the allocation of additional sites in Tasley or at Stanmore Industrial Estate. Parish Council outlines existing problems with Bridgnorth roads - A454, A458, A442 and pinch points throughout Bridgnorth town; new development would only increase use and congestion on these roads; Infrastructure to accommodate new development, including medical provision should be clearly defined and non-negotiable, both in terms of the accommodation needed and the ability to recruit, staff and fund these facilities. Air pollution - Bridgnorth Town has already been identified as having existing dangerously high levels of traffic pollution Any addition to the traffic will serve to produce pollution hot spots as yet not identified within the area. This must be a matter of concern from the aspect of our future green credentials and more importantly for the health of the current population. Adequate workplace and commercial opportunities - any new development needs to be accompanied by nearby work opportunities otherwise commuting will increase and access to teh Midlands Motorwat system is not good from the area. Over development may also impact on tourism which is a major economic driver for Bridgnorth. Parish Council questions the need for expansion of Stanmore Industrial estate and the evidence submitted in the report, as this is contrary to visual evidence of empty units on the site. This requires further investigation especially in light of the impact of the Covid pandemic on work places. Sufficient evidence to change the policy on Green belt developmnt has not been brought forward in the plan and is a concern for the Parish Council; Concern that teh development of a graden village in Tasley would impact on the Cattle Market in Bridgnorth which is a concern. Should the site close - as others in Shropshire have done - there would be a loss of jobs and further distances traveled by cattle which is an animal welfare concern.
A0699B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Significant concerns regarding the proposed development of BRD030 including justification of the need for housing and employment land on the scale proposed, the resultant increase in traffic and air pollution, effects on ecology & landscape and whether this consultation will be representative under Covid 19 conditions. However as other submissions address these issues focus on the potential loss of good quality agricultural land. BRD030 has not been subject to a detailed Agricultural Land Classification (ALC) survey, so no definitive information is available on presence of "Best and Most Versatile Agricultural Land" (BMV) (grades 1,2 and 3a), as required for planning decisions. Natural England Regional ALC maps are the only published information and this is only indicative (1:250,000 scale) and does not distinguish between grades 3a and 3b, this shows the site to be grade 3. However, Natural England have also produced regional maps showing probability of BMV, which indicate the site has >60% probability of BMV. A detailed ALC survey should be undertaken before any decision is made on this land. ALC grading is determined by a range of both site and soil characteristics. Some information on soils can be inferred from the published soil map of "The Midland and Western England" (Soil Survey of England and Wales). This shows the majority of the site is mapped as the Clifton Association, which comprises soils capable of producing good yields of common agricultural crops (Soil Survey of England & Wales "Soils and their Use in Midland and Western England" 1984). This soil association is also mapped on land immediately to the west of the proposed site, where a detailed Post 1988 ALC map is available, showing these Clifton Association soils to be ALC grade 3a. Given the similar soils and similar climatic and topographical features of the land and BRD030, this further increase the probability that a significant proportion of the site is Grade 3a BMV. This should be given due consideration in planning decisions. Grade 3a land is 'Good Quality Agricultural Land' which should be retained for agricultural use wherever possible. The Covid 19 crisis had highlighted the need for food security, but the UK has been declining in self-sufficiency in food (only 64% self sufficient in 2019, compared to 78% in 1984) and the NFU recently reported that the UK currently only produces 58% of the vegetables we consume and 16% of our fruit. The Climate Crisis requires action on reduction of carbon emissions and growing more food locally is necessary to address this. At a time when local food production in the UK is even more important, why should BMV agricultural land be taken for residential and employment facilities? Draft Policy DP19 states development should avoid BMV wherever possible. Para 170 of the NPPF states policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing soils and recognising the economic and other benefits of BMV agricultural land.
A0843B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	development of this site has over the years been fiercely resisted. .land is in the Green Belt and forms part of the only Green Space between the historical hamlet of Turley Green and Alveley on the western side of the A442. It has been used for village events and functions, which has brought in tourism and income to the Rural economy. Development of this site would have a major visual impact on the outskirts of the village and totally urbanise the existing Rural approach. The proposed development has been put forward "and accepted" as a community asset, allowing housing development to provide the capital for a new sports & social club with new sporting facilities. Much of the proposal was based on the local Recreation ground being oversubscribed as Alveley Cricket Club reserved most of the bookings. but the cricket club has now moved to new ground and pavillion on the outskirts of the village so there are now more than adequate sporting facilities that can be held within the Recreation'
A0849B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	with regard to sites ALV006 and ALV007 the sites are available and deliverable within the first 10 years of the plan period to accommodate a replacement club together with the community facilities and outdoor playing areas, and for at least 35 dwellings. The relevant planning applications will be made as soon as possible after Adoption, as we must await the removal of the Green Belt designation via Adoption.
A0864B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0984B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Para 137 of the NPPF states that Green Belt boundaries should only be altered when all other reasonable options for meeting its identified need for development have been explored and there are no other reasonable alternatives.</p> <p>The draft Local Plan recognises BRD030 (a non Green Belt sites) as a sustainable location for the delivery of housing and employment. The site also includes land proposed for housing and employment development and additional land capable of accommodating future growth well beyond the plan period. As such, there is no need to allocate Green Belt land either within this plan period or safeguard Green Belt land for development post plan period to deliver Bridgnorth's housing or employment needs.</p> <p>The Green Belt Exceptional Circumstances Statement seeks to provide justification for release of these sites. This is informed by evidence regarding current demand, capacity and occupancy rates at the existing Stanmore Industrial Estate which has not been published as part of the evidence base, this should be published to allow scrutiny.</p> <p>There is also a great focus on Stanmore being a centre of excellence and having a focus on advanced manufacturing and engineering, noting the presence of the Marches Centre for Manufacturing and Technology CIC (MCMTC), however no evidence base documents evidence how, or whether, the estate acts as such a centre of excellence or provides a concentration of such uses.</p> <p>The consideration of current occupiers and the current function of the industrial estate is critical given that this forms a significant part of the exceptional circumstances case and also provides much of the justification for dismissing all other reasonable options. For example, if there are a large number of non-manufacturing or engineering companies within Stanmore, these could be relocated over time to proposed and existing allocations elsewhere in Bridgnorth, thereby freeing up floorspace or sites to accommodate the specialist manufacturing uses proposed.</p> <p>If allocated, these sites will need to be tightly constrained to ensure they deliver engineering and advanced manufacturing employment development only, noting that it is the site's ability to act as a focus for such uses which appears to be the basis of the exceptional circumstances to justify Green Belt release on the site. Current guidelines allow for any B1, B2, B8 and sui generis uses, which would fail to deliver the forms of employment envisaged in the exceptional circumstances statement and would further increase competition for employment uses between the three main planned employment allocations.</p>
A0984B28	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Support the proposed housing guidelines (part 1 of the draft policy) for Bridgnorth which will help address affordability issues and support economic growth in the town, which acts as a key service centre for a large rural hinterland.</p> <p>Support identification of a level of employment floorspace that is appropriate to deliver economic growth, addresses an existing structural imbalance between housing and employment and provides for additional growth by existing businesses and employers in the town. However, concerned about the significant level of employment land proposed (part 1 of the draft policy), which amounts to around 23.5ha more than the previous proposed requirement within the Preferred Sites Consultation. It is unclear how this has been calculated, which sites are included and what evidence is available to justify it. Concerned about the level of employment development proposed and the impact that a potential oversupply could have on the delivery of employment sites in the town, particularly the concentrations of new employment sites around Tasley Garden Village which includes the SAMDev employment allocations.</p> <p>Part 3 of the draft policy relates to the identification of a mixed use sustainable urban extension (BRD030) for a comprehensive development to contribute towards the housing and employment guidelines whilst also delivering new community facilities within a new local centre and significant areas of open space. This is supported as an appropriate strategy for the settlement of Bridgnorth, given that the level of development that needs to be delivered and the need for this to be delivered through a strategic, co-ordinated and joined up approach to ensure that the level of proposed development is supported by, and able to deliver, services and facilities, infrastructure, open space, etc.</p> <p>Parts 4 and 5 of the draft policy confirm that new residential and employment development will also be delivered through the saved SAMDev residential allocations. Support the retention of the existing SAMDev allocations and their identification in Appendix 2, despite delays to their delivery, as this is a sustainable location for growth.</p> <p>Support part 7 of the draft policy regarding retail facilities in new development complementing and not negatively impacting on the viability of the town centre.</p> <p>Part 8 of the draft policy relates to development beyond the proposed plan period. Encourage and endorse the approach taken and the proposed future location for development. This allows for a comprehensive masterplan of the proposed allocation and land for development beyond the plan period to be undertaken and provides flexibility during the plan period should there be any amendments to housing or employment land requirements in the town.</p>
A0984B29	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Fully support allocation of BRD030 within the Local Plan Review.</p> <p>An updated Vision Document (Appendix 1) and masterplan (Appendix 2) prepared in support of this site. These demonstrate that proposals are for the development to be designed to comply and uphold the principles of a garden village which is identified within the Garden Communities Prospectus and the TCPA Garden City Standards.</p> <p>Support preparation of an SPD to help guide development on the site. However, there is some concern about the requirement for the SPD to be adopted before any planning application for the development of this site, as this would take time to prepare and therefore delay the site coming forward to deliver much needed new housing and employment. As such, recommend development guidelines are amended to allow early delivery of some initial phases of development. Whilst this may necessitate submission and determination of a future planning application during the preparation of the SPD, this could still be done whilst achieving the vision for the site. Given the nature of the site, its relationship to the existing town and proposed access arrangements from Ludlow Road, early phases of residential development/plots could be brought forward towards the north-eastern corner of the site which would still be well connected to, and easily accessible from, facilities within Bridgnorth. Furthermore it is unclear whether this relates to the submission or determination of an application.</p> <p>Fully support the delivery of housing to meet the identified local housing needs on BRD030, whilst upholding the Local Plan policies. It is envisaged further information on this will be obtained through the SPD.</p> <p>BRD030 can provide a range of densities to allow for different types of dwelling sizes and tenures, which will in turn accommodate a variety of households including first time buyers, older people, family housing and housing for key workers/local employees. This will provide a hierarchy of dwellings from larger detached properties through to smaller terraced forms, allowing for a variety in the proposed streetscape, as seen across Bridgnorth.</p> <p>The draft policy requires at least 10% of the energy needed to be generated from renewable sources, whilst supportive of provision of renewable energy, consider the level of renewable energy achievable is dealt with through the future SPD to ensure that it takes into account the future vision, design and masterplan for the site.</p> <p>Agree that employment development is an intrinsic part of BRD030. Additional employment land is needed to address the current balance between housing and employment and attract new businesses and industries into Bridgnorth, which will assist in securing economic growth.</p> <p>Agree that employment land on BRD030 should be in a gateway location, the site is located south of the A458 a main arterial route into Bridgnorth. The masterplan shows the employment located adjacent to/visible from the A458 and the existing SAMDev employment allocation and could create a business hub.</p> <p>Generally support employment uses being targeted towards office and R&D, however there it is important that the type of employment delivered on the site is not so constrained that it prevents the site from serving future and existing business needs, including the ability to adapt to changes in business requirements. Therefore greater flexibility should be provided.</p> <p>Support the need to deliver a village/local centre as part of the wider development in order to deliver localised retail and community uses. Guidelines state provision of the centre will be linked to the first phase of residential development, however it is envisaged this will be considered in more detail, including the proposed location of the centre, through the preparation of the SPD. It will be important that the centre is appropriately located so it is easily accessible and is also delivered at an appropriate time in the phasing to ensure the viable use and occupation of the centre and its units.</p> <p>Guidelines include a requirement to provide 2ha of land for a primary school, it is important that the location of the primary school is carefully considered through the SPD to ensure it is well related and easily accessible from new and existing dwellings.</p> <p>Support the provision of a medical centre if required by the CCG, welcome the recognition that this may not be required and it is for the CCG to decide if a facility of this nature is required on site, based on their knowledge of the provision and facilities within the local area.</p> <p>Agree that the design of BRD030 should respond to identified landscape and visual effects and include appropriate mitigation. A Landscape and Visual Impact Assessment (LVIA) (Appendix 3) has been prepared, including an illustrative landscape masterplan (with significant areas of GI and open space, designed to reflect opportunities in the Shropshire GI Strategy and consistent with the draft site guidelines - hectares of green infrastructure and 19 hectares of Country Park). This can be built on through the SPD. It is important that GI opportunities in the Shropshire GI strategy are reflected on adjacent SAMDev allocations.</p> <p>Support retention of existing vegetation, where possible. This has been incorporated into the design and masterplan.</p> <p>Support retain and respect of the two listed buildings within/in close proximity of the site. Whilst informed further by the future SPD, the current masterplan demonstrates how the Garden Village could account for these assets - land adjacent to the listed building will be used for open space and recreation.</p> <p>Agree that noise arising from the A458 can be appropriately managed through use of GI and strong tree planting. Masterplan highlights the ability to deliver significant landscape buffers along the A458 and around the employment development.</p> <p>Management of noise, dust or odour arising from the SAMDev allocations (ELR011/a and ELR011/b; given that part will be used for the relocation of the livestock market) and mineral activities in the surrounding area are appropriate requirements for the future development of this site.</p> <p>The policy seeks to ensure that Tasley Garden Village is appropriately designed to accommodate pedestrians, cyclists, and motorists. Promoting sustainable transport is a key priority and the site has been designed with the movement of pedestrians and cyclists as a priority, ahead of vehicles and includes a number of shared spaces and quiet streets to constrain vehicular speeds and to provide a safe environment for pedestrians and cyclists.</p> <p>The policy also seeks to ensure access to BRD030 complements the proposed roundabout access to the existing SAMDev allocation. Keen to ensure BRD030 and the existing SAMDev Plan allocation are complementary and the highest quality development is brought forward. Ask the Council to work with both applicants/developers to ensure the best scheme is brought forward and infrastructure requirements for both sites can be fully delivered without comprising the delivery of the other site.</p> <p>Consider there is significant potential within BRD030 to provide a range of improvements transport connectivity. There is the potential to form new bus stops close to and within the site and bus operators have already expressed interest in serving BRD030 through either a bespoke new bus service or a diversion/extension of an existing bus service. Also exploring the opportunity to deliver a park and ride facility on the site, however welcome the wording of the policy in this regard as there would be a need to identify a suitable operator, it is assumed the existing facility would need to be relocated and some indication from local residents this service is needed.</p> <p>The draft policy requires significant and effective pedestrian and cycle links over the A458 to encourage the movement of pedestrians and cyclists from BRD030 to the wider town, which is wholly agreed with and supported. The draft policy states this could include, but is not limited to, a raised pedestrian and cyclist footbridge. It therefore acknowledges that there are other solutions which may be more appropriate and therefore these would also be accepted. Welcome this flexibility and are currently working with the Council's highways team and the planning policy officers to establish the most suitable, appropriate and safe method of crossing the A458.</p> <p>The draft policy seeks to ensure nearby SSSI's are appropriately safeguarded. It is envisaged could be achieved through appropriate construction management.</p> <p>The draft policy requires multi-stage SUDS informed by a sustainable drainage system. BRD030 will deliver comprehensive SUDS, designed at application stage.</p> <p>The masterplan demonstrates how the site could be developed to avoid areas of potential flood risk through the creation of a new Country Park along the Tiddle Brook boundary.</p> <p>Commentary provided on various evidence base documents including the Bridgnorth Development Options Assessment. This covers flood risk, Green Belt, landscape and visual sensitivity, ecology, heritage, highways (vehicles and pedestrians/cyclists), public protection and other strategic considerations. Conclusion is support for the de-allocation of Stanmore Garden Village and support and agreement with the Council's conclusion that BRD030 represents the most appropriate site for a mixed use allocation to meet the housing and employment needs of Bridgnorth. Also supports the identification of additional land west of BRD030 for the future growth needs of the settlement, beyond the plan period. Agree that this allocation would complement the existing SAMDev allocations which are located in close proximity to the site.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1101B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Shropshire Council has published a Green Belt Exceptional Circumstances Statement. This demonstrates exceptional circumstances exist for release of Proposed Sites P58a and STC002 at Stanmore Industrial Estate near Bridgnorth</p> <p>Site assessments for P58a and STC002 confirm they are suitable, available, achievable and viable subject to exceptional circumstances.</p> <p>All other reasonable alternatives to expansion at Stanmore and for expansion at Stanmore, are assessed and it is concluded their removal from Green Belt is justified by:</p> <ul style="list-style-type: none"> - Supporting the role of Stanmore Industrial Estate; - Supporting the medium and long term needs of existing businesses; - Attracting new businesses, particularly those in the 'engineering and advanced manufacturing' sector; - Supporting the strategic role of Bridgnorth; - Supporting the aspirations of the Economic Growth Strategy for Shropshire; and - Provision of market and affordable housing in a sustainable location. <p>The statement does not consider impacts on access to facilities for employees at Stanmore Business Park. A Local Centre (with convenience store) in Stanmore Garden Village (within walking/cycling distance) and greater frequency of bus services through the Business Park as a result of the new community will help reduce travel by private vehicle would enhance Stanmore Business Parks sustainability.</p> <p>Existing businesses see high in-commuting due to lack of affordable housing. Conversely out-commuting by higher paid workers living in Bridgnorth is also high. The Local Plan commits to reversing this. Based on the principle of connecting housing and employment, locating houses close to Stanmore Business Park (and town) should assist in increasing availability of employees to Bridgnorth companies and would reduce the number of in-commuters (linking eligibility for affordable housing to key workers has also been offered at Stanmore Garden Village).</p> <p><u>As a result, the Council's exceptional circumstances are narrow and miss wider opportunities to deliver a sustainable inclusive new community. These exceptional circumstances can apply equally to the new garden village</u></p>
A1152B41	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>During Preferred Scale and Distribution of Development stage of consultation, the proposed housing and employment guidelines were 1,500 dwellings and 16ha of employment land (based on Shropshire Council's balanced growth calculation and rounded up).</p> <p>During Preferred Sites consultation the housing guideline remained the same, but the employment guideline was increased by 12ha to address 'local circumstances'.</p> <p>In the draft Local Plan, the housing guideline as increased by 20% to 1,800 dwellings, but the employment guideline has been increased by 21ha to 49ha, an increase of over 300% compared to the original figure.</p> <p>Neither the draft Local Plan nor the Bridgnorth section of the Green Belt Release Exceptional Circumstances Statement cogently justify this massive proposed increase in the employment land or for the departure from balance with the housing guideline.</p> <p>The draft Local Plan includes a proposed allocation of 1,050 houses on BRD030, rather than the previously proposed allocation of 850 houses on the Stanmore site. It is not consistent to continue to propose an employment land allocation at Stanmore, the more so because it is Green Belt.</p> <p>Have reservations about the site promoters consultation on proposals for BRD030 as:</p> <ul style="list-style-type: none"> -The consultation process was deficient. -Public is asked to judge merits of the scheme without the benefit of information known to have been produced -Phasing details indicate that the road frontage would be dominated by industrial estates; essential facilities would not become available until more than a decade into the scheme or, in the case of much of the country park, after 2038; and that locals would have a large building site near them for most of the next 30 years. -There is some doubt as to whether the land has been assembled with sufficient certainty as to make the whole scheme as put forward viable. -There is no proven need for the scale of the proposals, either for housing numbers or for employment land. -Economic benefits claimed should be treated as marketing hype rather than evidence in favour of the proposals -Pursuit of profit should not be the motivating force for any development around Bridgnorth there would be a greater benefit to Shropshire were Shropshire Council's Cornovii Developments Ltd to carry out any housing development proven to be needed. -Not enough account has been taken of the climate emergency. -Not enough account has been taken of the biodiversity gains that should be built into this scheme in view of the provisions within the current Environment Bill. -A different world might emerge after the Covid-19 emergency passes -Transport considerations of the scheme need to be rethought -There should be some indication of amount and timing of Community Infrastructure Levy (CIL) payments. -Use of the epithet "Garden Village" appears misleading; the present scheme remains a long way from the original concept of a walkable community, in fact it still remains dominated by the motor car -The scheme would use good agricultural land (likely to include Grade 2 and Grade 3a); there is an increasing realisation that good agricultural land is a national resource and that, as far as possible, it should not be used for development; food security post-Brexit is also of importance. <p>Some advantages of BRD030 are:</p> <ul style="list-style-type: none"> -The site appears to be better connected to Bridgnorth than the Stanmore scheme -BRD030 is not within the Green Belt and its clear availability as an alternative site to the Stanmore proposals means there are not the exceptional circumstances under NPPF para 136 for the release of Green Belt land around Stanmore. <p>Proposals are only promises with no certainty. BRD030 has advantages over proposals at Stanmore, but needs considerable modification, not least in its scale, in order to become an acceptable proposal; a significantly smaller scheme is likely to be more acceptable. As a mark of the landowners' combined commitment the application for Intensive Poultry Units should be withdrawn.</p> <p>These comments remain valid, particularly that there is no proven need for the scale of the proposals, either for housing numbers or for employment land, and not enough account has been taken of the climate emergency.</p>
A1177B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Morville Parish Council - Whilst accepting the need for more housing in Shropshire, the scale of development proposed in the plan is questioned, and in light of covid 19 and brexit its felt a more cautious approach with a lower housing figure should be adopted. With regard for proposals in Bridgnorth the Parish Council Council has reason to doubt the claims related to job creation stated in the Taylor Wimpey proposal at Tasley. Proposals for 'Garden Villages' have employment potential as a vital component – in the current economic crisis it seems unlikely that such ideals would be met. The Parish Council have concerns about the proposals for Tasley as they came in late and its not been possible to discuss them with the community due to Covid restrictions. Morville Parish Council are in agreement with Tasley Parish Councils response to the proposed garden village at Tasley which was made in June 2020. We also have concerns the development could impact on the future of Bridgnorth Livestock Market which would be in close proximity to housing development. The loss of this facility would be very hard for Bridgnorth. The scale of the Taylor Wimpey site is inappropriate for this rural community, and any expansion of the site should only be considered after the existing 500 homes allocated have been completed and their impact assessed. A detailed need assessment of housing in Bridgnorth should also be carried out. •The town of Bridgnorth would face a possible 35% increase in population with the Tasley development. It is misleading to propose the plans are a Garden Village. It is a large suburban development on the outskirts of a market town.</p>
A1184B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>As a neighbouring farmer - who farms our own land, I believe that now more than ever we need to become more self sufficient as a Nation, and be able to produce vital food, locally for us all to live on. I feel very strongly that agricultural land should be used for agriculture and not housing. I do not believe that the housing development on the proposed scale is necessary for Bridgnorth. I believe that future developments should be kept within the town. There are other locations around the town where development has already been given approval: Tasley livestock market area, Westgate/ former council office. Rushmere/former Davro site. These sites and many more brownfield sites within the town area should be made prime development areas and utilised without the need to lose the proposed/any valuable agricultural land forever. I truly elieve the proposed development would put intolerable strain on our local infrastructure and ecology. There fore destroying the heart of Bridgnorth - our unique historic market town.</p>
A1185B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>I am writing to register my objection to the proposed Tasley Garden Village Development. As neighbouring farmers - who farm our own land. I believe that now more than ever we need to become more self sufficient as a Nation, and be able to produce vital food locally for all to live on. The proposed site is on valuable prime agricultural land and the development would mean it being lost forever, please we really do have to preserve it for farming and our communities. I can not understand why brown field sites are not being proposed in place of agricultural land. There are already several industrial sites in the Bridgnorth area, all of which have vacant units. As a result of Covid 19 we are being warned of a major recession which seems to have already impacted hugely on our economy. I feel sad but sure that there will be many more vacant units and businesses premises available in the coming weeks/months, therefore removing the need for further industrial development. Maintaining our ability to produce food is the most vital and necessary way forward. It is also vital to protect our countryside so that residents can benefit from the natural outdoors. I do not believe that Bridgnorth needs further housing on the proposed scale. Perhaps we should be building apartments in the town to provide homes for people of all ages rather than more and more retired people. These retirement developments seem to have reached saturation point in the town with so many for sale. The proposed Tasley Garden Village development would put a huge strain on our local infrastructure and ecology. I strongly believe that Tasley Garden Village Development should be rejected and not included in the local plan review.</p>
A1195B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1195B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1196B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>I am against the Taylor Wimpey proposed Garden Village for the following reasons</p> <ol style="list-style-type: none"> A re-sited cattle market would be situated against new housing. Serious doubts about whether Taylor Wimpey have access to land to build the suggested footbridge over the main road, or that it would ever be built. Access to the probable first part of the proposed Tasley Garden Village site to be built is not known; possibly would have to be from the Ludlow Road just above the Punch Bowl. Most of the residents on this site would probably need to travel down the bypass or otherwise cross the river through the centre of Low Town to reach their place of work on the eastern side of Bridgnorth, Stanmore Industrial Estate, or commute to other towns such as Telford, Wolverhampton, Dudley, Stourbridge or Kidderminster. <p>Many people in Bridgnorth commute to work to locations east of Bridgnorth, and relatively few commute to the west.</p>
A1196B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<ol style="list-style-type: none"> Residents much more likely to work locally at Stanmore Industrial Estate or at businesses on the eastern fringe of Bridgnorth Town, or commute to work in neighbouring towns, without the need to travel through Low Town. This would significantly ease the traffic situation through Low Town when compared with the alternative that would occur if the proposed Tasley development went ahead. The proposed Stanmore Garden Village is smaller than the proposed Tasley site, and house sales could be more easily moderated to meet demand. The proposed Stanmore Garden Village could be a more innovated, interesting, and exciting architectural development, and much superior than normal housing estates. Of course, it might not happen. In their latest ideas on the current LPR, SC intend to put forward proposals to expand parts of Stanmore Industrial Estate that would change to the Green Belt.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1274B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1274B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1274B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1274B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A1275B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1275B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1275B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1275B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A1276B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1276B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1276B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1276B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A1277B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.

Page 138

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1277B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1277B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1277B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A1278B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1278B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1278B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1278B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A1279B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1279B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1279B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1279B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A1280B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1280B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1281B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1281B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1282B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1282B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1283B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1283B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1284B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1284B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1285B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1285B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1286B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1286B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1290B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1290B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1291B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1291B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1292B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1292B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1293B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1293B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1294B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1294B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1295B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1295B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1296B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1296B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1297B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1297B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1298B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1298B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1299B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1421B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1421B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1422B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1422B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1423B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1423B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1424B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1424B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1425B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1425B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1426B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1426B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1427B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1427B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1428B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A1428B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment should be deleted because 49ha is excessive and not fully evidenced and justified. There would be sufficient land for employment purposes to serve the existing and proposed residential expansion of Bridgnorth without the necessity to develop at Stanmore. No exceptional circumstances demonstrated. There would be a dependency on private vehicles. Stanmore is far from the residential allocation. Employment is included at Tasley. Stanmore is contrary to SP9. As there are vacant plots in Bridgnorth, it means that there is no need or demand for allocations like Stanmore. Employment was included in SAMDev and none built – if it was needed it would have been built by now.
A1429B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1429B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A1430B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1430B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1431B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1431B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1432B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1432B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1433B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1433B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1434B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Page 146

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1434B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1435B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1435B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1436B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1436B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1437B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1437B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1438B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1438B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1439B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1439B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1501B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1501B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1502B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1502B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1503B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1503B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1504B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1504B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1505B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1505B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1612B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1612B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1613B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1613B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1618B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>DUTY TO COOPERATE</p> <p>I consider that the case for allocating an additional 1,500 homes to meet the Black Country's projected shortfall is not sound. In particular, the referenced report notes that:</p> <p>Shropshire is not adjacent to any of the Black Country authorities.</p> <p>Progress on the Black Country plan has stalled due to Covid-19.</p> <p>The Black Country Authorities, Urban Capacity study indicates a shortfall of just under 27,000 homes, but the worst shortage is in Sandwell borough making up over half the total. The Bridgnorth area is not an obvious place to make up for that shortfall ... Other Black Country Authorities would be better positioned.</p> <p>Telford & Wrekin rejected ABCA's request in 2019 - they said there was not any evidence to support them contributing to the unmet Black Country Housing Need. One must assume that the same condition must apply to Bridgnorth and the adjoining parishes. (See Section 5.1, "Regulation 18 Consultation Update Report", Bridgnorth Plan Steering Group, September 2020 for more details)</p>
A1618B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>SCALE OF DEVELOPMENT AROUND BRIDGNORTH</p> <p>I recommended that 800 to 1,000 new dwellings be planned for in the revised Local Plan for the period from 2019 to 2036. Over 90% of the 155 respondents in the recent survey expressed a desire for housing growth to be below the upper of these figures. For the period from 2019 to 2038, we now recommend that 900 to 1,100 should be recommended for, which is an additional 50 dwellings per year for each of the extra two years (see reference below). I express concern that the levels of employment growth being considered (the draft Local Plan) will be difficult to achieve, and the recent pandemic will further add to the problem of jobs. I am still concerned that there is no robust plan for job creation in the Bridgnorth area I recommended that additional housing development be linked, in some way, to the provision of new jobs. Housing should not progress too far ahead of available jobs. We recommended that job creation and housing growth should be reviewed every 3 - 5 years and that additional housing may be allowed for (in subsequent reviews of the Local Plan) if the creation of new jobs justifies new housing.</p> <p>Provided data indicating that the amount of employment land already allocated under SAMDev was sufficient, or almost sufficient, to meet needs through to 2036. We acknowledge that some additional land will probably be needed for the period to 2038 (see reference below). I recommended that emphasis should be given to providing modern office premises. This has not been addressed in the draft Local Plan or Local Economic Growth Strategy for Bridgnorth and adjoining parishes.</p> <p>In the BPSG Consultation Update Report a table was provided showing that the draft Local Plan proposes that Bridgnorth and Whitchurch have been allocated a significantly higher growth rate than all other market towns, yet no justification for this has been given in the draft Local Plan or supporting documents. Given the acknowledged topological and Green Belt issues facing Bridgnorth, we consider that its growth rate over the period should be no higher, or lower than other market towns, such as Oswestry and Ludlow, which are on the strategic transport corridors and have mainline railway stations.</p> <p>(See Section 4.2, "Regulation 18 Consultation Update Report", Bridgnorth Plan Steering Group, September 2020) Report "Bridgnorth Plan: Phase 1 Report", Bridgnorth Plan Steering Group, June 2020: INFRASTRUCTURE TO SUPPORT DEVELOPMENT</p> <p>I recommended that "any growth in employment and housing should only proceed once commitment and funding for the necessary improvements to the local infrastructure, road network, transport links, public facilities and services has been confirmed." Infrastructure Provision "New development should only take place where there is sufficient existing infrastructure capacity available." "if there is a shortfall in infrastructure provision, the development will be required to fund necessary improvements ..., unless ... addressed by other means." Developer funding does not look to be sufficient. No other sources for Bridgnorth. Except "additional Section 106 contributions". Car this be confirmed that any developments will only commence after the infrastructure provision is in place?</p> <p>I commented that Bridgnorth and adjoining Parishes do not lie on a strategic transport corridor, and that there are no published plans for any improvements. We note that the draft Local Plan places emphasis on 'Strategic Corridors'. DP29 (para 4.621, page 138) lists proposed enhancements to the Strategic and Local Highway Networks. It does not include any improvements around Bridgnorth. This would imply that there are no plans to improve connections between Bridgnorth and the A5/M54 strategic corridor, or to Wolverhampton, Stourbridge, or Kidderminster. https://shropshire.gov.uk/media/6087/economic-growth-strategy-for-shropshire-2017-2021.pdf I note that the Settlement Policy for the Bridgnorth Place Plan area states (S3.1, para 5.62, page 175) that "a strategic assessment of the highway network will be undertaken." We consider that the proposed high level of growth for the Bridgnorth area cannot be considered sound without such an assessment having been completed and plans put in place for the implementation of any recommendations.</p> <p>The draft Local Plan and its supporting documentation does not provide any additional assessment of the infrastructure that would be required to support the proposed growth around Bridgnorth: and without this we do not consider that the proposed level of growth around Bridgnorth is sound or sustainable. I emphasise the need to provide continuously faster broadband within the town and adjoining parishes if we are to achieve the economic growth envisaged. I would welcome investment on footpaths and cycleways (DP29, point 3, page 136). However, there is already a commitment to this under earlier plans and there has been little, if any, investment on these to date. (See Section 4.4, "Regulation 18 Consultation Update Report", Bridgnorth Plan Steering Group, September 2020) In the report "Bridgnorth Plan: Phase 1 Report", Bridgnorth Plan Steering Group, June 2020: LOCATION OF DEVELOPMENT AROUND BRIDGNORTH</p> <p>•No specific recommendations were made as to where development should be located as, at the time, the only option being offered was around Stanmore. However, Tasley Garden Village has since been proposed. The Tasley Garden Village was introduced late into the LPR. There are advantages and disadvantages of both locations, however I feel consideration should be given to other areas, with any developments spread across smaller multiple locations.</p> <p>•The survey recently carried out; asked where development should be located. 25% of respondents said there should be none. 42% of those giving an opinion on the location preferred it to be distributed (that is, not all in one location). In addition, people voted specifically for development in Stanmore, Tasley, Oldbury and Astley Abbots in the ratio 2:2:1:1 (they could vote for more than one specific location).</p> <p>•Overall, voting for the survey supports distributed development, rather than all in one location (155 respondents) (See Section 4.3, "Regulation 18 Consultation Update Report", Bridgnorth Plan Steering Group, September 2020) In the report "Bridgnorth Plan: Phase 1 Report", Bridgnorth Plan Steering Group, June 2020:</p>
A1631B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>1) Lack of awareness as the proposals have been compiled at short notice and during the Covid pandemic 2) Over development of this part of Bridgnorth. We live in Tasley on Wenlock Road adjoining the Persimmon development which added around 315 houses in 2009. Land between Church Lane and Wenlock Road is already outlined for further residential development. The Taylor Wimpey proposals would add a further 1050 houses which would appear a ridiculously high number of houses additional to what is already proposed in addition to commercial/industrial development. We are aware there are government requirements for development but I cannot believe this level is necessary. I would suggest that the development plans should be re-considered following Brexit and the Covid pandemic. 3) Impact on ecology/landscape. We appreciate the area is not designated green belt but the land nevertheless provides a green boundary to Bridgnorth outside the by-pass. There would likely be negative impacts on the nearby Mor Brook Lakes part of the restoration of the sand and gravel workings which we understand are now being managed in conjunction with Shropshire Wildlife Trust for their conservation value. 4) Loss of high quality agricultural land. 5) Claims to provide a 'garden village' and 'country park' are just developers spin. The developers plan shows well over three quarters of the area covered by hard development - residential, commercial, industrial. This is not a country park, it's a hard development. (We have witnessed developers promises at the planning stage not being provided with the recent Persimmon development - bus service through the development never provided and a lack of replacement of dead trees during the aftercare period). Much of the green areas are occupied by ponds which I would expect would be required anyway for water balancing requirements for this size of development.</p>
A1633B1	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>There is no evidence that there is a demand for the scale of expansion proposed other than speculative</p> <p>The roads around Bridgnorth do not allow large vehicle traffic easy and quick access to any industrial development and businesses other than small scale enterprises will prefer Telford with its Motorway links.</p> <p>Any housing development is only going to increase road usage with resulting pollution and congestion as more people commute from the county to the West Midlands unless there is a change to more local work practices.</p>
A1641B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.</p>
A1641B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?</p>
A1652B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Industrial development in Bridgnorth has expanded substantially over the last few years – all adjacent to the Green Belt. No confidence in duty of care if the boundary of the Green Belt at Stanmore is moved, for employment, that 'Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise arising from the site.' Ancient woodland and unspoilt countryside which is Green Belt are right next to both sites. Unclear on any exceptional circumstances.</p>
A1652B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt no exceptional circumstances have been advanced that would justify its removal.</p>
A1652B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>I support this as the preferred site, it is adjacent to existing settlements and avoids green belt. I would question the housing need, particularly in the light of Covid-19 and looming economic recession. Housing for housing sake should not go ahead particularly in an area of poor infrastructure and transportation links</p>
A1652B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Page 2 of the Policies map, shows development boundary for the aluminium factory/TG are to the South East corner. This borders Green Belt, and in the planning applications and approvals for the industrial development little to no credence has been given to it being adjacent to historic, open and unspoilt countryside, and ancient woodland which happens also to be greenbelt.</p>
A1653B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.</p>
A1653B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1654B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.
A1654B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?
A1655B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	This area should not lose its classification as Green Belt land. It is though that the owner is a current Shropshire Councillor, however no declarations of interest have been completed by the owner throughout his term in office. Should this de-classification go ahead, it would raise serious legal questions about propriety that would require investigation.
A1655B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The location and topography of the Stanmore site leaves only one real option for residents to access health care, children to access education and adults to access employment – single use car journeys to the centre of Bridgnorth. The current level of public transport facility is completely inadequate to support healthcare, education and employment access for the current population – before any additional houses are built. The topography of the location makes it utterly inappropriate from a safety point of view to either walk or cycle to the centre of Bridgnorth. The main access road from the Stanmore development into the centre of Bridgnorth is one of the 2 areas in Shropshire where AQ exceeds national and European levels of pollution. If Shropshire is serious about reducing carbon emissions and promoting low carbon transport options then more appropriate housing sites – such as Tasley must be scored more highly
A1823B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.
A1823B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?
A1842B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.
A1842B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?
A1851B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.
A1851B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?
A1860B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.
A1860B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?
A1861B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Having lived in Bridgnorth for over 16 years, it is already evident that the Air Quality (Climate Change Policy) has deteriorated by congestion and traffic is a constant problem – this has a serious impact on peoples health. Bridgnorth is a rural town with several A roads which have been in disrepair for years and further development of dwellings on the scale suggested in this document will, in my opinion, be detrimental to the Town as further strains are put on the infrastructure. We would anticipate hundreds of additional car journeys in the area daily, either driving into the town or commuting across the county further afield to work elsewhere. The mixed use development at Tasley will by no means support local employment to the extent of the hundreds of new dwellings being built – it will simply mean that people will commute on the already busy roads roads further afield to work in Bridgnorth and vice versa, to live in Bridgnorth and commute elsewhere in the West Midlands, accessing the A5, M54 and other main roads – it just does not stack up that people will work and live in the same town on this scale and will lead to further congestion and problems. The town will lose its community by expanding too big. This will be a further problem for Policing, Secondary Schools and Medical Practice – you can't build new ones and expect Police, Doctors and Teachers to just appear – there is already a shortage and the town is already struggling to cope with the current population.
A1862B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Consultation: The plan seeks to deliver additional housing to help meet the requirements of adjoining councils. There is no evidence that communities of Shropshire support this ambition. The site allocation as a Garden Village in Tasley was not included on the original consultation of the Preferred Sites Allocation in 2018. It is noted that Taylor Wimpey consulted in June 2020 but this was only online and during the Covid 19 pandemic and was highly unlikely to have reached as many people as should be consulted on such a major development like this. It is undemocratic to make these major decisions until we are past the Covid19 crisis. People have the right to be consulted and to have the chance to express their views and there has been no proper public consultation about this. Housing: In total, the Local Plan is recommending that 2,250 new houses be built in the Tasley area, representing an increase of 35% on the existing population. Whilst it is accepted that Bridgnorth and surrounding areas requires more dwellings to cater for future growth, the existing housing needs assessment does not justify this level of increase in this area. It is not clear how has Shropshire Council arrived at the larger figure. An updated, detailed Local Housing Needs Assessment is required in order to establish what the needs are and whether the Town can support an increase of 35% to its population. Employment Land: The Local Plan confirms that in total 29 ha of employment land has been allocated to the Tasley area south of the A458, all of which is outside the Bridgnorth Development Boundary. How was this need established by Shropshire Council? This requirement is not identified in the Shropshire Economic Strategy and nor the Town Centre Study. Of the 2 documents only the Town Centre Study was completed during the Covid 19 pandemic period and pays some acknowledgment to the current economic climate. Employment patterns and requirements will undoubtedly change in at least the short to medium term. It would make more sense to deliver the employment land as set out in the SAMDev Plan and delay any further decisions until a. the success and impact of the SAMDev Plan is known b. the required infrastructure improvements have taken place c. the impact of coronavirus is clearly understood. Communication and Transport: As acknowledged by Shropshire Council there are topographical and landscape restraints within Bridgnorth. There is no evidence that existing Bridgnorth infrastructure will be able to cope with the additional traffic requirements of what is essentially a large housing estate. There is a paucity of information about how other transport requirements whether by bus, foot or cycle will be met. Ecology: I concur with comments by Shropshire Wildlife Trust that 'the insistence on pursuing a level of housing in excess of housing need is not a sustainable approach and reflects the focus on economic growth'. The proposed TGV is local to 4 SSSI's and forms a buffer zone between the urban and the rural. How can Shropshire Council justify pursuing the TGV without a full understanding the environmental implications and having clearly agreed mitigation strategy? The decision to include Tasley Garden Village appears to have been made before the evidence has been put together. As the proposal stands at the moment it does not fulfil the TCPA agreed 3 principles of a Garden Village. How and will Shropshire Council hold all those involved to these?
A1869B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	I strongly oppose these plans on the basis that, whilst you make reference to providing 'employment land to create choice and competition in the market' in truth most of the 1800 planned new dwellings will be occupied by commuters who will choke up local roads with their vehicles, having an obvious detrimental effect on the environment. In my experience running a small company in the Bridgnorth area for over 20 years, I am aware that countless business premises in existing industrial estates in Bridgnorth and surrounding areas (e.g. Stanmore, Netherton Workshops in Highley) have been under-occupied for years, (despite offers such as business rates reductions). The fact is this area is too rural and distant from motorway or rail networks to be of interest to most non-agricultural businesses. This situation will surely be exacerbated by the uncertain post-Covid era that will see many businesses closing premises or downsizing, not moving to new premises in the Shropshire countryside.
A1875B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of SP11, and is also in conflict with DP25 of the Draft Local Plan and the NPPF.
A1875B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The two sites proposed to be allocated for employment development Stanmore should not be allocated for employment – 49ha is too high and there is employment proposed in Bridgnorth. It is in Green Belt. It would rely on private car use. There is no need for the allocation. It is far from the housing allocation. It is countryside. There is no demand for Stanmore to be used because the existing vacant plots in Bridgnorth are not being used. Existing SAMDev sites have not been taken up yet – why are more being allocated?

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1884B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>I am writing in response to the proposed overly vast and inappropriate urban housing 'garden' development on the border of Bridgnorth upon valuable farmland. My family and I are extremely opposed to this development, reasons be as follows:</p> <p>1. The development is overly extensive covering a very large expanse of farmland, that affects the landscape enormously. This is not an inconspicuous development, one that cannot be undone and will be detrimental to the countryside that Bridgnorth is proud to own. This would cause unnecessary urban sprawl further into the countryside.</p> <p>2. Due to the expanse this will have an enormous affect of the local nature population as greenbelt land continues to be built upon. One huge reason why people visit Bridgnorth, to escape urban housing estates of nearby towns.</p> <p>3. Many other developments within Shropshire and surrounding counties exist or will do, that mean there is plenty of housing to meet any required needs. This development seems more like developer greed as oppose to a response to a demand. Farmers have been swayed by the cheque book of a large corporation, whom are pushing to see just how vast a development can be pushed through Shropshire Council. Housing on greenbelt land, once never built on, is a tragic growing problem. Other nearby developments in Telford (again huge), Shrewsbury, Wombourne, Shifnal as a few examples. Many of which are building on greenbelt land. It seems greenbelt / farmland is more of an attractive proposition to developers than brownfield sites, if councils continue to grant exceptions, precedent is set for every proposal thereafter. I would like to understand with so many new 'clone' estates popping up in other villages and towns, just what is the justification for yet another. In total, the Local Plan is recommending that 2,250 new dwellings be built in the Tasley area. This will increase the population of Bridgnorth by at least 4,500 people which represents an increase of 35%. On what basis has Shropshire Council arrived at the larger figure? Whilst it is accepted that Bridgnorth and surrounding areas require more dwellings to cater for the likely future growth of the town, on what basis has Shropshire Council decided that such numbers '... will make provision for the needs of the town and surrounding hinterland...'? What are the needs of the town? A Local Housing Needs Assessment is required in order to establish what the needs are. Should this not be carried out before it is decided on the numbers of dwellings to be built? Can the Town support such an increase of 35% to its population?</p> <p>4. With Brexit and Covid the requirement to bring more food production back to UK soil is a reality. The UK needs to become more self-sufficient relying less on EU and foreign imports. Once farmland has been built upon there is no way back. This is a point I would seriously wish to highlight.</p> <p>5. The plans state the development expects to last 30 years. 30 years!!!!!! At a disruption cost to the existing residents of the area. There are plans to build industrial units, which will bring more transport to the area, in addition to that already seen at the quarry. There is already industrial space at Stanmore which could (and was going to be) developed further. I believe Stanmore have recently place a revised proposal to Shropshire Council, Why pursue Tasley when over town there is a plot that locals are asking for development on?</p> <p>6. What makes this proposal an exception for removing restrictions to build on this land?6. This I am writing in response to the proposed overly vast and inappropriate urban housing 'garden' development on the border of Bridgnorth upon valuable farmland. My family and I are extremely opposed to this development, reasons be as follows:</p> <p>1. The development is overly extensive covering a very large expanse of farmland, that affects the landscape enormously. This is not an inconspicuous development, one that cannot be undone and will be detrimental to the countryside that Bridgnorth is proud to own. This would cause unnecessary urban sprawl further into the countryside.</p> <p>2. Due to the expanse this will have an enormous affect of the local nature population as greenbelt land continues to be built upon. One huge reason why people visit Bridgnorth, to escape urban housing estates of nearby towns.</p> <p>3. Many other developments within Shropshire and surrounding counties exist or will do, that mean there is plenty of housing to meet any required needs. This development seems more like developer greed as oppose to a response to a demand. Farmers have been swayed by the cheque book of a large corporation, whom are pushing to see just how vast a development can be pushed through Shropshire Council. Housing on greenbelt land, once never built on, is a tragic growing problem. Other nearby developments in Telford (again huge), Shrewsbury, Wombourne, Shifnal as a few examples. Many of which are building on greenbelt land. It seems greenbelt / farmland is more of an attractive proposition to developers than brownfield sites, if councils continue to grant exceptions, precedent is set for every proposal thereafter. I would like to understand with so many new 'clone' estates popping up in other villages and towns, just what is the justification for yet another. In total, the Local Plan is recommending that 2,250 new dwellings be built in the Tasley area. This will increase the population of Bridgnorth by at least 4,500 people which represents an increase of 35%. On what basis has Shropshire Council arrived at the larger figure? Whilst it is accepted that Bridgnorth and surrounding areas require more dwellings to cater for the likely future growth of the town, on what basis has Shropshire Council decided that such numbers '... will make provision for the needs of the town and surrounding hinterland...'? What are the needs of the town? A Local Housing Needs Assessment is required in order to establish what the needs are. Should this not be carried out before it is decided on the numbers of dwellings to be built? Can the Town support such an increase of 35% to its population?</p> <p>4. With Brexit and Covid the requirement to bring more food production back to UK soil is a reality. The UK needs to become more self-sufficient relying less on EU and foreign imports. Once farmland has been built upon there is no way back. This is a point I would seriously wish to highlight.</p> <p>5. The plans state the development expects to last 30 years. 30 years!!!!!! At a disruption cost to the existing residents of the area. There are plans to build industrial units, which will bring more transport to the area, in addition to that already seen at the quarry. There is already industrial space at Stanmore which could (and was going to be) developed further. I believe Stanmore have recently place a revised proposal to Shropshire Council, Why pursue Tasley when over town there is a plot that locals are asking for development on?</p> <p>6. What makes this proposal an exception for removing restrictions to build on this land?6. This project will bring additional traffic and transport to the area. When the bypass was closed for works and traffic had to flow through the town, the town was gridlocked. It highlighted just how populated the town is already. And if anything like that was to happen to the bypass again, just how it would affect the congestion of the town further.</p> <p>7. Calling the development a 'garden village' is purely marketing spin to make it sound more attractive and less shocking than what it actually is. This is in fact another vast glut of identical characterless blueprint houses, a plot of grass and a path and industrial units. Bridgnorth will in time lose all its character and any reason for tourists to visit. I urge you Shropshire Council to deeply consider this enormous unnecessary development. It is my understanding that it is under only exceptional circumstances farmland and greenbelt land can be built upon. I do not believe these tests have to be met and I would like to understand what justification has been laid out to make this proposal an exception.</p>
A1923B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	This is a housing estate not a garden village. I don't believe any of the attempts to preserve hedgrows for example will last very long. Once occupied owners will do what they want. Inhabitants live in Bridgnorth precisely because it is a market town.
A1923B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	New build houses which have been empty and for sale in Pound Street? Will any of these new estates have the schools and medical centres shown on the plan. All this will just make Bridgnorth a suburb of Wolverhampton or Telford
A1924B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1924B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1924B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.
A1924B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1925B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such. The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan. The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity. The proposal is contrary to National Planning Policy.
A1925B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF). An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.
A1925B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1925B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1930B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A1930B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.</p>
A1930B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1930B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1931B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A1931B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.</p>
A1931B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A1931B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A1932B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification have been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A1932B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2.</p>
A1932B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1932B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A2105B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Para 3 of SP6 and Para 3.42 of the explanation claim to provide clear guidelines regarding circumstances when development guidelines may be exceeded. However, the vagueness of these guidelines means a limitless amount of development may be approved based on a subjective test. For example, sub-para (d) states, "The increase of the number of dwellings relative to the guideline." Without any form of limit or tolerance, it makes this section of the policy worthless, meaning any number of dwellings could theoretically be approved provided it could be shown that 'due regard' had been given to the conditions. In order to provide residents with some form of peace of mind or confidence in the overall plan for a particular centre or hub, the guidance needs to be more robust and commit to the fact that the proposed guideline number of dwellings should be taken as an absolute maximum. This concern is amplified later in the same para with the statement, "The guideline is not intended to represent a ceiling on development."
A2105B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Development boundaries are an important mechanism for controlling development. However, para 4 of SP6 provides too much leeway in allowing development outside the boundaries. The clause that allows development outside the boundary where, "there are specific considerations set out in the Settlement Policies," is too wide ranging. The Settlement Policy (S17) for Wem Place Plan Area, specifically S17.2, allows the contents of any community-led plan to be used in support of this decision. Given such plans are not necessarily subject to the same level of scrutiny and consultation as the local plan, I would contest that they are suitable means for informing such important decisions. Also, within the same para, the test of 'community need' is not defined. How is this metric to be assessed and by whom?
A2119B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A2119B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.
A2139B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	It is hard to believe that 1550 houses are needed in Bridgnorth and there is certainly insufficient infrastructure to support this many. Of the 1550 houses proposed two thirds of these are allocated to a large, national, profit-driven developer and this seems totally unreasonable. Therefore we are strongly opposed to this development.
A2141B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Against proposals for Bridgnorth. Scale of growth has not previously been consulted on and agreed by Bridgnorth residents. The targets are too high and will see sprawling development in the countryside that surrounds Bridgnorth and will ruin the town. Proposals make it hard to deliver sustainability targets and the Covid outbreak should have seen the plan paused and a rethink of the Councils strategy for development
A2142B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy DP19 sets out the Council's desire to reduce pollution and safeguard public amenity through development proposals Policy DP19.1 says that development must be appropriate to its location, and the site must be suitable for its proposed use. Policy DP19.2 and 3 express concern about air quality. Policy D19.4 confirms that development should avoid, if possible, the use of Grade 1, 2 and 3a agricultural land. Policy DP19.5 says that the use of previously developed land is encouraged. Policy DP19.7 indicates that development should not create unacceptable adverse effects through increase in noise levels. The proposed employment development at Stanmore (Sites S57 and S58) would conflict with most of the issues set out in Policy DP29 because the land proposed for employment allocation is, a) In "countryside" and in the Green Belt – this is not a suitable location for operators that are engaged largely with the motor and steel fabrication, b) Is divorced from Bridgnorth town and thus is likely to encourage the use of motor cars, which will increase pollution and have a detrimental effect on public amenity. b) The local environment is relatively calm, quiet and with good air quality which would be adversely impacted by the proposed employment development at Stanmore and, c) The land concerned is Grade 3 abutting Grade 2 agricultural land, and thus likely to be Grade 3a, d) The land proposed for allocation is not 'previously developed land' as defined in the NPPF. The proposed allocation of land for employment purposes at Stanmore is in conflict with Policy DP29, and should be deleted from the Plan
A2142B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Policy S3: Bridgnorth Place Plan Policy S3.1 sets out a number or more detailed issues relating to the development of Bridgnorth as a Principal Centre. Policy S3.1.1 says that Bridgnorth will grow by 1,800 dwellings and by 49 ha. of employment land. This element of the Policy is supported. However Policy S3.1.1 goes on to indicate that one of the areas where 11.4 ha of the employment land is to be located, is proposed for Stanmore. This element of the Policy is not supported by any assessment of need, and is objected to. Policy S3.1.2 says that Bridgnorth is bounded on its eastern side by the Green Belt, and that development proposals in the Green Belt must be in accordance with national and local policies on Green Belt. Essentially, national and local policies indicate that Green Belt land should be protected from inappropriate development unless exceptional circumstances exist. This element of the Policy is supported. Policy S3.1.3 indicates that a comprehensive mixed use sustainable urban extension will contribute to new residential and employment development guidelines, whilst also delivering new community facilities within a new local centre and significant areas of open space. This Sustainable Urban Extension is shown on the proposals Map for Bridgnorth to be located to the north-west of the town, at Tasley. This element of the Policy is supported. The Bridgnorth Place Plan Policies Map indicates a development boundary for Bridgnorth which includes i. the existing built-up area of the town, ii. the areas of land included in the SAMDev Plan as allocations for employment growth, iii. that area proposed for the Sustainable Urban Extension (which includes land for employment development) at Tasley. iv. the employment areas within Bridgnorth town at Stanley Lane, Farriday Drive, Chartwell Business Park, and old Worcester Road. This development boundary is supported. The boundary however, does not extend to include either the existing industrial estate at Stanmore, or the land being proposed in the Local Plan Review as an extension to that estate, clearly indicating that they are not regarded as being part of the town. They are indeed, located in open countryside and in the Green Belt where development is significantly restricted unless there are exceptional circumstances. It is, therefore, inappropriate to confuse the consideration of the proposed extensions to the Stanmore Industrial Estate with those employment uses that lie within the proposed boundary of the Principal Centre of Bridgnorth as in Policy S3.1.5 and .6. Different considerations apply and this should be clear in the text of the Plan. This element of the Review, that is the proposed extensions to the Stanmore Industrial Estate, is not supported. Policy S3.1(ii) further confuses the issue. Both parts of the proposed extensions to the existing Stanmore Industrial Estate, i.e. 6.8 ha of running north from the Estate (SLAA Site P58a) and 4.6 ha to the west of the existing Estate (SLAA Site STC002) are referred to as Employment Allocations for Bridgnorth Principal Centre. Para 5.60 says that Stanmore Industrial Estate is located to the east of Bridgnorth and is "inset within the Green Belt". Whilst it is correct to say that the existing Industrial Estate is an inset within the Green Belt, it should be clearly stated that the land that is proposed to be allocated as extensions to the Estate is not part of that inset, and that the land is currently subject to Green Belt designation. Whilst, since the publication of the Local Plan Consultation document, the Council has published a document intended to explain the exceptional circumstances that have led them to conclude that the allocation of additional land at Stanmore for industry is imperative, it is clear from the document that there are, in fact, no exceptional circumstances have been advanced that would justify removing that Green Belt designation from the land. The text of para. 5.60 indicates that the existing Industrial Estate is of local importance, is successful and that there is limited land available for expansion – but these factors do not qualify as exceptional circumstances, especially when there are other areas of land being allocated, within the proposed boundary for Bridgnorth and well away from the Green Belt, that are in the same ownership as some of the land being proposed for development at Stanmore.

Page 154

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2142B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP1: The Shropshire Test Save Bridgnorth Greenbelt supports the general aims of this policy. However, it is essential that other policies contained in the Local Plan Review are in line with these aims, and Save Bridgnorth Greenbelt do not believe that this is the case. A prime example, and one in which Save Bridgnorth Greenbelt and our local supporters have direct involvement in, is the proposal to allocate more land adjacent to the Stanmore Industrial Estate for, in total, some 11.4 ha of Class B1, B2 or B8 uses. This cannot be justified in terms of Policy SP1 which says that "development will contribute to meeting local needs and making settlements more sustainable". The local employment needs of the settlement at Stanmore would not support the existing Industrial Estate at Stanmore, let alone further significant additions. The settlement at Stanmore is very small and is clearly regarded as a separate entity from Bridgnorth because the Council was, at one time, proposing to use it as a base for a new village quite separate from Bridgnorth. The area is excluded from the now-proposed Development Boundary for the town of Bridgnorth as shown on the Proposals Map for Bridgnorth. The development now proposed for Stanmore would then, conflict with Policy SP1, as it would not meet any identified local need and would not make Stanmore more sustainable, and with several other policies. Either the proposal at Stanmore should be removed from the Plan in order to secure compliance with Policy SP1 and others, or the policies concerned should all be revised such that developments such as that proposed at Stanmore do not conflict with them
A2142B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	The basic aim of Policy SP2 is supported. There is no disagreement with the idea of Shropshire accommodating investment and new development that contributes to meeting needs and making settlements more sustainable. However, the estimated need for 300 hectares of employment land, appears to be much more of an aspirational target rather than one that is actually based on identified need and making settlements more sustainable, and it is far from certain that such a figure can actually be delivered within the timeframe of the Local Plan Review. This is certainly the case in relation to the proposed allocation of two sites at Stanmore (totalling 11.4 ha) - a settlement that has no need for further employment provision. The emphasis in the Local Plan Review is very much meeting local need, and even if the proposed allocations at Stanmore are intended to cater for Bridgnorth town rather than the rural area in which it is situated, it remains clear that the Stanmore sites are unnecessary, given the amount of currently available but undeveloped or unused employment land in Bridgnorth, the allocations that exist and are to be carried forward from the SAMDev Plan, and the additional allocations being proposed in association with the Garden Village, Sustainable Urban Extension, at Tasley. The proposed employment development at Stanmore would, then, be in conflict with the aims of Policy SP2. Stanmore stands in an area of open countryside and in the West Midlands Green Belt that is outside any Principal or Key Centre, or Community Hub or Cluster. Policy SP2.6 says that, outside such settlements "new development will consist of affordable housing where there is evidence of local needs and appropriate rural employment and economic diversification". The aim of Policy SP2.6, then, is supported. It is clear that this Policy does not support the proposed allocation of 11.4 ha of unneeded employment land at Stanmore, and the type of employment provision being proposed by the Council is not "appropriate rural employment" or any form of "diversification" of the rural economy.
A2142B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	The basic aims of Policy SP4 are supported. However, the preparation and adoption of a Local Plan should not be used simply to avoid having to comply with more general policies, particularly when those policies are endorsed in the National Planning Policy Framework (NPPF). The NPPF is clear that land in a Green Belt should be protected from development unless there are exceptional circumstances that are fully evidenced and justified, through the preparation of local plans. Allocating land in a Local Plan should not be used as a means of legitimising development that is, in itself, an unsustainable proposition. There is no evidence that the development of land adjacent to the existing Stanmore Industrial Estate is necessary to serve the needs of Stanmore, or Bridgnorth. Whilst, since the publication of the Local Plan Consultation document the Council has published a document intended to explain the exceptional circumstances that have led them to conclude that the allocation of additional land at Stanmore for industry is imperative, it is clear from that document that there are, in fact, no exceptional circumstances that could justify the proposal that has been put forward. At present, the land that is the subject of the proposed allocation of 11.4 ha at Stanmore is Green Belt, and, if a planning application were to be submitted for employment development on the land, unless very special circumstances were advanced, permission for the development would be refused. An unjustified allocation in a local Plan should not be used to circumvent accepted planning principles. Such development would be unsustainable and would be in conflict with Policy SP4. If exceptional circumstances that made the development of 11.4 ha of land at Stanmore essential, then the proposal could be furthered through the submission of a planning application - an allocation in a Local Plan is unnecessary.
A2142B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	The proposals advanced in Policy SP6 and SP3, as far as the development of housing, employment, community facilities and open space, in the proposed Sustainable Urban Extension at Tasley are concerned, are supported.
A2142B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP9.1 indicates that, in the rural area, Community Hubs and Community Clusters will be identified as a focus for new development, whilst fostering appropriate rural employment opportunities, subject to further controls over development that apply to the Green Belt, the AONB and other designated areas. Policy SP9.2 and .3 say that employment, business and community development, will be considered against national policy and other relevant Local Plan policies, recognising the need for flexibility to meet rural economic and community needs. Sustainable employment in the countryside, where it maintains or enhances countryside vitality and character, and which is consistent with national Green Belt policy, and which relate to, i.small scale new economic diversification including farm diversification projects, ii.the retention of an existing established business (unless relocation to a settlement or established employment location is a better option), iii.agricultural, horticultural, forestry or mineral related development, iv.rural tourism, leisure or recreational proposals, v.community uses, vi.re-use of redundant or disused buildings, will be considered positively. The aim of this element of Policy SP9 is supported as a matter of principle. However, the Local Plan proposes an allocation of some 11.4 ha of employment land at Stanmore, which will encroach into open countryside which is designated Green Belt. The resulting development would not meet any of the suggested employment types set out in Policy SP9.2 and .3 (above) and thus the proposed allocations at Stanmore would be in conflict with the aims of Policy SP9. Policies in the Local Plan should be consistent one with another.
A2142B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	The essential aims of Policy SP10 are supported. However, it is important that the public is able to appreciate that the Council is promoting both these aims and the aims of other policies in the Local Plan. It is important that different policies do not conflict with one another, and that the Strategic Policies (in particular relating to land allocations), Development Management Policies and Settlement Development Guidelines, should all be consistent with the essential aims of the Plan as a whole. Policy SP10.3 says that economic growth and investment will be supported in, i.Shrewsbury, ii.Principal and Key Centres, iii.Strategic Corridors, Settlement and Sites, iv.Community Hubs, v.Community Clusters and the Countryside through windfall development where the location, scale, land use and impacts of the proposal will conform with existing land uses, settlement form and environmental qualities in accordance with relevant Local Plan policies. However, the Plan proposes the allocation of two areas of land, totalling 11.4 ha, at Stanmore in open countryside which is also Green Belt land, adjacent to an existing industrial Estate. Stanmore is not within Shrewsbury, a Principal or Key Centre, a Community Hub or a Community Cluster. Its location within the East Strategic Corridor is tenuous as it does not connect effectively with other settlements within that Corridor or the major road links upon which the Corridor is based. The development proposed for Stanmore, then, fulfils none of the locational requirements set out above, and the proposed allocations would, therefore, be in conflict with Policy SP10.3. The proposed development at Stanmore should therefore be deleted from the Plan in order to ensure compliance with Policy SP10
A2142B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11: Delivering Sustainable Economic Growth and Enterprise Policy SP11 is supported in terms of its essential aims, but the justification for 300 ha of land to be allocated for employment use in the County is questioned. This would equate to the delivery of around 14 ha. every year throughout the Plan period. That is a tall order, indeed, when, in the period 2016 – 2019, a yearly build rate of only 10.7 ha of employment land had been delivered – over the period of the current Local Plan, delivery has been far less. No particular factors are evidenced as guaranteeing an increase in delivery in the plan period 2016 – 2038. This lack of delivery has not been caused by lack of sites or planning permissions, as land on existing employment areas, as committed sites and in "Saved" allocations, amounts to 239 ha, which in theory has been readily developable (figures taken from Appendix 6 of the of the Local Plan Review consultation document). It does not appear that the figure of 300 ha of employment land is likely to be delivered in the plan period and there is little need for the 142 ha of newly allocated employment land. Policy SP11.2.e says that a development proposal for employment will predominantly comprise Class B uses, (though certain others – sui generis, A2, C1, C2, C2A and D1 would be appropriate, though that is debatable – for example, an employment site in an employment area is possibly not the most appropriate location for a place of worship or Church Hall) but the proposals should "satisfy the requirements of national and local policies especially to protect the Green Belt".....(amongst other things). The land proposed in the Local Plan consultation document for employment allocation at Stanmore is located in the Green Belt and in countryside, and an allocation for the use of the land for employment would clearly be in conflict with Policy SP11.2.e. The allocations should be deleted from the Plan.
A2156B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A2156B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community. The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town. The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley. There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore. The sites are situated in Green Belt and no very special or exceptional circumstances have been identified. The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9. Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development. Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore. Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation. Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2157B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>[1] Ecology Mor brook forms a very valuable and virtually continuous wildlife corridor from its source near Much Wenlock through numerous wildlife sites before flowing into the Severn. Habitat management and restoration work along this corridor has had considerable success in halting and even reversing the terrifying decline & extinction of so many mammal, bird, amphibian, reptile and insect species that is occurring in so much of the UK and around the world. The current degree of access by tourists and the local population is probably sustainable because the agricultural land between Mor brook & the town forms a buffer zone. But the permanent loss of this buffer zone is being proposed. Shropshire Wildlife Trust objects to these proposals for a large number of houses in the open countryside around Bridgnorth. It appears to be an entirely opportunistic proposal outside of any strategic planning consideration within the democratic scrutiny of the Shropshire Local Plan and the SAMDev housing allocation process. Along with this proposal there are several similar developments of this significant scale under consideration in Shropshire, for example Tong Garden Village and Ironbridge Power Station. They all have a cumulative impact on limited water resources in the county, whilst the potential impact of house building itself and the lifetime energy requirements of the households will contribute to the negative impacts of climate change. They have not been taken into consideration and do not align with the Climate Emergency Declaration signed by Shropshire Council last year. Coupled with increased pressure on wildlife populations in the surrounding countryside, and in the context of a growing climate, ecological and health emergency, we would question whether this proposal is appropriate in a post-Covid-19 situation when there is an appetite for a [Green Recovery] rather than business as usual approach.</p> <p>[2] Pollution and Public Amenity: The land on which the proposed Tasley Garden Village is to be built is classified as Grade 3 agricultural land. The NFU says the UK currently only produces 58% of the veg we consume and 16% of our fruit. At a time when local food production in the UK is under threat, why is Grade 3 agricultural land being taken for residential and employment facilities?</p> <p>[3] Housing: In total, the Local Plan is recommending that 2,250 new houses be built in the Tasley area. This will increase the population of Bridgnorth by at least 4,500 people which represents an increase of 35%. On what basis has Shropshire Council arrived at the larger figure? Whilst it is accepted that Bridgnorth and surrounding areas require more dwellings to cater for the likely future growth of the town, on what basis has Shropshire Council decided that such numbers will make provision for the needs of the town and surrounding hinterland? A Local Housing Needs Assessment is required in order to establish what the needs are. Should this not be carried out before it is decided on the numbers of dwellings to be built? Can the Town support an increase of 35% to its population? [4]</p> <p>Employment Land: The Local Plan confirms that in total 29 ha of employment land (the equivalent of just over 54 full sized football pitches) has been allocated to the Tasley area south of the A458, all of which is outside the Bridgnorth Development Boundary. As well as setting out the above for employment land the Local Plan has identified a further 11 ha of Green Belt land to allow for the extension of the current Stanmore Industrial Estate. Altogether the Local Plan has earmarked a total of 40 ha for employment land in the Bridgnorth area. On what grounds does Shropshire Council believe that there is a requirement for 40 ha for offices, research and development, industrial processes and warehousing for storage or distribution? Are all the units already available for occupation by businesses in Bridgnorth and surrounding areas occupied? What is the vacancy rate? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable? What effect will coronavirus have on our work practices and how will this affect the requirement for 40 ha of employment land? What happens to this designated land if the targets are not achieved? It would make more sense to deliver the employment land as set out in the</p>
A2181B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A2181B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A2188 B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>The land that is proposed for employment use at Stanmore currently lies within the Green Belt and should remain as such.</p> <p>The NPPF indicates Green Belt boundaries should only be revised where exceptional circumstances are fully evidenced and justified. No adequate justification has been put forward within the Pre-Submission Draft of the Shropshire Local Plan.</p> <p>The Green Belt Review does not qualify as "exceptional circumstances" and did not demonstrate or suggest that there was a necessity for change to the Green Belt boundaries at Stanmore. Other reasonable options for meeting the identified need for development exist, outside the Green Belt in the near vicinity.</p> <p>The proposal is contrary to National Planning Policy.</p>
A2188 B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy DP25.2 indicates that the Green Belt will be protected against inappropriate development (consistent with the NPPF).</p> <p>An industrial estate represents inappropriate development in the Green Belt, as it would harm openness. If the land were subject to a Planning Application for employment uses it would be refused due to conflict with the Green Belt and lack of very special circumstances. The Local Plan Review should not be used to justify inappropriate development of the Green Belt. As there are no very special circumstances and employment development is considered inappropriate in the Green Belt, proposed allocations STC002 and P58a conflict with policy DP25.2. Form 2</p>
A2188 B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11 (2.e) states development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported.</p> <p>However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. As such proposed allocations STC002 and P58a conflict with sub-section 2.e. of Policy SP11, in addition to Policy DP25 and the NPPF.</p>
A2188 B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A2188B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Bridgnorth is NOT the second largest principal area; it is a small market town with approx. 12,079 population, according to the 2011 census. Oswestry has 17,105 inhabitants (2011 census), therefore Bridgnorth is the THIRD largest principal centre in the Shropshire Council area. This is misleading information and should be changed, as you development plan is built on erroneous information. A development of 1,800 homes in a market town the size of Bridgnorth is totally unwarranted and I object strongly to it. If each home houses a family of 4 (average sized family), this would mean an increase of 7,200 people, which would MORE THAN DOUBLE the inhabitants of Bridgnorth. Whilst development is expected, a development of this size is totally unacceptable and out of keeping with the town. In addition, there are 500 homes already planned and agreed at Tasley, so this increase could actually be significantly higher. An increase of homes of this size is NOT to accommodate existing residents; it is to increase the size of the town by incoming buyers, namely, West Midlands overspill.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2188B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Greenbelt land must only be used where there are exceptional circumstances; where there are not, use of this land would be unlawful.
A2188B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sustainable or not, this type of large 'urban extension' means you would create a completely new, massive, community in itself, completely out of keeping with the size of the existing town. Whilst development is expected, the proposed development of a 'garden village' is similar to that which is currently taking place in Telford, a town which can accommodate this type of development, whereas Bridgnorth is a small market town whose transport network and services are already at breaking point. Namely: <ul style="list-style-type: none"> • The roads are narrow/one way and struggle to accommodate existing traffic • Car parking is already inadequate for current residents and visitors to the town • Although there are 3 supermarkets in Bridgnorth, they are all small with very limited parking, which is frequently full • There is ONE fuel station which is already overloaded, creating dangerous queues onto the A442 • The road system is already extremely poorly maintained and with additional traffic, will no doubt degrade further, particularly the major A422 running through Low Town • Services such as the doctors surgery are completely overloaded already I object strongly to this development as an 'urban development' on this massive scale, because it is completely out of keeping with the existing town.
A2188B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Regarding business land, the local Chamber of Commerce has already stated that no other business premises are required and that there are some already lying empty. There are no links to motorways (apart from via the already congested and poorly maintained A442), so any development for business is surplus to requirements. Just because business premises may be created, it doesn't mean businesses will relocate to Bridgnorth – why would they, when nearby Telford, near to the M54, is much better served?
A2188B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	'All other new retail development will be directed towards the town centre in line with policy DP10, where it will benefit from and contribute to the historic character of the town'. How can retail development contribute to the historic character of the town? This statement is a joke! By this policy, it is expected that the new 7000+ residents will make Bridgnorth town their main shopping centre. The town centre is already overcrowded, has grossly inadequate parking, and welcomes hundreds of visitors. Saturdays (market days) are heaving already – so much so that residents are already staying away. Social distancing is simply not possible. This type and size of development is totally out of keeping with an already overcrowded town centre, and I object strongly.
A2188B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	I am appalled that, after proposing more than doubling the size of the existing town of Bridgnorth Shropshire Council wishes to add further development in the future, as well as the proposed 'garden village'. Who will that be for? The town of Bridgnorth will become the new Telford – ever-growing sprawl with no thought whatsoever to the nature of the town. I object strongly to even further plans for uncontrolled development long term.
A2188B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Paragraph 4 of this section cites that 'identified local needs' will inform the development. No-one from Shropshire Council has demonstrated what these 'local needs' are – ie to accommodate and grow the existing residents of the town. Will Shropshire Council share their figures and evidence for this? I believe the 500 homes already agreed for development at Tasley will more than accommodate local need, considering the population of Bridgnorth is NOT growing but FALLING; school admissions clearly show this. Shropshire Council are passing off this development as being for 'local need' when it is absolutely NOT for local need, but to encourage buyers from outside the locality, ie the West Midlands, to generate funds for the Council. The Council must start to be accountable to the residents of Bridgnorth, and start telling the truth about the figures for 'local need'. I absolutely and strongly object to the development of a massive garden village at Tasley
A2188B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	A raised pedestrian and cycle footbridge would be an ideal means of crossing the busy A458, although your rider of 'subject to ground investigations and available land' means this will probably never happen. Pedestrians and cyclists will find themselves fighting with fast traffic and there are bound to be accidents. The A458 is not only busy but a fast road (60mph), meaning any accidents are likely to be of a serious nature. The noise element is also realised as you have included 'noise reduction' methods. The hundreds of bikers who roar up the bypass on a Sunday already cause a noise nuisance to existing residents in Wellmeadow (many adverse comments on social media), so a development so close to the A458 would be very unpleasant for residents. I object strongly to the siting (and size) of this development.
A2188B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	In my view, it is simply impossible to build over huge areas of natural farmland and not cause flooding to properties lower down - it just can't be done, whatever your assurances. Low Town residents are already battling with flooding issues. As a Low Town resident, I object strongly to this aspect of the development. As previously stated, this development is NOT for Bridgnorth's housing need, but about attracting overspill from the West Midlands to re-locate, and to make money for the cash-strapped Shropshire Council. This does NOT mean it is acceptable - it isn't! I object strongly to the 'Tasley Garden Village' development proposals.
A2188B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	As previously stated, Bridgnorth is NOT the second largest principal centre of the Shropshire Council area, but the third. If development strategy is built on this premise, it is erroneous, because Oswestry is a considerably bigger centre. You have cited 'Bridgnorth's 'extensive services and facilities', yet once again, I list the very overloaded current 'services and facilities' in Bridgnorth: <ul style="list-style-type: none"> • The roads are narrow/one way and struggle to accommodate existing traffic • Car parking is already inadequate for current residents and visitors to the town • Although there are 3 supermarkets in Bridgnorth, they are all small with very limited parking • There is ONE fuel station which is already overloaded, creating dangerous queues onto the A442 • The road system is already extremely poorly maintained and with additional traffic, will no doubt degrade further • Services such as doctors surgeries are completely overloaded already
A2188B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The strategic role of Bridgnorth? It is a market town without direct links to motorways and other transport links – it is not strategically placed at all!
A2188B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The housing needs will have already been met by the 500 homes already agreed to be built at Tasley, without the proposed 'garden village' or any further housing. Again, this phrase 'local need' is used glibly – there are no figures or evidence given to support the supposed 'local need' of Bridgnorth! The population of Bridgnorth is NOT growing but FALLING; school admissions clearly show this. As previously mentioned, the Bridgnorth Chamber of Commerce has already stated that there are already sufficient employment buildings available in Bridgnorth, with some existing buildings lying empty. I strongly object to the scale of development planned by Shropshire Council for Bridgnorth.
A2188B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	The Bridgnorth Chamber of Commerce works hard to attract business to the town; there is a reason why more businesses are NOT attracted to the town – because the road networks are poor and there is no direct link to a motorway. No new road networks have been proposed, so new businesses will NOT be attracted to Bridgnorth. It's as though Shropshire Council think they can provide employment land, and businesses will automatically come – they won't!
A2188B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	In an ideal world, a 'better balance' would be lovely, but it won't ever happen, despite whatever provisions are made – for the reasons cited previously – ie poor transport links - no access to the M54 - poorly maintained roads, specifically the A442.
A2188B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Potential businesses will not 'relocate' or 'start-up' for the reasons already stated; the road network is just not up to this. Businesses have already moved OUT of Bridgnorth for this very reason. In an ideal world, everyone would like to live and work in the same town, but this just isn't going to happen, unless Shropshire Council has a plan to build a new road network system connecting the town with motorways. The state of the main A442 going out of Bridgnorth towards Telford is in a dreadful state of repair; it carries a huge amount of traffic, yet has not been resurfaced for many years. It is currently breaking up and only resurfacing will save it from further decay. If additional traffic uses this road, it will only exacerbate this problem.
A2191B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	I am concerned about plans to build on greenbelt near Stanmore industrial site. If covid has taught us anything it is that we need our green areas more than ever. We need to protect our greenbelt and its wildlife which in turn helps our wellbeing. Once it is gone it cannot be replaced! We do not want the area to become a mass sprawl. I really hope this does not go ahead. Kind regards Jane Deeley Brewer.
A2193B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A2193B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Sites STC002 and P58a should not be allocated for employment as: <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have been for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A2277B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Site allocation conflicts with SP1 and should not be allowed because of this. This and the SAMDev development substantially increases the size of the town. Development to the south of the A458 prevents the creation of a cohesive community. There is no detail about new pedestrian and cycle facilities and in my view these will be impossible. Development here will increase traffic in Low Town as people commute to work at Stanmore, Telford or Wolverhampton. This is contrary to policy SP1 1c addressing climate change. It will not be possible to mitigate the impact on the landscape as the site is on high and sloping ground. This is contrary to SP1 1d.
A2281B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies requirements of national and local policies especially relating to protection of Green Belt (amongst others). This element of the draft Policy is supported. However, proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of draft Policy SP11, and is also in conflict with draft Policy DP25 of the Draft Local Plan and the NPPF.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2281B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A2284B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.</p>
A2284B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A2337B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>No exceptional circumstances for removing land from Greenbelt in Alveley. Suitable land in Highley should be allocated instead</p>
A2362B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>There is no need for additional massive development of Bridgnorth. Future plans should be guided by</p> <p>a) the need to retain productive farmland, particularly post-BREXIT/COVID</p> <p>b) the protection of green local environments and ecosystems, for their physical and mental health benefits</p> <p>c) the need to reduce car travel and associated pollution (including noise pollution) There is no evidence that large numbers of people commute to Bridgnorth for work from Telford and the West Midlands conurbation - so providing additional housing will not reduce road travel. In fact, the significant traffic flows are in the opposite direction- out of Bridgnorth . New housing will exacerbate this if, as is likely, a lot of housing is occupied by incoming new residents who will continue to work elsewhere. New housing should be driven by local needs only, and should be as close to existing employment as possible. Further excessive development will destroy the character of the town, and significantly reduce the quality of life of the current residents</p>
A2379B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.</p>
A2379B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>
A2380B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	<p>Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst others). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.</p>
A2380B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Sites STC002 and P58a should not be allocated for employment as:</p> <p>The allocation of some 49ha of land for employment purposes in Bridgnorth to create choice and competition in the market (para. S3.1.1) is excessive and not fully evidenced or justified. There is sufficient land elsewhere for employment purposes to serve the existing and proposed community.</p> <p>The proposed Tasley allocation includes some 16ha of employment land, this will be within walking distance of the main residential development proposals for Bridgnorth and can accommodate necessary floorspace to serve the proposed population growth for the town.</p> <p>The current Local Plan includes employment allocations at Tasley which have not been developed (between 2006–2026). These sites are carried forward into the current Local Plan Review. If demand or need for significant employment development existed these sites could have been developed. Some of this land is believed to belong to the same organisation that owns Stanmore Industrial Estate and one of the proposed allocations (STC002 or P58a), meaning that there can be no certainty that the land at Stanmore would be developed any quicker than the sites that are currently allocated at Tasley.</p> <p>There are long-term vacant plots on existing industrial estates in Bridgnorth which show no signs of being taken up. This shows there is no need or demand for additional land at Stanmore.</p> <p>The sites are situated in Green Belt and no very special or exceptional circumstances have been identified.</p> <p>The sites are located in 'Countryside' and unrelated to any significant urban development area. As such they are contrary to draft Policy SP9.</p> <p>Stanmore is divorced from residential areas and workers would have to travel, mostly by private motor vehicles, to access the site. This is contrary to the aims of Policy SP4.1 and the main aim of the NPPF. As such it cannot be considered sustainable development.</p> <p>Stanmore Industrial Estate was established to make use of a former WWII military site, there is no such justification for the present proposals. Furthermore a number of the plots on the current Estate are vacant, and have ben for months/years. There is no need for business operations generated by Bridgnorth residents (existing or future) to locate at Stanmore.</p> <p>Residential allocations proposed are at Tasley, some 3 1/2 miles from Stanmore. It is unsustainable to locate a major employment allocation so far away from the main new housing allocation.</p> <p>Having several sites available for development in Bridgnorth increases choice for developers, but only if all other matters are equal. The land proposed for employment development at Stanmore has significant drawbacks, not least being its current designation as Green Belt and its unsustainable location, and so it is, in any event, in a less favourable situation than other sites that are either currently allocated or proposed for allocation in the Local Plan Review. Further, an over-provision of sites can fragment development opportunities making investment in buildings and infrastructure less attractive and less likely to take place.</p>

Page 158

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2386B1	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Why Bridgnorth, a quaint market town, much loved by residents and visitors alike, which already struggles for the lack of infrastructure and internal development</p> <p>When there is already permission for 567 houses to be built in Tasley, with a rumoured 31 houses to be built on the former Bridgnorth Council Office site, how can a development of an extra 1050 houses up to the year 2038, prove to be acceptable?</p> <p>As for employment on the proposed site, why is this necessary, when there are already empty units available, with unused industrial land, that has been granted and remains undeveloped? When you consider that within a 15/18 mile radius, there is Shrewsbury, Telford, Wolverhampton, Stourbridge and Kidderminster with commercial developments that are well serviced by good road,rail and motorway access, why choose Bridgnorth? The local road system struggles to cope with current levels of traffic. The A458 is already a very busy road linking with the A53, through from the M6 motorway at junction 15, through to the West and South of the West Midlands conurbation. Extra traffic on this road will cause more air pollution, noise pollution and increase the dangers that are already part of the day to day.</p> <p>The only winners of this development will be Taylor Wimpey from the sale of new properties, Shropshire Council from the rates payable from new properties, and the land owners. Bridgnorth could be left in a much worse situation with no further investment, but having to cope with an increase in population, traffic and the loss of productive agricultural land.</p> <p>At a time when Covid19 excludes public meetings to discuss situations like this, would it not be sensible to put a hold on the proceedings until the correct manner of discussion can be held?</p> <p>I strongly believe that the Tasley Garden Village Development should be rejected and not included in the Local Plan Review.</p>
A2387B1	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Why Bridgnorth, a quaint market town, much loved by residents and visitors alike, which already struggles for the lack of infrastructure and internal development</p> <p>When there is already permission for 567 houses to be built in Tasley, with a rumoured 31 houses to be built on the former Bridgnorth Council Office site, how can a development of an extra 1050 houses up to the year 2038, prove to be acceptable?</p> <p>As for employment on the proposed site, why is this necessary, when there are already empty units available, with unused industrial land, that has been granted and remains undeveloped? When you consider that within a 15/18 mile radius, there is Shrewsbury, Telford, Wolverhampton, Stourbridge and Kidderminster with commercial developments that are well serviced by good road,rail and motorway access, why choose Bridgnorth? The local road system struggles to cope with current levels of traffic. The A458 is already a very busy road linking with the A53, through from the M6 motorway at junction 15, through to the West and South of the West Midlands conurbation. Extra traffic on this road will cause more air pollution, noise pollution and increase the dangers that are already part of the day to day.</p> <p>The only winners of this development will be Taylor Wimpey from the sale of new properties, Shropshire Council from the rates payable from new properties, and the land owners. Bridgnorth could be left in a much worse situation with no further investment, but having to cope with an increase in population, traffic and the loss of productive agricultural land.</p> <p>At a time when Covid19 excludes public meetings to discuss situations like this, would it not be sensible to put a hold on the proceedings until the correct manner of discussion can be held?</p> <p>I strongly believe that the Tasley Garden Village Development should be rejected and not included in the Local Plan Review.</p>
A2395B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Do not support the Council's change in its approach to the growth of Bridgnorth through the proposed amendment to Policy S3 to allocate Site BRD030 for residential development. The Preferred Options version of the Local Plan Review (November 2018) proposed to allocate land to the east of Bridgnorth for 850 dwellings (Sites P54, P56, P58, STC002, STC004, STC005 and STC006). The Pre-Submission consultation document proposes to remove this site and instead allocate land to the south west of Bridgnorth for 1,050 dwellings (Site BRD030). A presumption in favour of sustainable development is at the heart of the National Planning Policy Framework ('NPPF') 2019. Having reviewed Appendix D of the Sustainability Appraisal ('SA'), the sites that comprise the previous proposed allocation to the east of Bridgnorth perform more highly than Site BRD030. We understand from the SA that the key reason that Site BRD030 is now proposed to be allocated is because it is outside of the Green Belt. Paragraph 136 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and justified. However, the High Court has determined that releasing Green Belt land and allocating it for development in Local Plans does not need to be "a last resort". In 2014, a Judicial Review was brought by IM Properties against a decision by Lichfield District Council to release two strategic sites adjacent to Lichfield City from the Green Belt and allocate them for residential development rather than the land being promoted by IM Properties which was outside of the Green Belt but also adjacent to Lichfield City (IM Properties v Lichfield District Council and Taylor Wimpey and Persimmon Homes [2014] EWHC 2440). Mrs Justice Patterson rejected IM Properties claim that Green Belt could only be used to meet housing needs "as a last resort" and rather it was a matter of planning judgement as to whether exceptional circumstances to release land from the Green Belt have been demonstrated. The NPPF (paragraph 137) states that before concluding that exceptional circumstances exist, Councils should be able to demonstrate that all other reasonable options for meeting its identified need for development have been examined which includes: use of brownfield sites; optimising density of development; and neighbouring authority discussions. The Strategic Land Availability Assessment (SLAA) has identified that there is insufficient previously developed land / infill opportunities within Bridgnorth to accommodate the development needs for the new plan period. There is also a Greater Birmingham and Black Country Housing Market Area shortfall and Shropshire is required to accommodate some of this shortfall in order to accord with the duty to cooperate (NPPF Paragraph 24). Additionally, we consider that allocating a single area of land for the creation of a new mixed use settlement to the east of Bridgnorth provides an opportunity to support the delivery of a range of new residential and employment development to meet local needs with the delivery of new infrastructure and community facilities, including enhancement to the quality, quantity and connectivity of public open space, as well as improved access to extensive recreational open space and the wider countryside, which would benefit both new and existing residents. It is therefore considered that Shropshire Council can demonstrate that there are exceptional circumstances to remove land from the Green Belt to accommodate the strategic development needs for Bridgnorth. When it is established that there are exceptional circumstances to release Green Belt, when reviewing Green Belt boundaries "the need to promote sustainable patterns of development should be taken into account" and consideration should first be given to release Green Belt land which "has been previously developed and/or is well-served by public transport" (NPPF paragraph 138). Mrs Justice Patterson concluded in the IM Properties case that the Lichfield District Council had legitimately had regard to travel patterns and urban focus when deciding to release Green Belt land in preference to other land which it considered performed less well in these respects. In light of this, we consider that development in Bridgnorth should be directed to the east of the Settlement, as previously proposed. This land is better performing than Site BRD030 (Appendix D of the Sustainability Appraisal) and will improve connectivity to Stanmore Industrial Estate which is considered to be of local importance (paragraph 5.60 of the consultation document). Development to the east will also assist with rebalancing the growth of Bridgnorth, which has been focused to the west of the settlement during recent decades, whilst also offering good connectivity from new development at Bridgnorth to the Black Country conurbation. Should the Council correctly revert back to its original approach to allocate land to the east of Bridgnorth, the inclusion of our clients land (Site STC003) would result in the A458 being the revised boundary of the site. We consider that this will create a more logical, permanent and defensible Green Belt boundary than the edge of Stanmore Country Park, to accord with the requirements of paragraph 139 of the NPPF. In regards to Local Housing Need, Shropshire Council's assessment using the Government's Standard Methodology indicates that as of April 2020 there is a minimum need for 25,894 dwellings over the plan period (2016-2038). However, the Government is currently consulting on a revised standard methodology which will result in Shropshire's annual housing requirement increasing by circa 80% (1,177 dwellings per annum to a minimum of 2,129 dwellings). It is also noted that the proposed housing requirement for the County has increased since the Preferred Options consultation to 30,040 dwellings (previously 28,750 dwellings) to include 1,500 dwellings towards the Black Country housing shortfall. The revised housing requirement proposed through the Plan is not enough to meet the Shropshire housing needs calculated using the revised standard method. We therefore request that this is reviewed and additional sites are allocated within the plan to meet this greater housing need. In order to comply with the NPPF and Policy SP2 of the consultation plan, we consider that the additional housing growth should be directed to the most sustainable settlements in Shropshire; Shrewsbury and the Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch). The proposed housing apportionment to Bridgnorth has increased from 1,500 dwellings in the Preferred Options document to 1,800 dwellings in the Pre-submission document. The Principal Centres are proposed to deliver 7,500 dwellings, which is circa 24% of the Council's housing requirement. In our previous representations we sought confirmation as to how the Principal Centres' housing figure apportionments had been decided. As the second most sustainable tier in the proposed 'Urban Locations' Hierarchy (Schedule SP2.1), and in accordance with the sustainable development aims set out in Policy SP2, we consider that a greater proportion of the Council's housing need (once amended to accord with the revised Standard Method figure) should be directed to the Principal Centres, particularly Bridgnorth which is the third largest settlement in Shropshire. Policy S3 of the Pre-Submission consultation document states that Bridgnorth is expected to provide a total of 1,800 dwellings towards the total requirement of 30,800 dwellings. Schedule A5(i) sets out that 1,050 dwellings will be delivered on the Local Plan allocation (Site BRD030) and 500 dwellings will be delivered on saved SAMDev allocations. The schedule also highlights that between 2016-2019 only 52 dwellings were completed in Bridgnorth and there are only 38 dwellings with planning permission as of March 2019. We do not consider that there is a sufficient amount of immediate sites that can deliver housing in Bridgnorth within the next 5 years. Smaller sites, such as our client's site (STC003) that are currently available and can be delivered in the short term should be allocated in addition to, and to complement, any strategic allocations to ensure the housing needs of Bridgnorth are sufficiently met. It is considered that the wider proposed Preferred Options allocation at Stanmore and our client's site can together accommodate both the identified 1,050 allocation apportionment to Bridgnorth and further growth to meet the additional requirements identified (through applying the revised standard methodology) for the next Plan period and beyond. The enclosed Illustrative Concept Plan demonstrates at a very high level how development might be accommodated on our client's site, whilst linking it to the wider area being promoted by the Stanmore Consortium to the north and west of our client's site.</p>
A2395B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	<p>Do not support the Council's change in its approach to the growth of Bridgnorth through the proposed amendment to Policy S3 to allocate Site BRD030 for residential development. The Preferred Options version of the Local Plan Review (November 2018) proposed to allocate land to the east of Bridgnorth for 850 dwellings (Sites P54, P56, P58, STC002, STC004, STC005 and STC006). The Pre-Submission consultation document proposes to remove this site and instead allocate land to the south west of Bridgnorth for 1,050 dwellings (Site BRD030). A presumption in favour of sustainable development is at the heart of the National Planning Policy Framework ('NPPF') 2019. Having reviewed Appendix D of the Sustainability Appraisal ('SA'), the sites that comprise the previous proposed allocation to the east of Bridgnorth perform more highly than Site BRD030. We understand from the SA that the key reason that Site BRD030 is now proposed to be allocated is because it is outside of the Green Belt. Paragraph 136 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and justified. However, the High Court has determined that releasing Green Belt land and allocating it for development in Local Plans does not need to be "a last resort". In 2014, a Judicial Review was brought by IM Properties against a decision by Lichfield District Council to release two strategic sites adjacent to Lichfield City from the Green Belt and allocate them for residential development rather than the land being promoted by IM Properties which was outside of the Green Belt but also adjacent to Lichfield City (IM Properties v Lichfield District Council and Taylor Wimpey and Persimmon Homes [2014] EWHC 2440). Mrs Justice Patterson rejected IM Properties claim that Green Belt could only be used to meet housing needs "as a last resort" and rather it was a matter of planning judgement as to whether exceptional circumstances to release land from the Green Belt have been demonstrated. The NPPF (paragraph 137) states that before concluding that exceptional circumstances exist, Councils should be able to demonstrate that all other reasonable options for meeting its identified need for development have been examined which includes: use of brownfield sites; optimising density of development; and neighbouring authority discussions. The Strategic Land Availability Assessment (SLAA) has identified that there is insufficient previously developed land / infill opportunities within Bridgnorth to accommodate the development needs for the new plan period. There is also a Greater Birmingham and Black Country Housing Market Area shortfall and Shropshire is required to accommodate some of this shortfall in order to accord with the duty to cooperate (NPPF Paragraph 24). Additionally, we consider that allocating a single area of land for the creation of a new mixed use settlement to the east of Bridgnorth provides an opportunity to support the delivery of a range of new residential and employment development to meet local needs with the delivery of new infrastructure and community facilities, including enhancement to the quality, quantity and connectivity of public open space, as well as improved access to extensive recreational open space and the wider countryside, which would benefit both new and existing residents. It is therefore considered that Shropshire Council can demonstrate that there are exceptional circumstances to remove land from the Green Belt to accommodate the strategic development needs for Bridgnorth. When it is established that there are exceptional circumstances to release Green Belt, when reviewing Green Belt boundaries "the need to promote sustainable patterns of development should be taken into account" and consideration should first be given to release Green Belt land which "has been previously developed and/or is well-served by public transport" (NPPF paragraph 138). Mrs Justice Patterson concluded in the IM Properties case that the Lichfield District Council had legitimately had regard to travel patterns and urban focus when deciding to release Green Belt land in preference to other land which it considered performed less well in these respects. In light of this, we consider that development in Bridgnorth should be directed to the east of the Settlement, as previously proposed. This land is better performing than Site BRD030 (Appendix D of the Sustainability Appraisal) and will improve connectivity to Stanmore Industrial Estate which is considered to be of local importance (paragraph 5.60 of the consultation document). Development to the east will also assist with rebalancing the growth of Bridgnorth, which has been focused to the west of the settlement during recent decades, whilst also offering good connectivity from new development at Bridgnorth to the Black Country conurbation. Should the Council correctly revert back to its original approach to allocate land to the east of Bridgnorth, the inclusion of our clients land (Site STC003) would result in the A458 being the revised boundary of the site. We consider that this will create a more logical, permanent and defensible Green Belt boundary than the edge of Stanmore Country Park, to accord with the requirements of paragraph 139 of the NPPF. In regards to Local Housing Need, Shropshire Council's assessment using the Government's Standard Methodology indicates that as of April 2020 there is a minimum need for 25,894 dwellings over the plan period (2016-2038). However, the Government is currently consulting on a revised standard methodology which will result in Shropshire's annual housing requirement increasing by circa 80% (1,177 dwellings per annum to a minimum of 2,129 dwellings). It is also noted that the proposed housing requirement for the County has increased since the Preferred Options consultation to 30,040 dwellings (previously 28,750 dwellings) to include 1,500 dwellings towards the Black Country housing shortfall. The revised housing requirement proposed through the Plan is not enough to meet the Shropshire housing needs calculated using the revised standard method. We therefore request that this is reviewed and additional sites are allocated within the plan to meet this greater housing need. In order to comply with the NPPF and Policy SP2 of the consultation plan, we consider that the additional housing growth should be directed to the most sustainable settlements in Shropshire; Shrewsbury and the Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch). The proposed housing apportionment to Bridgnorth has increased from 1,500 dwellings in the Preferred Options document to 1,800 dwellings in the Pre-submission document. The Principal Centres are proposed to deliver 7,500 dwellings, which is circa 24% of the Council's housing requirement. In our previous representations we sought confirmation as to how the Principal Centres' housing figure apportionments had been decided. As the second most sustainable tier in the proposed 'Urban Locations' Hierarchy (Schedule SP2.1), and in accordance with the sustainable development aims set out in Policy SP2, we consider that a greater proportion of the Council's housing need (once amended to accord with the revised Standard Method figure) should be directed to the Principal Centres, particularly Bridgnorth which is the third largest settlement in Shropshire. Policy S3 of the Pre-Submission consultation document states that Bridgnorth is expected to provide a total of 1,800 dwellings towards the total requirement of 30,800 dwellings. Schedule A5(i) sets out that 1,050 dwellings will be delivered on the Local Plan allocation (Site BRD030) and 500 dwellings will be delivered on saved SAMDev allocations. The schedule also highlights that between 2016-2019 only 52 dwellings were completed in Bridgnorth and there are only 38 dwellings with planning permission as of March 2019. We do not consider that there is a sufficient amount of immediate sites that can deliver housing in Bridgnorth within the next 5 years. Smaller sites, such as our client's site (STC003) that are currently available and can be delivered in the short term should be allocated in addition to, and to complement, any strategic allocations to ensure the housing needs of Bridgnorth are sufficiently met. It is considered that the wider proposed Preferred Options allocation at Stanmore and our client's site can together accommodate both the identified 1,050 allocation apportionment to Bridgnorth and further growth to meet the additional requirements identified (through applying the revised standard methodology) for the next Plan period and beyond. The enclosed Illustrative Concept Plan demonstrates at a very high level how development might be accommodated on our client's site, whilst linking it to the wider area being promoted by the Stanmore Consortium to the north and west of our client's site.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2446B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	I suggest that SC develops the Country Park making infilling between Russel's Close and The Hobbins, making the wood along the Hermitage ridge nearer the town between the Wolverhampton A454 and Stourbridge A458 into a replacement country park. Do not agree with developing Stanmore Farm as it is one of the best productive farms in the Bridgnorth District.
A2448B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area		A reasonable assessment (based on occupancy by single persons, couples and families) concludes the proposed development (existing and new allocations) could result in a 40% increase of the Bridgnorth population. To mitigate this: -Relieve traffic flows through Low Town, which cause congestion and air pollution (above permitted levels). One solution to northbound (and conversely southbound) traffic from the Kidderminster direction towards Telford would be to improve the route north from the A454/Wolverhampton Road roundabout to where it joins the A442 (plus work to associated roads), and encourage traffic onto it. -Improve/provide additional car parking. Bridgnorth is not simply a market town, it is also an important visitor destination due to its medieval streets/character which creates significant demand. Of the two central car parks, one is privately owned and used for a market on Saturdays (as are both sides of the High Street), exacerbating parking problems on Saturdays. Closure of Westgate and redevelopment of the site will also result in loss of 70 parking spaces. The Council's Innage Lane Car Park is within walking distance of the town centre (but too far to carry shopping and used for school drop-offs/collections), a multi-story car park should be developed on this site. -Further education facilities required. Existing facility was closed and site redeveloped, however there is an overwhelming need for such a facility. This could be integrated into a special needs facility and provided on BRD030. - Quality of housing. Recent proposals for the Westgate site were poor. Future housing should comply with the following criteria: solar panels on each home, sufficient internal space for dishwasher/fridge/freezer/washing machine/perambulator/airer/kitchen extraction fan, parking for two vehicles (one beneath a car port) or one for multi-occupancy buildings (beneath a car port), no gas connection, heat pumps provided and a water butt.
A2467B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	1. Bridgnorth is NOT the second largest principal area; it is a small market town with approx. 12,079 population, according to the 2011 census. Oswestry has 17,105 inhabitants (2011 census), therefore Bridgnorth is the THIRD largest principal centre in the Shropshire Council area. This is misleading information and should be changed, as your development plan is built on erroneous information. A development of 1,800 homes in a market town the size of Bridgnorth is totally unwarranted and I object strongly to it. If each home houses a family of 4 (average sized family), this would mean an increase of 7,200 people, which would MORE THAN DOUBLE the inhabitants of Bridgnorth. Whilst development is expected, a development of this size is totally unacceptable and out of keeping with the town. In addition, there are 500 homes already planned and agreed at Tasley, so this increase could actually be significantly higher. An increase of homes of this size is NOT to accommodate existing residents; it is to increase the size of the town by incoming buyers, namely, West Midlands overspill.
A2467B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	2. Greenbelt land must only be used where there are exceptional circumstances; where there are not, use of this land would be unlawful.
A2467B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	3. Sustainable or not, this type of large 'urban extension' means you would create a completely new, massive, community in itself, completely out of keeping with the size of the existing town. Whilst development is expected, the proposed development of a 'garden village' is similar to that which is currently taking place in Telford, a town which can accommodate this type of development, whereas Bridgnorth is a small market town whose transport network and services are already at breaking point. Namely: <ul style="list-style-type: none">• The roads are narrow/one way and struggle to accommodate existing traffic• Car parking is already inadequate for current residents and visitors to the town• Although there are 3 supermarkets in Bridgnorth, they are all small with very limited parking, which is frequently full• There is ONE fuel station which is already overloaded, creating dangerous queues onto the A442• The road system is already extremely poorly maintained and with additional traffic, will no doubt degrade further, particularly the major A422 running through Low Town• Services such as the doctors surgery are completely overloaded already I object strongly to this development as an 'urban development' on this massive scale, because it is completely out of keeping with the existing town
A2467B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	5 & 6. Regarding business land, the local Chamber of Commerce has already stated that no other business premises are required and that there are some already lying empty. There are no links to motorways (apart from via the already congested and poorly maintained A442), so any development for business is surplus to requirements. Just because business premises may be created, it doesn't mean businesses will relocate to Bridgnorth – why would they, when nearby Telford, near to the M54, is much better served?
A2467B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	7. 'All other new retail development will be directed towards the town centre in line with policy DP10, where it will benefit from and contribute to the historic character of the town'. How can retail development contribute to the historic character of the town? This statement is a joke! By this policy, it is expected that the new 7000+ residents will make Bridgnorth their main shopping centre. The town centre is already overcrowded, has grossly inadequate parking, and welcomes hundreds of visitors. Saturdays (market days) are heaving already – so much so that residents are already staying away. Social distancing is simply not possible. This type and size of development is totally out of keeping with an already overcrowded town centre, and I object strongly.
A2467B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	8. I am appalled that, after proposing more than doubling the size of the existing town of Bridgnorth, Shropshire Council wishes to add further development in the future, as well as the proposed 'garden village'. Who will that be for? The town of Bridgnorth will become the new Telford – ever-growing sprawl with no thought whatsoever to the nature of the town. I object strongly to even further plans for uncontrolled development long term.
A2467B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	Paragraph 4 of this section cites that 'identified local needs' will inform the development. No-one from Shropshire Council has demonstrated what these 'local needs' are – ie to accommodate and grow the existing residents of the town. Will Shropshire Council share their figures and evidence for this? I believe the 500 homes already agreed for development at Tasley will more than accommodate local need, considering the population of Bridgnorth is NOT growing but FALLING; school admissions clearly show this. Shropshire Council are passing off this development as being for 'local need' when it is absolutely NOT for local need, but to encourage buyers from outside the locality, ie the West Midlands, to generate funds for the Council. The Council must start to be accountable to the residents of Bridgnorth, and start telling the truth about the figures for 'local need'. I absolutely and strongly object to the development of a massive garden village at Tasley.
A2467B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	A raised pedestrian and cycle footbridge would be an ideal means of crossing the busy A458, although your rider of 'subject to ground investigations and available land' means this will probably never happen. Pedestrians and cyclists will find themselves fighting with fast traffic and there are bound to be accidents. The A458 is not only busy but a fast road (60mph), meaning any accidents are likely to be of a serious nature. The noise element is also realised as you have included 'noise reduction' methods. The hundreds of bikers who roar up the bypass on a Sunday already cause a noise nuisance to existing residents in Wellmeadow (many adverse comments on social media), so a development so close to the A458 would be very unpleasant for residents. I object strongly to the siting (and size) of this development.
A2467B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	'Flood and water management measures must not displace water elsewhere.' In my view, it is simply impossible to build over huge areas of natural farmland and not cause flooding to properties lower down - it just can't be done, whatever your assurances. Low Town residents are already battling with flooding issues. As a Low Town resident, I object strongly to this aspect of the development. As previously stated, this development is NOT for Bridgnorth's housing need, but about attracting overspill from the West Midlands to re-locate, and to make money for the cash-strapped Shropshire Council. This does NOT mean it is acceptable - it isn't! I object strongly to the 'Tasley Garden Village' development proposals.
A2467B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	5.53 As previously stated, Bridgnorth is NOT the second largest principal centre of the Shropshire Council area, but the third. If development strategy is built on this premise, it is erroneous, because Oswestry is a considerably bigger centre. You have cited 'Bridgnorth's extensive services and facilities', yet once again, I list the very overloaded current 'services and facilities' in Bridgnorth: <ul style="list-style-type: none">• The roads are narrow/one way and struggle to accommodate existing traffic• Car parking is already inadequate for current residents and visitors to the town• Although there are 3 supermarkets in Bridgnorth, they are all small with very limited parking• There is ONE fuel station which is already overloaded, creating dangerous queues onto the A442• The road system is already extremely poorly maintained and with additional traffic, will no doubt degrade further• Services such as doctors surgeries are completely overloaded already
A2467B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	a) The strategic role of Bridgnorth? It is a market town without direct links to motorways and other transport links – it is not strategically placed at all!
A2467B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	c) The housing needs will have already been met by the 500 homes already agreed to be built at Tasley, without the proposed 'garden village' or any further housing. Again, this phrase 'local need' is used glibly – there are no figures or evidence given to support the supposed 'local need' of Bridgnorth! The population of Bridgnorth is NOT growing but FALLING; school admissions clearly show this. As previously mentioned, the Bridgnorth Chamber of Commerce has already stated that there are already sufficient employment buildings available in Bridgnorth, with some existing buildings lying empty. I strongly object to the scale of development planned by Shropshire Council for Bridgnorth.
A2467B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	d) The Bridgnorth Chamber of Commerce works hard to attract business to the town; there is a reason why more businesses are NOT attracted to the town – because the road networks are poor and there is no direct link to a motorway. No new road networks have been proposed, so new businesses will NOT be attracted to Bridgnorth. It's as though Shropshire Council think they can provide employment land, and businesses will automatically come – they won't!
A2467B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	e & f) In an ideal world, a 'better balance' would be lovely, but it won't ever happen, despite whatever provisions are made – for the reasons cited previously – ie poor transport links - no access to the M54 - poorly maintained roads, specifically the A442.
A2467B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Disagree	5.55 Potential businesses will not 'relocate' or 'start-up' for the reasons already stated; the road network is just not up to this. Businesses have already moved OUT of Bridgnorth for this very reason. In an ideal world, everyone would like to live and work in the same town, but this just isn't going to happen, unless Shropshire Council has a plan to build a new road network system connecting the town with motorways. The state of the main A442 going out of Bridgnorth towards Telford is in a dreadful state of repair; it carries a huge amount of traffic, yet has not been resurfaced for many years. It is currently breaking up and only resurfacing will save it from further decay. If additional traffic uses this road, it will only exacerbate this problem.
A2484B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	Policy SP11.2.e. says that Development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the Green Belt (amongst other points). This element of the Policy is supported. However, the proposed removal of land from the Green Belt at Stanmore would not protect the Green Belt and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the Green Belt is, then, in conflict with the stated aim of sub-section 2.e. of Policy SP11, and is also in conflict with Policy DP25 of the Draft Local Plan and the National Planning Policy Framework.
A2485B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S3 Bridgnorth Place Plan Area	Agree	POLICY SP11.2.e. says that development proposals for employment development will be expected to demonstrate the development scheme satisfies the requirements of national and local policies especially relating to the protection of the GREEN BELT, amongst other points. This element of the Policy is supported. However the proposed removal of land from the GREEN BELT at Stanmore would not protect the GREEN BELT and no very special circumstances have been advanced that would justify its removal. The proposal to remove the land from the GREEN BELT is then, in conflict with the stated aim of sub section 2.e. of POLICY SP11, and is also in conflict with POLICY DP25 of the DRAFT LOCAL PLAN AND THE NATIONAL PLANNING POLICY FRAMEWORK.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0028B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The site is located within the AONB. Whilst new housing is needed this should be small-scale and adjacent to the current built environment The site has been promoted numerous times in the past and ultimately not allocated due to constraints present. The site is well used by countless groups, visitors and locals - particularly during the lockdown. The site offers immediate access to wild/semi-wild countryside along the Jack Mytton Way. The site is extremely wet. There have been flooding incidents along main access routes including Watling Street South and Regleth Road. There are serious immediate and wider access issues. Clive Avenue is a particular point of concern, with a narrow carriageway causing problems for vehicles and pedestrians. Increased vehicular movements will exacerbate damage to local roads.
A0028B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 because the site is in an AONB, used by rambling groups, visitors, locals etc via Jack Mytton Way. Major development in an AONB is against NPPF and is against policy DP18. There is no objective need for 200 houses in Church Stretton. Snatchfields flood, has underground spring issues, is too far from schools, has terrain and access problems. Sinkholes opened up in Ragleth Road and Clive Avenue in 2019 after heavy rain. Site failed Council's own SA in 2018. Smaller and brownfield sites would be less damaging. CSTR014 is preferred. Snatchfields is a haven for wildlife and cannot deliver 10% biodiversity net gain.
A0092B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Extremely high quality, amenity area with amazing views and scenery. Historic site is a rare commodity, the loss of which would be environmentally disastrous and impact on health and wellbeing of locals and visitors, who also contribute to the local economy. Such areas of increasing importance due to COVID-19. Access to the site is not safe or appropriate for increased traffic levels with poor access to public transport & potential impacts and risk to pedestrian and cyclist safety. Future residents would be car dependent contrary to national climate change act and carbon emission reduction targets. Do not consider that this the most suitable site out of 33 available - notable that site fails Council's SA test. Recognise need for housing but location is inappropriate. Council needs to carry out in depth housing needs assessment for the area and provide more detailed evidence of demand for housing here. Evidence needs to be provided as to why this is considered to be most suitable site rather than others available. Construction of housing in AONB in conflict with Policies DP13 & 18 & does not meet NPPF criteria which states that major development more damaging than smaller carefully planned development to meet local need based on objective assessment of housing requirements in that area. Council needs to prioritise accessible brownfield sites within easier reach of public transport & amenities. If no option other than single allocation then site CSTR014 (behind School) far more suitable than CSTR021(Snatchfield)
A0105B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The site is in the AONB. No justification for 200 dwellings in C. Stretton. The site floods, is far from schools and had a sinkhole. Brownfield sites should not have been screened out. Wildlife on the site disrupted - contrary to DP13. Poor access to the site, and increase in cars in area. This is major development, so is contrary to DP26. Need for 200 dwellings in C Stretton is wrong. 20% affordable unlikely due to costs. There is no detailed evidence for Exceptional Circumstances for development of this site in the AONB - development can be on alternative sites, such as CSTR014. Noise and pollution will increase.
A0109B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	There is no proof of the need for all these houses. There are more suitable smaller sites, such as CST014. Poor access from the site - narrow with no pavement. Site contrary to NPPF - smaller developments are recommended in an AONB. There is no detailed evidence for Exceptional Circumstances for development of this site in the AONB.
A0125B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	It is recognised that the site referred to under CST016X is a small infill plot less than 0.2 ha but my clients, HF Holidays, who own the land wish to make it clear that the site is currently available as an infill plot and therefore the assessment set out on page 31 (or 29) of the report is not correct in its conclusion and should be amended. To confirm this site is available and the owners are currently contemplating submitting a planning application.
A0151B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Housing target must be based on conclusive evidence of the numbers and types of dwellings. Guideline of 200 is too high. Focus on housing for the young families, those who work in the town and older people. Affordability and close access to facilities are key. CST021 failed your own sustainability assessment [-7]. The Snatchfield site is likely to be expensive to develop enabling developers to argue against the DP3 Affordable housing provision percentage of 20%. I consider this percentage too low anyway. Sites CST001, CST002 and CST017 are examples of sites ideal for affordable small sized properties close to facilities. Location of CST021 does not promote sustainable transport - development here would increase car dependency and worsen existing traffic problems along Clive Avenue and worsen the Watling Street South junction. The household survey conducted by the Community led plan [2020] indicated a desire to protect the landscape and the character of our town. CST021 is in the AONB. Covid has emphasised importance of countryside walks. CST021 would affect an attractive visual area and the quality and extent of important wildlife habitats.
A0152B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Shropshire Council has provided no evidence based on local need for housing in Church Stretton No quantitative analysis of the need for housing growth in Church Stretton has been undertaken. The number of 200 homes has been based on vague statements about the need to grow Church Stretton as a Key Centre The site lies within the Shropshire Hills Area of Outstanding Natural (AONB). This is not addressed. The justification fails to demonstrate exceptional circumstances. Insufficient weight has been afforded to conserving and enhancing the AONB and therefore major development should not be allocated in Church Stretton. Site specific constraints would significantly reduce the viability of the site and the number and type of houses that could be provided. Access to the site is steep and its location and topography make it unsuitable for the provision of specialist housing other alternative sites should be explored further Alternative smaller and brownfield sites exist in Church Stretton and these should be developed CSTR014 should be considered Snatchfield is an unsuitable site to achieve Shropshire Council Policy DP13 (net biodiversity gain) or Policy DP18 (safeguard or enhancement of landscape character and visual amenity)
A0157B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Nothing has changed from the decision to reject this site in 2015. The land is extremely wet and building here would pose a significant increased flood risk to properties lower down the valley. There are serious access problems - Clive Avenue is a particular concern. The carriageway is narrow and there is no pavement or pedestrian walkway anywhere to provide one. There is hardly room for cars to pass each other and certainly not when pedestrians are present. The site is in an AONB. Snatchfield is a valley that offers perhaps the most significant walking access route to the hills east of Church Stretton. There are several smaller and low impact sites already within the town that could provide the sort of low cost practical housing that is required.
A0170B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of CST021 within the Plan as: There has been no objective assessment of housing need. Without this, the guideline for Church Stretton is just an arbitrary figure. Local agreement of need for around 20 affordable houses, due to local demographics there are always other properties available. Due to site constraints and associated costs, CST021 will deliver no affordables. As Shropshire's housing need is being exceeded and cross-boundary need accepted (without consultation, so that Green Belt can be protected and valued countryside in Shropshire lost), no contribution is required from Church Stretton and the AONB, other than windfall and affordable dwellings. CST021 was withdrawn from the Local Plan process in 2012 as the Council said it was not suitable for development and was not supported locally. Nothing has changed, except infilling around the site has exacerbated problems. CST021 performs poorly within the Sustainability Appraisal. CSTR014 performs better and is now available. The AONB has greater protection from development than other areas - no major development should occur without exceptional circumstances. Including CST021 when there are alternative sites, several smaller, fails the exceptional circumstances requirement. CST021 also contradicts policy DP26. The 875 responses to the Community Led Plan Household Survey clearly show residents wish to "protect the landscape on both sides of the valley" and "preserve the character and appearance of the town (and) preserving the trees and green spaces". Vehicular access to CST021 is dangerous, demolition of a bungalow will not resolve steep gradients, pinch points to the A49, on-street parking, subsidence on Ragleth Road and conflict between vehicles and pedestrians. Further traffic and pedestrians from development of CST021 would increase risk. No comprehensive traffic survey has been conducted by the Council, a local on highlights problems. CST021 is saturated and there is run-off into the Bridalways and from here into Swains Meadow causing flood risk when it rains. Development would increase these problems and it is unclear how development could alleviate them. Tourism is vital in Church Stretton, development of CST021 (around the Jack Mytton Way) would detract from this and aspirations to increase walking in the hills east of the A49. Jack Mytton Way is well used and would not be the same if through a housing estate. CST021 is an important habitat including for Badgers, Bats, Foxes, Deer, Owls, Buzzards and smaller birds. Development of CST021 contradicts policies DP13 and 18. Development of CST021 would increase smoke pollution (more bonfires, barbecues, wood burning stoves etc), noise pollution (amphitheater effect of the valley) and light pollution. There is insufficient infrastructure, employment and parking in the town centre (need to cross the A49 from the site). Smaller brownfield sites should be pursued.
A0194B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	None
A0195B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	None
A0201B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Site is in AONB - no exceptional circumstances cited by the council. DP18 recognizes the importance of safeguarding landscape character and visual amenity - contradicts this site allocation. Poor roads/access, no change since SAMDev, no suitable public transport, site will have drainage/flood issues. Houses on this site would be too expensive against DP3
A0204B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Poor access to the site - difficult in icy conditions. Increased traffic would cause congestion and pollution. No pavements on Clive Avenue for pedestrians. Noise and light pollution issues with site. Site has drainage issues. Habitats badly affected. Visual amenity affected.
A0206B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Poor access to the site. Increased traffic would cause congestion and pollution. No pavements on Clive Avenue for pedestrians. Noise and light pollution issues with site. Site has drainage issues. Habitats badly affected. Visual amenity affected. It is AONB land.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0235B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The Snatchfields site likely to yield a reduced number of houses and unlikely to deliver required affordable homes due to economic viability arguments relating to expensive site development & infrastructure costs. The chosen site for development at Snatchfield has hilly terrain, drainage issues and will require a new road so prove expensive to develop on. There is a specific need for affordable homes as available information confirms there are proportionally fewer small houses and flats at affordable prices compared to Shropshire as a whole, & a shortage of smaller affordable properties A more suitable site (CST014 "Land adjacent to the School) has become available which has lower landscape sensitive, more suitable terrain, road access and is within easier walking distance of school, bus stop and town centre. As this site is likely to be less expensive to develop it is more likely to be economic to provide affordable housing on it. This site should be considered as a more suitable alternative to the land at Snatchfields
A0236B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	More housing is needed in England but Church Stretton should contribute to meeting that need in a way appropriate to a town fully within an AONB. Shropshire Council needs to <ul style="list-style-type: none"> • base housing plans on real needs determined by full housing needs assessment; • reflect feedback from previous consultations and take heed of previous decisions both at Council and Inspectorate level. The Snatchfield site is unsuited to development. key issues with the site are: (a) It contravenes NPPF - strategic transport and site-specific transport issues. Shropshire Council cannot demonstrate that it is a suitable site to promote sustainable transport. The housing would be up steep hills accessed by a lengthy access route & few residents would walk. (b) It contravenes Shropshire Council Policy DP13 (net biodiversity gain) and Policy DP18 (safeguard or enhancement of landscape character and visual amenity); (c) access problems- Clive Avenue "pinch point" already problematic & additional traffic movements would increase highway issues (d) drainage problems- modest rainfall creates continuous run off down the leading to localised flooding at the lower end of Chelmick Close which freezes in winter creating dangerous conditions (e) Development would create a significant, detrimental intrusion into the AONB, affecting views' the AONB as an amenity asset and the visitor experience; visitors being needed to sustain local businesses; Jack Mytton way is a major walking route (f) significant local opposition. (f) Snatchfield is a demonstrably unsustainable site, as scored by Shropshire Council's own Sustainability Assessment. Alternative sites more environmentally acceptable with far lower detrimental impact, and likely to be more supported locally. CST021 should be replaced with site CST014
A0237B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	There should not be any major developments in an AONB contrary to NPPF & other opportunities to in-fill or to develop in locations outside AONB should be pursued. The outline plans for a major development here are completely at odds with NPPF - Section 15 – Conserving and Enhancing the Natural Environment Top down approach does not properly assess and match the new housing allocation to the actual needs of local people or the location of employment opportunities and public services Lack of demonstrable need for more housing - (FOAHN) does not include assess of the actual housing needs in the Church Stretton community. Insufficient infrastructure and services to support growth. Site location is unsuitable- elevated & distant from the town both in terms of distance and elevation. A selection of in-fill/ smaller sites in brownfield or closer to town locations would provide a more diverse stock of housing to meet the aspirations of a wider population, although Site Assessments process deliberately screen out and exclude any small (mostly brownfield) sites of less than 0.5ha Further development would greatly diminish biodiversity, the diverse natural landscape and views and amenity for walkers. Proposal inconsistent with the Council's Policy DP13 – The Natural Environment which requires development must deliver at least a 10% net gain for biodiversity in accordance with the Environment Act. Poor & hazardous access . Increased traffic will, significantly increase the danger to pedestrians in this area contra to Paragraph 108 of the NPPF that states that it should be ensured that safe and suitable access can be achieved for all. The ability for new residents to easily and sustainably access the town's shops and facilities should be taken into account. The Sustainability Appraisal for the site resulted in a failure score. Most journeys will be taken by car as no attractive/practical alternative sustainable options contrary to Council's Policy DP 12 – Managing Carbon Emissions Increased traffic and carbon emission increases will result- already a problem with existing levels of traffic on the lower part of Clive Avenue/ junction with Watling Street.
A0257B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Shropshire Council have provided no credible evidence of exceptional circumstances for AONB development. Without an OAHN it seems that 56 unneeded homes are to be built in order to provide 14 needed affordable homes! Costly development may reduce affordable numbers. Other sites are more suitable. No detailed review of the site taken or ecological survey. No surveys on how to protect trees, priority habitats, heritage or archaeological assessments. The 200 allocation is not based on local needs. The site failed the SA. Shropshire deliberately screen out brownfield sites of <0.5ha. The guideline could be reached through existing brownfield conversions. The Community-Led Plan Group in 2020 showed that there was a desire to preserve and protect the landscape and character/appearance of the town. Smaller sites would limit the damage to the AONB. Church Stretton's Housing Needs Survey (2020) identified a great need for adapted homes (8%) than affordable homes (5%). But DP3 wants more, but 20% would affect a developer's profits, as other guidelines are needed at a cost (drainage issues, highways etc.). The site would not deliver 10% biodiversity net gain (contrary to DP13) – it is a wildlife haven and a priority habitat. The site is contrary to DP18. The site would rely on private transport, poor footpaths in area. There will be over 600 additional vehicle movements per day should the site go ahead. Poor access off Clive Avenue and Ragleth Road, with poor/no paths. The site is in Flood Zone 3. Policies that work for Shrewsbury or Oswestry cannot meet the needs and requirements of a rural community of the nature of Church Stretton, and in particular of communities in Areas of Outstanding Natural Beauty.
A0263B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Objects; reasons are impact on the AONB and access to countryside and Jack Mytton Way; plan doesn't sufficiently demonstrate the need for this level of housing; lack of affordables in the plan; major development in AONB should be refused; Policy DP13 and DP18 yo protect biodiversity have not been properly applied to this site; access to the site is steep and not suitable for older peoples needs
Page 164 A0292B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Understand the need for new housing and identification of Church Stretton as a Key Centre. However, Church Stretton is located in the centre of an AONB, therefore outward expansion should be a last resort. CST021 is unsuitable for development, especially at the proposed scale. Access (or lack of) via a convoluted route with steep gradients, narrow points where cars cannot pass, presence of parked vehicles which narrow the route further and difficult junctions is unsuitable for the increased traffic associated with development of CST021 (nor the larger vehicles during construction). Ragleth Road has also suffered from sink holes, CST021 would double traffic on this road. Traffic at the bottom part of Clive Avenue would increase by around two thirds, this is the most problematic part of the access route as it is very narrow, on a blind/steep hill with busy junctions at either end. It also has no pavements meaning it is particularly dangerous for pedestrians. CST021 is 1km from the town centre, parts of the route are steep/unlit which is unattractive to pedestrians and cyclists. There are also no bus routes near the site and this is unlikely to change given its location, this will increase use of the car and may encourage people to shop outside the town. Development of CST021 will directly impact on one of the most of popular walking routes out of the town towards the Stretton Hills and due to increased road traffic indirectly effect other key paths (from Clive Avenue and Poplar Drive). This will negatively impact on the Church Stretton's attraction as a walking town, a key part of the local economy. Accept the desperate need for housing in the Country, but requiring a maximum of 15% as affordable housing, means the main ddrive is to make money not address the housing crisis - more affordable housing should be required.
A0293B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to identification of CST021 as a proposed allocation. Development of CST021 would have a detrimental environmental and recreational impact on the AONB. It offers access between the town/railway station and the eastern hills. Enclosing the route in housing will diminish it and disadvantage its users (particularly the elderly for which it represents the only accessible countryside). Development of CST021 contradicts Government aspirations to protect AONB's as expressed within the recent Planning White Paper and ignores the Council's responsibility to conserve and 'enhance' this valuable legacy of an AONB. Clive Avenue is a dangerous pinch-point with no pedestrian pavements and Ragleth road is steep, experience run-off and sink holes. Additional traffic associated with CST021 must pass these roads and will exacerbate existing issues and there is no way to mitigate this impact. The exceptional circumstances identified for CST021 fail the requirements of para 172 of the NPPF and development of CST021 would not support proposed policies DP1 and DP3. This is because: There has been no objective assessment of housing need (the assessment undertaken is not locally informed), the housing delivered would be entirely disproportionate in meeting identified local need (DP1) and providing affordable housing (DP3) for the young people and key workers (only a small number of affordables will be delivered and these may even occur off-site). The Council concludes there will be no significant environmental/landscape/recreational constraints. To reach this conclusion there must be publicly available ecological, recreational usage, heritage and archaeological, flood risk and road safety assessments. Do not consider they have been undertaken, otherwise there would be recognition that CST021 contains one of the few remaining ancient meadows in the county, numerous species/habitats and that scores of people (locals and visitors) access the eastern hills on a daily basis via the Jack Mytton Way, which runs through the site. There are alternative sites that offer the potential to meet housing need, protect the AONB and have better/safer highway access, these are the sites at Ley Gardens (CST014), the police & fire station and Woodbank House.
A0294B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to identification of CST021 as a proposed allocation There are smaller and more suitable alternative sites which have not been considered. A recent 'Household Survey' conducted by the Community Led Plan Group, recorded a desire to protect the landscape on both sides of the valley and preserve the character of the town. Large scale development at CST021 will not achieve this objective as it is clearly visible from every hill based view point around the town, including Hazler, Helmeth, Hope Bowdler, Caradoc, Haddon, Burway and Ashlett's. Local housing need is for affordable homes for the young and key workers and it makes no sense to ignore smaller brown field sites in this process or the re-purposing of a number of older large buildings within the town (this would maintain the fabric and character of the town (desirable given its tourist status) and provide more suitable housing to meet the identified need (essential)). There is no need to develop in an inappropriate area (CST021), away from shops, services, transport and health and education facilities. Are we really aiming to meet local need or make a profit for developers. Development of CST021 will enhance risk of flooding in Watling Street, an identified high risk flood zone (level 3). There are high levels of water run-off from Ragleth Hill and heavy rain sees CST021 heavily waterlogged and sheets of run off water flow over the slopes and into the wet flush area and main stream, Snatchfield Brook. CST021 is a natural water-soak which would be destroyed by development and extensive works would need to be carried out to prevent localised flooding at the bottom of the hill. In addition to visible run-off from Ragleth Hill, there is well documented dangerous underground run-off along the slope of Ragleth Road, which has repeatedly caused sink holes to emerge on the road surface despite attempted fixes. This is the only access road to CST021 and would need to be used for all heavy construction traffic. The ongoing threat to the ongoing integrity of this access road to our homes, particularly for emergency services, is a major cause for concern. Development of CST021 ignores the 2019 Target Amendment in respect of carbon emissions, generating hundreds of additional vehicular movements each day (A 2020 council study suggested 5.86 vehicle movements per household per 12 hour period). CST021 is a car dependent site, there is no access for public transport, neither is their local (walkable) employment to sustain potential residents, meaning most new residents will be commuters. Walking distance to town services is over 1km if using Jack Mytton bridleway, longer if using the metaled but non pedestrianised, and dangerous, Clive avenue. Extensive assessments of the road safety issues have been undertaken by the local community, but am unaware of any such undertaking by the Council, who are either ignorant or in denial about vehicle and pedestrian safety
A0304B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of CST021 within the Plan as it would not be in the public interest as it's location is not sustainable and does not meet the criteria of Shropshire Councils 2018 Sustainability Appraisal. Development would not meet the needs identified within the recent Town Council Housing Needs Survey. Concerned that topography of site would not allow for required affordable housing deliverability. There is a failure to demonstrate exceptional circumstances for the site and there is an alternative deliverable site at CST014 which would be less harmful to the Shropshire Hills AONB. Concerns about flooding to the land and biodiversity. No material change to make the site suitable following rejection many times in the past.
A0305B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of CST021 within the Plan as an act of environmental vandalism to 3 medieval meadows of special environmental interest which should be preserved. Concerns about flooding and location of the site with regards to transport and amenity links and inadequate pedestrian access. No material change to make the site suitable following rejection many times in the past.
A0308B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of CST021 within the Plan as location is not sustainable and does not meet needs of Church Stretton residents. Site is too far from amenities with inadequate vehicular and pedestrian access. Other site available on Burway or next to the school which are suitable for development. Development would cause light pollution and damage wildlife.
A0312B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	No local need evidence for these houses. There are brownfield sites more suitable, The site is home to biodiversity and wildlife. Ragleth road is poor. Clive avenue is a dangerous pinch point for pedestrians

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0320B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to Snatchfields being developed. The access to the site is dangerous and convoluted. To permit more building work and inevitably more traffic would be irresponsible on an already dangerous road putting pedestrians at even greater risk than they are now. This access would result in unnecessary extra pollution and noise as this is not the direct route to Snatchfield. A sink hole appeared on Ragleth Road a year or two ago – is the road stable enough to cope with even more traffic? The proposal is to build on a very beautiful and ancient meadow which leads to some of the Shropshire Hills. Looking at Snatchfield it is clear that water drains down the valley towards the town. More development will make this worse. Finally, tourism for the town is very important. Many people visit the town to enjoy the surrounding countryside and do not wish to see yet another housing estate as the town sprawls out whilst in the centre there are sites suitable for redevelopment (respondent ref; Form 1)
A0322B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I understand the need for affordable housing. However it has already been admitted that the chances of a property developer wanting to build affordable houses is very unlikely. This will be somewhere for the “better off” to invest their money and to live in a large under occupied house. There have been plenty of other similar projects in the town where large houses are either lived on by one or two people or even empty. This does not help the town, or local families and is a disaster for the beautiful countryside that is already struggling to survive. Please therefore do not build on this meadow that during “lockdown” gave me somewhere very lovely and peaceful to walk each day important for physical and mental health.
A0324B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Strongly believe that no exceptional circumstances exist and Shropshire Council have not shown that they do. Where is the evidence that 200 houses are needed in Church Stretton. What is needed, as a recent housing needs survey has clearly shown is more affordable housing (in perpetuity) and smaller adapted homes in a suitable location, easily accessible to public transport and within easy walking distance of town amenities. The alleged “Affordable houses” in the proposed Snatchfields development may be initially affordable in price but their location does not match the truly affordable needs of residents in such designated housing. The site does not achieve the Council’s own Affordable Housing Provision DP3 and specialist housing provision Policy DP1. Permission for development of this site has been refused several times before. What has changed to now to make the site acceptable? The site has failed Shropshire Councils own Sustainability Assessment. The site does nothing to promote Sustainable Transport(NPPF Section 9) and would be highly car dependent. This would also be contrary to Shropshire Council’s own carbon reduction plans (40% of the county emissions come from transport.) Paragraphs 102, 103 and 108 of the National Planning Policy Framework (NPPF) require sites to demonstrate the ability to promote sustainable transport. The Snatchfields site is an important “soak” for surface run off from the surrounding hills. Any building development of the site (even with attenuation tanks and a % of additional capacity etc.) will increase stress on the Snatchfields brook and cause flooding downstream. Climate change is making this worse and design of the Snatchfields open culvert as it runs through The Bridleways is already causing considerable erosion at the point where the concrete culvert ends and during extreme rainfall it gets close to maximum capacity. Site Assessments: Church Stretton Place Plan Area (November 2018) Smaller sites for development have been deliberately screened out. The view that smaller sites are uneconomic does not stand up to scrutiny. DP13 – The Natural Environment This policy outlines that all development must deliver at least 10% net gain for biodiversity. Development of Snatchfields will destroy rather than enhance existing high levels of biodiversity.
A0332B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The housing guideline proposed for Church Stretton over-estimates local need and may result in dwelling types unsuited to local demographics There is a need to consider the capacity of other sites - small sites and CSTR014 represent a more effective means of meeting need than CST021. Precedent at Arnside and Silverdale: Removal of sites from AONB and adoption of separate Development Plan Document aimed at unique needs, giving priority to small sites with relevant housing. Object to inclusion of CST021 within the Plan as: There is no proven exceptional need or public interest to develop within the AONB, required by para 172 of the NPPF. There are also alternative options. Planning Permission has previously, correctly, been refused. Support the Town Council report regarding the unsustainability of the site. The site fails the Shropshire Council Sustainability Appraisal. The site assessment process excluded smaller sites better located. more capable of meeting local need and in line with local wishes. Development of CST021 is unlikely to meet either the preferred housing mix (DP1) and potentially not economically viable to provide affordables (DP3). CST021 is contrary to draft policies DP13 (natural environment) and DP18 (built environment). Contrary to paras 103 and 108 of the NPPF and the Climate Change Act (2009)/Target Amendments Order (2019) as CST021 will generate high car usage, has limited transport options and does not have adequate/safe access. Development of CST021 will exacerbate existing general safety issues on unsuitable roads. Examples include Ragleth Road (subsidence), ‘blind’ exit from The Narrows, pedestrian safety in Clive Ave (children, walkers and cyclists), nursery, church & nursing home at Watling St junction, Bridleways junction, no turning opportunities, steep gradients, impact of HGV site traffic, one way in and out for all traffic, access for emergency vehicles. Contrary to draft Policy DP26 (AONBs). CST021 will have significant landscape, environmental and recreational impact. Access to CST021 is via a road in flood zone 3. The catchment is identified as susceptible to the cumulative effect of development - flooding and run-off from higher ground would affect CST021 and have a knock-on effects elsewhere
A0333B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The housing guideline proposed for Church Stretton over-estimates local need and may result in dwelling types unsuited to local demographics There is a need to consider the capacity of other sites - small sites and CSTR014 represent a more effective means of meeting need than CST021. Precedent at Arnside and Silverdale: Removal of sites from AONB and adoption of separate Development Plan Document aimed at unique needs, giving priority to small sites with relevant housing. Object to inclusion of CST021 within the Plan as: There is no proven exceptional need or public interest to develop within the AONB, required by para 172 of the NPPF. There are also alternative options. Planning Permission has previously, correctly, been refused. Support the Town Council report regarding the unsustainability of the site. The site fails the Shropshire Council Sustainability Appraisal. The site assessment process excluded smaller sites better located. more capable of meeting local need and in line with local wishes. Development of CST021 is unlikely to meet either the preferred housing mix (DP1) and potentially not economically viable to provide affordables (DP3). CST021 is contrary to draft policies DP13 (natural environment) and DP18 (built environment). Contrary to paras 103 and 108 of the NPPF and the Climate Change Act (2009)/Target Amendments Order (2019) as CST021 will generate high car usage, has limited transport options and does not have adequate/safe access. Development of CST021 will exacerbate existing general safety issues on unsuitable roads. Examples include Ragleth Road (subsidence), ‘blind’ exit from The Narrows, pedestrian safety in Clive Ave (children, walkers and cyclists), nursery, church & nursing home at Watling St junction, Bridleways junction, no turning opportunities, steep gradients, impact of HGV site traffic, one way in and out for all traffic, access for emergency vehicles. Contrary to draft Policy DP26 (AONBs). CST021 will have significant landscape, environmental and recreational impact. Access to CST021 is via a road in flood zone 3. The catchment is identified as susceptible to the cumulative effect of development - flooding and run-off from higher ground would affect CST021 and have a knock-on effects elsewhere
A0335B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to identification of CST021 as a site allocation as: CST021 is located wholly within the AONB. Its development contravenes draft Policy DP26, which specifies that development in the AONB which is likely to have a significant adverse effect on the special qualities of the AONB will be resisted in the interest of conserving the area’s natural beauty. Further, para 172 of the NPPF states major development should only occur within the AONB where there are exceptional circumstances, development of CST021 represents major development. How can development in the AONB be proposed to protect sites in the Black Country (accepting cross boundary need) and without an assessment of housing need. CST021 was considered unsuitable for development within the 2012 Plan review and scores poorly against Sustainability Appraisal criteria. Access to CST021 is convoluted. The route includes Watling Street South (cars and larger vehicles are often parked on both sides of the road due to lack of off-street parking), Clive Avenue (steep, narrow in places and has no pavements causing difficulties for pedestrians - a local survey highlights issues on this road), Ragleth Road (suffers from subsidence and sink holes) and Chelmick Drive (quiet road). Development in the vicinity has placed increased pressure on the access route. Development of CST021 would increase traffic movements and exacerbate existing problems. It would also effect the street scene. The Jack Mytton Way which runs through CST021 is a well known/used walking route that provides a ‘sense of place’ within the AONB. Development of CST021 would represent placeless urban sprawl and deter residents/visitors. CST021 has existing serious water saturation problems. Surface water, following a heavy downpour, flows into The Bridleways causing flooding in this established residential area. Development would increase this problem. CST021 will increase air (wood burning/bonfires), noise (garden machinery and vehicles - amphitheatre effect of the vally is well documented) and light pollution. CST021 is a habitat for many species, development would contradict draft Policy DP13. CST021 is the last remaining ancient meadow in Church Stretton and must be preserved and protected for future generations to explore, development would contradict draft Policy DP18. Support the Town Council submission that CST021 is unsuitable for development.
A0337B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to identification of CST021 as a site allocation as: It is located within the AONB. Past Planning Applications on CST021 have failed and the SoS has stated that it should not be built on. Church Stretton is heavil reliant on tourism, it makes no sense to develop CST021, a site well used by tourists and local walking groups for recreation. CST021 takes pressure off Carding Mill Valley, which suffers from overcrowding. Noise and pollution from CST021 would be unacceptable for residents of the Chelmick Estate and Hazler Orchard. Access to CST021 is inappropriate and dangerous for construction traffic (particularly in the winter) as these are steep residential streets. CST021 contains important habitats and species.
A0338B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Strongly disagree with the inclusion of CST021 within the Local Plan as Access to CST021 is unsuitable, roads are steep and in winter the roads are very slippy and it would not be possible to reach the site. The community conducted a Traffic Survey in 2019, which should be considered. Residents of CST021 would have limited job opportunities in the town. The Exceptional Circumstances Statement contains no assessment of local housing need, no data on the economic impact of developing (or not) CST021 and no detailed review of environmental impacts of developing CST021.. The need for affordable housing in Church Stretton could be met through alternative small or less environmentally damaging sites. CST021 is a haven for wildlife. CST021 is well used by walkers enjoying the AONB and bringing tourists to Church Stretton. There is a need to consider alternative options, particularly CSTR014, development fo which would have a much smaller impact on the AONB. Within the SAMDev Plan site assessment CSTR014 performed much better than CST021 as: It is within walking distance of a regular bus service, schools, sports and recreation facilities and the town centre/main employment areas. Access could be provided from the housing to the south, in addition to the track between the school and its playing fields. It is not within a SAC, SPA, Ramsar Site, SSSI, national/local nature reserve, wildlife site, ancient woodland or RIG. the site was previously promoted with no legal/ownership constraints. Part of the site is in the flood zone, but the remainder is developable. Community supported the site for housing during SAMDev, although this has not been tested since.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0466B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Strongly object to Snatchfields. 1) Transport - car dependency for access to services; greater emissions and lower air quality; Clive Avenue too narrow with no footpath and pinchpoints for vehicle/pedestrian interaction; used by parents with children, walkers and mobility vehicles; only road lit at night; Ragleth Rd has sinkholes - HGV traffic will increase problem. 2) AONB - last remaining field of three original oneast side of A49 - significant to the AONB. The Jack Myton Way runs through the site. Walks are enjoyed by locals and tourists. Site does not conform to the wishes of the community regarding the protection of the landscape of the hills and to preserve the character of the town.
A0474B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to the Church Stretton strategy because the housing guideline is merely a pro-rata share of the Shropshire housing requirement. The Church Stretton housing guideline fails to assess housing need, appropriate dwelling mix and affordable housing requirement and this has not been considered for least 10 years. This will affect the implementation of the Shropshire test in Policy SP1 as the housing guideline does not match the needs of the community
A0474B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to the AONB Exceptional Circumstances Statement which fails to meet the NPPF three part test due to (1) the lack of evidence of housing need; (2) absence of an economic justification for development and (3) the failure to consider alternative and more sustainable sites proposed by the local community.
A0474B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 due to insufficient evidence to justify large scale development in Church Stretton especially at Snatchfields Farm. CST021 has biodiversity value as the last medieval water meadow in the town with woodland habitat on bird's feeding and roosting flight paths. CST021 has local amenity value due to presence of Jack Myton Way through the site and views out to AONB. CST021 is too distant from the town services and schools. A local housing survey indicated a need for smaller adapted living properties with significant affordable housing and it is questioned whether this can be delivered with the likely significant development costs for Snatchfields Farm. Development of CST021 will increase traffic into Clive Avenue identified by experience and a resident Traffic Survey as a dangerous road due to speeding and poor driving. The County Transport Statement fails to assess issues of road safety and so the Council fails to consider road safety issues from poor highway maintenance, on-street parking, traffic volumes and speeding.
A0475B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 land at Snatchfields Farm because it will increase traffic flows through Clive Avenue which already carries significant and sometimes dangerous levels of traffic. The resulting issues of road safety and air pollution raises three significant but often overlooked considerations: (1) highway safety issues and traffic generated air pollution affect the use of local roads as safe routes for children walking to school; (2) where proposed developments would increase traffic flows on local roads there may be a need for off-site infrastructure investment such as provision of pedestrian footways and (3) increasing levels of traffic on local urban roads poses some risk to urban biodiversity from wildlife passing through the town/village and to residents pets. These safety issues may be best served by not permitting further housing developments especially at CST021 land at Snatchfields Farm.
A0480B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to site CST021. There is no evidence that Shropshire Council have based the housing needs on objectively assessed evidence in its FOAHN. The Council cannot demonstrate how it has achieved a figure of 200+ houses to be built and why Church Stretton is nominated a Key Centre. The SA process scored Snatchfield as an unsustainable site. It is highly unlikely that the developer will provide 20% affordable housing. Development will not achieve 10% biodiversity net gain and is contrary to DP13. The effect of development will be landscape wide and impact visually on the AONB. This will damage wildlife and the tourist economy. There is no evidence that this development in the AONB is sensitive and a case of last resort. The development is not in the public interest and does not meet the Exceptional Circumstances test in NPPF. It undermines DP13 and DP18. The increase in traffic is not sustainable, will impact the road surface and will be dangerous. Existing flooding problems will be exacerbated.
A0481B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to site CST021. There is no evidence that Shropshire Council have based the housing needs on objectively assessed evidence. The Council cannot demonstrate how it has achieved a figure of 200+ houses to be built and the FOAHN is not fit for purpose. The SA process scored Snatchfield as an unsustainable site. Development will not meet policies DP1 and DP3 and the developer will argue for a reduced number of affordable houses. Previous affordable housing has been sold off after 5 years. No evidence that the Council actually addresses specific local housing needs. The site will not meet policies DP13 and DP18. Snatchfield is a corridor for wildlife and the impact of the housing on nature will be significant, particularly with the addition of dogs and cats in the neighbourhood. The bridleway has seen a considerable increase in use of this area. The view to the Longmynd and the backdrop of the woodland is an asset to the area and developing it will impact biodiversity as well as the aesthetics. The site is an historic landscape and should be protected (respondent ref: page 1). Development disregards NPPF on major development in an AONB. There is no evidence of that the Council has met the exceptional circumstances, public interest and environmental harm tests. Vehicle journeys will increase carbon emissions. The only vehicular access is unsafe for pedestrians and passes through Flood Zone 3. Run off from the hardstanding in the development will increase flood risk elsewhere (respondent ref: page 2). The Council has deliberately screened out small brownfield sites. CST014 is a more suitable site. A separate DPD for the AONB should be prepared. The site will not promote the use of sustainable transport (respondent ref: page 3). The consultation process has not been transparent and there are more people who want to have a say. The consultation process should have been extended due to Covid restrictions (respondent ref: page 4). Respondent questions the following: how will affordable housing remain as such; how many local people are in housing need; why do windfall sites never address affordable housing need; how will this development help with the government's Levelling Up agenda; where will then new residents work (respondent ref page 4). Other questions: how does the travel to work outside Church Stretton fit with the Council's Climate Emergency; how will existing road and rail links be promoted above the road network: how does development fit with air quality regulations for Lond Mynd SSSI; why is greenfield preferred; why is development not focussed in Craven Arms; why is the Council overriding the existing quality of life of the Church Stretton community (respondent ref: page 5).
A0482B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to site CST021. There is no evidence that Shropshire Council have based the housing needs on objectively assessed evidence in its FOAHN. The Council cannot demonstrate how it has achieved a figure of 200+ houses to be built and why Church Stretton is nominated a Key Centre. The SA process scored Snatchfield as an unsustainable site. It is highly unlikely that the developer will provide 20% affordable housing. Development will not achieve 10% biodiversity net gain and is contrary to DP13. The effect of development will be landscape wide and impact visually on the AONB. This will damage wildlife and the tourist economy. There is no evidence that this development in the AONB is sensitive and a case of last resort. The development is not in the public interest and does not meet the Exceptional Circumstances test in NPPF. It undermines DP13 and DP18. The increase in traffic is not sustainable, will impact the road surface and will be dangerous. Existing flooding problems will be exacerbated.
A0483B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to site CST021. There is no evidence that Shropshire Council have based the housing needs on objectively assessed evidence in its FOAHN. The Council cannot demonstrate how it has achieved a figure of 200+ houses to be built and why Church Stretton is nominated a Key Centre. The SA process scored Snatchfield as an unsustainable site. It is highly unlikely that the developer will provide 20% affordable housing. Development will not achieve 10% biodiversity net gain and is contrary to DP13. The effect of development will be landscape wide and impact visually on the AONB. This will damage wildlife and the tourist economy. There is no evidence that this development in the AONB is sensitive and a case of last resort. The development is not in the public interest and does not meet the Exceptional Circumstances test in NPPF. It undermines DP13 and DP18. The increase in traffic is not sustainable, will impact the road surface and will be dangerous. Existing flooding problems will be exacerbated.
A0486B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Concerned about surface water flooding downstream of the site which contributes to the creation of Flood Zone 3 on the valley floor. If this site is developed it is imperative that the sustainable drainage scheme ensures that the current surface water flooding is dealt with as well as additional runoff from development. Object to this policy on these grounds.
A0492B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021. The exceptional circumstances test is not met. Other brownfield sites have been disregarded and should be used instead. Extra vehicle movements would exacerbate already dangerous and difficult roads. Landscape and visual amenity are not being safeguarded. This site has been rejected at least 7 times already.
A0493B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to this site. There is no assessment of housing needs for Church Stretton. The exceptional circumstances test is not met. Development will increase flooding downstream. The access to the site is in Flood Zone 3. Existing roads have not been designed to accommodate the extra traffic from the site. This site is a medieval meadow. Site CSTR014 should be developed instead.
A0500B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Opposes allocation of the site for a range of reasons including lack of community support; the impact on the immediate and surrounding ecology and biodiversity of the area; no clear rationale for the need for 200 homes in Church Stretton; restrictive vehicle access to the site and impact on wider highway network; impact on the AONB and not protecting key characteristics of the AONB in Church Stretton
A0505B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area		Object to inclusion of CST021 within the Plan as: There has been no objective assessment of housing need. Without this, the guideline for Church Stretton is just an arbitrary figure. Local agreement of need for around 20 affordable houses, due to local demographics there are always other properties available. Due to site constraints and associated costs, CST021 will deliver no affordables. As Shropshire's housing need is being exceeded and cross-boundary need accepted (without consultation, so that Green Belt can be protected and valued countryside in Shropshire lost), no contribution is required from Church Stretton and the AONB, other than windfall and affordable dwellings. CST021 was withdrawn from the Local Plan process in 2012 as the Council said it was not suitable for development and was not supported locally. Nothing has changed, except infilling around the site has exacerbated problems. CST021 performs poorly within the Sustainability Appraisal. CSTR014 performs better and is now available. The AONB has greater protection from development than other areas - no major development should occur without exceptional circumstances. Including CST021 when there are alternative sites, several smaller, fails the exceptional circumstances requirement. CST021 also contradicts policy DP26. The 875 responses to the Community Led Plan Household Survey clearly show residents wish to "protect the landscape on both sides of the valley" and "preserve the character and appearance of the town (and) preserving the trees and green spaces". Vehicular access to CST021 is dangerous, demolition of a bungalow will not resolve steep gradients, pinch points to the A49, on-street parking, subsidence on Ragleth Road and conflict between vehicles and pedestrians. Further traffic and pedestrians from development of CST021 would increase risk. No comprehensive traffic survey has been conducted by the Council, a local on highlights problems. CST021 is saturated and there is run-off into the Bridalways and from here into Swains Meadow causing flood risk when it rains. Development would increase these problems and it is unclear how development could alleviate them. Tourism is vital in Church Stretton, development of CST021 (around the Jack Myton Way) would detract from this and aspirations to increase walking in the hills east of the A49. Jack Myton Way is well used and would not be the same if through a housing estate. CST021 is an important habitat including for Badgers, Bats, Foxes, Deer, Owls, Buzzards and smaller birds. Development of CST021 contradicts policies DP13 and 18. Development of CST021 would increase smoke pollution (more bonfires, barbecues, wood burning stoves etc), noise pollution (amphitheater effect of the valley) and light pollution. There is insufficient infrastructure, employment and parking in the town centre (need to cross the A49 from the site). Smaller brownfield sites should be pursued.
A0506B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Development on the hillsides should be resisted, as urban creep is producing increased water roll off, exac
A0506B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	This map shows the development boundary for Church Stretton. Anything outside that boundary is regarded as open countryside. However, in the main, although the boundary is drawn tightly around the existing built up area, it excludes some parts of the town, such as Ley Gardens, Street Meadow and Leasowes Close, for no apparent good reason. The Town Council request that this is corrected. In addition, any new sites agreed as part of this consultation should be included in the development boundary.
A0506B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Under this section the Town Council requests the inclusion of the heritage assets of Hazler Hill, Ragleth Hill and Ancient Woodland, Helmeth Hill and the Lawley which lie to the east of the A49. More importantly the Ancient Scheduled Monument of Caer Caradoc multivallate Hill Fort has been omitted from this section of the 'Explanation'. This should be corrected

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0614B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object: No exceptional circumstances have been proved; no evidence of objectively assessed local housing need has been made. Concern about environmental and heritage asset being lost, along with recreational and footpath access loss. Suggest alternative sites in Church Stretton are more appropriate
A0617B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to allocation of the site, as it doesn't meet Shropshire Councils Sustainability appraisal, and I can find no evidence of Shropshire Council fulfilling it's obligations to carry out updated and proper assessments (or any in some case) of environmental impacts and impacts on the recreational use and public footpath/bridleway use on Snatchfields.
A0623B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Site will require car access - increased emissions. Poor, single access route. Additional flood risk.
A0628B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Site is unsustainable for housing. Dependent on car travel - no pavements for pedestrians. Affordable housing here would be ridiculous. Contrary to AONB status. Site should be a nature conservation.
A0630B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Site is in AONB, pollution increase, visual effects, inadequate access proposed, pollution increase due to increase car numbers, SC is noticeably lacking in a policy that addresses climate problems. Housing guideline too high,
A0634B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	This site was withdrawn from SAMDev and nothing has changed since. The FOAHN is not finished and the figure of 200 for Church Stretton is arbitrary. There are plenty of other houses for sale. The costs of building on this site mean that affordable houses will not be delivered. There are other sites available. Major development in an AONB is against NPPF. Clive Avenue has pinch points and is dangerous and hundreds more vehicle journeys will make things even worse. Surface water will flood the Bridalways and the town if the site is developed. This ancient meadow must be retained. The site is an amphitheatre and development will create nuisance throughout the valley with light pollution being immense.
A0636B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021. Road infrastructure is totally inadequate to cater for the projected traffic volume from both construction vehicles and proposed additional residents. CST021 just produces more traffic congestion through housing estates and narrow roads. Regarding the exceptional circumstances argument, local housing requirements are not realistically taken into account. The Arnside and Silverdale model should be used to protect the AONB. The housing requirement is not objectively derived and is top down, ignoring local wishes. Small and brownfield sites have been deliberately screened out. The Communities wishes are being ignored. CST014 should be allocated. Safe and suitable access to Snatchfield, via the Clive Avenue Conflict Area route, cannot be demonstrated. Shropshire Council Flood Risk Assessment for the site is far from assuring. A very valuable environmental asset will be lost for ever should this site be developed contrary to policies DP13 and DP18. The site has historic value. Other professional opinions are against this site; the Green Planning Studio Position Statements – Objection to Policy S5 (Failure to Conform with National Policy) and Objection to CST021 Site (Specific Objections); Previous Regulation 18 Consultation and the Church Stretton Housing Survey have expressed local opposition; The Strettons Civic Society response to Preferred Site Consultation. In my view CST021 site development is not a plan to provide housing for local Church Stretton residents in need of housing. The site is uphill and remote for young families and encourages the use of motor cars rather than walking to local amenities and school.
A0640B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Not based on any objective assessment of housing needs in Church Stretton. Although 70 homes proposed there are key restrictions that will likely result in developers having to reduce this number or build higher 3 storey homes which will affect the visual impact and could result in lower numbers of affordable housing. The exceptional circumstances statement has not succeeded in making a valid case for building on this site. Proposal contradicts spirit of Policy DP26. Concerned also about impact of additional traffic to the town. Several previous attempts to develop the site have failed and there are no material differences in the local circumstances or new grounds.
A0643B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as there is another more suitable site at CSTR014. CSTR014 is allocated under SAMDEV to provide replacement sports facilities to allow for development on school playing fields at CSTR018. Understood that CSTR018 has proved unviable for development and has been deallocated from the SAMDEV. Consequently CSTR014 is no longer required for replacement school facilities and could be used for housing as it's of similar size to CST021. CSTR014 performed better in every respect in the Housing Site Assessment than CST021 as it's closer to amenities, bus routes, schools and has no legal constraints. Community is in favour of CSTR014 and is supported by the Town Council as an alternative to CST021.
A0643B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as allocation of 200 homes is arbitrary and does not take account of the needs of the town. No objective housing needs survey undertaken. ONS figures indicate Shropshire's population growth will be driven by 65+ who are likely purchasers and will likely exacerbate the demographic challenges in Church Stretton. The housing need figures are inflated to reflect the needs of the Black Country requirement. CST021 should be removed and an objective assessment of housing needs should be conducted.
A0643B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as unsuitable for development as indicated in the Sustainability Assessment where CST021 received a score of -7 which is a fail.
A0643B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as site assessment process was flawed as it failed to take account of more suitable brownfield sites. The Council argued that smaller sites would be uneconomic for developer but this has proven not to be the case as planning applications are already being processed for some smaller sites. These smaller sites are closer to facilities and are far less damaging to the appearance and quality of the town and the AONB. A recent survey by a group working on the Church Stretton Community led plan found that from 875 respondents there was an overwhelming desire to preserve the character and appearance and green space.
A0643B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object as CST021 is not a suitable site to achieve DP1 and DP3. Due to the location and nature of this site it is an inappropriate site to meet these specialist range of housing types to meet the housing needs identified in the local community. Due to the infrastructure requirements for the site it is believed that CST021 will be an expensive site to develop. Highly likely that developers will be argue that 20% affordable housing be reduced or substituted with a financial settlement resulting in few affordable homes and more open market homes.
A0643B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as site does not meet requirements of DP13 or DP18. It is a haven for wildlife, trees, plants etc and development will destroy not enhance these features. A major development cannot possibly safeguard or enhance the landscape and visual amenity.
A0643B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as it is not in accordance with NPPF. In particular Section 9 Paras 102, 103 and 108 - as the site will create a car dependent development with little option for alternative means of transport due to it's location. Access for pedestrians, wheelchairs mobility scooters and cyclists is via sections of narrow roads without pavement along with the significant increase in traffic flow, would be dangerous.
A0643B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as site doesn't meet exceptional circumstances test for a major development with AONB under NPPF instead of less damaging alternatives. The exceptional circumstances statement produced by the council contains no evidence of objectively assessed local housing need and no data to prove the economic impact of developing. No detailed site review has been undertaken to confirm environmental impacts and affordable housing requirements for Church Stretton can be met through alternative sites. In respect of NPPF major development test the Council has not given consideration to the need for major development on CST021 including the impact on the local economy. There is no objectively assessed need for the 200 dwellings up to 2038 for Church Stretton, or 70 dwellings on CST021, the council has provided no date illustrating the economic impact and the council has not produced an ecology study.
A0643B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 as Shropshire Council has applied "one size fits all" approach to the provision of development land across the county and has not taken into account special circumstances of the AONB like other authorities do where their development plan meets objectively assessed local community needs.
A0645B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of CST021 within the Plan and support the long list of objections from the Town Council. The AONB has greater protection from development than other areas - no major development should occur without exceptional circumstances. Vehicular access to CST021 is dangerous. Development would increase flood problems and it is unclear how development could alleviate them. Concerned about environment impact of developing site. Impact on tourism should not be underestimated.
A0646B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Shropshire Council have totally failed to demonstrate the exceptional circumstances that would allow for a major development in an AONB.
A0653B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Objections to CST021 the Jack Mytton Way is used by dog walkers and ramblers they contribute to the local economy. the roads are not suitable for additional residents traffic. Unsuitable for families with children as need to cross the A49. the noise would be 'intolerable' and cause light pollution. drainage problem at lower part of field. building at the back of the school makes more sense
A0654B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	object in strongest possible terms area is in AONB and outside of the development boundary -used by walkers, land is wet and proposes flood risk to others, access problems for additional traffic. Site has previously been rejected by Planning Inspectors. Want this site deleted from the plan for now and future plans
A0655B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	CST021 objects due to personal use and memories of the meadow, future generations not being able to benefit from it, blocks the entrance to the Jack Mytton Way, access to the site and disturbance to residents from construction traffic and future volume of traffic. Sink hole concern
A0656B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	object to site CST021 after studying the detailed technical objections and endorsing them, wishes to draw attention to - SC's exceptional circumstances statement lacks supporting evidence, previous planning application have been rejected following an appeal, suggests CSTR014 as a better site. concern with flooding and drainage, wants brownfield site development no
A0657B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Concerned about on and off-site flood alleviation being the responsibility of the developer due to existing problems with flooding and size of potential development. Developers of Hunters failed to address the continual flood risk and residents left accountable. Given history of serious flooding 2007 and 2020 disgraceful that insufficient flood alleviate measures have been carried out. Strongly opposed to any significant development in and around MW without properly designed and constructed alleviation measures. Concerned about effects of flooding from Farley Brook as the sole drainage watercourse from the town to the River Severn.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0664B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	In allowing this development in an AONB. Shropshire Council would not meet the major development tests of 'exceptional circumstances' and 'public interest' regarding the proposed building site. (Paragraph 172 of the National Planning Policy Framework) (NPPF) Local planning authorities need to determine whether there are any environmental designations or policy constraints which prevent them from meeting housing need. These include Ancient Woodland, and Areas of Outstanding Natural Beauty. Shropshire Hills AONB Management Plan Countryside and Rights of Way Act, 2000 Section 82 states that ..."the primary purpose of designation of an AONB is to conserve and enhance natural beauty". The site has two ancient woodlands and a conservation area on the boundaries so therefore should not even be considered for such a large development. Indeed in Shropshire Council's own Core Strategy 'ENVIRONMENT & LANDSCAPE CSS' it states that "There will be areas where development will need to pay particular regard to landscape character, biodiversity or other environmental considerations including in the Shropshire Hills Area of Outstanding Natural Beauty" Tourism plays an important part in the local economy. People travel from towns and cities in the West Midlands and beyond to enjoy the beautiful views and hills around Church Stretton. A development of this size would be a blot on the landscape from many viewpoints on the surrounding hills and make the area far less attractive to visitors. On landscape history grounds there is a good case for opposing this development proposal. Snatchfield, being the last relatively intact area of open field, provides a direct link with the historic development of Church Stretton's early medieval settlement and thus an important educational resource. The position of the estate would lead to an increase in traffic on Clive Avenue and in the town as the majority of residents would travel down by car, causing more air/noise pollution as well as raising the danger levels to pedestrians walking down 'The Conflict Area'. There is no evidence that the town needs such a large-scale development. It would be much better to use other more appropriate areas for smaller and less obtrusive sites within or close to the town. A 2020 survey of the residents demonstrated how much people thought it was necessary to protect the local landscape on both sides of the hills. The recent pandemic has also demonstrated the importance of open spaces and green areas to people's wellbeing. Hopefully, Shropshire Council will play their part in working towards the Prime Minister's commitment of protecting 30% of our countryside by 2030 announced today and reject this totally inappropriate application.
A0667B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area		I object to the inclusion of CST021 in the Local Development Plan - The infrastructure within Church Stretton would not be able to cope - The Doctors and dentist are already bulging - The road network is totally inefficient, can barely cope with the amount of traffic on it at present - No pavement making it extremely unsafe for walkers and local residents. - This land concerned lies within an area of AONB which is protected by the Countryside and Rights of Way Act 2000 - Why build on a site of beauty when there are other sites within the town which are more suited
A0668B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the inclusion of site CST021 and believe the Snatchfield site should be removed from the local development plan Snatchfield medieval meadow forms part of the Jack Mytton Way This land lies on the east and slopes down the valley. The site is clearly visible from various areas high and low within the valley, how can you calculate how much light pollution 70 houses will cause and how this will affect our dark sky policy Also there is only one access in and out to this site, it is not suitable for the current amount of vehicles let alone another 70 vehicles plus and the extent of any heavy machinery would put our lives, local residents, walkers and our vehicles at risk when emergency services are unable to get through
A0676B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	There is no need for 200 new homes in Church Stretton which is a AONB. It will decrease biodiversity. This proposal does nothing to enhance or conserve the natural environment any development of this scale is at odds with the Environment Act. The Snatchfield site is used by many existing and local walking groups as a starting point, The development would damage the area and the economy of Church Stretton. This development will increase cars and congestion it would not reduce climate change goals. Visitors to the area are horrified at the proposal. There is no local support for this development and if democracy is to be respected then this proposal must be rejected.
A0681B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Objects to allocation of the site and agrees with Church Stretton Town Council representation of 25.09.20. Does not feel that the Exceptional Circumstances Statement for the site is valid, and the need for 200 dwellings in Church Stretton is not proven, and their economic and environmental impact properly assessed. The site is up a steep road so is an unsuitable location for affordable housing. Drainage works are also required to mitigate flooding, and a public footpath would need to be rerouted.
A0687B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Opposes allocation of the site as it is against a number of National and Local Planning Policies, including NPPF para 172, Local Plan Policy DP26 and other relevant planning documents such as the Council's own Core Strategy Objectives 4 and 11, and Policy CS5; their Natural Environment Guidance Note 13, the CROW Act and Shropshire Hills AONB Management Plan. Consultation has also failed to consider sites previously identified in SAMdev including CSTR014 North of Ley Gardens and CSTR018
A0687B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The development of 70 houses on Snatchfield is a major development and should only be allowed in exceptional circumstances, and the site does not meet the three tests for this set out in paragraph 172 of the NPPF. The need for these houses has not been shown, indeed the Town Council's own survey suggests demand for affordable housing is low. The suitability of other sites including those at Craven Arms has not been fully explored and the impact of the development on the natural environment has not been fully explored. The site also fails to meet paragraph 108 of the NPPF - Safe and sustainable access to the town centre. Services and facilities are beyond the distance recommended for a comfortable walking distance and hence Snatchfield would encourage car usage and not contribute to the Council's commitment to reduce greenhouse gas emissions. For the above reasons Land at Snatchfields Farm (CST021) is not a suitable site for development of 70 houses
A0703B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to CST021 land at Snatchfields Farm being allocated for new housing development. This greenfield site in the AONB is historic landscape, providing wildlife habitat for a range of species and amenity access into unspoilt open countryside. The land is extremely wet and prone to flooding due to drainage issues likely to be affected by housing development. The single access route to and from the site creates a number of traffic problems for construction traffic and for the car dependent new residents who have no public transport options. Clive Avenue is narrow, on a steep gradient without pedestrian footways especially for the young and elderly. Ragleth Road has potholes and subsidence likely to be further affected by construction traffic. These narrow, steep roads will be dangerous in winter. Further evidence is provided in the local Community Conducted Clive Avenue Conflict Area Traffic Analysis from January to April (2020?) and in the RIBA Green Planning Studio report. Site CST014 adjoining the school is a better development opportunity along with brownfield sites in the town which will have fewer impacts on the AONB
A0715B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	No development should take place on access to the main walking routes ie Shropshire Way Jack Mytton Way. Demand does not exist for housing development in this area and can be met in other locations
A0720B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Building on this site will create the feeling of denser building and destroy the general outlook from the Longmynd.
A0721B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Site fails to meet strategic objectives of the Plan. No exceptional circumstances. Landscape and visual amenity affected, flood risk, transport issues, road safety issues, natural environment impacted.
A0722B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Objection to allocation. The Council has not surveyed actual housing need in Church Stretton. Small sites within the development boundary would be better. These two issues mean that the first AONB exceptional circumstances test is failed. The second test is failed because there is no assessment of possibility of developing outside the AONB The site suffers severe access problems and its allocation is contrary to NPPF paras 108-111. Clive Avenue is already a safety hazard and Ragleth Road has experienced subsidence. Both roads are steep and treacherous in cold weather. The site is not within walking distance of the town centre so would lead to an increase in car use. The ground easily becomes saturated and development would lead to increased run off and flood risk to properties further down the hill. This will be worse with climate change. The site acts a gateway to the Stretton Hills. Its development would diminish this and harm the tourist industry. It would also lead to pressure for the development of more sites on the east of the town. This is contrary to policy DP13 and against the principle of AONB designation. These factors cause the failure of the third test. The site is near two ancient woodlands and is a medieval meadow. Development is counter to DP26, DP18 and NPPF paras 172 and section 16. A previous planning inspector stated there should be no preference for development to the east of the A49 and there have been no material changes since. Shropshire Council has not demonstrated exceptional circumstances for such a major development in an AONB.
A0723B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Objection to allocation. The Council has not surveyed actual housing need in Church Stretton. Small sites within the development boundary would be better. These two issues mean that the first AONB exceptional circumstances test is failed. The second test is failed because there is no assessment of possibility of developing outside the AONB The site suffers severe access problems and its allocation is contrary to NPPF paras 108-111. Clive Avenue is already a safety hazard and Ragleth Road has experienced subsidence. Both roads are steep and treacherous in cold weather. The site is not within walking distance of the town centre so would lead to an increase in car use. The ground easily becomes saturated and development would lead to increased run off and flood risk to properties further down the hill. This will be worse with climate change. The site acts a gateway to the Stretton Hills. Its development would diminish this and harm the tourist industry. It would also lead to pressure for the development of more sites on the east of the town. This is contrary to policy DP13 and against the principle of AONB designation. These factors cause the failure of the third test. The site is near two ancient woodlands and is a medieval meadow. Development is counter to DP26, DP18 and NPPF paras 172 and section 16. A previous planning inspector stated there should be no preference for development to the east of the A49 and there have been no material changes since. Shropshire Council has not demonstrated exceptional circumstances for such a major development in an AONB.
A0828B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to site allocation. The Council has not demonstrated exceptional circumstance for major development in an AONB. Need affordable homes for the elderly who want to move in to town. The small need for housing that does exist could be met on brownfield sites within the development boundary. New residents will be commuting to work elsewhere and thus increase the traffic. Development would mean more surface water run off with nowhere to go. The Council's own flood risk assessment says the site is sensitive to the cumulative impact of any development. The valley is boulder clay which would mean deeper foundations and many houses would have to be split level because of the topography. These issues make development expensive and rule out affordable homes. Previous planning applications have been refused on appeal and the SAMDev Inspector said the same. The access to the site is dangerous and there are sink holes. There is no footpath on the bottom part of the route along Clive Avenue. There is no exit for emergency vehicles. People on mobility scooters will be at risk
A0830B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to site allocation. The Council has not demonstrated exceptional circumstance for major development in an AONB. Development will create noise and light pollution and spoil tranquillity. The access route is hazardous and Clive Avenue has no pavement. Extra traffic will make things worse.
A0840B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of CST021 within the Plan and support the long list of objections from the Town Council. The AONB has greater protection from development than other areas - no major development should occur without exceptional circumstances. Vehicular access to CST021 is dangerous. Development would increase flood problems and it is unclear how development could alleviate them. Concerned about environment impact of developing site. Impact on tourism should not be underestimated. No demonstrated housing need.
A0844B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	strongly disagrees as inappropriate to the AONB, would be car dependent, access is through a flood area, traffic issues, sink hole, prone to flooding
A0877B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Don't know / no opinion	Pleased CST033/ CST034 is identified as a site with long term potential which has no significant constraints by the SLAA. However considered site is has short term potential because site is immediately available, fully deliverable ; adjoining land has been developed for residential use and there has been interest from developers in the site; has direct access to A49 via Watling Street North (with required arrangement & upgrading achievable as outlined in highway access report). Access to A49 in turn provides good access to larger service centres and employment opportunities with less strain on minor roads, as per preferred site. Site has a favourable Fair sustainability rating which is better than for many other sites including preferred site, CST020 which is Poor & located with challenging topography. Additional information can be provided as required to support bringing the site forward. Site location plan provided.

Page 170

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0921B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The designation of Church Stretton as a Key Centre settlement in Policy S5.1 is strongly supported as this is seen as vital to ensuring the town's long-term future. We agree with the explanatory text to policy S5.1 that Church Stretton plays an important role in south Shropshire, providing services and facilities for a wide rural hinterland (paragraph 5.88). In addition, due to the town's strategic transport links (including main rail line) the settlement contributes towards strategic growth objectives in this area of the County". Nonetheless, despite the strategic importance of growth being directed to Church Stretton the plan allocates only 1 site for 70 dwellings in the town, with an additional 51 dwellings identified to be delivered as windfall (unplanned development). There is, therefore, a significant reliance on windfall development and this reliance may increase, given the comments made in our representations on Strategic Policy SP2 'Strategic Approach'. It is therefore considered essential that further land is included within the development boundary of the town and potentially allocated for residential development to ensure that the needs of the settlement and surrounding area are met and consequently the aims and objectives of the Plan are realised. Our client's land was submitted under the Council's Call for Sites and identified as CST035 'Springbank Farm, Church Stretton' (a site location plan has been attached to this representation's covering letter for ease of reference). This site was subject to assessment by the Council as part of the Plan preparation process and the results of the assessment are included within the 'Church Stretton Place Plan Area Site Assessments (August 2020)'. The results of the site assessment detail that, whilst the site achieved the joint second highest score in the Stage 2a Sustainability Appraisal and that residential development on the site was considered to be achievable and viable in the Stage 2b Screening, the site was removed from the assessment process due to concerns over flood risk and ecological impacts. However, detailed reports on flood risk and ecology prepared in support of a current planning application on part of site CST035 (application ref. 18/01258/OUT) have addressed these issues. In summary, the current consultation provides an opportunity for Shropshire Council to amend policy S5.1 and Inset Map S5 to include our client's land, in whole or part, within the development boundary of the settlement and potentially allocate it for residential development. The inclusion of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.
A0921B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area		The designation of Church Stretton as a Key Centre settlement in Policy S5.1 is strongly supported as this is seen as vital to ensuring the town's long-term future. We agree with the explanatory text to policy S5.1 that Church Stretton plays an important role in south Shropshire, providing services and facilities for a wide rural hinterland (paragraph 5.88). In addition, due to the town's strategic transport links (including main rail line) the settlement contributes towards strategic growth objectives in this area of the County". Nonetheless, despite the strategic importance of growth being directed to Church Stretton the plan allocates only 1 site for 70 dwellings in the town, with an additional 51 dwellings identified to be delivered as windfall (unplanned development). There is, therefore, a significant reliance on windfall development and this reliance may increase, given the comments made in our representations on Strategic Policy SP2 'Strategic Approach'. It is therefore considered essential that further land is included within the development boundary of the town and potentially allocated for residential development to ensure that the needs of the settlement and surrounding area are met and consequently the aims and objectives of the Plan are realised. Our client's land was submitted under the Council's Call for Sites and identified as CST035 'Springbank Farm, Church Stretton' (a site location plan has been attached to this representation's covering letter for ease of reference). This site was subject to assessment by the Council as part of the Plan preparation process and the results of the assessment are included within the 'Church Stretton Place Plan Area Site Assessments (August 2020)'. The results of the site assessment detail that, whilst the site achieved the joint second highest score in the Stage 2a Sustainability Appraisal and that residential development on the site was considered to be achievable and viable in the Stage 2b Screening, the site was removed from the assessment process due to concerns over flood risk and ecological impacts. However, detailed reports on flood risk and ecology prepared in support of a current planning application on part of site CST035 (application ref. 18/01258/OUT) have addressed these issues. In summary, the current consultation provides an opportunity for Shropshire Council to amend policy S5.1 and Inset Map S5 to include our client's land, in whole or part, within the development boundary of the settlement and potentially allocate it for residential development. The inclusion of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.
A0925B1	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area		Site promotion for sites CST029 and CST031. These sites were subject to assessment by the Council as part of the Plan preparation process and the results of the assessment are included within the 'Church Stretton Place Plan Area Site Assessments (August 2020)'. With specific regard to the assessment of site CST029, the stage 2 assessment gave an indicative capacity of 28 units. However, that density of development is not achievable on the site as it fails to have regard to the site's (and wider area's) ecology, heritage, trees and landscape. The indicative site layout (attached) demonstrates how the site may be developed for 3 dwellings. A development of 3 dwellings has regard to the site's characteristics and constraints, ensuring that no unacceptable adverse impacts (including landscape, visual and highway impacts) would arise as a result of the development. It should also be noted that whilst the stage 3 assessment states that the site is steeply sloping, this is not the case. In addition, and significantly, the site was previously owned and allocated for residential development, with the rest of Clive Avenue, by the Stretton Land Company. Kenyon Road was constructed to provide access to CST029 and makes legal provision for this. A development of 3 dwellings on the site can easily be accommodated by the surrounding highway infrastructure. Similarly, with regard to the assessment of site CST031, the stage 2 assessment gave an indicative capacity of 14 units. Again that density of development is not achievable on the site due to the site's (and wider area's) ecology, heritage, trees and landscape. The indicative site layout (attached) demonstrates how the site may be developed for 6 dwellings. A development of 6 dwellings has regard to the site's characteristics and constraints, ensuring that no unacceptable adverse impacts (including landscape, visual and highway impacts) would arise as a result of the development. It should also be noted that whilst the stage 3 assessment states that the site is steeply sloping, this is not the case. The site, via the southern end of Clive Avenue, benefits from an existing access onto the A49. The additional traffic generated from 6 dwellings on the site would be insignificant. In addition, whilst the existing highway arrangement is more than adequate to accommodate 6 additional dwellings, it is agreed that the 30mph speed limit should be moved to include the existing access. The development of CST031 would deliver this betterment which would be a significant highways improvement not only to CST031 but also Watling Street North and Laundry Bank, which has been called for by the community for many years. Given the above, it is evident that the two proposed sites represent sustainable opportunities to deliver windfall residential development in the town on land that is unconstrained. We are also aware that Church Stretton Town Council, community groups (including The Strettons Civic Society) and individuals have expressed support for the development needs of the settlement to be delivered across a number of smaller sites, objecting to the larger allocation of 70 dwellings on Snatchfields Farm CST021. As with other settlements in South Shropshire it is difficult to get medium to large developers to deliver housing numbers. Smaller developments, of up to 20 units, are therefore better placed to provide the housing required. The provision of development across a number of smaller sites in the settlement would better accord with the advice contained within the National Planning Policy Framework (NPPF), including: Paragraph 68 which stresses the importance of small and medium sized sites to the delivery of housing; and Paragraph 172 which states that the scale and extent of development within Areas of Outstanding Natural Beauty should be limited and planning permission refused for major development "other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest". The inclusion of CST029 & CST031 within the development boundary would therefore meet with the aims and aspirations of the local community and ensure that development in the settlement better accords with the guidance contained within the NPPF. In summary, the current consultation provides an opportunity for Shropshire Council to include sites CST029 & CST031 within the development boundary of the settlement. The inclusion of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.
A0925B3	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area		The designation of Church Stretton as a Key Centre settlement in Policy S5.1 is strongly supported as this is seen as vital to ensuring the town's long-term future. We agree with the explanatory text to policy S5.1 that Church Stretton plays an important role in south Shropshire, providing services and facilities for a wide rural hinterland (paragraph 5.88). In addition, due to the town's strategic transport links (including main rail line) the settlement contributes towards strategic growth objectives in this area of the County". In this regard, Paragraph 4.91(e) specifically identifies Church Stretton as a Key Centre on a Strategic Corridor and Policy DP9: Strategic Corridors states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity". It is evident, therefore, that Church Stretton should be a significant centre for growth in Shropshire, both socially and economically. Nonetheless, despite the strategic importance of growth being directed to Church Stretton the plan allocates only 1 site for 70 dwellings in the town, with an additional 51 dwellings identified to be delivered as windfall (unplanned development). There is, therefore, a significant reliance on windfall development and this reliance may increase, given the comments made in our representations on Strategic Policy SP2 'Strategic Approach'. The delivery of sufficient windfall development in Church Stretton will be problematic given that the development boundary has been drawn tightly around the existing built form of the settlement and the numerous constraints to development identified in the supporting text to policy S5.1, including the Shropshire Hills Area of Outstanding Natural Beauty (AONB), the Long Mynd Site of Special Scientific Interest, the Coppice Leasowes Local Nature Reserve, Scheduled Ancient Monuments at Nover's Hill and Brockhurst, The Old Rectory historic designed landscape, woodlands and trees protected by Tree Preservation Orders, flooding, the large Conservation Area and the need to separate the two smaller settlements of All Stretton and Little Stretton from Church Stretton. Given the above, it is considered evident that in order to provide the significant level of windfall development needed in the town over the Plan period the development boundary should be redrawn to encompass additional unconstrained land for small scale residential development to ensure that the needs of the settlement and surrounding area are met and consequently the aims and objectives of the Plan are realised. Our client's land was submitted under the Council's Call for Sites and identified as CST029 'Land between Clive Avenue and Kenyon Road, Church Stretton' and CST031 'South of Clive Avenue, Church Stretton'. Site location plans and indicative site layouts have been attached to this representation's covering letter for ease of reference. These sites were subject to assessment by the Council as part of the Plan preparation process and the results of the assessment are included within the 'Church Stretton Place Plan Area Site Assessments (August 2020)'. With specific regard to the assessment of site CST029, the stage 2 assessment gave an indicative capacity of 28 units. However, that density of development is not achievable on the site as it fails to have regard to the site's (and wider area's) ecology, heritage, trees and landscape. The indicative site layout (attached) demonstrates how the site may be developed for 3 dwellings. A development of 3 dwellings has regard to the site's characteristics and constraints, ensuring that no unacceptable adverse impacts (including landscape, visual and highway impacts) would arise as a result of the development. It should also be noted that whilst the stage 3 assessment states that the site is steeply sloping, this is not the case. In addition, and significantly, the site was previously owned and allocated for residential development, with the rest of Clive Avenue, by the Stretton Land Company. Kenyon Road was constructed to provide access to CST029 and makes legal provision for this. A development of 3 dwellings on the site can easily be accommodated by the surrounding highway infrastructure. Similarly, with regard to the assessment of site CST031, the stage 2 assessment gave an indicative capacity of 14 units. Again that density of development is not achievable on the site due to the site's (and wider area's) ecology, heritage, trees and landscape. The indicative site layout (attached) demonstrates how the site may be developed for 6 dwellings. A development of 6 dwellings has regard to the site's characteristics and constraints, ensuring that no unacceptable adverse impacts (including landscape, visual and highway impacts) would arise as a result of the development. It should also be noted that whilst the stage 3 assessment states that the site is steeply sloping, this is not the case. The site, via the southern end of Clive Avenue, benefits from an existing access onto the A49. The additional traffic generated from 6 dwellings on the site would be insignificant. In addition, whilst the existing highway arrangement is more than adequate to accommodate 6 additional dwellings, it is agreed that the 30mph speed limit should be moved to include the existing access. The development of CST031 would deliver this betterment which would be a significant highways improvement not only to CST031 but also Watling Street North and Laundry Bank, which has been called for by the community for many years. Given the above, it is evident that the two proposed sites represent sustainable opportunities to deliver windfall residential development in the town on land that is unconstrained. We are also aware that Church Stretton Town Council, community groups (including The Strettons Civic Society) and individuals have expressed support for the development needs of the settlement to be delivered across a number of smaller sites, objecting to the larger allocation of 70 dwellings on Snatchfields Farm CST021. As with other settlements in South Shropshire it is difficult to get medium to large developers to deliver housing numbers. Smaller developments, of up to 20 units, are therefore better placed to provide the housing required. The provision of development across a number of smaller sites in the settlement would better accord with the advice contained within the National Planning Policy Framework (NPPF), including: Paragraph 68 which stresses the importance of small and medium sized sites to the delivery of housing; and Paragraph 172 which states that the scale and extent of development within Areas of Outstanding Natural Beauty should be limited and planning permission refused for major development "other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest". The inclusion of CST029 & CST031 within the development boundary would therefore meet with the aims and aspirations of the local community and ensure that development in the settlement better accords with the guidance contained within the NPPF. In summary, the current consultation provides an opportunity for Shropshire Council to include sites CST029 & CST031 within the development boundary of the settlement. The inclusion of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.
A0925B4	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area		Location plans and indicative layouts accompanying promotion of CST029 and CST031
A0979B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Disagrees with intentions of Policy S5 not to identify any "hubs" or "clusters" in the Church Stretton Place plan and submits evidence for inclusion of land at Old Hall Farm Cottage. Concern that designation of community clusters is influenced by local opinion rather than professional assessments of the sustainability and suitability of settlement such as All Stretton. Assistance in this regard has already been provided by the Inspector in the 3149461 appeal decision. On the basis of the Inspector's independent assessment of the sustainability of All Stretton, its development status should clearly be altered from "open countryside" to a named "cluster" settlement in Policies SP2.3 and S5.3. This would then enable Shropshire Council to support appropriate housing development in accordance with Policy SP8 on our client's Starr Lane site. Preliminary site layout on the site submitted with document which shows a mixture of housing which reflects the requirements of Policies DP1 – DP7 to support the differing categories of housing needed in Shropshire identified in the SHMA and draft Housing Strategy. This will become increasingly important if the revised housing methodology for Shropshire becomes national policy in late 2020
A1000B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Surprised that Church Stretton needs to encroach into the AONB to meet its target for new houses. However, if it does this site should not be considered for development. This land is a green finger stretching out from the edge of the town and separating two substantial housing developments; it is popular with walkers and includes the Jack Mytton way. There are drainage problems below Snatchfields now and additional housing can only make matters worse. The only access to the site for vehicles will be via Clive Avenue. For most of the relevant part of Clive Avenue the road is too narrow for vehicles to pass with comfort and there are no pavements for pedestrians. To add to the risk of a serious accident by increasing the flow of traffic from this development seems reckless to say the least.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1071B1	Viability and Deliverability of Proposed Site Allocations	Draft Policy Area S5 Church Stretton Place Plan Area	Agree	Fully support the Development Strategy proposed for Church Stretton. Fully agree that Church Stretton plays an important role in South Shropshire, providing services and facilities for a wide rural hinterland and, as such, it has been identified as a Key Centre. Fully agree with the identification of CST021 as a proposed residential allocation. It is the most appropriate and justifiable location for such housing growth, which will make a meaningful contribution to the town's housing needs and the Local Plan target of 200 dwellings. CST021 is available now, offers a suitable location for development, with the delivery of housing on the site within the next five years a realistic prospect (anticipate delivery in the short to medium term, between 2021 and 2029), subject to allocation within the Local Plan. The site is viable, taking into account the policy requirements set out in the Local Plan as a whole. As such the site is considered deliverable as defined in the NPPF. Construction of around 70 dwellings at CST021 would deliver economic and social benefits for the town with viable options available to mitigate any limited environmental harm. It is unclear if the site guideline is a maximum, minimum or approximate figure. Draft site guidelines for CST021 include the need to undertake a number of supporting assessments. Reflecting this, a thorough and comprehensive review of the site's constraints and opportunities, including the completion of a number of baseline technical studies and assessments, has been undertaken. Supporting technical assessment appendices to this representation are: Drainage Report; Preliminary Ecological Assessment; Heritage Statement; Landscape and Visual Appraisal; Constraints and Opportunities Plan; Proposed Site Plan; and Traffic and Transport Feasibility Report. The assessments demonstrate the sites suitability and lack of fundamental constraints. An illustrative masterplan (comprehensive development proposals would not be prepared until the Planning Application stage, subject to confirmation of the current draft allocation) has been provided demonstrating how the site could comply with draft policies DP1 and DP2. It also shows generous areas of open space and ensures that an attractive environment would be created, while being cognisant of the intrinsic site constraints, such as the biodiversity and arboricultural qualities of the land and the line of the Jack Mytton Way that crosses the site in a broadly north-south axis. Development would also incorporate sustainable methods of drainage (appropriately sized attenuation basin located in the site's north-eastern corner), as part of a sustainable drainage strategy. The site is within 2,000 metres of the entirety of Church Stretton town centre, with good accessibility to a variety of local services to cater to future residents' everyday needs. The Church Stretton railway station is also located within 500 metres of the site, a short walking distance, providing onward connections to larger towns and interchanges. The site is in a sustainable and well-linked location. The Traffic and Transport Feasibility Report concludes traffic generated by the development is unlikely to have a severe impact on the surrounding highway network and the creation of the primary vehicular access at the southern end of Chelmick Drive via the demolition of number 24 (which is under our clients' ownership) is entirely appropriate and capable of meeting usual highways standards. Aware of Town Council and some local residents concerns regarding CST021. However, many are considered unfounded or can be addressed through the design of any future development informed by further appropriate technical work at the Planning Application stage. The site is not a meadow, but farmland used for grazing sheep and as such is not a recognised green space that should be protected from development. The Jack Mytton Way that crosses the site will be retained and enhanced as part of the development. The woodland to the south of the site and marshland/mature trees along the site's eastern boundary will be retained and adequately buffered as part of the development. The heritage assessment indicates that there is limited archaeological interest and no indications that, if present, any archaeological resource within the site would be so complex, rare, and well-preserved so as to elevate its significance and preclude development. Any requirement for further archaeological works ahead of development taking place can be agreed in consultation with the Council. The site is surrounded by existing residential development on three sides, which means that the proposed housing allocation will constitute a logical 'rounding off' of the built-up area of Church Stretton. The form and location of the site means that the impact on the Shropshire Hills Area of Outstanding Natural Beauty (AONB) will be limited, as demonstrated by the initial Landscape and Visual Appraisal prepared for the site. The site has capacity to accommodate a sensitively designed residential development which would not give rise to significant landscape or visual effects, the illustrative site plan shows how such development could be laid out. Welcome the opportunity to respond to concerns raised during consultation and provide assurances to the Town Council and community that the site is suitable for development and that any concerns can be satisfactorily addressed.
A1112B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	In the Bridleways, where I live, there is an open water course adjacent and parallel to the road and pavement which carries the surface water from the proposed development site. During the twenty years that I have lived here, there has ALWAYS been a continuous flow of water, even during the hot and dry summer of 2018. I am extremely concerned that the volume of water will increase dramatically, potentially flooding some properties in The Bridleways
A1113B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Concern about traffic access to the Snatchfield site via Chelmick Drive and The Bridleways which is a Cul-de-sac. The roads are very narrow and there is only one pathway on one side of the road. Concern that cars will be parked in The Bridleways by residents of the new development and used as through new pedestrian access to the Snatchfield site. At the moment, as I understand it, the road at the eastern end of The Bridleway is privately owned by whom I do not know
A1122B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to allocation of CST021 Snatchfields Farm as unsustainable, inaccessible and unviable because the site is affected by the following considerations poor single carriageway site access constrained by neighbouring properties with no capacity to introduce pedestrian footways to improve safety; there is poor visibility along Chelmick Drive towards the site; the development exits onto the highway (this is a southern access point at the junction of Chelmick Drive & Chelmick Close) on an existing junction (into Chelmick Close) which will create a confusing and unsafe highway layout; site slopes steeply with an uneven surface that will require significant groundworks to level the surface that will permanently alter the landscape affecting the setting of the site within the AONB; CST021 is not a site the community wish to see developed as shown by the local objections and so, is unsustainable in many ways. The better development option is to expand and reallocate the existing employment allocation at Springbank Farm CST018 up to 5.5ha to deliver the housing needs of the town, physical infrastructure and other community benefits and improvements to replace site CST021 Snatchfields Farm. CST018 Springbank Farm will provide flood alleviation, reduced risks of affecting trade to the town centre and local infrastructure improvements if built to conform with the Local Plan and CST021 Snatchfields Farm should be deleted.
A1122B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Proposal to expand and reallocate the existing employment allocation CST018 Springbank Farm for housing development to replace CST021 Snatchfields Farm. The expanded site to comprise two paddocks north of Lawley Close to increase the site area to 5.5 ha (CST021 comprises 4.25ha) with access from the B5477 Shrewsbury Road using the existing private accesses. Access to CST018 from Shrewsbury Road is within the 30mph formal speed limit and within the advisory 20mph limit and lies on the access apron for the adjoining secondary school giving a wide and safe degree of visibility onto the highway with the possibility for a pedestrian crossing to provide both a safe access to the school and a safe point of access into the surrounding countryside. There are no ecological constraints on CST018 as the site has no local, national or international ecological or biodiversity value; CST018 is larger than the preferred allocation at CST021 and so can deliver the required housing numbers and open space provision; The open space can lie over the Flood Zone 3 within CST018 and the site access road can comprise a raised highway through the Flood Zone 2 within the site as part of a comprehensive Site Flood Risk Assessment and Management Plan; CST018 lies outside the Church Stretton Conservation Area and whilst the site is flat open within the AONB the development can be sensitively located against the built edge of the town and designed to protect the special landscape qualities of the AONB including retention of boundary trees, site landscaping, biodiversity enhancements and visual amenity improvements. This development proposal is accompanied by a letter of support from the Church Stretton Mayor Bob Welch
A1133B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the inclusion of site CST021 because of its natural environment used by walkers and horse riders, and has biodiversity. We need to protect our countryside. The building need in Church Stretton could be accommodated by considering sites closer to town. Snatchfields is not easily accessed and will cause increased traffic to Clive Av., Ragleth Road and Chelmick Drive and will make it dangerous to walk these areas
A1134B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	There is no local need or desire for a housing development on this scale. Church Stretton should not be subjected to the same policies that apply to larger towns such as Telford, Oswestry or Shrewsbury and no solid evidence has been provided that Stretton needs more housing. Impact on wildlife. Studies of Snatchfields have discovered that the site is particularly vulnerable to flooding, including the access track. The access is poor. This site is also of huge historical, ecological and physical importance to residents and visitors alike. Sit rarely used by walkers.
A1150B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Please find attached the submission by the All Stretton Village Society which rejects proposed major developments within Church Stretton Plan Area under Draft Policy S5. The ASVS agree with Church Stretton Town Council, the 'Save Snatchfield' Group, GreenPlanning Solutions (independent planning consultants), and numerous residents that the proposed site CST021 fails to satisfy the tests established by NPPF172. As an alternative way forward, the ASVS propose that the area covered by the Stretton Hills AONB is removed from the draft Local Plan and a separate development plan created for the AONB following successful precedents elsewhere in the country. Creating a Shropshire Hills AONB DPD would remove difficulties for the passage of the local plan because Church Stretton is the only town in Shropshire protected by NPPF172 and CROW 2000 Section 85. It would also afford Shropshire Council the opportunity to demonstrate excellence in planning. The attached document forms part of the ASVS submission and provides detailed legal justification for this position.
A1152B42	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Church Stretton is the only Key Centre in the South Shropshire Hills Area of Outstanding Natural Beauty (AONB). It is therefore heavily constrained by the presence of those protected hills all around it. Shropshire Council should therefore treat it in a different way to other towns in Shropshire, and not necessarily require it to take 'its share' of development'. Consider there is no justification for levels of development proposed. The Shropshire Hills AONB Exceptional Circumstances Statement simply repeats the fact that 'the Local Plan Review identifies a need for 200 dwellings and 2 hectares of employment land in Church Stretton'. Pages 183 to 185 of the consultation document offer no further explanation of how those figures have been arrived at. Understand the employment figure has been calculated to balance the housing figure. CST021 is particularly controversial, as witnessed by the considerable local opposition to it. It would be obtrusive in views of the town from the Long Mynd and surrounding hills. Understand the local preference is that any development in Church Stretton should be on smaller sites around the town, rather than on a large site in a controversial location. These sites would conserve its character far better than large new housing developments
A1153B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Detailed response from Church Stretton Community Led Plan Group on policies for Church Stretton and specifically the Snatchfields site proposed in the Local Plan. In summary the group supports the views of townspeople who are opposed to large scale housing developments in the AONB and specifically to designating Snatchfield Farm (CST021) as an Allocated site. The proposal to build a major housing development at Snatchfield Farm is clearly in conflict with the guiding principle in paragraph 172 of the NPPF: 'Great weight should be given to conserve and enhance landscape and scenic beauty in National Parks, the Broads and AONBs which have the highest status of protection in relation to these issues'
A1154B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	National planning Policy Framework (NPPF), paragraph 172 and Local Plan DP 26. Shropshire Council's intention to build 70 houses at Snatchfield Farm does not comply with the principles of the NPPF nor its iteration in the Local Plan, DP 26. Paragraph 4.227 of the Local Plan says: "Areas of Outstanding Natural Beauty (AONB) represent areas of the highest scenic quality, and, in landscape terms, are intended to enjoy equal status with National Parks. The primary purpose of an Area of Outstanding Natural Beauty designation is the conservation of the natural beauty of the landscape." The injunction to conserve is reinforced in the CROW Act 2000 which says " - - - in exercising or performing any function in relation to, or so as to affect, land in an AONB, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty". In 2012 the Shropshire Council assessment for Snatchfield Farm for the South Shropshire Landscape Sensitivity and Capacity Mapping report says "the site helps to alleviate the linear nature of the settlement edge in a prominent location. The area has very limited capacity for housing, as this would fill in the green wedge which is a major positive feature of the settlement". Snatchfield Farm (CSTO 21) is one of the few remaining examples of the medieval field system of Church Stretton. It is a finger of green meadow that provides a scenic route into and out of town for walkers on the long distance Jack Mytton Way, which traverses the site. This is important because it offers a fine vista of the hills of the Long Mynd to the north-west across the valley when approaching the town and when walking out of town through Snatchfield it provides an attractive panorama of the wooded hills rising to the south: some of these are ancient woodlands of a protected landscape owned by the Woodland Trust or the National Trust. Tourism is important for Church Stretton; walkers and holiday makers come to enjoy the scenery and we need to preserve it in the interests of both visitors and the community. Church Stretton, has, as the result of planning decisions, spread steadily into the open countryside of the AONB since the second World War. Development began as infill near the town centre in the middle of the valley; urban development to the west was limited because of the topography and the status of the Long Mynd much of which is in the ownership of the National Trust and this situation has fostered growth up the hillsides to the east. This urban growth has now reached the stage when its cumulative effect on the landscape must preclude any more significant major development on the hillsides east of the town.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1154B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Shropshire Council, in accordance with policy guidance in the National Planning Policy Framework, undertook a Full Objectively Assessed Housing Need (FOAHN). It showed a need for around 25,000 homes for the plan period, but the Council decided that the number should be around 28,000 because they considered that Shropshire should adopt a high growth policy that recognised the potential that could arise from major national initiatives, including the HS2 railway, the Midlands Engine and the Northern Powerhouse; the figure was subsequently raised to around 30,000 when the plan period was extended from 2036 to 2038. The guideline for housing in Church Stretton was reduced from 250 to 200, partly because of the deletion of the Gaerstone site (CSTO20) from the plan and partly because the school housing site (CSTRO18) in the current Local Plan was de-allocated when the developer withdrew the planning applications. The composition of the 200 homes is listed in Appendix 5 table of the plan, Residential Development Guidelines and Residential Supply; 17 have already been built, 62 have planning permission, 51 are estimated windfall and 70 is the Snatchfield Local Plan Allocation. In practice the National Planning Policy Framework does not permit the inclusion of AONB housing development within FOAHN targets for the county. Paragraph 11 of the NPPF says: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: b) strategic policies should, as a minimum, provide for objectively assessed housing needs and other uses - - - unless: i) the application of policies within this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area (6); Footnote 6 says; "The policies referred to are those in the Framework - - - relating to - - - land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park - - -" It follows clearly that a top-down target for development related to the county FOAHN cannot be imposed on Church Stretton because it is embedded within the Shropshire Hills AONB: a housing target must be derived from an assessment of local needs.
A1154B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	DP 26, paragraph 3 This section of the Local plan relates to Shropshire Hills AONB and says: " Proposals for major development (as defined within Annex 2 of the NPPF) in the Shropshire Hills AONB should be accompanied by a proportionate assessment setting out: a) The need for the development - - - b) The cost of, and scope for, developing outside the designated area, or meeting the need for development in some other way; and c) Any detrimental effect on the environment, the landscape - - - " Shropshire Council has accepted that the proposed Snatchfield allocation of 70 houses is a major development which the NPPF says should be refused other than in exceptional circumstances. The Council have published an AONB Exceptional Circumstances Statement which argues that Snatchfield meets the three tests set by paragraph 172 of the NPPF. The first test relates to the need for the development and its impact on the local economy. By its nature a housing development must cause some harm to the purposes for which the AONB was designated. It is therefore essential for the Council to provide conclusive evidence of such a housing need in Church Stretton. The Council argues that the 70 houses are required to support the town's role as a key centre in South Shropshire but they have not demonstrated the specific need for 70 houses, of which only 14 would be affordable and 56 would be market price houses. The recent Housing Needs survey carried out by Church Stretton Town Council demonstrated a strong demand for affordable homes rather than market homes which are likely, based on historical facts, to attract mainly retired people rather than key workers who will contribute to the economy. The second test relates to the scope for developing outside the designated AONB area or meeting the need in some other way. The Council do not appear to have fully assessed the scope for development in Craven Arms, a key centre, 8 miles south of Church Stretton and outside the AONB boundary. It has good bus and train links to Church Stretton and Shrewsbury. The Council offers no evidence that it has examined the option of meeting the need "in some other way". The third test relates to any detrimental effect on the environment. The Council says it has examined issues of landscape, wildlife, woodland heritage factors and flood risk and find that Snatchfield is the most appropriate for housing when compared with other available sites. But the proper test is not whether Snatchfield is less harmful than other sites but whether it is harmful in itself. It is a highly popular walk for both local people and visitors and its development would be harmful to the principle of conserving and enhancing the AONB landscape. Shropshire Council has not met the test of 'exceptional circumstances'.
A1154B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Shropshire Council cannot demonstrate that Snatchfield is a sustainable site for transport, nor cansite-specific problems be overcome. NPPF paragraph 103 says: "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health." Paragraph 108 says: "In assessing sites that may be allocated for development in plans, it should be ensured that safe and suitable access can be achieved for all." Snatchfield fails to meet these guidelines for the following reasons: Road Transport There are about 120 dwellings in the area served by a single access road network and there are a number of outstanding planning permissions, mainly in Clive Avenue, so the addition of 70 houses would mean about 200 houses would be served. The road access climbs from Watling Street South, up Clive Avenue, Ragleth Road, then steeply to the Chelmick Drive summit (one of the highest points of urban development in the town) where a new access, requiring the demolition of a bungalow, would descend to the housingsite. The network is below standard with Chelmick Drive and Ragleth Road being 4.8m wide carriageways compared with the Council's 5.5m specification for estate roads. The Clive Avenue section, which would service all 200 houses, is steep, has no pavements and a survey conducted by residents showed that it is now regarded as a conflict zone between traffic and pedestrians; the addition of 70 houses would make the existing dangers much worse. Pedestrian Access There is a more direct access to the town centre for pedestrians along the Jack Mytton Way, it is currently narrow, dark, overshadowed by tall hedges, poorly surfaced and badly lit; these discouraging conditions could be mitigated by upgrading the route. However it would not meet the standards for accessibility on foot, nor would it provide a reasonable route for people using wheelchairs or with sight disabilities.. It is a distance of 830m to the Sandford Avenue shops, 1.15km to the medical practice and 1.6km to the schools. The 'Manual for Streets' regards 800m as a comfortable walking distance and a 20 minute (1.6km) walk as acceptable in a suitable environment. The route involves a busy traffic light crossroads of the A49 which includes a pedestrian controlled crossing. The site falls just below the standards for access. There is no bus route in this area; the bus route to Ludlow and Shrewsbury is about 1km from Snatchfield and the railway station about 700m. Because of the access limitations for both vehicles and pedestrians Snatchfield is not a sound and convenient location for specialist housing provision or affordable homes. Snatchfield would be a 'Car Dependant' site which would contribute to Shropshire Council's greenhouse gas emissions.
A1154B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Alternative Deliverable Sites At the previous informal consultation, the Preferred Options stage, Shropshire Council ruled out for allocation sites below 0.5ha. Subsequently, but after the consultation had closed, they accepted that these smaller sites could be considered but have declined to work with the community to identify and assess them for sustainability. There is a widespread view in the Church Stretton community that a detailed examination would produce a number of small brownfield sites within the town boundary and small rural exception sites just outside the town boundary; both would usually be good sites for affordable homes, which is what are needed. Although any major site would not be welcomed by the community, and this was made clear in a recent survey carried out by the Steering Group of the emerging Community Led Plan, there are two potential sites on the valley floor which could accommodate a larger number of houses but would be less damaging to the landscape of the AONB than Snatchfield Farm. They are CSTO 35, field adjacent to Springbank Farm and CSTO 19, formerly CSTRO 14 under the current SAMDev local plan (sometimes referred to as Oak Berries, from medieval field names in the locality). This latter site was part of the substitute playing fields site allocation for CSTRO18, now de-allocated, so Oak Berries may now be available for housing development. Parts of both sites are in flood zone 3 but this can be avoided for house building or mitigated by raising part of the access road on a low embankment. It is not known publicly if either site has been put forward for development but both are worthwhile exploring in preference to Snatchfield.
A1154B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Summary document of A1154B1 - B4
A1166B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	As a resident of Church Stretton, I wish to object in the strongest possible terms AGAIN, to ANY housing development at Snatchfield - (CSTO21) How many times does this have to happen, numerous development applications have been refused and rejected for this inappropriate and unsuitable land over the years, for very specific and important reasons - NOTHING HAS CHANGED to affect any of these decisions! The site has been designated as an Area of Outstanding Natural Beauty (AONB) for very important reasons - I.E, with its last remaining unimproved Medieval Meadow in Church Stretton, it's 2 x Ancient Woodlands, the vast array of Flora, Fauna, Habitats, Nesting Birds, Animals, Bats & Badgers, to name just a few! Preserving these Trees and Green Spaces, must now be considered a Priority. The much valued and unspoilt landscape in Church Stretton is absolutely unique with its views and vistas which bring in much valued Tourism to the area with Walkers and Visitors, which our local economy needs and depends on. This development would have a completely negative impact on Tourism to this beautiful area. There are also MAJOR road safety and environmental concerns that need to be considered as it is an AONB. With the additional increased volume of cars using these roads for 70 New Homes, the impact will have severe consequences for pedestrians and residents safety. ALL of the roads to this site are totally unsuitable, they are inaccessible, unpaved in many areas, narrow and have steep gradients in excess of 1 in 8, which DO NOT get gritted when the weather is BAD in the Winter and so consequently access can be impossible! The land on this site is also extremely wet, so there will be MAJOR drainage issues and any housing development on this site, would pose a significant flood risk to these houses and also to the properties lower down the valley. Local facilities and infrastructure cannot cope at the moment, so building 70 New Homes will just exacerbate the situation - this development is just NOT viable. Shropshire Council have not met any of the criteria or produced any evidence for using the phrases "exceptional circumstances" and "public interest" with regards to the proposed housing development at the AONB - Snatchfield - (CSTO21). So, given all of this information, points, and facts, I believe that the proposed development of 70 New Homes on Snatchfield - (CSTO21), should once and for all, be deleted, refused and removed from all planning considerations, now and in the future
A1167B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	As a resident of Church Stretton, I wish to object in the strongest possible terms AGAIN, to ANY housing development at Snatchfield - (CSTO21) How many times does this have to happen, numerous development applications have been refused and rejected for this inappropriate and unsuitable land over the years, for very specific and important reasons - NOTHING HAS CHANGED to affect any of these decisions! The site has been designated as an Area of Outstanding Natural Beauty (AONB) for very important reasons - I.E, with its last remaining unimproved Medieval Meadow in Church Stretton, it's 2 x Ancient Woodlands, the vast array of Flora, Fauna, Habitats, Nesting Birds, Animals, Bats & Badgers, to name just a few! Preserving these Trees and Green Spaces, must now be considered a Priority. The much valued and unspoilt landscape in Church Stretton is absolutely unique with its views and vistas which bring in much valued Tourism to the area with Walkers and Visitors, which our local economy needs and depends on. This development would have a completely negative impact on Tourism to this beautiful area. There are also MAJOR road safety and environmental concerns that need to be considered as it is an AONB. With the additional increased volume of cars using these roads for 70 New Homes, the impact will have severe consequences for pedestrians and residents safety. ALL of the roads to this site are totally unsuitable, they are inaccessible, unpaved in many areas, narrow and have steep gradients in excess of 1 in 8, which DO NOT get gritted when the weather is BAD in the Winter and so consequently access can be impossible! The land on this site is also extremely wet, so there will be MAJOR drainage issues and any housing development on this site, would pose a significant flood risk to these houses and also to the properties lower down the valley. Local facilities and infrastructure cannot cope at the moment, so building 70 New Homes will just exacerbate the situation - this development is just NOT viable. Shropshire Council have not met any of the criteria or produced any evidence for using the phrases "exceptional circumstances" and "public interest" with regards to the proposed housing development at the AONB - Snatchfield - (CSTO21). So, given all of this information, points, and facts, I believe that the proposed development of 70 New Homes on Snatchfield - (CSTO21), should once and for all, be deleted, refused and removed from all planning considerations, now and in the future
A1193B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	1. Proposals for building on Snatchfield Meadow have been rejected 7 times by the County. What has changed? The meadow hasn't that. 2. This land is part of an Area of Outstanding Natural Beauty, given extra protection unless there are special circumstances. There weren't for the last 7 applications to build on this Medieval field so what is suddenly different? This proposal would destroy beauty. 3. The latest Government proposal is to create more countryside. This contradicts that. 4. A recent TV programme showed The Wash, where bird populations are dropping alarmingly, owing to the destruction of natural habitats. Climate Change is now recognised as a major factor, leading to flooding, which has affected Shropshire, and major fires in many parts of the world. We should all be helping nature to survive; proposals such as this one are totally out of keeping with today's thinking. Preservation is more important than the profit motive. 5. My wife and I have derived much enjoyment from walking through this meadow on the way to Ragleth Hill and cannot bear the thought of its becoming another estate. There must be alternatives. 6. It is difficult and dangerous enough to walk up Clive Avenue at the moment. This proposal would involve serious disruption and more danger with many lorries competing for space with cars, delivery lorries, of which there are more with lockdown, with children on their way to school and with older disabled people. We don't want accidents or deaths. 7. Why do we need all these houses? These are surely arbitrary figures.
A1194B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of the site for following reasons - no evidence of exceptional circumstances for the development are put forward that meets the criteria, nor that alternative sites have been explored; The site is not sustainable and people will need to use cars to access services as it is over 1 mile to shops and schools; development of the site would see significant loss of an important wildlife corridor and impact on the surrounding AONB; The site is an example of medieval layouts of fields and its loss would be detrimental to the heritage of the area. It is also an important setting for the Jack Mytton way
A1384B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Against allocation of the site as the residential roads leading to it are already narrow and steep. Also object due to impact on the AONB
A1384B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Against allocation of the site as the residential roads leading to it are already narrow and steep. Also object due to impact on the AONB
A1384B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Against allocation of the site as the residential roads leading to it are already narrow and steep. Also object due to impact on the AONB

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1387B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Against allocation of the site as the residential roads leading to it are already narrow and steep. Also object due to impact on the AONB and feel better sites are available elsewhere in Church Stretton that are better suited for access to services
A1608B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Inappropriate, AONB, scale is too large, poor roads, out-of-town, inappropriate house types are likely (i.e. too large). Any alternative sites would have the same problems.
A1625B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The major development test in the exceptional circumstances argument has not been met. The site is car dependant and will exacerbate the pressure on the already narrow and unstable access route. This is the last of the three medieval meadows left in the town. There are other more sensible sites in Church Stretton which would provide affordable housing for local people.
A1626B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The major development test in the exceptional circumstances argument has not been met. The site is car dependant and will exacerbate the pressure on the already narrow and unstable access route. This is the last of the three medieval meadows left in the town. There are other more sensible sites in Church Stretton which would provide affordable housing for local people.
A1640B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Tourism is important for Church Stretton and, as such, the preservation of the natural landscape and visual landscape must be of the highest priority, as per DP18. There are no exceptional circumstances for this major development in the AONB. Alternative sites for development have been proposed by Church Stretton community groups. These sites are near the town centre and the town's services.
A1645B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	CST020 should be included in the LPR. It has been amended to take account of topographical issues, access and objections raised within the community during the consultation process. The site area has been amended, density reduced and on less visible areas, the wooded amenity areas would act as a 'buffer' to reduce visual impacts, alternative access. It would have less negative impacts than the current preferred allocation at CST021.
A1812B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	No exceptional circumstances. Other sites more suitable
A1815B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	[9 Forms Bs submitted, all on CST021]. No exceptional circumstances to allocate in AONB, no requirement for 70 homes here. Other sites in the town are better (Form 1). It has a low SA score (form 2). Smaller 0.5ha sites should be allocated – smaller sites would be preferred by the residents (form 3). Snatchfields is not the place for range of specialist housing. Due to viability issues relating to drainage, highway mitigation and buffering, it is unlikely that many affordable homes would be built (form 4). CST014 should be allocated instead (form 5). Snatchfield would not achieve DP13 or DP18 (form 6). The site would depend on private transport and the roads are unsafe (form 7 & 9). Brownfield sites should be used (form 8).
A1816B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Concern over traffic increase and lack of pedestrian pathways. It would affect the visual amenity of the AONB. There are other, smaller more appropriate sites in the town which are closer to the services on offer. CST014 should replace the Snatchfields proposal, with far less impact on the landscape. The Exceptional Circumstances Statement contains no evidence supporting the need for this major development which would impact the AONB and the surrounding environment.
A1817B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Bad effects on visual amenity. Site is in AONB. Flood risk increase. Far from existing services.
A1822B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	No exceptional circumstances demonstrated, in AONB, local people do not want it
A1853B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	This site is entirely unsuitable within the AONB. It is an important buffer between the existing buildings and Hazler and Ragleth hills, and should remain so. The PM has just announced a strategy of increasing the % of land to be left to the natural world. Developing Snatchfields would be a negative step. I note that Paragraph 172 of the National Planning Policy Framework (NPPF) describes the exceptional circumstances 'test' as follows: "Planning permission should be refused for major development in an AONB other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: • the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; • the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated." The development of the Snatchfields would have very detrimental effects of the local environment.
A1855B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	ACCESS. Traffic access via Clive Av, Ragleth Rd and Chelmick Dr is narrow, with blind bends and humps, and no pedestrian footpaths. Part of the surface of this access is fragile, having already collapsed into sinkholes twice in recent years (subterranean stream washes away road bed). Totally unsuitable for use by the type of construction traffic this type of development would require. Additional domestic traffic, including delivery vehicles, would also increase traffic hazard/risk beyond the capacity of access. NOISE POLLUTION Modern styles of living are already creating new sources of noise pollution. Barbeques, fireworks used in family celebrations and music already drifts from one side of Snatchfield to the other on warm evenings. 70 more houses will increase this to the detriment to the rights of residents to quiet enjoyment of existing properties. Increased noise levels, which will also come from increased traffic movements, will have a devastating effect on local wildlife. WILDLIFE Dozens of varieties of birds feed, breed, roost and hunt across Snatchfields. In recent years, buzzards, Red Kites, owls and cuckoos have become common place. Weasels, and other hunting mammals cross the field, using field margins for cover. These would disappear should houses be built. DRAINAGE The Bridlways would be at risk of flooding from water run-off. Part of Snatchfield is already marshy, especially in wet weather, and the extra interference with run-off caused by new roads, housing, concrete and domestic garden design/buildings will increase risk. BREACHES OF GOVERNMENT GUIDANCE This development breaches declared Government policy of preserving designated AONB and environmentally precious sites. OTHER SITES There are several other, more suitable sites, available, which are closer to the town centre and local facilities. The Council has not provided any logical, reason against using these sites, which have been offered and are much more suitable for development
A1865B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	ACCESS. Since moving to Church Stretton over 8 years ago, sinkholes in Ragleth Road have had to be repaired twice in that time. This, coupled with the fact that the access for the large number of houses in the proposed development is restricted makes the site totally unsuitable. EMPLOYMENT/ENVIRONMENT Church Stretton provides limited options for employment, mainly serving the local community and tourism. The proposal for this development means that the new residents will need to travel further afield to obtain work opportunities (Shrewsbury, Telford, Wolverhampton etc). There is no heavy industry locally and minimal office opportunities. It can be argued that the development might increase the risk of destroying jobs in the tourism industry on which the town so heavily relies. DRAINAGE Snatchfield is already has marshy patches. The water will have to go somewhere. There must be a risk of increased flooding lower down the valley. BREACHES OF GOVERNMENT GUIDANCE This development breaches declared Government policy of preserving designated AONB and environmentally precious sites. Indeed, the government has decreed that there should be greater use of brownfield sites of which there are many within the County. OTHER SITES There are several other, more suitable sites, available, which are closer to the town centre and local facilities. The Council has not provided any logical, reason against using these sites, which have been offered and are much more suitable for development
A1873B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Site would be car dependent. Access is poor. No exceptional circumstances for AONB development. There are alternative sites in the town
A1881B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	major development site in Church Stretton is not needed and Shropshire Council has not demonstrated otherwise. Indeed, there has been no quantitative analysis of the need for housing growth in Church Stretton or for the AONB as a whole For Policy S5 to be 'sound' it would have to meet the 3 tests of 'exceptional circumstances' - as set out in Para 172 of the NPPF. Shropshire Council have failed to demonstrate these exceptional circumstances (indeed it is doubtful that any serious attempt has been made to do so.) Firstly, as outlined above, there is no adequate justification explained for the need for 200 new dwellings in Church Stretton. Secondly, the provision of housing in alternative locations outside Church Stretton and the AONB has not been adequately explored. For example, there is no adequate evidence to support the conclusion that Craven Arms is not able to meet any housing need identified for Church Stretton. Thirdly, insufficient weight has been given by Shropshire Council to their duty to take into account "any detrimental effect on the environment and landscape". As such, Policy S5 is clearly in conflict with national policy and insufficient evidence has been demonstrated in order to meet the test of exceptionality. Land for major development should not be allocated in Church Stretton
A1881B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Shropshire Council have not demonstrated that a major development in the Stretton Hills AONB is necessary and meets the 3 NPPF tests of 'exceptional circumstances'. However, even if this evidence subsequently comes to light, site CST021 is still a demonstrably unsuitable site for 70 new dwellings and I Object to Site CST021 on the following grounds - CST021 FAILS Shropshire Council's own Sustainability Assessment. CST021 is a COMPLETELY UNSUITABLE site to meet the Residential Mix requirements in Policy DP1 (specialist housing eg sheltered housing, extra care housing, housing to meet the needs of those with disabilities or special needs etc). CST021 will be a very expensive site to develop (topography, drainage, mature trees etc). As such, 20% AFFORDABLE HOUSING (Policy DP3) WILL NOT BE MET. CST021 WILL NOT DELIVER 10% net gain for biodiversity (Policy DP13). CST021 will DESTROY the rich biodiversity already in existence. CST021 will be a car dependant site - due to i) distance from shops, schools, GP Surgery and ii) distance to realistic employment opportunities. As such, CST021 will INCREASE Shropshire's greenhouse gas emissions. In addition, the additional vehicle movements (circa 600 per day) and the poor quality of the existing road infrastructure (particularly the pavement free Clive Avenue Conflict Area) will SIGNIFICANTLY INCREASE existing pedestrian safety issues. he only access to CST021 will have to pass through Flood Zone 3. Access for Emergency Vehicles CANNOT be guaranteed. In addition, in Shropshire Council's own words - "Runoff is likely to be RAPID given the site's location in the foothills. This catchment has been identified as one of those that is MOST SENSITIVE to the cumulative impact of any development
A1894B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	strongly object to Snatchfields being considered as a potential building site. The ancient area is currently one of peace and tranquility and an important haven for local wildlife with established native trees and shrubs. It is part of a celebrated walking route and an asset to our town for local residents and visitors alike. The site would require access by Clive Avenue. I live at the bottom of this road so already experience the congestion caused by drivers attempting to pass pedestrians and cyclists who don't have access to a pavement, leaving people who are trying to access their own homes or countryside on foot in a dangerous position. I have witnessed people turning into Clive Avenue and putting their foot on the accelerator as they attempt to drive up the narrow, steep road. A sight that makes me shiver for the safety of my young family who do not have a footpath to walk on and a situation that would become significantly worse with seventy households all accessing their new properties. (And this is without the danger, disruption and potential structural damage caused by all of the construction vehicles required.) In addition to this, Snatchfields would be a car dependent site thus adding to the problems already mentioned. It would also cause increased noise and would be in complete contrast to the Climate Change Strategy to avoid car use. (Policy SP3) I urge you to reconsider this proposal and look for more suitable, safer and convenient locations to the town centre.
A2127B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The Snatchfield site is a wildlife corridor promoting biodiversity. It represents the last relatively intact area of Church Stretton's three open fields. As thus Snatchfield provides a direct link with the historic development of the early medieval settlement of Church Stretton and should be protected as an educational resource in its own right.

Page 174

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2129B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that, in the event that Shropshire Council maintains that the allocated housing requirement in Church Stretton is to be met through development of a large site, there is another site (CSTR014) which is far better located for development and access to the town and is much less damaging to the nature and appearance of the AONB. Site CSTR014 is within easy walking distance of Church Stretton Town Centre, transport links and the Secondary School. It is not within a Special Area of Conservation, a Special Protection Area, a Ramsar Site, a SSSI or a National/Local Nature Reserve or Wildlife Site and the site is promoted and available and is also supported by the Town Council
A2129B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that the allocation of 200 houses to Church Stretton is arbitrary and does not take into account the needs or requirements of the town Shropshire Council has not carried out any objective assessment of housing need within Church Stretton and has allocated the required 200 houses simply on the basis that Church Stretton must be allocated a share of the total housing the Council has planned to create in Shropshire. ONS figures indicate Shropshire's population growth over the Plan period will be driven by the older, 65+, age group. These people are likely to buy the proposed open-market homes built on CST021 thus exacerbating the demographic challenges in Church Stretton. The housing numbers indicated for Church Stretton have been influenced by Shropshire Council's desire to pursue a 'high growth' strategy, building more houses than are required within the County. CST021 should be removed from the Draft Local Plan and an objective assessment of housing need should be conducted for Church Stretton to identify specifically what type, and what numbers, of housing the community needs
A2129B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that the site is not a suitable site for development as indicated by Shropshire Council's own Sustainability Assessment In the original assessment of sites in and around Church Stretton during 2018, 33 potential sites were identified through the call for sites exercise. Each of the sites identified were subjected to a Sustainability Appraisal covering issues including: - Distance from schools; - Distance from GP services; - Flooding issues; - Landscape sensitivity; In this process CST021 received a score of -7 which on Shropshire Council's criteria is a fail. CST021 should be removed from the Draft Local Plan as it does not meet Shropshire Council's own criteria for sustainable development.
A2129B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that the Site Assessment process which resulted in the identification of CST021 was flawed as it failed to take into account more suitable brownfield sites within Church Stretton Shropshire Council's Site Assessments: Church Stretton Place Plan Area - November 2018 specifically excluded small (typically brownfield) sites within Church Stretton having a size less than 0.5Ha. The Council argued that such smaller sites would be uneconomic for developers to pursue. This has already proven not to be the case as planning applications are already being progressed for some of the smaller sites excluded by the Council's assessment. These smaller sites are typically much closer located to the facilities of the town and are also far less damaging to the appearance and quality of the town and the AONB than a large housing development far from the town centre and in a highly visible location such as is proposed for CST02
A2129B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that CST021 is not a suitable site to achieve Shropshire Council Policies DP1 (specialist housing provision) and DP3 (affordable housing provision). Policy DP1 mandates that any residential development will be expected to provide a mix of housing sizes and types to meet the housing needs identified in the local community. Sites of 50 or more properties are required to incorporate a range of specialist housing types including sheltered housing, extra-care housing, retirement housing and housing that will meet the requirements of those with disabilities and/or special needs. Due to the location and nature of CST021 it is an inappropriate site to meet these specialist requirements. Policy DP3 requires that 20% of new homes in a development of 5 or more dwellings are affordable properties. However, it is open to developers to argue that, due to the impact on the profitability of the site, fewer affordable homes should be produced or a financial contribution made in lieu of affordable homes. Due to the topography of CST021 and the infrastructure requirements that will be needed to make development of the site viable (including drainage, highways, terracing, etc.) it is believed that CST021 will be an expensive site to develop. In these circumstances it is considered highly likely that developers will be able to argue that the 20% affordable housing be reduced or substituted with a financial settlement resulting in the net gain of fewer affordable dwellings in Church Stretton and an increase in open-market housing which, it has been established through surveys, are not required in the town. CST021 should be removed from the Draft Local Plan as it not compliant with Shropshire Council Policies DP1 or DP3.
A2129B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that the site does not achieve the requirements of Council Policy DP13 (net biodiversity gain) or Council Policy DP18 (safeguard or enhancement of landscape character and visual amenity). CST021 is a haven for wildlife including badgers, at least 5 species of bats, nesting birds and butterflies. It has a mix of mature and younger trees including ash, oak, hazel, cherry, alder, and rowan. It also has brambles which provide habitat for several species including dormice. The lower part of CST021 is considered to be 'priority habitat' (rush pasture) and supports vascular plants and multiple invertebrates. Development at CST021 (irrespective of mitigation measures) can only result in a destruction rather than an enhancement of the above features which is incompatible with Policy DP13 which requires that ALL development must deliver at least a 10% net gain for biodiversity in accordance with the Environment Act. In respect of Policy DP18, this states that development proposals should respect, safeguard and wherever possible, restore or enhance landscape character and visual amenity in Shropshire. It further states that significant adverse landscape and visual effects will be a material consideration in determining planning applications. Given the existing stunning landscape that CST021 significantly contributes to, a major development of this site cannot possibly safeguard or enhance landscape and visual amenity. CST021 should be removed from the Draft Local Plan as it does not allow for compliance with Council Policies DP13 or DP18.
A2129B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that major development of this site would not be in accordance with the sustainable transport requirements of the National Planning Policy Framework (NPPF) Section 9 of the NPPF (Promoting Sustainable Transport) states: - Para 102 - Transport issues should be considered from the earliest stages of plan making. Shropshire Council has no strategic view of transport issues to 2038 to inform the Local Plan proposals. The only document existing is the "Provisional Local Plan Transport Strategy 2011-2026". This was produced in March 2011 using an evidence base extending only up to 2009. This document is clearly long out of date and not suitable for use in discharging the Council's obligations under NPPF Para 102 in respect of the current Local Plan Review extending to 2038. - Para 103 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. The proposed housing estate on CST021 will create a car dependent development with little option for alternative means of transport modes. The site is a considerable distance from a bus service to local towns, the town shops, GP and health services, schools and recreational facilities. Traffic surveys carried out recently have shown there is already significant road traffic from existing dwelling which would greatly increase due to the limited options for access to a development on CST021. - Para 108 - In assessing sites that may be considered for development in plans it should be ensured that safe and suitable access can be achieved for all. Access for pedestrians, wheelchairs, mobility scooters and cyclists to a development on CST021 is via sections of narrow roads without pavement. Coupled with a significant increase in road traffic this would provide a dangerous access route which it is very difficult to mitigate against. CST021 should be removed from the Draft Local Plan as it is unable to be brought into compliance with Section 9 of the National Planning Policy Framework (NPPF)
A2129B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that Shropshire Council has not met the tests of "exceptional circumstances" for a major development within an AONB as required under the National Planning Policy Framework (NPPF). Major development in an AONB is demonstrably more damaging than smaller, carefully managed developments, designed to meet objectively assessed local housing needs. By actively promoting a major development at CST021 in the Shropshire Hills AONB instead of, less damaging, alternatives Shropshire Council is ignoring the clear intent of the NPPF. Para 172 of the NPPF states that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest". Shropshire Council has not met the major development tests of 'exceptional circumstances' and 'public interest' in respect of the potential major development on CST021. The Exceptional Circumstances Statement produced by the Council contains no evidence of objectively assessed local housing need, no data to prove the economic impact of developing (or not developing) CST021. No detailed site review has been undertaken to confirm environmental impacts. In addition, the affordable housing requirements for Church Stretton can be met through alternative, smaller, less environmentally damaging sites in the town. In respect of the NPPF 'major development' test the Council has not given consideration to the need for major development on CST021 including the impact of including, it or not including, it on the local economy. The Council has not given consideration to the cost of, and scope for, developing outside of the AONB or meeting the need for housing in some other way than major development of CST021. In particular: - There is no objectively assessed need in Church Stretton for the proposed 200 dwellings up to 2038. - Consequently, there is no objectively assessed need for the proposed 70 dwellings on CST021. - The Council has provided no data illustrating the economic impact of the major development on CST021 or the impact of not developing the site. - The council has not carried out a detailed review of CST021, has not produced an ecology study for the site, has not carried out heritage, archaeological, or priority habitat assessments. CST021 should be removed from the Draft Local Plan as it does not meet the 'exceptional circumstances' test for a major development in an AONB as set out in the NPPF.
A2129B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to the allocation of CST021 (Snatchfield Farm) on the basis that Shropshire Council has applied a "one size fits all" approach to the provision of development land across the County and has not taken into account the special circumstances of the Shropshire Hills AONB. Other Councils have created dedicated, separate, Local Plans to address the needs of AONBs within their Council areas. In particular South Lakeland District Council and Lancaster City Council created a dedicated Development Plan to meet the special qualities and requirements of the Arnsdale and Silverdale AONB which falls within their Council areas. The Arnsdale and Silverdale AONB Development Plan Document identifies sites for new housing and employment which directly meet objectively assessed local community needs and sets out robust planning policies to ensure that developments respect the special qualities necessary to protect and enhance the AONB. Specifically, the Development Plan Document allows for a 50% affordable housing requirement in order to meet the objectively assessed housing need. It also gives priority to smaller development sites (typically less than the 0.5ha size that was excluded by Shropshire Council's site allocation process) limiting the damage to the AONB and avoiding issues of major development contrary to the NPPF. CST021 should be removed from the Draft Local Plan and a dedicated Development Plan should be created for the Shropshire Hills AONB which addresses the specific circumstances of development within an AONB.
A2130B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Disagree with allocation of the site for a range of reasons, which could also be applied to other areas within or adjacent to the AONB. Reasons for opposing the site allocation are: Impact of development on the AONB; site does not promote sustainable development as residents would be car dependent to access services and employment; site does not meet the needs of local population as no clear housing need has been identified; sites below 0.5ha should also have been considered in Church Stretton; topography of the site would require mitigations for flooding biodiversity and green infrastructure which make the site expensive to develop and will make delivery of policy DP13 impossible; will be in contradiction of Policy DP18; the site won't deliver sufficient type and number of affordable homes needed for Church Stretton. The designation of this site should be deleted and Shropshire Council should investigate a number of smaller sites in Church Stretton that will deliver genuinely affordable, accessible, energy efficient, low carbon homes that enable local people to live within the boundaries of Church Stretton, thus reducing car dependence
A2143B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Disagree with allocation of the site for a range of reasons: increase in traffic through steep residential roads that the development will create; unsuitable location to allow safe pedestrian and cycle access; increase in delivery vehicles would have detrimental impact on the area; ambulances would have difficulty accessing the site
A2145B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	We totally understand that we need more houses. But my main objection the development is far too big. there will be too many cars using Clive avenue and that will be very dangerous for pedestrians. In my opinion get rid off the old sheds which ones are in a very bad state and full of asbestos. Use that area for a small development of 8-10 houses. In that case, that will keep everybody happy.
A2151B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I write in support of the All Stretton Village Society submission which objects to Policy S5 of the Church Stretton Area plan. In particular, the Draft Local Plan for this area fails to distinguish the AONB and further fails to recognise Church Stretton as the only town in the AONB. The draft local plan does not reflect the high level of protection afforded to AONBs under Section 85 CROW 2000 and NPPF 172. This local area must remain an economically viable and thriving community and not preserved as a museum-piece. However, given the special nature of Church Stretton within the AONB, and the undoubted economic benefits that the AONB brings to Shropshire in terms of tourism, it is essential that a separate plan be constructed which reflects Church Stretton's position as the market town of the AONB. An example of where this has already been done is in South Lakeland.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2185B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Snatchfields is a haven for diverse wildlife - foxes, badgers, deer and many birds and insects. It is an ancient meadowland and you wish to replace this with an urban sprawl of 70 up-market and expensive houses. More of this new type of housing is not needed by the local people of Church Stretton. Brownfield sites could be developed within the town in order to provide affordable houses for young people - but this is an idea which has been rejected. Rather than local people, this development would attract buyers from other areas such as Shrewsbury. I already know of one young couple who have heard about the proposed development and plan to put their names forward; they are wealthy professionals who would be travelling daily to Shrewsbury for their work. This would be repeated many times over. Climate change is high on the world's agenda. I do not feel that ripping up green areas and covering them with unnecessary housing makes a contribution towards addressing the problem. Concrete in itself gives off a lot of carbon dioxide, not to mention the pollution caused by the building process. This area becomes saturated, especially during the winter months, and once the green space is replaced by roads, houses and drives, the water would be displaced to lower-down areas, causing flooding problems for other properties. Ragleth Road is not suitable for access, especially where it becomes steep and narrow at its junction with Clive Avenue. It is used by many walkers, elderly people, and children going to school. It is therefore dangerous for pedestrians and also prone to developing sinkholes as the water from surrounding hills undermines it constantly. In view of all these points, I would hope that the Council would think again before destroying such a beautiful area within the AONB - an area which the Government plans to protect from development in the future.
A2195B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	National policy designation Snatchfield (CST021) is a designated ANOB which is a national designation to protect the area. To achieve the designation the area will have been subject to rigorous appraisal as to its quality and uniqueness. These factors have not changed and as such is not suitable for development The recently published Planning White Paper: Planning for the Future (2020) sets out the Government's approach to planning for the coming decades. It will create Protected Areas where development will be restricted to protect areas of treasured heritage like AONBs and National Parks. Access to Snatchfield site is via Clive Avenue and Ragleth Road Clive Avenue is approx 200m long, it is narrow, twisting and has poor visibility. It has a steep gradient in places and is without pavements. It is already dangerous for pedestrians. Save Snatchfield group studies (2 week day, 2 weekend) forecast an annualised vehicle and pedestrian/cyclist movements in the Clive Avenue Area are currently around 300,000 per annum. The split between vehicles and pedestrian/cyclists is 75/25. During our surveys we recorded 102 'safety concerns' and 'near misses'. No similar studies have been undertaken by Shropshire Council. Adding likely new vehicle movements of over 600 per day to an already unsafe route will exacerbate the situation Ragleth Road has longstanding sinkhole and subsidence problems. The considerable volume of HGV construction traffic over the site development process can only exacerbate existing issues. On this basis I wish to object to the allocation of Snatchfield as a suitable site for a housing allocator
A2198B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I strongly object to the inclusion of site CST021 and to Shropshire Council's Exceptional Circumstances Statement. It is very dispiriting that yet again I need to object to another proposed major development which would further damage the South Shropshire Hills AONB. This is particularly inappropriate at a time when the prime minister has just signed the Pledge For Nature, and made a commitment to protect the English countryside and to support the recovery of nature, including national parks and AONBs. Objections and arguments against major housing developments in the South Shropshire Hills AONB, have been made repeatedly by local residents to Shropshire Council over the past decade. Why are small sites not counted in the numbers which Shropshire Council deem (spuriously in my opinion) to be needed to meet Church Stretton's needs? Small developments provide housing for families as well as large developments, but are more in keeping with the visual landscape, so important in an area where tourism is the main industry. Why have Shropshire Council not followed the example of Arnsdale and Silverdale AONBs, who successfully argued that priority be given to small sites, and meeting local housing needs, rather than compensating for shortfalls in the whole county or adjoining counties? Shropshire Council's Exceptional Circumstances Statement is simply not true. Firstly there are enough small sites in Church Stretton to accommodate 70 houses, and at least two potential sites in Church Stretton which would accommodate major housing developments, but in a less damaging way than the Snatchfield site, namely CST014 (the site behind Church Stretton School) and CST035 (the site abutting Springbank Farm), although as I hope I have already made clear, I oppose any major housing development in Church Stretton because it lies within the AONB. Secondly, Craven Arms is outside of the AONB, is also a key centre in the same way as Church Stretton, is only 7 miles away and has bus and rail links to Church Stretton. There are no exceptional circumstances to justify the destruction of AONB open countryside. The Snatchfield site is not sustainable. A housing development there will increase car use and associated carbon emissions and congestion problems in Church Stretton, partly because of distance from the town amenities and the schools, but also because the access via Clive Avenue is already dangerous for pedestrians and cyclists. The Snatchfield site is an unspoiled green field site which is highly visible from many viewpoints, borders ancient woodland, and is an important wildlife corridor. Preserving such an area should be a priority in these times of dwindling biodiversity. Light pollution and noise pollution are also important factors which should be taken into account, both in terms of the impact they will have on wildlife and for people living in the vicinity. Many years ago a Department of Environment Planning Inspector, who rejected an appeal for planning permission on this site, drew attention to the amphitheatre effect at this site I hope that Shropshire Council will take into account the feedback that local residents have provided in the past about proposed developments on this site. Not surprisingly people who take the trouble to take part in consultations become disillusioned when their Council continues along the same pathway, apparently intent on getting their own way by hook or by crook.
A2251B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Development over recent years has put an incredible strain on the infrastructure in Church Stretton, roads/traffic/doctors. In a period where mental health issues are increasing people can benefit from exercise in our beautiful countryside. This development should not be allowed to re-route an ancient right of way
A2252B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Object to inclusion of CST021 within the Plan as: There has been no objective assessment of housing need. Without this, the guideline for Church Stretton is just an arbitrary figure. Local agreement of need for around 20 affordable houses, due to local demographics there are always other properties available. Due to site constraints and associated costs, CST021 will deliver no affordables. As Shropshire's housing need is being exceeded and cross-boundary need accepted (without consultation, so that Green Belt can be protected and valued countryside in Shropshire lost), no contribution is required from Church Stretton and the AONB, other than windfall and affordable dwellings. CST021 was withdrawn from the Local Plan process in 2012 as the Council said it was not suitable for development and was not supported locally. Nothing has changed, except infilling around the site has exacerbated problems. CST021 performs poorly within the Sustainability Appraisal. CST014 performs better and is now available. The AONB has greater protection from development than other areas - no major development should occur without exceptional circumstances. Including CST021 when there are alternative sites, several smaller, fails the exceptional circumstances requirement. CST021 also contradicts policy DP26. The 875 responses to the Community Led Plan Household Survey clearly show residents wish to "protect the landscape on both sides of the valley" and "preserve the character and appearance of the town (and) preserving the trees and green spaces". Vehicular access to CST021 is dangerous, demolition of a bungalow will not resolve steep gradients, pinch points to the A49, on-street parking, subsidence on Ragleth Road and conflict between vehicles and pedestrians. Further traffic and pedestrians from development of CST021 would increase risk. No comprehensive traffic survey has been conducted by the Council, a local on highlights problems. CST021 is saturated and there is run-off into the Bridalways and from here into Swains Meadow causing flood risk when it rains. Development would increase these problems and it is unclear how development could alleviate them. Tourism is vital in Church Stretton, development of CST021 (around the Jack Mytton Way) would detract from this and aspirations to increase walking in the hills east of the A49. Jack Mytton Way is well used and would not be the same if through a housing estate. CST021 is an important habitat including for Badgers, Bats, Foxes, Deer, Owls, Buzzards and smaller birds. Development of CST021 contradicts policies DP13 and 18. Development of CST021 would increase smoke pollution (more bonfires, barbecues, wood burning stoves etc), noise pollution (amphitheatre effect of the valley) and light pollution. There is insufficient infrastructure, employment and parking in the town centre (need to cross the A49 from the site). Smaller brownfield sites should be pursued.
A2254B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The site is not suitable for housing and has been rejected before. Access to the site is poor. Developing the site would cause disruption to existing residents for a long time. Clive Avenue is hilly and narrow and traffic would have further problems with 70 more houses.
A2255B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	SC is attempting to destroy a valuable country green space. AONB status means nothing. This site was refused at SAMDev. This site is completely inappropriate and would spoil a valuable community green space. Other areas in the town are suitable for housing but have been ignored. This site would cause disruption to existing residents over long periods. Traffic delays and friction between drivers would result. Access to the Battlefield estate should be via Watling Street south, not north.
A2261B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Road network cannot sustain more houses. It is dangerous in Clive Ave and Snatchfields La as it is.
A2262B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Road network cannot sustain more houses. It is dangerous in Clive Ave and Snatchfields La as it is. I see no exceptional circumstances that justify the destruction of our landscape for ever, one recognised as an AONB.
A22641B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	There are no Exceptional Circumstances for this proposed development in the AONB. There are less damaging sites in Stretton not in the AONB. The proposal is in conflict with national policy as insufficient weight has been afforded to conserving and enhancing the AONB. Snatchfield is the wrong site to include any special housing to meet the need for retirement living, sheltered housing, extra care housing, housing to meet the needs of those with disabilities and special needs. Access to the site is dangerous, no pavement up Clive Avenue, single file traffic in places. The road is continuously collapsing.
A2265B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The council has a responsibility to safeguard Church Stretton's position as the gateway to the hills. This proposal will decrease the attractiveness of the area. I am concerned for the safety of the residents following the increase in traffic this proposal will bring. Clive Avenue is narrow and beyond the pinch point will be made a dangerous road. There are several other smaller low impact sites in the town that could provide the sort of low cost practical housing that is required.
A2270B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	The access roads are not suitable for any extra traffic, they are at capacity now. The lower end of Clive Avenue poses a threat to safety. The Snatchfields site is not suitable for the young or old as it is too steep.
A2272B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to CST021. Access is dangerous and parts of Clive Avenue have no footpath and are narrow. We walk the Jack Mytton Way and it would be awful to lose this historical meadow. The noise would be terrible as several hundred people would be living in a "bowl" This development will also affect our dark skies status. I support the cornerstone objection.
A2273B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to CST021. Access is dangerous and parts of Clive Avenue have no footpath and are narrow. We walk the Jack Mytton Way and it would be awful to lose this historical meadow. The noise would be terrible as several hundred people would be living in a "bowl" This development will also affect our dark skies status. I support the cornerstone objection.
A2278B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I object to site CST021. No development should take place in the AONB without exceptional Circumstances. There are other possible smaller sites. It is a meadow of historical importance, to develop it goes against SC policies DP13 and 18. The valley is a natural bowl and pollution would get trapped. So would noise and light pollution, threatening our dark sky status. Large concerned over the infrastructure issues. Parking, Medical dentists? Drainage. What has changed since this site was removed from consideration in 2012.
A2279B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Access to the site is very difficult and steep. Roads are often icy which makes it even more dangerous for pedestrians and motor traffic. Flooding is already a concern and more building will increase run-off. Surely a better site would be CST014

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2287B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Snatchfields lane already has a drainage problem, creating a flood at the bottom of Clive avenue. Traffic down Clive avenue following this proposal would make enormous problems as there are no footpaths and bends down this steep hill make driving dangerous. It would be a crime to destroy the Jack Mytton Right of Way.
A2310B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	At the recent virtual United Nations event, Boris Johnson pledged to increase protection of the English countryside to support the recovery of nature: '...to support biodiversity we must turn words into actions and agree ambitious goals and binding targets'. At the heart of this commitment is the protection and expansion of National Parks and Areas of Outstanding Natural Beauty. At the recent Citizens Assembly on Climate Change Solutions, a key recommendation was that all new housing developments must have good access to facilities through walking and cycling. Developments which increase reliance on car use should be resisted. I do hope that Shropshire councillors are able to recognise and support the direction of travel that we as a country are now keen to embrace to mitigate the imminent threats of pollution, climate change and depletion of biodiversity. Locally to Church Stretton, which is wholly within the AONB, this means protecting the area from anything other than sympathetic small-scale developments and definitely not building any more on the hillsides, where the most damage will be done with regard to all of the factors mentioned above. The accolade of AONB has been awarded to just 38 areas in the whole of England and Wales and is a recognition of landscape which is exceptionally fine, of great value to the nation and worthy of conservation. In a very real sense AONBs belong to us all and they should be protected from the predations of development. The Snatchfield site lies within the AONB and is a well-used, primary access route to Hazler Hill and Ragleth Hill and the countryside beyond. Development of this hillside site would be intrusive and overbearing and would damage a 'public visual amenity'. Already the hills that surround Church Stretton have been somewhat snared by creeping development, and any further development plans should be strongly resisted. Any new developments in Church Stretton should be small in scale, in keeping with the local area and restricted to the valley floor to ensure sustainable access to local facilities on foot or by bicycle. I would argue that windfall sites and available brownfield sites should be taken into account, and if any larger developments are still deemed necessary because of economies of scale, first consideration should be given to the area near to the schools or to the area to the south of Stretton Farm Road. The latter site might well be challenging as it tends to bogginess, but the upside of this is that it could be developed as an area of unique interest and value to the town and to visitors (upon which the economy of the town substantially depends) as it could include natural areas in the form of ponds in addition to housing and employment and visitor facilities: I strongly object to the proposed development of 70 dwellings on the Land at Snatchfields in Church Stretton (Ref S5.1 Residential Allocations. Church Stretton Key Centre) for the following reasons:
A2313B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	1. Building on rural land surrounding the Stretton Hills will diminish greatly the Area of Outstanding Natural Beauty which is the main attraction of the area. Whilst the Stretton Hills are a great asset, they cannot be separated from their rural landscape in terms of natural beauty. 2. Significant development will increase the population and may well result in pressure on services. Services such as banks, dentists, GP surgeries and post offices are facing external pressures nationally and would almost certainly not be in a position to respond to increased demand. 3. Large development on greenfield land will not, in the long term, deliver the mix of housing required for the local community. So called 'affordable homes' soon become unaffordable when sold on, even if some safeguards are put in place initially. 4. Many incoming residents will add to the road traffic in the area, increasing pollution and reducing air quality. 5. Whilst Church Stretton is referred to as a Key Centre, it is in relation to the current community and 'wide rural hinterland' who already use the town and would be unlikely to benefit from further significant housing development as they already live here or nearby. Residential development of any significant size would not 'enhance' the role of Church Stretton plays in Shropshire, it would greatly diminish its significance as a tourist attraction. 6. There are several brownfield sites in the town, some already identified, that should be prioritised for development instead of greenfield land. Whilst large developers may not benefit from small scale development on brownfield sites, this type of development could deliver more 'subservient' housing, benefit local builders and increase employment of local tradespeople and small businesses. This is unlikely to happen with larger developers. Alternative development sites. a) Site of previous 'TOFFS' store in residential road which has been empty for two years. b) Repurposing of empty shops and banks for residential use (already identified by the Government as a priority). c) Consider potential incentives to convert large, difficult to sell, houses into two or more dwellings at more affordable prices and without impact on land use
A2326B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Inappropriate site for major development, no exceptional circumstances provided, it is in AONB, density of 70 too high, visual impacts, habitats and mature trees on site, existing highways insufficient
A2326B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	There has been no quantitative analysis of the need for housing growth in Church Stretton or for the AONB as a whole. The justification provided for the delivery of houses within the AONB is weak and fails to demonstrate exceptional circumstances. S5 is in conflict with National Policy
A2347B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	1. Church Stretton is meant to be in an Area of Outstanding Natural Beauty. A development of this size and position undermines that status and massively damages the scenic beauty both of the hills and from the hills. 2. This development will contribute to the ongoing damage of the natural environment and wildlife of the area (something acknowledged as a problem in the main section of the Draft Local Plan). Apart from the intrinsic value of the environment and its wildlife, it adds massively to the quality of existence in the town. 3. Apart from the environmental damage caused, undermining the AONB and its appearance around Church Stretton will detrimentally impact the tourist based economy of the area. Perhaps more should be made of this local natural resource, not less. 4. It is very unlikely, that these homes will house many people with jobs in Church Stretton. The development will add further to traffic movements on the A49. This will counter objectives of environmental sustainability and reductions in emissions. It will add to existing unsatisfactory levels of air and noise pollution from this road which should be dealt with even as things stand. 5. There are alternatives, if these are less easy for the councils involved and less profitable for developers. There are a number of sites in the town that should be developed first. Action should be taken on the Crown Carpets site(s) at the bottom Burway. There are many unused/underused sites within the "business zone" where retail businesses, financial concerns etc are withdrawing and are unlikely to return in the foreseeable future. Too many retail units are given the apparent signs of occupation and economic viability by charitable use. Also, some of the hospitality units have either closed or appear to be in irretrievable decline. There should be some radical repurposing of many buildings to provide housing, reinvigorate the local tax base and prevent the use of agricultural land, woods etc. (The former TOFs retail unit on Beaumont Road is an excellent example of where town space could be brought into resident use to individual and collective benefit.) While it might be sad in some ways, there are a number of very large, older properties lingering on the property market, which perhaps need sympathetic subdivision. 6. Apart from the Snatchfield Site, when this development is added to the other threatened sites of longer term development along the Stretton Gap, the area will soon take on the horrid appearance of the Battlefield area of Shrewsbury. Another environmental monstrosity waiting to happen at the hands of "government planning". 7. We should wait? Covid, Brexit... even by the usual standards of difficulty in predicting the future (until 2038!), who knows what is about to occur in the next few years in terms of both the quantity and quality of economic activity. 8. If the natural environment and scenic value do not have importance in an area like Church Stretton, and on the sides of Hazler and the Ragleth, then where does it matter and where does it get protection? Stop preaching to us about sustainability and global warming as these sentiments are clearly not meant and are merely used to fill bureaucratic paper and time.
A2349B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	Strongly believe that this major development will have far-reaching and irrevocable negative impact on the Shropshire Hills AONB. The AONB requires particular respect and protection of several aspects. This site holds a prominent position clearly visible from many areas of the valley. A housing estate would create a large suburban area that would dominate and destroy the character and appearance of the landscape. As a local resident and regular walker in this area, I am greatly aware of its benefits to health and wellbeing through appreciation of open spaces, tranquility and wildlife. The Jack Mytton Way runs through the site, contributing to tourism in the town. The proposed development would destroy the high levels of biodiversity on the site. It borders areas of ancient woodland and provides a habitat for numerous wild mammals, birds, invertebrates and plants. This is one of very few remaining areas of historic landscape and if developed, would be lost forever. In addition to the sensitivity of the landscape and natural environment there are other reasons why the site is unsustainable. I have serious concerns regarding the safety of road users due to the limited and challenging access to the site. The only access is via Clive Avenue at a point which is already dangerous, particularly in bad weather. This part of the road is steep, narrow and does not have footpaths. It has a high volume of use by schoolchildren, walkers, elderly residents and vehicles including HGV and delivery vans. I feel that sustained increase in traffic from 70 additional households would greatly increase the congestion, emissions and safety risks. Due to the distance from schools, shops, medical services etc, with no transport links, the site would be car-dependent. There are drainage issues, a brook runs through the site, access crosses a flood area and potential run off from a major development would increase problems further downhill. Ragleth Road already has problems with damage from sink holes which would be further compromised by heavy construction vehicles which would also cause huge disruption to traffic and local community. I do not believe that the requirement for development is based upon objective assessment of housing need in Church Stretton. The Snatchfield development seems unlikely to provide 20% affordable housing of the type required to meet need for smaller or adapted homes close to the town centre. Benefits from the development to local shops and businesses would be insignificant compared to the strain on medical, educational, welfare, transport services etc. Actual local needs should be met using brownfield or alternative sites (eg CST014) which would have significantly less impact on the AONB. Community surveys appear to demonstrate that local priorities across all ages are to preserve the landscape/countryside/AONB that are so central to this town and its economic situation. Major development of this type is not necessary or appropriate in the AONB. Irreversible mistakes must be avoided and responsibility must be taken to conserve and enhance the character of the landscape.
A2352B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	I strongly object to the inclusion of Site CST021 within the plan for the following reasons: The proposed development is contraindicated by both national policy and the County's own plans (including but not limited to SAMDev). On 28 September 2020 the Prime Minister signed the United Nations Leaders' Pledge for Nature and made significant commitments to protecting biodiversity and increasing the 26% of protected land (National Parks and AONB) in England to 30% by 2030. Site CST021 is a biodiverse site within an AONB and clearly falls within the remit of this commitment. Development within an AONB is only permitted in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Annex 2 of the NPFF enumerates three areas which require a proportionate assessment where such development is under consideration. Clear justification, in the public interest, must be present for all three criteria for development to be permitted. I address these below with reference to SC's Exceptional Circumstances Statement. 1. The need for development. SC's Exceptional Circumstances Statement for this proposed development references an assumption that employment will increase in line with Church Stretton in line with Local Plan Review. However, I can find no compelling evidence of or substantive plan for any such employment increase in the local area and hence evidence for increased housing need. The current and recent employment opportunities in Church Stretton are extremely limited and predominantly low paid, which would lead to occupiers of the new development commuting out of the area for work and a consequent increase of traffic and pollution with little benefit to the town's economy. The Statement fails to show a quantifiable analysis of the impact on the local economy of NOT developing the site. 2. The cost/scope for developing outside the designated area. SC's Exceptional Circumstances Statement discusses alternative options of Shrewsbury and Craven Arms, but is silent on alternative sites within Church Stretton itself. Alternative development sites, both small and major, exist within the town which would have a smaller negative impact on the AONB and should form part of a holistic assessment. 3. Any detrimental effect on the landscape and the environment. It is specious to suggest that the impact on the visual amenity and environmental security of this landscape could be mitigated by design. The site is highly visible from many points in the valley and surrounding hills and its loss would be irreversible. The section of the SC's Exceptional Circumstances Statement which deals with this criteria (4.21 to 4.28) is thinly argued and unsupported by evidence. In effect, the suggestion seems to be that Site CST021 is the least worst option (of the limited options considered), which is not a compelling argument for development in an AONB. I dispute that Shropshire Council has satisfied the requirement for providing a proportionate assessment or of demonstrating that it is in the public interest to permit development on site CST021 within the AONB. In addition to the principles highlighted above, I object to the inclusion of site CST021 on the following grounds: 1. Access to the site, both pedestrian and by car, is indirect and through steep and single-track roads. The roads are wholly unsuited to a higher volume of traffic particularly in the areas where there are no pavements and the road is shared with pedestrians. I live at the lower end of Clive Avenue and my family walk up and the down the bottom of Clive Avenue to access the town and public transport virtually every day. This section of road is steep, only partially lit and has no pavement. This development would compromise our safety through increased traffic in this area. 2. My family and I walk in the Church Stretton hills several times a week, and use the Jack Mytton Way across the site very regularly. The building of 70 houses on the site would be hugely detrimental to the many local people and visitors who are lucky enough to enjoy this area. I find it immensely disappointing that the Council's position is to argue for this development when it so clearly is in contravention of national and local policy put in place to protect such sites.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2354B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	<p>Object to inclusion of CST021 within the Plan as: There has been no objective assessment of housing need. Without this, the guideline for Church Stretton is just an arbitrary figure. Local agreement of need for around 20 affordable houses, due to local demographics there are always other properties available. Due to site constraints associated costs, CST021 will deliver no affordables.</p> <p>As Shropshire's housing need is being exceeded and cross-boundary need accepted (without consultation, so that Green Belt can be protected and valued countryside in Shropshire lost), no contribution is required from Church Stretton and the AONB, other than windfall and affordable dwellings.</p> <p>CST021 was withdrawn from the Local Plan process in 2012 as the Council said it was not suitable for development and was not supported locally. Nothing has changed, except infilling around the site has exacerbated problems.</p> <p>CST021 performs poorly within the Sustainability Appraisal. CSTR014 performs better and is now available.</p> <p>The AONB has greater protection from development than other areas - no major development should occur without exceptional circumstances. Including CST021 when there are alternative sites, several smaller, fails the exceptional circumstances requirement.</p> <p>CST021 also contradicts policy DP26.</p> <p>The 875 responses to the Community Led Plan Household Survey clearly show residents wish to "protect the landscape on both sides of the valley" and "preserve the character and appearance of the town (and) preserving the trees and green spaces".</p> <p>vehicular access to CST021 is dangerous, demolition of a bungalow will not resolve steep gradients, pinch points to the A49, on-street parking, subsidence on Raglith Road and conflict between vehicles and pedestrians. Further traffic and pedestrians from development of CST021 would increase risk. No comprehensive traffic survey has been conducted by the Council, a local on highlights problems.</p> <p>CST021 is saturated and there is run-off into the Bridalways and from here into Swains Meadow causing flood risk when it rains. Development would increase these problems and it is unclear how development could alleviate them.</p> <p>Tourism is vital in Church Stretton, development of CST021 (around the Jack Mytton Way) would detract from this and aspirations to increase walking in the hills east of the A49.</p> <p>Jack Mytton Way is well used and would not be the same if through a housing estate.</p> <p>CST021 is an important habitat including for Badgers, Bats, Foxes, Deer, Owls, Buzzards and smaller birds.</p> <p>Development of CST021 contradicts policies DP13 and 18.</p> <p>Development of CST021 would increase smoke pollution (more bonfires, barbecues, wood burning stoves etc), noise pollution (amphitheater effect of the valley) and light pollution.</p> <p>There is insufficient infrastructure, employment and parking in the town centre (need to cross the A49 from the site).</p> <p><u>Smaller brownfield sites should be pursued.</u></p>
A2366B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	<p>ALSO SEE ATTACHMENTS FOR A2366 CACA SURVEY 2019 FULL REPORT and CACA SURVEY 2019 KEY SUMMARY</p> <p>This objection solely relates to the Transport Statement for Land at Snatchfield Farm (Site CST021) Church Stretton. The objection INCLUDES two attachments to the e mail entitled Local Plan Review - Bunce, which are referred to in the text below and should be read in conjunction with the text below. The Transport Statement for Land at Snatchfield Farm is dated 26 June 2020, fully 18 months after Shropshire Council first proposed CST021 as a preferred option. As such, it is hard to escape the conclusion that Shropshire Council are trying to 're-fit' some (albeit flimsy) justification for their choice, long after the initial decision was taken. Indeed, Shropshire Council Highways and Shropshire Council Planners had previously (2014) decided on the basis of a similar Transport Statement (2012) thatthe technical exercise (previous BWB Report) has demonstrated there will be a significant impact on the local highway network without any consideration for mitigation or improvement and as such Snatchfield could not be supported for future allocation'.</p> <p>It is hard to see what has changed since 2014. Particularly, as the Transport Statement for Land at Snatchfield Farm (Site CST021) Church Stretton is a very high level, desktop driven report that lacks objective analysis and contains suspect base material and illogical extrapolations. For example, it is nonsense to extrapolate peak rate trips from a development 'Land Adjacent to Church Stretton School'. For one thing, this site is a short, level walk from town centre amenities, while CST021 is anything but. For another, were the statistics for 'Land Adjacent to Church Stretton School' based on an actual vehicle count or estimated projections? The Transport Statement consistently claims that the traffic increase will be well below the capacity of the local roads but nowhere does it reveal what those capacities actually are, which seems to undermine the case being made. Beyond, some sweeping statements that there are no pedestrian safety concerns from the additional vehicle journeys generated from the proposed Snatchfield development, no 'on site' observations have been done by WSP to assess the existing (considerable) vehicle and pedestrian conflicts in the pavement free Clive Avenue Conflict Area. This contrasts with the 102 'incidents of concern', including 'near misses' recorded by the Church Stretton community during our 4 traffic/pedestrian safety events in 2019. In conclusion, the WSP report does nothing to allay the justifiable concerns of local residents regarding traffic generation and pedestrian safety. We would happily contest the WSP 'findings' at a Planning Inspectorate Examination in Public. The evidence collated by the local community (the two documents attached to the e mail entitled Local Plan Review - Bunce), represent compelling evidence of the unsuitability of site CST021. We will continue to build our evidence base and consult with Highways Consultancies and Transport for New Homes over the coming months.</p>
A2376B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	<p>Site CST021 (Snatchfields Farm) is an area of open land extending into the east side of the built-up area of Church Stretton. The open land softens the appearance of this elevated area of the town when seen from surrounding higher land, including in views across the valley from the Long Mynd. The open land also gives a gradual transition from the built-up area of the town on the footpath that leads to Hazler Hill. This path forms part of the Jack Mytton Way, an important recreational route.</p> <p>The National Trust is a charity founded in 1895 to promote the permanent preservation of places of historic interest and natural beauty for the benefit of the nation. Although independent of government, we have been given the unique ability to declare our property inalienable, meaning that it will be protected for everyone, for ever. Our ownership of land at Church Stretton includes a significant area of the Long Mynd on the west side of the town. Near the site, we own 7.3ha of land comprising part of Raglith Wood with adjoining paddock. This land was bought by the Trust in 2001 with a bequest from Mr K E Wild and a grant from the Countryside Agency. The nearest part of our ownership is about 100m from the site boundary.</p> <p>Raglith Wood is an Ancient Semi-Natural Woodland. Ancient Semi-Natural Woodland is identified as irreplaceable habitat in the National Planning Policy Framework. The woodland within our ownership is largely upland oakwood with an area of wet woodland – both of which are identified as UK BAP priority habitats. The paddock includes an area of lowland dry acid grassland, also a UK BAP priority habitat.</p> <p>Like the whole of Church Stretton, site CST021 is within the Shropshire Hills AONB. Paragraph 172 of the National Planning Policy Framework states, "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues."</p> <p>Church Stretton is the only market town in the Shropshire Hills AONB. This is recognised in the AONB Management Plan which states, "As the only such town in Shropshire within a nationally protected landscape, the scale and design of development here needs to be of high quality and be sensitive to the location. The fact that no communities have come forward as Hubs or Clusters within Church Stretton's hinterland places greater pressure on the town itself to accommodate housing, while at the same time there are real physical as well as environmental constraints on the availability of sites in the town." The Management Plan also states, "The AONB Management Plan supports a vision of sustainable rural communities and of development which enhances local landscapes, heritage and biodiversity. Housing developments need to be of appropriate scale to the location and its landscape sensitivity, and of a high standard in terms of design."</p> <p>We raised concerns about impact of development on the natural beauty of the AONB in our response to the preferred sites consultation. We continue to have these concerns. The Council's Landscape and Visual Sensitivity Assessment (Gillespies, 2018) shows the site as part of an area with medium-high landscape and visual sensitivity to housing development. This clearly indicates that there would be some harm to the landscape of the AONB as a result of the development of this site. In accordance with the NPPF, that harm should be given great weight.</p> <p>Appendix F of the sustainability appraisal states, "the site's visual and landscape sensitivity to residential development is amongst the lowest in Church Stretton." However, we are aware that Church Stretton Town Council has suggested alternative sites within the town and other means of meeting the development need identified. We do not envisage any of these having the same harm on the AONB as CST021 and urge Shropshire Council to give them serious consideration.</p> <p>Our preference would be for the allocation on site CST021 to be deleted and for the land to be excluded from the development boundary.</p> <p>If the Council continues to propose the allocation, we suggest that the development guidelines in schedule 5.1 should as a minimum address mitigation of the impact of development of this site on the AONB, including in views across the valley. This could, for example, include guidance in relation to landscaping within the site as well as on its boundaries, the quality of design, the need to reflect local traditions, the choice of materials and use of external lighting. These are all matters raised in general in Policy P4 of the AONB Management Plan.</p>
A2381B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	<p>The proposed development land at Snatchfields Farm (CST021) has been put forward by Shropshire Council with out any consideration of the restrictions and protection that an ANOB is subject to. Shropshire imposes many rules in its area of control but fail to follow rules and regulations that the Authority itself should follow. How the Council feel they can over ride and ignore these requirements is deplorable and puts even more in doubt the credibility of the County Council.</p> <p>Sustainability The classic example here is in the Sustainability Appraisal assessment. CST021 score on Shropshire's own sustainability assessment was -7 (very conservative) a real independent assessment would show worse figure, however this still failed and yet this authority continues to ignore this. There are underlying tones here to develop at any cost to the environment as if the ANOB did not exist</p> <p>Affordable Housing Any site that is developed in Church Stretton needs to have a high percentage of affordable housing not a pitiful 20%. The Town needs to look after the young and the people who work here and to provide the housing they need, you do not go down the big developer route to achieve this. Shropshire County Council need to employ a traditional building company who will build what is required i.e. 100% affordable. This is done by many housing associations through out the country so if Shropshire Council wants to listen to the local needs survey recently carried out it should step up to the task and investigate this route. There are Architect practices and Contractors who specialise in this work so the wheel does not have to be reinvented.</p> <p>DP13 Natural Environment. Any development must deliver a net gain for biodiversity; the Environment Act is quite clear on this. How can Shropshire County Council ignore this, do you have some special standing within this country that says you should not comply. Any development on CST021 will produce a significant loss to the Natural Environment and you should therefore desist from further consideration.</p> <p>DP18 Landscape and Visual Amenity It is a clear that the Local Authority cannot under any circumstances comply with DP18. How the development will not Safeguard and Enhance the landscape is obvious to so many but Shropshire Council seem to have their heads buried so deep in the sand. Planning permission should not be granted for developments in AONB unless there are exceptional circumstances. There are certainly no exceptional circumstances especially when Brownfield site are available and also site (CSTR014). This site has a large capacity but we do not need 70 houses building only the ones the Local Needs Survey has identified. What Church Stretton need is an understanding Local Authority like Arnsdale and Silverdale in the Southern Lake District. Here you have an authority that listens and understands the local needs, complies with National Policy and knows the restrictions of an ANOB. Shropshire County Council are not in the same league and should be ashamed,</p>
A2390B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	<p>object to the planning on snatchfields.. its a great place to take the children to see the wildlife they like to go see the sheep and have even seen deer in the field. we have problems with raglith road as theres a sink hole underneath the road and the road keeps falling away if there was heavy machinery going over it the road wouldnt last and im very concerned as i live with a fire fighter for church stretton and when on call need to get out.</p>
A2408B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	<p>Obect to inclusion of Snatchfields Farm (CST021) in the Draft Local Plan.</p>
A2411B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S5 Church Stretton Place Plan Area	Disagree	<p>The Snatchfields site is an historic meadow providing a scenic walking route for residents and visitors to and from the town. It can be easily seen from many areas surrounding the town. The economy of Church Stretton depends upon visitors many of whom are walkers and any damage to the surrounding landscape will have a detrimental effect on the economy. The town is within an AONB and according to NPPF, major building developments should not be permitted. This proposal for 70 dwellings is a major development, which has been accepted by Shropshire Council, but should not go ahead. In relation to the housing target set for Church Stretton, the need for the proposed numbers has not been demonstrated, and it should be done so based on the needs of the town and restrictions of an AONB. Alternative sites within the area of the town, such as a site behind Church Stretton School, should be investigated. I object to this proposed development.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0934B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area	Disagree	The selection of Community Hub settlements in policy SP2 and schedule SP2.2 was based on an assessment by the Council in the Hierarchy of Settlements document November 2018. All settlements which scored a total of 48 points in the Assessment were designated as Community Hubs. Those scoring below 48 points were classed as other rural settlements. Some of these were subsequently designated as Community Clusters. Dudleston Heath/Gadlas scored 42 points in the assessment, and yet is identified in the Submission Draft Local Plan (SDLP) policy S8.2 as a Community Hub. This is inconsistent with the approach taken for other settlements scoring below 48 points. No explanation or evidence is included in the SDLP to explain why Dudleston Heath/Gadlas should be so designated. The settlement should therefore be down-graded to a Community Cluster.
A0967B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area	Agree	Support for Modified Ellesmere Settlement Boundary as shown on plan provided. Modification of the settlement boundary responds to inclusion within the allocation in the Adopted Local Plan of ELL003a & planning permission 14/04047/OUT (phase 1 of allocation subject to current application). The modification on the settlement boundary assists in the delivery of the residential/leisure allocation & provides the potential for a mix of housing and/or commercial uses within this road frontage site. The modification of the settlement boundary creates a windfall site which will assist in the provision of the housing target for Ellesmere and the wider Local Plan area and should be retained. Confirm land along with the wider site is viable, is available for development & deliverable, expected timescales Spring 2023 on site, Spring 2025 expected completion therefore would come forward in the 'Short Term' (2020 to 2025)
A0978B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area		with reference to the Part B consultation response form for the ELL003 land submitted to you on 30.09.2020, the planning application referred to in the form has now been validated (20/03759/FUL).
A0978B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area	Disagree	Our client, the owner of the land shown on the attached location and illustrative development plans, disagrees with the settlement strategies for Ellesmere proposed in Policies SP6 and S8.1. The reason for this is that he considers that the ELL003 land should be included in Policy S8.1 as an allocated site in order to address the growing need for older persons' accommodation in Ellesmere and the County as a whole. An example of how this can be achieved on the ELL003 site is contained within the attached Meadow View Proposal Document. It is welcomed that an acknowledgement of this unmet need is contained within Policy SP2:-"support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community", and "much of the household growth projected is driven by increase in households with an Elderly Household Reference Person (65 years and over)" In the light of this evidence, the Council is strongly urged to include the ELL003 land as an allocated site for older persons' accommodation in Policy S8.1. National Planning Practice Guidance (NPPG) encourages specific allocations stating:- "Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing" (NPPG Ref ID: 63-013-20190626). The Council would be able to satisfy this requirement by allocating and cross referencing the site to another specific, separate policy in Section 4 (Development Management Policies) of the Plan. This additional policy (perhaps entitled "Delivery of housing for older people") could be based on the part of Policy DP1 which refers to the diverse housing needs of older people. A specific, targeted policy such as this would assist Shropshire council to achieve its objectives in the Housing Strategy of "meeting the overall current and future housing needs of Shropshire's growing population by addressing the housing needs of particular groups within communities"
A0993B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area	Disagree	Site promoted - The land is a continuation of the approved development at The Hawthorns and is a natural progression of the proposed development boundary for Ellesmere, which this site is directly connected to. SC should consider this land as a preferred site in the current Local Plan as the placement and location of our site seems to be a natural progression of development in Ellesmere, and additionally serves a potential benefit to the town of Ellesmere itself in so far as providing relief of traffic congestion through the centre of town. It is our view that this site should be included for allocation to address the shortfall in delivery since the SAMDev was adopted and meet the growing need for different types of housing identified in the NPPF and the draft Local Plan (Policies DP1 – DP7).
A1834B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area		Consider that proposed site allocation ELL005, ELL008 & ELL033 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: ELL005, ELL008 & ELL033: traffic; A5/ A495 Whittington roundabout. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A1844B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area	Disagree	Reference to connectivity and opportunity for enhancement of public rights of way should be expanded to include the canal towpath. Potential access and enhancement of the canal towpath should be referenced within the design guidelines for the site. Development in proximity to waterways can increase use of towpaths and we are keen to ensure that where appropriate, any potential impact is mitigated.
A1844B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area	Disagree	Consideration should be given to future re-use of the Listed Buildings at Ellesmere Yard. The Canal and River Trust is exploring future opportunities for their sustainable use to safeguard them. Aspirations for the regeneration and re-use of this area and improving its connectivity with the town would be both appropriate and beneficial. We welcome the opportunity to discuss this with you.
A2415B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S8 Ellesmere Place Plan Area	Don't know / no opinion	Under the development guide in schedule S8.1(i) and explanation 5.114, both on page 194 of the plan, councillors would like to see the creation of a circular cycle route as well as the creation of a circular walk detailed in the plan. Other than that, they are happy with the rest of the plan.
A0898B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S9 Highley Place Plan Area	Disagree	Object to housing guideline for Highley which is appropriately designated as a Key Centre. The guideline has increased to 250 dwellings (from 200 dwellings) but Highley can deliver more dwellings. From 2006 - 2019, Highley delivered 181 dwellings in 13 years and had commitments for 47 dwellings totalling 228 dwellings. If completions are extrapolated over 22 years from 2016 - 2038, the settlement could deliver 306 dwellings consistent with the national policy objective to significantly boost the supply of housing. Furthermore, set into the context of the County housing requirement for 30,800 dwellings [Note: A0894B1 Berry's are also requesting this requirement be increased to 46,700 dwellings] it might be possible to take the County's 135,452 households as a proxy for the number of dwellings. The housing requirement (30,800) would then represent growth of 22.7% equal to 1.03% per annum over the household/dwelling stock (135,452). If these growth rates are applied to Highley's dwellings stock (1,462 dwellings) the housing guideline would increase further to 332 dwellings over the plan period. The Highley housing guideline should therefore be increased further to 330 dwellings (rounded down). Also note, if the housing requirement were increased to 46,700 based on a revised 2018-based household projection of 171,876 the Highley guideline recalculation would be County growth of 46,700 div by 171,876 equal to 27.2% or 1.236% giving a revised guideline on the Highley dwelling stock (1,462 dwellings) of 397 dwellings].
A0898B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S9 Highley Place Plan Area	Agree	Support housing allocation HNN016 land south of Oak Street as most sustainably located site close to High Street and school. Located in the east, HNN016 is less sensitively located to Shropshire Hills AONB to the west of Highley. In relation to Landscape and Visual Sensitivity Study, the east of the town is less sensitive than the north-west of the town. Site assessments in south-west for HNN010 (Redstone Drive) and HNN006 (south-west Highley) identify historic environment issues with proximity to Highley Conservation Area with archaeological significance and maintaining separation between historic settlements of Highley and Netherton. HNN010 and HNN006 considered unsuitable due to historic environment, existing amenity access and traffic impacts especially on Redstone Drive and providing suitable access to HNN006. In contrast HNN016 adjoins a site with an approved highway access, junction and LVIA assessment under permission 20/00193/FUL and it is considered that the issues resolved in this permission would apply equally to HNN016. HNN016 could also provide better pedestrian connections to the countryside, Severn Valley Country Park and Shropshire Way. HNN016 also offers further long term potential through provision of an estate road link to the B4555 north of Highley. Land at Hazelwells Farm is in same ownership permitting development north-east of Hazelwells Road in a future plan to relieve congestion on Woodhead Road and improve Highley's road network. Existing rear gardens at Yew Tree Grove adjoining HNN016 are extensive protecting amenity. Topography falls to the east lowering HNN016 below Yew Tree Grove. HNN016 has a density of 18.5 dwellings allowing for green space corridors. HNN016 can meet the proposed development guidelines. HNN016 is deliverable and likely to start earlier than forecast in 2025-2030 and so HNN016 is viable.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0986B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S9 Highley Place Plan Area	Disagree	<p>Disagree with the proposed allocation of site HNN016 for 100 dwellings.</p> <p>Acknowledge Highley is a Key Centre with proposed guidelines to deliver around 250 dwellings and 3 hectares of employment land which responds to local needs.</p> <p>However, consider HNN016 is inadequate in terms of access arrangements - the site is severely constrained by the limited frontage onto public highway at Bridgnorth Road. No evidence of a suitable access solution has been presented. We have consulted a highways engineer and consider it is doubtful that the widths of a conventional priority junction with associated bellmouth and new road to adoptable standards is capable of being achieved within the site frontage and that it would appear that third party land will be required to achieve suitable access arrangements. Use of third party land has not been demonstrated to be a viable option at this stage. This is a significant constraint and undermines the deliverability of the site.</p> <p>In comparison, HNN019 is unconstrained in terms of access. A priority junction can be located approximately 30m north of the southern boundary at an existing field gate (allowing 59m visibility in each direction, commensurate with speeds typical in a 30mph zone).</p> <p>HNN019 is suitable for residential development and is not constrained by technical constraints to prevent development on the site as a whole. A Vision Document is provided as part of this representation, including a concept masterplan demonstrating how a scheme might work on the site. Consider HNN019 could deliver a residential-led mixed use development (40 dwellings), to include a potential care home (60 bed care home) and additional space for a new/expanded GP Surgery and sufficient car parking spaces (stopping visitors to the surgery parking on the roadside on Woodhill Road), should the existing surgery be required to upgrade and expand if necessary. Can also provide areas of high quality open space for play, general amenity and leisure.</p> <p>HNN019 extends to approximately 3.56 ha and comprises agricultural land to the north of the stables on Woodhill Road and also includes a modern bungalow and its curtilage. It is broadly bound by Woodhill Road to the east, residential development to the south, the Malt Shovel Inn Public House and residential properties to the north and agricultural land to the west.</p> <p>HNN019 offers an opportunity for distinctive, legible and active place that embodies best practice urban design principles and is responsive to important site features. It could promote healthy lifestyle through provision of open space and informal walks along adjoining PRoWs.</p> <p>Bus stops are located opposite the site. Pedestrian and cycle connectivity from HNN019 to key local amenities, facilities and destinations will be maximised where possible.</p> <p>Key local amenities within walking distance of the site (1.5km) include a public house, convenience stores, golf course, pharmacy, restaurant, primary school, post office and leisure centre with swimming pool/gym. Higher order services and facilities are also available in nearby Bewdley, Bridgnorth and Kidderminster.</p> <p>Information on matters such as ecology, noise and landscape sets out the benefits of this site coming forward and have informed identification of opportunities and constraints, in summary:</p> <ul style="list-style-type: none"> -Access and movement: Vehicular access summarised above. Pedestrian/cycle access can also be achieved along Woodhill Road to enhance the permeability of the site and walking/cycling accessibility into Woodhill and Highley. Both accesses are deliverable within the extent of the site boundary and highway land. -Noise: Not anticipated that road noise from adjoining B4555 Woodhill Road will require extensive mitigation measures such as acoustic fencing. Subject to mitigation, not anticipated that noise will constrain development. Would be formally assessed as proposals evolve. -Agricultural land: Natural England mapping identifies the site as Grade 3 good to moderate agricultural land. Site specific work currently being undertaken. Do not consider it represents best and most versatile agricultural land. -Heritage and archaeology: The site lies outside of the Conservation Area for Highley and Woodhill, although note a Conservation Area runs along the terrace houses immediately to the south-east of the site on Cleve View, it is screened by the existing mature hedgerow which runs along Woodhill Road to the north and south of the proposed access point. Therefore intervisibility would be minimal and therefore the harm associated with the character and appearance of the conservation area limited. Whilst works are ongoing with the archaeological desk based assessment, it is unlikely that the site contains any major archaeological features. -Ecology: Currently being assessed. Given agricultural and pastoral nature of the site, consider it offers little in the way of significant habitats for protected species. More likely surrounding mature landscaping will provide suitable roosting and foraging habitats for birds and bats which will be considered accordingly as the masterplan evolves. -Drainage: Entirely within Flood Zone 1 and is therefore subject to the lowest possible risk of flooding. It also has a very low risk of flooding from surface water. Site slopes from a high point in the north eastern corner. Currently propose to provide an attenuation basin to the south western corner to allow adequate surface water drainage of the site. Detailed drainage information will be provided. -Trees: A self contained parcel of agricultural land bounded by mature hedgerows/trees. Anticipate these will remain in situ and development designed around these landscape features which add to the character of the settlement in this location. Furthermore, mature landscaping will assist in screening the proposed development from both the PRoW to the south-west of the site and the bridleway which runs along the north-western boundary. Views into the site are therefore limited. -Landscape: Within the Shropshire Landscape and Visual Sensitivity Assessment, HNN019 is considered within Parcel C, which has a medium to high sensitivity to residential development and a high visual sensitivity to residential development. The site has well defined boundaries and built-up area of Highley wraps around it. Trees/hedgerow boundaries provide good screening opportunities from the development from the PRoW to the south-west and wider views across to the Shropshire AONB. The landform on the site is sloping from a high point in the north-east to a lower point in the south-west which is characteristic of the area and the views across to the Shropshire Hills AONB. There are no PRoWs within the site. The closest PRoWs to the site run along the northern and western boundaries of the site connecting further to the open countryside across the settlement. Landscape principles also identified. <p>Following design principles have informed the masterplan for the site:</p> <ul style="list-style-type: none"> -Site capacity (see above). -Access (see above). -Development parcels will front onto well defined streets and spaces wherever possible, ensuring good levels of natural surveillance and activity. This includes the eastern development frontage which adjoins Woodhill Road. The setback and scale of new properties which front onto Woodhill Road will take into account the living conditions of existing occupier. -Built development parcels fronting the western site boundary will be set back, overlooking a green wildlife corridor that will 'buffer' with the adjoining open countryside. Landscape screening and planting will be utilised to soften the new development and
A1271B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S9 Highley Place Plan Area	Disagree	<p>Carrying out a SA offers provides an opportunity to:1 -consider how a plan contributes to improvements in environmental, social and economic conditions2 -identify any significant adverse effects that a plan might have3 -amend proposals in a plan to avoid any significant adverse effects4 -propose mitigation measures to counter any remaining significant adverse effectsAs has been made clear in ALL earlier correspondence, the preferred site does none of those things.#1. The choice of site breaches an existing Article 4 Direction in place for 18 years and goes against guidelines laid down by the current head of Shropshire Council planning, Ian Kilby.#2. Multiple submissions to Shropshire Council planning department clearly identify the known risks associated with the access to the whole development area. con)401rmed by the current di)401culties encountered by TC Homes the developer of 20 affordable houses on the neighbouring site in identifying a safe location for a crossing point to protect residents of the site when crossing the busy B4555. [See Shropshire Local Plan Review: Consultation on Preferred Sites. November 2018 - p93, 12.19: Information of each of the preferred allocations: 'A pedestrian crossing of Bridgnorth Road should be provided at an appropriate location in proximity of the site.'] The provision of such a crossing was made a condition to the planning committee's allowing the application to proceed.#3. Shropshire Council has consistently ignored this opportunity, choosing instead to dismiss all concerns about the suitability of the site for such a large development.#4. No mitigation has been proposed for any of the risks identified by the local community, certainly no mitigation that would pass the most basic examination. Instead Shropshire Council has consistently ignored the local community's concerns about any clearly identified adverse effects, whether direct (highways) or indirect (environmental/landscape ref: Gillespies 'Shropshire Landscape & Visual Sensitivity Assessment: HIGHLEY [14HG]). My response to the Local Plan Review - Preferred Sites Consultation went into some detail about my opposition to the planning of)401ccr' hsoice, but that response went unacknowledged. That completed questionnaire will be included as an attachment together with this form. Attachments included: Extract from Regulation 18 Pre-Submission Draft Shropshire Local Plan Sustainability Appraisal and Site Assessment Environmental Report Summary Respondent's response form to Preferred Scale and Distribution of Development consultation. Highley section of Shropshire Landscape and Visual Sensitivity Study. Respondents submission to planning application 19/02791/FUL Email correspondence between respondent and SC Highways Officer Highley section of Preferred Sites consultation document</p>
A2337B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S9 Highley Place Plan Area	Disagree	<p>The Site at Netherton Lane in Highley should be allocated. It would provide for 300-350 homes with access to the south for cars and access for pedestrians and cyclists throughout the site. This site should be preferred over HNN016 - it has better access, is more deliverable, better linkages and is better in terms of landscape and visual impact</p>
A2435B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S9 Highley Place Plan Area	Disagree	<p>Objection to allocation. As close residents of the proposed access to the development we see and hear many incidents on this bend</p> <p>The junction does not have good visibility either way along Bridgnorth Road.</p> <p>Traffic speeding up the bank from the direction of Bridgnorth and those from the village direction are often caught out by this 'blind' bend. It often causes busses, lorries, large vehicles, etc. to mount the kerb to avoid colliding. On numerous occasions I have witnessed close calls with screeching tyres and horn warnings where incidents have occurred.</p> <p>To think that this site has been passed for development with such poor access considering that there are more suitable sites within the village is certainly a concern.</p> <p>As for the council's procedures of local consultation I feel that our and the parish council's concerns have been disregarded in this matter.</p> <p>Access to and from the proposed development is on a dangerous bend near the brow of a hill where pedestrians have no safe place to cross the road. This corner has been the site of at least three accidents that I have personally observed. One of these resulted in a car rolling over the pavement into our hedgerow, completely writing the car off and damaging our property.</p> <p>A second incident again involved a car rolling over right on the access point. Thirdly, a car swerved across the road on this corner and damaged the railings on the opposite side. These incidents involved the vehicles mounting the pavements. Therefore, it is of great concern should this development go ahead as there would be more people/children around this area. Young children accessing the playing fields opposite or going to school will be at the highest risk.</p> <p>The proposed access is currently a bridleway, but the farm uses it as an access route, several times a day, for large farm vehicles/machinery.</p> <p>The Council has a responsibility to ensure the safety of pedestrians and road users on its highways. This development will seriously jeopardise public safety due to unsafe access and an increased volume of traffic in a known danger zone</p>
A0046B1	Viability and Deliverability of Proposed Site	Draft Policy Area S10 Ludlow Place Plan Area		CHK002
A0089B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>The loss of infiltration of surface water which will result from the proposed planning at BUR004 will exacerbate the situation. The stream will have to pass under the A456 which may increase flood potential – a much wider flood prevention scheme is needed. There are little employment opportunities for new dwellings. New development would result in too many cars, existing services are not enough – overreliance on Tenbury Wells. Proposed speed limit change to 40mph welcomed.</p>
A0103B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>A series of questions raised on whether the site floods, the hydraulic assessment and brownfield sites</p>
A0253B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>This farming land is needed for the future. The field floods. Bats are in the vicinity. Air pollution will increase. Uncertain whether doctors/schools would cope. Highway casualty issues already exist. Existing pedestrian paths are poor.</p>
A0265B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>Object to the site allocation. The site is susceptible to flooding from the river Teme and also general run off from the surface. The flood area extends beyond the site and onto the nearby A456 and based on Government Flood Plan website information has been subject to flooding on several occasions. Concern that if developed the site could increase flood risk for neighbouring properties. Nearby brownfield sites are more suitable</p>
A0269B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	<p>Community Hubs Ludlow Place Plan areas We support the need for an ambitious 190 dwelling housing guideline for Burford, reflecting it's sub regional status and local needs. We were instrumental in securing BUR001 for housing development, now under construction. We are already experiencing off market demand for BUR002.</p>
A0269B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	<p>We support the allocation of BUR002, it's development guidelines and approximate site provision figure of 40 dwellings. On behalf of the owner, see our separate report on viability and deliverability as well as our further comments in relation to the Sustainability Site Assessment for BUR002, Appendix K and timescales for delivery in draft Appendix 7</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0269B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	Community Hubs : Ludlow Place Plan Area We support in so far as community led plans are complementary to the development guidelines and approximatre site provision figures in relation to strategic allocations and are not at material variance with the same
A0269B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area		BUR002 is said to have a Poor Sustainability Rating due to the distance to services in Burford and the additional services located in Tenbury Wells. Nevertheless, the Stage 3 Assessment concludes " Allocate for residential development" – see Appendix K page 141 with full reasoning, which is supported. The owner wishes to make the following points on the Stage 2a assessment (Appendix K page 22) :- 1. Primary School : distance from the site to the school car park is 596m, one minute extra walking time from the control distance 2. GP surgery : distance of 539m, 50m beyond the control distance ; it is about a 6 minute walking time, has pavements for the whole route suitable for wheel chair and baby carriage access, with no roads to cross until opposite the surgery where there is a crossing point 3. Library : distance of 554m and has same access and distance as surgery 4. Leisure : Gym HQ is 442m away / gym-swimming pool at 718m 5. Burford / Tenbury Town playgrounds at 650m – open to development management discussion as to some provision on-site 6. Outdoor sports : 589m to the tennis club / bowling green ; 600m to cricket / rugby club with pavement access to all sites 7. Extensive footpath network within retained land providing access to amenity / natural green space – direct access available to Burford Church and gardens parallel to the River Teme SSSI 8. Transport nodes within 480m, with buses travelling to Ludlow, Kidderminster and Worcester – pupils, college students and working adults serviced 9. 4 minutes walking time to town, 6 minute walking time to Tesco 10. Public protection / constraints : very little, if any, noise from business park and nursery no longer in operation 11. The site does not lie directly opposite Kerry Foods or the Aspire Centre
A0269B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Forecast of Delivery Timescales for Local Plan Allocations The assumption for delivery of BUR002 is too late ; we, as the owner's agent, have already received off market interest from developers following publication of the Regulation 18 draft plan ; delivery should be moved forward to Short Term (2020/21 – 2024/25) ; current implementation of BUR001 (with our involvement) is supportive evidence Please
A0269B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	Managing Development in Community Hubs We support the development boundary for Burford set out on the Policies Map
A0282B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Flood issues with site, oversubscribed medical practice
A0339B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Concerned about development of BUR004 due to flood risk. The site is often under water during periods of heavy rain and if the river Teme floods, there will be nowhere for the water to go, except possibly west into the existing properties in Boraston Drive, which currently do not have a flooding problem. Strongly object to the proposed secondary vehicular access into BUR004 from Boraston Drive, this would increase traffic on an already busy road. Pedestrian access from BUR004 onto Boraston Drive could be achieved via an existing PROW.
A0390B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	From the policies map it looks very much as if Cleestanton is labled and a Community Cluster. Could you confirm this? Earlier this year there was a meeting held at Stoke St Milborough village hall, where approximately 60 people attended from the surrounding area. People from Cleestanton, approximately 10 of us, were given the option of becoming a "rural area allocation" or a community cluster. We voted almost unanimously to be considered as a rural area. Could you please confirm that this is the case. As it stands, it looks like a disregard of a democratic vote, if this is the case, residents of Cleestanton will no doubt be pursuing the matter. Shropshire Councils total of the employment land guidelines and housing guideline is vastly overrated for the Ludlow community. I have a daughter who has no problem finding a aplace to live. We need some housing, of course, but it is very clear that the intention is to grow Ludlow economically by pooling the increase of population from outside the area rather than just supplying housing for local need. This applies to most areas, particularly the larger towns. I question your figures for growth taking account of climate change, the resultant pollutant, loss of wildlife habitats and light pollution. I understand there is pressure from government diktat, but looking ahead, they will in turn be pressurised by a young population fuelled with a new environmental awareness, reacting to climate change by producing less offspring and consuming less. We all know economic growth for its own sake is futile; look at the research of the European Environment Bureau.
A0421B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	BUR008 should be included for employment - The Council Must make proper provision for its established Industry and relying on infilling is an inadequate designation and is far from satisfactory.
A0424B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Hints relates well to both Ludlow place plan area and to Cleobury Mortimer place plan area and should be included for housing development as a cluster settlement.
A0456B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	BUR004 is in Flood Zone 3 and subject to severe annual flooding and likely to be further affected by climate change. Development may widen the local effects of flooding to affect adjacent properties. Development would also affect the operation of the annual Tenbury Country Show.
A0574B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Object to BUR004 land adjoining Boraston Drive on A456 for the following reasons: infrastructure - there are likely to be capacity constraints for the school and GP surgery. flooding - the site is affected by a flood risk and is partially flooded for many months of the year. highways - safe access need to be provided to the A456 and Boraston Drive with the latter only currently providing private drives and public footpath accessibility. pollution - increased traffic likely to create air pollution and ground contamination issues. parking - development of the land will deprive the Tenbury Show of much needed public parking. countryside use - the site is used for livestock farming and provides feeding/breeding ground for tawny owls and buzzards. countryside views - the community enjoy views across this open field to the wider countryside
A0575B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Disagrees with the allocation of the site. Reasons for opposing the site are: Flooding on the site; impact on views across the site; lack of infrastructure in the village; increased pollution from traffic movements; loss of parking for Tenby Show; road safety issues on junction with A456; loss of wildlife habitat for buzzards, tawny and barn owls
A0577B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Raises concerns about the scale of development on a small community; the impact on local schools and doctors; the issues of flooding on the site; loss of habitat for animals and birds; increased trafic caused by the development of the site
A0912B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	Policy Map Inset S10 Ludlow is supported. The statement in paragraph 5.136 that "there is scope for flexibility in the employment uses delivered on the allocations, but any flexibility must respect the significance and setting of this historic town to ensure it's history will continue to be recognised and appreciated" is also supported. However, further to our representation on policy SP11, we would request that the Council have maximum flexibility in employment generating uses given the uncertainty of the post-COVID marketplace. In summary, the allocation of site LUD052 is supported as it represents a significant, and unique, opportunity to meet the economic needs of Ludlow during the Plan period and realise the ambitions of both the Shropshire and Ludlow Economic Growth Strategies.
A0912B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	Employment Allocation 'Land south of The Sheet on A49, Ludlow' (LUD052) is supported. However, further to our representation on policy SP11, we would request that the Council have maximum flexibility in employment generating uses given the uncertainty of the post-COVID marketplace. In summary, the allocation of site LUD052 is supported as it represents a significant, and unique, opportunity to meet the economic needs of Ludlow during the Plan period and realise the ambitions of both the Shropshire and Ludlow Economic Growth Strategies.
A0912B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	This policy and its supporting text is supported as it recognises the strategic role of Ludlow in the County as the third largest employment centre in Shropshire and a principal focus for investment, employment, housing and development during the Plan period. In addition, the identification of 11ha. of employment land to meet the needs of the town and its hinterland (including employment land allocation LUD052 and saved employment land allocation ELR058) is supported as this land will make a significant and unique contribution towards meeting the employment growth needs of both the Town and this area of the County
A0912B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	Strategic Policy S10.1(ii) 'Employment Allocations: Ludlow Principal Centre' is supported. The statement in paragraph 5.136 that "there is scope for flexibility in the employment uses delivered on the allocations, but any flexibility must respect the significance and setting of this historic town to ensure it's history will continue to be recognised and appreciated" is also supported. However, further to our representation on policy SP11, we would request that the Council have maximum flexibility in employment generating uses given the uncertainty of the post-COVID marketplace.
A0912B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area		Supporting letter covering response to LUD052 and other policies for Ludlow

Page 183

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0923B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>The designation of Ludlow as a Principal Centre settlement in Policy S10.1 is strongly supported as this is seen as vital to ensuring the town's long-term future. We agree with the recognition in the explanatory text to policy S10.1 that the settlement plays a key role in the strategic growth objectives for south Shropshire. In this regard, Paragraph 4.91(e) specifically identifies Ludlow as a Principal Centre on a Strategic Corridor and Policy DP9: Strategic Corridors states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity". It is evident, therefore, that Ludlow is a significant centre for growth in Shropshire, both socially and economically. However, Policy S10.1 places a significant reliance on windfall development to meet the needs of the town over the Plan period, with an additional 82 dwellings as windfall (unplanned development). Given the strategic importance of growth being directed to Ludlow such a reliance on windfall development is considered inappropriate. It is therefore considered essential that further land is included within the development boundary of the town and potentially allocated for residential development to ensure that the needs of the settlement and surrounding area are met and consequently the aims and objectives of the Plan are realised.</p> <p>Our client's sites were submitted under the Council's Call for Sites and identified as</p> <ul style="list-style-type: none"> • LUD047 'Land off Burway Lane, Ludlow'; • LUD048 'Land adjoining Ludlow Football Stadium, Ludlow'; and • LUD049 'Site A Land at Burway Farm, Ludlow' <p>Plan identifying the location of these sites is attached to this letter for ease of reference.</p> <p>These sites were subject to assessment by the Council as part of the Plan preparation process and the results of the assessment are included within the 'Ludlow Place Plan Area Site Assessments (August 2020)'. The results of this 3 stage assessment detail that these sites are available, viable, deliverable and developable. No physical constraints have been identified that would prevent their development. In this regard, whilst the assessment of LUD047 details that its development would have significant impacts upon the highway network, the local highway authority commented that it had no objection to the site's development subject to Burway Lane, along the site frontage, being improved to an appropriate standard.</p> <p>Whilst the site assessments identify that there are more preferable sites available within Ludlow, there are significant concerns over the delivery and development of the allocated housing sites LUD056 and LUD057, given that they have been included within the development boundary of Ludlow for a number of years but have yet to be developed.</p> <p>Our client's land therefore represents a unique and highly sustainable opportunity to deliver residential development in the town on land that is unconstrained and lies in close proximity to existing built development and some of the settlement's most significant services and facilities (and key trip generators) including the Secondary School and Leisure Centre.</p> <p>In summary, the current consultation provides an opportunity for Shropshire Council to amend policy S10.1 and Inset Map S10 to include some or all of our client's land within the development boundary of the settlement and potentially allocate it for residential development. The inclusion of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.</p>
A1141B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>Promotion of site on Castle Grange, Linney Ludlow for single story accommodation to meet the need for Elderly Households in Ludlow. The site is considered to be entirely sustainable both in terms of its location and the contribution it would make towards Ludlow. The provision of specialist housing is NPPF and NPPG compliant and outweighs the harm to the Conservation Area and deserves a specific allocation in Policy S10.1</p>
A1191B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	<p>Support proposed allocation of BUR004 for 100 dwellings. An illustrative Masterplan, informed by initial technical assessment of the site's constraints and opportunities, has been prepared for the site which illustrates how development could comply with proposed site guidelines. Fully committed to bringing BUR004 forward for residential development and recognise its important role in helping to deliver the Council's housing need and the sustainable growth of Burford.</p> <p>Comments on proposed development guidelines for BUR004 are as follows:</p> <p>Point 1: BUR004 can deliver a wide range of housing in line with the Council's emerging planning policies.</p> <p>Point 2: Proposed developable area of BUR004 has been defined after identifying site constraints, and the layout of the development will respond to all identified constraints and opportunities. When further detailed site-specific surveys are undertaken ahead of submission of an outline planning application (including a Topographical Survey and more detailed hydraulic modelling), the developable area will be refined further. Consider the capacity of the site should be expressed as 'approximately 100 dwellings', in order to allow a reasonable amount of flexibility in dwelling numbers, to respond to more detailed assessments of the site's capacity.</p> <p>Point 3: BUR004 will provide new public open space and green infrastructure which will benefit both new and existing residents of Burford. Open space proposed to the north west of the site will provide a link to the former Tenbury – Bewdley railway to the north of the site. Open space will also help ensure any habitats of value associated with the railway embankment are retained and appropriate buffers are maintained. Development would respect the heritage of the Tenbury – Bewdley railway. The Heritage Note prepared for the site concludes there are no major archaeological constraints to BUR004 as any below ground remains relating to the railway would not be of a significance that would prevent development.</p> <p>Point 4: Significant areas of proposed open space will assist in retaining BUR004's open character. New landscape planting will soften the edge of the settlement and help it to assimilate with the River Teme Valley.</p> <p>Point 5: An outline planning application for the site could be accompanied by a Phase 1 Ground Investigation to fully scope the potential for ground contamination. Development would ensure the site is safely remediated.</p> <p>Point 6: Open space to the south and east of the site can accommodate an attenuation pond for proposed SuDS. Best practice SuDS methods would be used, designed to discharge clean water from the attenuation pond into the watercourse (at a greenfield run off rate). This will help to lessen the impact on the River Teme SSSI, as this current suffers from water pollution as a result of agricultural run-off. Existing culverted watercourse to the east of the site will be re-naturalised to provide significant ecological benefits and potentially provide a betterment to surface water flood risk.</p> <p>Point 7: A site-specific Flood Risk Assessment and Sustainable Drainage strategy would be submitted alongside a future planning application. Hydraulic modelling will be undertaken to better understand the risk of flooding from the existing watercourse, surface water flooding and the available developable area.</p> <p>Point 8: BUR004 would be served by a new primary vehicular and pedestrian access off the A456. A new priority-controlled T-Junction will be provided onto the A456 and residents would be able to access Burford on foot via the existing footway along the A456.</p> <p>A secondary vehicular access from Boraston Drive is not required to facilitate development of BUR004. Reference to provision of a secondary access to Boraston Drive should therefore be deleted. Feasibility of delivering a secondary pedestrian access to Boraston Drive will be confirmed ahead of any outline planning application.</p> <p>Point 9: A Utilities Assessment would be provided to support a planning application for the site.</p> <p>As recognised in para 5.141 of the draft Local Plan, Burford in combination with Tenbury Wells is an important service centre for surrounding communities, see response to draft Policy SP2.</p> <p>Having regard to the proposed policy requirements for BUR004, including the mix of dwellings, the requirement to provide affordable housing and self-build homes, and the site specific factors (such as de-culverting the watercourse and addressing potential site contamination), we can confirm that the site is viable and deliverable. There is known market interest in the site due to Burford and Tenbury Wells being attractive and popular locations for home buyers. Finally, we also confirm that there are no known significant abnormal costs associated with developing the site.</p> <p>Delivery is anticipated to commence in 2023/24 meaning that the majority of the site will be complete within the 'Short-Term' period of 2020/21 to 2024/25.</p> <p>Burford has a wide range of existing services and facilities, including a primary school, pre-school, sports club, pub and a petrol station with shop. Burford also contains a hospital and a fire station. Moreover, there are significant existing employment opportunities within Burford at the Upper and Lower Teme Business Parks, including the Kerry Foods Factory.</p> <p>Additionally, Tenbury Wells has a wide range of shops (including a supermarket) available on Teme Street/Market Street. Moreover, there are other services, such as a further primary school, secondary school, library, doctors, dentists, cinema/theatre and a swimming pool. In combination with the services available in adjoining Tenbury Wells Burford is a highly sustainable location for development. Whilst they are referred to as two settlements, they are nevertheless intrinsically linked, hence why Burford could be considered a Key Centre.</p> <p>The SAMDev Plan has restricted growth in the locality. Indeed, Appendix 5 of the draft Local Plan shows Burford has only had 2 residential completions between 2016/17 to 2018/19. Allocating around 190 dwellings at Burford would provide an important opportunity to ensure ongoing vitality and viability of services and facilities in Burford, allowing the settlement to grow in a manner commensurate to its size and importance in the Ludlow Place Plan Area.</p> <p>Recognise 190 dwellings is the higher 'Residential Guideline', but consider this is appropriate having regard to the range of services and facilities in Burford and its position in the settlement hierarchy when the full range of services are considered with neighbouring Tenbury Wells.</p> <p>Delivery of new dwellings in Burford identified through the draft Local Plan's proposed residential allocations; supplemented with appropriate small-scale windfall residential development within the development boundary (where it is consistent with Community Hub Policy SP7 and other relevant policies), is supported as a way to ensure the growth assigned to the settlement is delivered.</p>
A1393B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>A1393 Series of responses commenting on policies for Burford.</p> <p>My main point of interest is Site reference BUR004 in BURFORD to which my comments/observations apply, although there are other sites in this locale to which some of my comments may also apply.</p> <p>The site is often referred to as Brownfield, and sometimes as Agricultural. I cannot understand the Brownfield reference which would appear to refer to the possibility of the remains of the railway bridge which was in the North West corner whose remains may have been deposited in a section of the "field" at this point. The area under consideration is very much agricultural and forms part of the local farming community's operations being used for the grazing of cattle and sheep with a crop of hay gathered during the Summer, on occasion two crops of hay in a good year. It also once a year forms either the site for the Tenbury Wells Annual Show or alternately it's car park. It also forms the opening vista of beautiful scenery down the valley of the river Teme which is enjoyed by many local residents and visitors, who either sit and enjoy the scenery and wild life, or sometimes park their cars in Boraston Drive for similar purposes.</p> <p>As mentioned in the Consultation Documents it is prone to flooding both during heavy rain and periods of wet weather, this will be referred to later.</p> <p>Burford is a small residential area serving the Market town of Tenbury Wells which is across the county border in Worcestershire, it is also within walking distance of Herefordshire, and at the very tip of Shropshire. There is little industry in Burford except a medium sized factory producing products used in jam making, a small industrial estate which is full and two disused industrial buildings that have been unoccupied for many years. It has a large number of retired residents together with a mixture of others who either work in Tenbury or travel to Kidderminster, Worcester, Ludlow or Hereford and various small traders in between, not forgetting local farmers.</p> <p>Considering the total area and accepting projected population gains together with industrial projections into the foreseeable future, it is considered unnecessary for developments of the size proposed for Burford, except to help underpin the National expansion projections imposed on Shrewsbury and the county of Shropshire. Here we are more dependent and supportive of our neighbouring Counties.</p> <p>Developments proposed for Burford and in particular BUR004 have no practical reason except to be counted in the County figures so should not be progressed.</p>
A1393B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>Ludlow shows significant positive effects as SO3 which is; Provide sufficient amount of good quality housing, which meets the needs of all sections of society.</p> <p>As Burford comes under the Ludlow heading which is a collective location therefore Table 1.1 is a generalisation and is not specific enough. Therefore the Positive SO3 cannot necessarily include Burford although Table 1.2 does state BUR004 is not included at this stage. The reference to Burford however, which we know is likely to be included in the future, see a reference in Table 2.4 page 33 it can be argued that the Supplementary questions stated are not met since the requirement is not present now or in the foreseeable future.</p>
A1393B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>It is not stated if this includes Burford, if not it can be argued that Burford is not required to provide Settlement in the Local Plan Review.</p>
A1393B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Don't know / no opinion	<p>Paragraph Table 10.3 Allocated Employment Sites Allocated Employment Sites SA Rating. Nothing shown for BUR004, Why?</p>
A1393B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	<p>Community Hub, Burford Page 22 Primary School OK for now but will require enlarging if more children enter the area.</p> <p>Children's Playground, Where is it sited?</p> <p>Outdoor Sports facility Is it viable in the time of the proposals. The facilities are meagre and probably would need updating and the building improved, who will pay assuming it still exists.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1393B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	With regard to BUR004: Visual Impact Considerations from the LVSS - Not agreed the result should be High not Medium and Medium High. Highway Comments - Direct access to Highway Network A456 j Possible but on to a road with a reasonably high density of traffic including a large number of HGV where there has been 4 fatalities in the last 4 years. Traffic calming, speed limits, are not recognised and for some reason,possibly the location of the road to County Boundaries, speed checks have been refused by the Police. Existing Highway at Access Point - No, possible but not practicable. Development without off Site Works - Not agreed,there would be considerable upheaval particularly during Flood works. Ecology Comments - agreed it is a natural wildlife habitat. Public Protection Comments - High Level of Traffic Noise,Fumes Etc. alongside the A456. Traffic noise is already increasing and becoming a nuisance for the existing houses. Strategic Considerations - Development of site could allow de-culverting of watercourse with SUDS scheme to improve drainage through town from Cleve Hills to river Teme. - Not agreed. There would need to be a water catchment area for use in flood times which could - impact any houses built on the site, and probably not work. Ground water levels rise during rain and lying water appears over the site. Additionally there are a number of 'Dry' springs which appear and in some cases flow towards the Teme. Water flows from the East of the site forming a wide frontage of water along the A456 to the center of the site, also the complete frontage is covered with water from the 'Waterway' on site. There is some flooding of the A456, not all of which comes from the site. However, although slowing traffic it has never stopped the slow flow of vehicles. I don't recognise the comment that there are 'A shorter distance of some key services located in the East of Burford'. Where? all main services except one school, a local Hospital which is constantly under closure threats from the NHS and a playing field. Other services are in Tenbury (in Worcestershire) across a narrow bridge where extra traffic from any development would cause extra congestion in the town and it's road system. Self Build is mentioned, I don't think any self builder would have his house as part of a 100 house site! A proposed entrance from Boraston Drive would cause traffic problems and extra noise and fumes to houses adjoining the entrance. No mention is made of the Medium Voltage Electricity Cable running along about half the South and West of the site. Indeed one report and map refers to wooden pylons and electricity cables across the site, which have not been there for many years. The foot path towards Tenbury is narrow and would require widening, it is quite frightening to walk along this footpath due to heavy HGV's being too close, and very noisy. There is a national walkers foot path along part of the West side of the site. No mention is made of the increased use of Doctors, Dentists, and Schools, in the area. The capacity of Sewage systems, including Pumping Stations, and any extra employment for incomers. A high percentage of working people travel away from the area.
A1393B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	I have considered all documents in the Consultation papers and understand that this is not a Planning application. The paper covers the whole of Shropshire and I have no comments to make other than the sites being considered in Burford. This is a small residential community at the very tip of Shropshire mostly dependent on Tenbury Wells for it's services etc. situated in the adjacent County of Worcestershire. Any increase in housing and therefore the population has no material significance for the community other than to underpin any requirements of Tenbury Wells and Worcestershire. There is a small development of 35 houses to the West of Burford which should meet any requirements of the village well towards and beyond the time span of the Consultation period. Although it is assumed that all Burford proposals are part of the County's estimated population increases which should be concentrated more towards the centres of population and work,not small villages miles from where an increase of 200 or so adults can be found work. There may be some entrepreneurial work in the area in the future, but it is not suitable for large industrial organisations - there are already two large premises that have been empty for years. The whole area is one of beautiful countryside living for a static population and there is no need for house building in the hundreds (190 or so in the document). My specific interest is regarding the proposed building of 100 houses on BUR004 which would need considerable work and therefore expenditure in order to make the site suitable for building and I disagree with the proposals being considered for Burford per se.
A1834B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area		Consider that proposed site allocation LUD056 and LUD052 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: LUD056: traffic; A49/ A4117/ Henley road roundabout. LUD052: traffic, boundary; A49/ Sheet Road roundabout. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A1834B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area		Consider that proposed site allocation BUR004 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: BUR004: traffic; A49/ A456/ Wyson Lane junction. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
Page 185 A1858B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area		In the area of LUD052, there are significant opportunities to improve the access to residential and business areas. With reference to the hatched area current allocated as existing mixed use by the Sheet, this area should be reallocated as residential land to support the development of the existing housing at the Sheet. Ludlow Town Council would also like to see a roundabout created at the point that the road forks. The area of the proposed employment site LUD052 should be extended in a block along the edge of the A49, which would create up to an extra 4 hectares of employment land. A roundabout should be created on the A49 to serve access to the existing Foldgate Lane housing allocation and the extended LUD 052 site. Ludlow Town Council believes that the town needs to attract more employment opportunities to support the 1,000 extra properties that Shropshire Council has allocated for Ludlow. Working from the premise that one hectare of land will support employment for 100 people, there is a disparity between 1000 new homes, which could equate to up to 2,000 adults seeking employment, and only 11 hectares of employment land is currently allocated to Ludlow. Ludlow will need to attract and keep a younger population to ensure the town thrives in the future, which means there needs to be sufficient employment land available, and the sustained and planned impetus from Shropshire Council to help attract employers. Significant need for actively generating business opportunities. Employment opportunity and economic growth are the drivers that will fulfil Ludlow's planned housing growth. At present the significant new employment opportunities are being created 30 plus miles from Ludlow – this needs to change. The A49 needs to be developed as a corridor for economic growth. The issues faced by the south of the county in terms of much lower levels of industrial development than the east and north of the county, need to be recognised, and the solutions to these problems need to become the planning and economic focus of Shropshire Council in the south of the county. Ludlow needs the right sort of housing for the right reasons. Ludlow is heritage rich, and people will pay considerable amounts to buy into the historic environment / properties. However, ill-advised builders think that because people will spend large amounts on beautiful period homes, there is a market for 'run of the mill' expensive new homes in Ludlow, which is completely missing the point of the attractiveness of Ludlow. It is also the case that whilst there are over 500 listed properties in Ludlow, there are not enough historic properties to accommodate everyone, and the income levels of the majority of people who live and work in Ludlow will not stretch to affording a period property, so there is a significant need for affordable housing for those on typical rural economy wages, and also a need for a supply of mid-range well-designed modern housing to ensure that Ludlow continues to thrive as a market town. Ludlow currently has a significant aging population, and whilst there is a need to support young families and offer them the right sort of housing, it is also revealing to understand that in a survey of estate agents by Ludlow Town Council the most desired type of property were bungalows, but no new bungalows are being built in Ludlow. Ludlow is a town on the border of Shropshire, Herefordshire and Wales. Historically border towns are at risk of poor impetus for development from the planning authority. Ludlow Town Council asks Shropshire Council for assurances that Ludlow will be adequately supported within Shropshire's planning and economic growth strategies, policies and initiatives. Ludlow Town Council appreciates that the majority of residential and business development land is in Ludford Parish. However, the future prosperity and development of the town must be considered holistically from a joined up and inclusive perspective. Ludlow is a beautiful town and an asset for Shropshire, and Ludlow Town Council want to work with Shropshire Council to create opportunities that support the future prosperity of Ludlow. Currently, employment prospects are not growing in Ludlow, and in the past 11 years, no significant new employers have moved into Ludlow. Our town needs to be made attractive to new employers, and also retain its unique heritage appeal. Ludlow Town Council wishes to work with Shropshire Council to find the best ways to achieve positive long term outcomes for Ludlow.
A2308B37	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: LUD052: Safeguard Zone - West WAM Plan T Any development.
A2456B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	Broadly in support of the proposals put forward in the latest Regulation 18 Pre-Submission draft of the Shropshire Local Plan. More specifically, policies relating to the projected housing numbers for the borough and the amendment of the settlement boundary to include windfall sites with permission around the Principal Centre of Ludlow. Draft Policy S10.1 outlines this strategy in greater detail and on a localised scale. This policy allocates sites in order to meet the requirement of 1,000 dwellings for Ludlow. Although this is a figure that should be seen as a minimum, it is a number which is supported by Tesni. In order to meet Ludlow's ambitious strategy and approach to economic growth with inward investment, and to maintain its position as the primary location for businesses and jobs in the south of the County, the settlement will require significant housing to support its future growth. The target of 1,000 dwellings is highly appropriate especially given the settlement's position within the authority's hierarchy. Tesni are supportive of the current draft Shropshire Local Plan and in particular the proposed policy in relation to the Strategic Approach (SP2) and the Ludlow Place Plan Area (S10). The proposal to include 'Land to the North of Bromfield Road' (as identified in the Location Plan in Appendices 01) within the settlement boundary of Ludlow is supported by all parties involved.
A2457B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S10 Ludlow Place Plan Area	Agree	Response from Ludford Parish Council. Supports policy of Windfall housing development within the Ludlow Town boundary, essential to support open countryside around the town. Ludford Parish has supplied considerable amounts of land for economic development, it is not in favour of allowing windfall sites for further commercial uses outside the development boundary of the town. Ludford Parish Council supports the policy of retail development within the town and the presumption against out of centre Retail Parks. This relates directly to LUD052 and the comment from Shropshire Council on page 203 "limited service provision within the development." Ludford Parish Council regards this comment as prejudicial to any future discussions and planning applications. Since the inception of the Village Plan in 2004, Ludford Parish Council has sought to improve and protect infrastructure improvements around the southern entrance to the town. The most important of which should include curtailing heavy traffic using Ludford Bridge. The bridge is a popular viewing place for visitors, it gives access to local walks and sets the scene for the historic entrance to Ludlow. Ludford Parish Council welcomed the residential development at Rocks Green at the junction of the A49 and B4117. Keen to see policies that address the conservation of Ludford Bridge. LUD057. It is interesting to note that the current Western Power Distribution site at Riddings Road is described as "an inappropriate use in this residential area." However, its new site, within Ludford Parish, sits next to a site of 68 houses. Ludford Parish has always been keen to support appropriate developments but is not keen on being a convenient location for inappropriate commercial uses that are excluded from the town environment. LUD052. Land south of the Sheet. Ludford Parish Council were not in favour of green field development that breaches the route of the A49. Consequently the quality of the development, landscaping and infrastructure must be of the highest quality. In the final paragraph Shropshire Council makes reference to "limited service provision within the development." With the existing services at Foldgate Lane and the proposed supermarket and petrol station at Rocks Green there are ample opportunities within the locality. Ludford Parish Council expresses its concerns regarding expansion by subterfuge. The policy statements and commitments by Shropshire Council acknowledging that "Any further expansion into Ludford Parish is deferred to focus on the delivery of housing within the town."; and that "limited intensification of the cluster of development around The Sheet..." are to be welcomed by Ludford Parish Council and its residents. Since the inception of SAMdev Ludford Parish Council has continued to raise the importance of its independence whilst supporting the welfare of the town and its development. This work will continue as the parish expands and consolidates these changes, as well as protecting its individual character.
A0041B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	HKW009 site is not viable as promoter claimed to need 68 houses, but even at the reduced number of 35 there will be disruption to our business as we load and unload lorries. Last consultation large number of objections to this site.
A0054B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Sets a precedent for development north of the bypass Development north of bypass not supposed to happen - area should remain rural Development would aesthetically degrade the approach to Market Drayton from both directions along the A53 and from Adderley. Environmental assessment and appeasement work should be carried out as the ponds on the northern boundary could be important wildlife habitats (possibly Great Crested Newt breeding sites as they are present nearby)
A0054B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Sets a precedent for development north of the bypass Development north of bypass not supposed to happen - area should remain rural Site subject to flooding and provides a water retention function which if lost would increase flood risk downstream Supports wet pasture and marsh habitats Not suitable for development

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0054B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Sets a precedent for development north of the bypass Development north of bypass not supposed to happen - area should remain rural Site subject to flooding and provides a water retention function which if lost would increase flood risk downstream Supports wet pasture and marsh habitats Not suitable for development
A0054B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Sets a precedent for development north of the bypass Development north of bypass not supposed to happen - area should remain rural Development would increase risk of pollution entering water course Site is good productive farmland which should not be developed for housing
A0054B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	This site is close to Fen habitat and water course which would be at risk of pollution and degradation of an important wildlife habitat.
A0064B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	The policy map does not indicate an accurate settlement boundary for Hinstock village. Considering the recent 95 extra dwellings, a further 155 is not realistic considering the lack of amenities. A new road system with revised road junctions and adequate footpaths needs to be planned and agreed by both the Parish Council and residents before this Shropshire Local Plan is approved, Remote planning approval could result in a Judicial Review
A0130B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	School Bank is a very busy road, used by heavy/large vehicles, farm vehicles and cars. Vehicles regularly speed and the pavements are narrow and dangerous. The road cannot be widened without removing trees, which the draft site guidelines state will be retained. Visibility on the road is poor, particularly where the junction for the lower part of the village is located. Consider that creating an access from the road into the site and the extra vehicles will exacerbate these existing issues. The construction process will also exacerbate road problems. A mini-roundabout would not represent an appropriate site access as they are driven over and represent a hazard for pedestrians and other road users. There have been two other recent developments in the area. New properties on the site will overlook existing ones, resulting in loss of privacy. Whilst existing trees and hedges may be maintained, in the winter they will not protect privacy. The development will increase light pollution. Underground water needs to be considered. A stream from the pond in the upper part of the village enters our property and is then diverted underground. It is possible that the stream re-emerges lower in the village which means that it may well be under part of the field where building is proposed. The lower part of the village floods and new development increases surface water runoff, drains have insufficient capacity to accommodate this and flooding will increase. Existing wildlife will lose their habitat - many birds and small mammals use this area and will be lost. Most development makes no provision for wildlife. Developers offer green space/play areas but do not always provide
A0264B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Additional wording to complete statement and should read as follows: 5.160. A Neighbourhood Plan has been prepared for the Woore, Irelands Cross and Pipe Gate area. This Neighbourhood Plan establishes the long-term delivery strategy for the linked communities with strategically important gaps between them, as defined by the development boundary.
A0323B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A0373B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Site LCA001 should be allocated within the Local Plan. It is in a wholly sustainable location adjacent to the cluster settlement of Longford and only a short distance from the large town of Market Drayton (a Principle Centre). The site and it available and could come forward for a mixed residential development immediately.
A0389B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I disagree with your assessment that land at Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated without loss of local amenity green spaces. The land at Longford Turning provides vital and easily accessible amenity space for both physical and mental well being. Also wildlife and diversity within these spaces should be retained. It also provides a natural boundary between residential dwellings and industry. The Countryside Access Improvement Plan stipulates that dog friendly access to the countryside should be encouraged and safeguarded.
A0390B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A0391B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A0422B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	The settlement of Colehurst is omitted as a cluster settlement in this policy and should be included. It is as sustainably located as the other settlement indicated and its inclusion will I strengthen the the plan overall
A0425B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	The Community Hub of Woore Irelands Cross and Pipe Gate does not include any boundary or allocations for Pipe Gate. Site promoted in Pipe Gate should be included for a housing allocation to address the shortfall in delivery since the SAMDev was adopted and meet the growing need for different types of housing identified in the NPPF and the draft Local Plan
A0436B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Support identification of Market Drayton as a Principal Centre and the proposed housing and employment guidelines However development boundary could be extended so that it is more logical and provides greater windfall opportunities. Particularly with regard to MDR013, which should be included within the development boundary given that it is surrounded by existing built form/proposed allocation MDR006 (which lies to the north and west of the site, whilst existing built form is to the east and south). Inclusion of MDR013 in the development boundary would afford efficient use of the land and represent a logical windfall opportunity or could deliver suitable roadside uses. MDR013 is around 0.49ha and is afforded road frontage with good visibility, subsequently it is considered sufficiently large enough to cater for several uses. It is noted that a signalled pedestrian crossing is proposed as part of MDR006, this could also serve MDR013
A0437B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Support identification of Cheswardine as part of a Community Cluster as this will remove the development boundary and provide opportunity for new housing on suitable sites - challenge SP8. CHS004 is a suitable site for development but may not comply with Policy SP8. The site is located within the 30mph speed restricted area of the village; within walking distance of Nursery School, Primary School, Community Shop run by volunteers, Large Park, Children's Play Park, Village Hall, Bowling Green, Two Public Houses and the Church, and served by 'Border Car' Dial-a-ride bus service. Failure to plan positively and appropriately for settlements will negatively affect the existing range of facilities. For example, it is understood that the number of pupils enrolled at the school are falling due to lack of development in the village, subsequently there is a risk that if numbers continue to fall, the school could face closure. It should be noted that the approved redevelopment of Cheswardine Farm, North East of CHS004, has not delivered the anticipated new dwellings as yet (24no. dwellings). Thus, it is increasingly important that Cheswardine can expand appropriately allowing new suitable housing developments.
A0443B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Welcome inclusion of Hinstock as a Community Hub. Recognise that the settlement has a range of facilities and services. Concerned the proposed development boundary is overly restrictive and will not allow the targeted amount of housing to be delivered. The development boundary should be expanded to reflect recent development to the south and logical opportunities to round-off the settlement, including land in the immediate vicinity of the Old Malthouse. Land at the Old Malthouse is at the heart of Hinstock Village and affords the opportunity for additional windfall development without major alterations to the development boundary. Modest development in this location would complement its surroundings. Other nearby developments have benefited the community by increasing the stock of new homes and introducing new families into the community to support the existing facilities. A similar development of two homes could be accommodated on the subject land. The subject site is afforded suitable road frontage to Marsh Lane, an adopted public highway, and there is mains drainage available in the vicinity. For the Local Plan to be considered sound, sufficient opportunities for windfall development need to be allowed.
A0448B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Disagree with the inclusion of land Longford Turning (MDR031) within the Local Plan now or in the future. Other more appropriate areas for housing have been proposed for allocation within the Local Plan, which would not result in loss of local amenity green spaces and more than satisfy local need. MDR031 provides vital and easily accessible amenity space for our local community. Particularly during lockdown, when we have been reminded how important green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces which needs to be retained for the benefit of the community. It would be vandalism to cut down 100's of trees on the site. Particularly as National Policy supports planting of new trees. MDR031 also provides a natural boundary between residential dwellings and industry. Shropshire Councils Countryside Access Improvement Plan (2018-2028) stipulates dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage".
A0449B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Disagree with the inclusion of land Longford Turning (MDR031) within the Local Plan now or in the future. Other more appropriate areas for housing have been proposed for allocation within the Local Plan, which would not result in loss of local amenity green spaces and more than satisfy local need. MDR031 provides vital and easily accessible amenity space for our local community. Particularly during lockdown, when we have been reminded how important green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces which needs to be retained for the benefit of the community. It would be vandalism to cut down 100's of trees on the site. Particularly as National Policy supports planting of new trees. MDR031 also provides a natural boundary between residential dwellings and industry. Shropshire Councils Countryside Access Improvement Plan (2018-2028) stipulates dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage".

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0508B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	We consider that the Plan is unsound as it is not positively prepared and that its failure to make an allocation or allocations in Woore will undermine the Council's objective of sustaining rural settlements. The change to the Plan that we seek that would in our view address this issue is for the Council to allocate land that is within MPG's control at Audlem Road, Woore. The site extends to approximately 4.7 hectares and is located on the south side of Audlem Road on the north western edge of the village. It is well located to the centre of the village, being approximately 200 metres away from the site.
A0625B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	All references to Victoria Wharf to read Victoria Farm Using the wording suggested below will make the developments read as more deliverable schemes Page 212, S11.1, paragraph 4 4. Land is specifically allocated for this purpose and it is recognised there are opportunities to deliver a marina and related uses on land at Victoria Farm. Page 213 Schedule S11.1(i) MDR012, paragraph 1 The development of a new marina at land adjacent to Victoria Farm is a firm opportunity and should be considered as part of the development of this site. Page 214, Schedule S11.1(i) MDR034, paragraph 1 The development of a new marina at land adjacent to Victoria Farm is a firm opportunity and should be considered as part of the development of this site. Page 216, paragraph 5.155 5.155. During the process of the Neighbourhood Plan for Market Drayton a questionnaire was distributed to all the residents of Market Drayton and the surrounding areas. There was resounding support for the development of a Marina of over 70% of residents. In seeking to utilise the town's proximity to the Shropshire Union Canal, the development of a marina is another key objective for the town, in recognition of the economic and social benefits this could bring as identified in the current Shropshire Core Strategy, upon securing the support of the Canals and Rivers Trust. It is considered that in principle land at Victoria Farm identified on the Policies Map is capable of delivering such a marina alongside associated uses.
A0626B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Changing the wording as indicated below will make the document sound as more deliverable Page 212, S11.1, paragraph 3 3. The relocation of Market Drayton Sports facilities to land at Longford Turning, allocated on the Policies Map, is a central objective of the Strategy, and housing development (MDR39 and MDR43) has been identified specifically to support its delivery. Page 216, paragraph 5.154 5.154.. To support the relocation of the sports facilities the strategy recognises that there is a presumption in favour of supporting additional residential windfall development at the existing Greenfields site given the sustainability credentials of this site its proximity to other existing and planned residential developments.
A0662B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A0685B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Policy S11.2 (page 217) deals with the Community Hubs within the Market Drayton Place Plan area. There is no objection to the allocation of an additional 88 dwellings within this hub at Woore, Irelands Cross and Pipegate. Support is given for policy text which supports appropriate small-scale windfall residential development within the settlements development boundary, as shown on the Policies Map. To avoid doubt this should confirm that small scale means up to and including 10 dwellings. Additionally and again to avoid doubt and give certainty the site at London Road should be included as an allocated site within this draft plan. It is anticipated that if the present planning application on the site and/or the lawful development certificate is approved this site will be completed well before this revised plan is adopted. The policy planning team are informed that as matter of fact site drains have been installed and detailed reserved matter approvals have been granted in respect of the site. Once the present impasse with the council's development management team is resolved work on this development can continue.
A0698B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree with and fully support conclusions that MDR014 should not be included within the draft Local Plan, now or in the future. Urge Shropshire Council to retain this view in any future consultations and look favourably on a proposal to designate MDR014 as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. MDR014 should remain as high quality, vastly diverse, organic agricultural land. Fordhall Farm (adjacent) is a vital resource to our local community and a flagship for our area, both locally and nationally. It needs to be protected
A0853B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	The identification of Market Drayton as a Principal Centre is supported and the level of growth is broadly supported too. However, Market Drayton could accommodate a higher level of housing growth. It is a sustainable location for new development, and there are suitable unconstrained sites available for development, in particular to the north of the A53. The draft plan proposes that Market Drayton should accommodate 1,200 dwellings but it is not clear from the available evidence base, why certain other settlements within the same tier of the hierarchy, are apportioned higher levels of growth than Market Drayton. For example, it is proposed that all of the Principal Centres would accommodate dwelling growth of 19-22% save for Bridgnorth (29%, increased from 24% in the Preferred Sites consultation) and Whitchurch (35%). It should also be noted that 35ha of employment land is allocated in Market Drayton, which is substantially more than the quantum of employment land allocated in all of the other Principal Centres with only 20ha is allocated in Whitchurch, except for Oswestry where 57ha is allocated. Therefore, with 35ha of allocated employment development available in Market Drayton, additional housing development in the settlement would be logical in the context of aligning housing and economic growth and delivering a sustainable pattern of development. Furthermore, Whitchurch already benefits from one significant housing allocation (Tilstock Road) which raises concerns that additional housing allocations could compromise the delivery of this strategic site. Market Drayton is the other Principal Centre located in the north-east of the county, and is well placed to accommodate any additional growth that cannot be delivered in Whitchurch
A0853B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Support the allocation of MDR006 which is controlled by SLG, and considered to be deliverable in the first 5 years of the plan period. A full analysis of the site is provided in the representation. The draft allocation is for approximately 125 dwellings. We consider that this quantum of development is realistic and is therefore supported. However the capacity could be increased if the Council considered that a higher density development would be more appropriate. The 2018 SLAA identifies an indicative capacity of 137 dwellings for the site. The previously submitted illustrative layout took into account the technical work commissioned by SLG, as discussed above, and demonstrates that the site can accommodate approximately 131 new homes, including affordable housing. This accounts for a policy compliant level of public open space (amounting to almost 10% of the gross site area), and the retention of key features such as trees and hedgerows.
A0853B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	The principle of a new marina in the town is supported and the principal of allocating MDR012/MDR034 for residential development is not challenged in principle because there is a residual housing requirement of 435 dwellings (along with a windfall allowance for 206 dwellings) which cannot be met on MDR006 alone. There is concern however, that the complexity of delivering a marina alongside a housing development means that the first homes may take some time to be delivered and occupied. This is reflected in Appendix 7 of the plan, which identifies that the sites will deliver in the medium – long term. Therefore to ensure that a five year supply of housing land may be maintained, further provision for housing development should be made through additional allocations within Market Drayton for deliverable sites free of constraint, capable of coming forward early in the plan period including an increased housing capacity to 131 dwellings or even 137 dwellings (from the current capacity of 125 dwellings) on existing allocation MDR006.
A0853B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	The principle of allocating MDR039/MDR043 to deliver playing fields and to continue the allocation in the Draft Market Drayton Neighbourhood Plan is supported especially because there is a residual housing requirement of 435 dwellings (along with a windfall allowance of 206 dwellings) which cannot be met on MDR006 alone. There is concern however, that the delivery of the site for the playing fields is reliant upon land in third party ownership, and furthermore any planning application involving the provision of new playing fields is likely to be extremely complex. It is not clear whether there is sufficient evidence to justify the site being identified for delivery within the short term, as suggested in Appendix 7 of the draft plan. Therefore to ensure that a five year supply of housing land may be maintained, further provision for housing development should be made through additional allocations within Market Drayton for deliverable sites free of constraint, capable of coming forward early in the plan period including an increased housing capacity to 131 dwellings or even 137 dwellings (from the current capacity of 125 dwellings) on existing allocation MDR006.

Page 187

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1119B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Summary document of responses included in wider representation which concludes Acknowledge the Stoke Upon Tern Neighbourhood Plan, its robustness and recognise that it should be given significant weight in planning decisions and accordingly, designate the area as a Community Cluster under Schedule SP2.2 and change Policy S11.3 to account for this; Provide a positive framework for residential park homes by acknowledging the legal obligations imposed on the authority by the Housing and Planning Act 2016; Further enhance the framework by recognising the benefits and role of residential park homes which are wide ranging from assisting the housing market more generally to providing low-cost accommodation for local people; Introduce an entirely new policy relating to residential park homes including earmarking a proportion of the authority's total housing requirement for this type of residential accommodation; Allocate land adjoining the southern boundary of Warren Park as an extension to the park with a capacity of around 33 residential park homes given the plan currently makes no provision at all for this type of residential accommodation; Change Policy SP8 so that low cost housing, such as residential park homes, is included as an additional form of residential development, which will be allowed in principle in Community Clusters; and, Change Policy SP9 to include residential park homes as an additional form of residential development that is acceptable in the countryside, subject to being in accordance with specific criteria.
A1125B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Confirm that NIH is content with its entry in the Local Plan, noting the Community Cluster allocation
A1138B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future.
A1138B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I disagree that MDR031 should be included in the local development plan. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. If this land is built on it would be a huge loss to the community as a space to walk, and around nature and it would mean the killing of so much wildlife. Please reconsider building on this land.
A1144B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A1145B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I agree with Shropshire Councils assessment that land Longford Turning (MDR031) should be excluded from the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage". I would also like to add that the planet needs to be encouraging the growth of wildlife as we see every day on tv. We are destroying habitats. Just to make way for houses that could be built in more suitable areas. This small area of land is one of very few places in market drayton for nature to live along side us in the woodland and the surrounding long grasses and brash
A1145B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I agree with Shropshire Councils assessment that land Longford Turning (MDR031) should be excluded from the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage". I would also like to add that the planet needs to be encouraging the growth of wildlife as we see every day on tv. We are destroying habitats. Just to make way for houses that could be built in more suitable areas. This small area of land is one of very few places in market drayton for nature to live along side us in the woodland and the surrounding long grasses and brash
A1151B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	S11 indicates the requirement for sustainable drainage strategies to support delivery of allocations. This approach is very much supported by United Utilities and we wish to highlight our free pre-application service for applicants to discuss and agree drainage strategies to support planning applications in Market Drayton and elsewhere in the borough where we are the relevant water company. We cannot stress highly enough the importance of contacting us as early as possible. Pre-application discussions with United Utilities should be consistent with those with the LPA as they do not override the planning application process, and information submitted to United Utilities must be consistent with the planning application that they are proposing to submit. Should any circumstances change, we would recommend that a pre-application to United Utilities is resubmitted to highlight any changes. As referenced in our previous representations and discussions with the LPA, the experience of United Utilities is that where allocations are large and in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. This can lead to issues between interconnecting infrastructure between phases of development. We are pleased to see the LPA use the above policy to influence a co-ordinated approach to ensure sustainable development from both the GMSF and future Local Plan allocations. We believe this is in the best interests of achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner. Future allocations in Market Drayton are close to existing infrastructure assets, but future applicants must be aware that they are located on the fringe/limits of the existing water supply and/or sewerage infrastructure networks. The network in these areas generally are of size that reflect their greenfield location. The current infrastructure may have limited capacity to support the planned growth. Providing a co-ordinated approach to infrastructure by collaborating with United Utilities will result in providing assets required to support the planned growth, in line with any sustainable drainage solution. Any growth in a co-ordinated matter with the LPA and United Utilities to ensure new infrastructure provision does not cause any unexpected delays to new development.
A1152B43	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	During the Preferred Scale and Distribution of Development consultation 1,200 dwellings and 13ha of employment land was proposed (based on the proposed balanced growth). This remained the same during the preferred sites consultation. In the draft Local Plan the housing guideline remains the same, however, the employment land guideline has been increased by 22Ha to 35Ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed. This does mean that housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting.
A1157B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A1158B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I agree with Shropshire Councils assessment that land Longford Turning (MDR031) should be excluded from the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage".
A1169B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I disagree with Shropshire Councils assessment that land Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage" **ALSO SEE SECOND EMAIL RECEIVED VIA MP A1169 WITH FOLLOWING INFORMATION - I am writing to you today to ask for your support in overturning the development plans put forward for the Longford Turning development in Market Drayton. The woodland and wild areas set for development are important not only to our local community, but also for our native wildlife. There are countless species of plant, bird, wild, and insect life living in the grassland, woodland, and riverside scrubland that would be displaced, destroyed, and lost if the development were to go ahead. Any faith I may have had in the development being sensitively handled in regards to the natural residents was destroyed when the scrubland down by the river, which is covered in the plans, was illegally razed to the ground during nesting season. Multiple nests of varying species were destroyed, not to mention the loss of habitat for insects and destruction of the plants themselves. The space is well used by the local public of all ages, enjoying nature and the freedom it brings. There are precious few places like this left, and the current state of our climate calls for us to be creating more woodland to protect our future, not for it to be pulled down and replaced with housing. Furthermore, from looking at public information, this development falls outside of Market Drayton's development boundary. I fully support the current development boundaries of the town and would accept happily the building of these houses within that area. However the destruction of established woodland outside of the boundaries is wholly unacceptable. I believe that it would benefit the town and local community much more, if the Longford Turning area were to remain as the wildlife haven and public space it is now. Please voice your support in overturning these plans
A1169B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Email to MP Owen Patterson covering same points as A1169B1: I disagree with Shropshire Councils assessment that land Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage" **ALSO SEE SECOND EMAIL RECEIVED VIA MP A1169 WITH FOLLOWING INFORMATION - I am writing to you today to ask for your support in overturning the development plans put forward for the Longford Turning development in Market Drayton. The woodland and wild areas set for development are important not only to our local community, but also for our native wildlife. There are countless species of plant, bird, wild, and insect life living in the grassland, woodland, and riverside scrubland that would be displaced, destroyed, and lost if the development were to go ahead. Any faith I may have had in the development being sensitively handled in regards to the natural residents was destroyed when the scrubland down by the river, which is covered in the plans, was illegally razed to the ground during nesting season. Multiple nests of varying species were destroyed, not to mention the loss of habitat for insects and destruction of the plants themselves. The space is well used by the local public of all ages, enjoying nature and the freedom it brings. There are precious few places like this left, and the current state of our climate calls for us to be creating more woodland to protect our future, not for it to be pulled down and replaced with housing. Furthermore, from looking at public information, this development falls outside of Market Drayton's development boundary. I fully support the current development boundaries of the town and would accept happily the building of these houses within that area. However the destruction of established woodland outside of the boundaries is wholly unacceptable. I believe that it would benefit the town and local community much more, if the Longford Turning area were to remain as the wildlife haven and public space it is now. Please voice your support in overturning these plans

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1623B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm is not included, it needs to be protected.
A1627B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm is not included, it needs to be protected.
A1628B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm is not included, it needs to be protected.
A1632B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm is not included, it needs to be protected.
A1636B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1643B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1651B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1701B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with you that the Land at Fordhill Farm should not be included in the Plan. The land should remain as agricultural and be available to Fordhill Farm to purchase. This facility is a vital community resource and it is not suitable for development at all. Please look favourably on a proposal to designate it as a "Local Green Space" to ensure the land is retained as a green gateway to the town. Fordhill Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A1811B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1811B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Disagree with the 'broad location for proposed relocation of Sports Facilities' in the Longford area. The town's sports facilities should be retained within the town's existing boundary. Moving the sports facilities out of town will increase car traffic or require children to walk along narrow unlit country roads to use the facilities. I would urge the Council to rethink the relocation of sports facilities. By all means develop Greenfields for residential use, but consider consolidating sport facilities on the Grove School site which would benefit the School and wider community.
A1819B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1820B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1825B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1828B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1829B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1830B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1831B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1838B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1840B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1844B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Reference should be made to connection with and improvements to the canal towpath. Development should mitigate impact on the towpath caused by increased useage. There are no proposals for a marina and this reference in the third paragraph of the guidelines should be deleted. Future development should positively address the adjoining waterspace and the opportunities it presents and have no adverse impact on the structural integrity of the canal corridor or detrimental impact on heritage, ecology, or character. The planting of large trees (within any buffer to the canal) may not be appropriate.
A1844B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Reference should be made to connection with and improvements to the canal towpath. Development should mitigate impact on the towpath caused by increased useage. There are no proposals for a marina and this reference in the third paragraph of the guidelines should be deleted. Future development should positively address the adjoining waterspace and the opportunities it presents and have no adverse impact on the structural integrity of the canal corridor or detrimental impact on heritage, ecology, or character. The planting of large trees (within any buffer to the canal) may not be appropriate.
A1844B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Marina's are not generally supported by the Canal and River Trust. There is no specific proposal for a marina at Victoria Wharf and this reference should be deleted from the text and the policy map. The inability to guarantee that any site will ultimately be able to connect to the waterway network means that the wording of para 5.155 should be amended to 'it is considered that in principle, land at Victoria Wharf may be capable of delivering such a use if able to demonstrate the capability of the canal network to accomodate it'. Reference to the Canals and Rivers Trust should be corrected to Canal and River Trust.
A1844B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Whilst there is no site allocation for a marina, we suggest that some minor re-wording of the development strategy to address the Canal and River Trust's concerns around the need for such a development to pass the Trust's process for dealing with connections to our waterways is needed. It is difficult for both the Trust and the LPA to determine the deliverability of a marina scheme at this stage. Suggest point 4 is amended to read 'it is recognised that there may be opportunities to deliver a marina'. It may also be more appropriate to refer to aspirations for a marina rather than the potential for a marina.
A1848B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1850B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1854B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I disagree that site MDR014 should be considered for development for the following reasons 1. The site is currently used as Organic Agricultural Land as it is rented to Fordhall Community Farm and therefore should be classed as valuable farm land which is already farmed in a sustainable way. The organic status of the farm is highly likely to promote and sustain greater biodiversity than any mitigating measures proposed by developers for a relatively small site. 2. The site in its current agricultural use allows the neighbouring farm to remain sustainable as a business. As grazing land this land frees up areas of the farm where biodiversity is greater. These areas are used recreational facilities, providing an accessible outdoor space for walking and education. This is a valuable space for the health and wellbeing of the surrounding community. The size of the site does not offer sufficient affordable development opportunity to mitigate the loss of the natural habitat. 3. The site scores poor on the SA and the subsequent assessment does not provide justification for this to be considered as a future development site
A1856B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Agree that Fordall Farm should not be included as a preferred site
A1859B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Carter Jonas LLP is instructed by Müller UK to comment on the Council's Regulation: Pre-submission Draft of the Shropshire Local Plan. Müller UK owns and controls the 25 ha 'protected employment land' site located north of the A53 and south of Longford. The site has the benefit of an extant permission for new production and distribution buildings lorry parking (permission ref. 07/02018/EIA). Müller UK would question the appropriateness of the proposed housing allocation on land to the east of the 'protected employment site' (Site Ref. MDR043 & MDR039). Müller UK is concerned that locating housing close to its major development site could give rise to amenity concerns from occupants of the proposed housing site which, in turn, could affect adversely its ability to make full use of its landholding for production, warehousing and other related development.
A1877B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I agree with Shropshire Councils assessment that land Longford Turning (MDR031) should be excluded from the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community.
A1878B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I agree with Shropshire Councils assessment that land Longford Turning (MDR031) should be excluded from the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community.
A1882B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	disagree with Shropshire Councils assessment that land Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage"
A1883B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A1887B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected
A2100B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected. Fordhall Farm has a reputation as a beacon of sustainable and resilient agriculture that extends far beyond the borders of Shropshire. In a post-Brexit, climate-challenged environment, allowing development on this land would send all the wrong signals about Shropshire Council's concern for the future.
A2111B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I disagree with Shropshire Councils assessment that land Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage"
A2113B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A2115B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Proposed development at Longford Turning Market Drayton, I am against the area proposed for development, it should not go ahead as it takes away an area where local people & wild life can enjoy together. People out dog walking, would then have to seek open space, possibly adjacent to farmland. Also the elderly people living on the Sherwood ave estate, would surely have their lives blighted by the increased noise caused by the footfall through the public pathway that run between the areas.
A2124B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A2133B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected. This land has been farmed organically for many years. Such ecologically managed and diverse ecosystems should be protected. The loss of numerous plants and animals is contributing to the climate emergency. By preserving this land and protecting it from development Shropshire Council is making a contribution to the future of the county, the country and the planet. Much of Shropshire is now owned by groups whose objective is to make financial gains from the limited land available. Please demonstrate that Shropshire Council cares about the environment above financial profit and values the future.
A2134B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I disagree with Shropshire Councils assessment that land Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations including the future development of the MOD Tern Hill Barracks more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage" The assessment has no mitigation factors to the flooding of the River Tern and its adjacent tributaries. The assessment does not address the existing woodland, tree preservation etc.....
A2136B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I disagree with Shropshire Councils assessment that land Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations including the future development of the MOD Tern Hill Barracks more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage" The assessment has no mitigation factors to the flooding of the River Tern and its adjacent tributaries. The assessment does not address the existing woodland, tree preservation etc.....

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2312B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Council's current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected. Although I am not a resident of Market Drayton, I have been a strong supporter of Fordhall Farm since its creation and greatly value the huge and varied contribution it makes to life in Shropshire. Any development which could restrict or in any way negatively impact on Fordhall's work should be discouraged.
A2329B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	MDR031 should not be included. It has mature trees, it would cause noise/air pollution, water runoff, erosion, wildlife habitats are there, contrary to the Neighbourhood Plan policy MDNDP7, other allocations more than satisfy the need
A2334B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	MDR031 should not be included. It has mature trees, it would cause noise/air pollution, water runoff, erosion, wildlife habitats are there, contrary to the Neighbourhood Plan policy MDNDP7, other allocations more than satisfy the need. Market Drayton is already over-populated.
A2355B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Council's current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital and long-established community resource. It is extremely well known for its long-standing commitment and practice of organic farming, and it is therefore a very important continuing attribute - indeed a flagship - not only for Market Drayton and North Shropshire, but for Shropshire as a whole. If this is to be sustained needs long-term protection. I want Fordhall Community Farm to continue to be a successful organic farming venture and Cottage field is an integral part of the farm. Since there is space for development elsewhere (adjacent to the town bypass) there is no need for development on this part of Fordhall Farm.
A2356B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	The destruction of the Longford Turning Woods in Shropshire is outrageous!! How can the Shropshire Council advertise that they are going to plant a tree for all Shropshire residents on naked land when they then want to go and tear down all the trees, shrubs and kill animals in the woods. Residents and the community of Shropshire is up in arms about this and quite rightly too. YOU CAN NOT DESTROY NATURE!!!
A2357B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Opposes development on the site as it will result in a loss of ancient woodland and have an impact on wildlife in the area.
A2359B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Council's current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital and long-established community resource. It is extremely well known for its long-standing commitment and practice of organic farming, and it is therefore a very important continuing attribute - indeed a flagship - not only for Market Drayton and North Shropshire, but for Shropshire as a whole. If this is to be sustained needs long-term protection. I want Fordhall Community Farm to continue to be a successful organic farming venture and Cottage field is an integral part of the farm. Since there is space for development elsewhere (adjacent to the town bypass) there is no need for development on this part of Fordhall Farm.
A2360B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Council's current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A2361B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Council's current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A2374B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I wholeheartedly support Shropshire Council's current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A2412B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	SEE A2412 ATTCHED DOCUMENT S11.1 text.pdf Object - Please see the attached document. Objection to S11.1 Points 3 and 4 and S11.1(i) - Point 3 and MDR039 and MDR043 Land at Longford Turning. Site MDR012: Land to the east of Maer Lane, north of the A53. Site MDR034: Land to the west of Maer Lane, north of the A53. Site MDR006: Land adjoining Adderley Road, Market Drayton. Alternative option - Sites MDR014 and MDR031 provide a deliverable alternative. This document demonstrates that the land is suitable, available and achievable for housing or employment development. The land is in a single ownership and can be brought forward quickly to meet the housing need, and meets the requirements of the NPPF (2019). We therefore respectfully request that the Council considers MDR014 as a key allocated housing site for retirement living and land at MDR031 allocated housing site and allocate them within the Shropshire Local Plan Review. Space has been left for a potential community facility and we would like to investigate this further with the Council for doctors or nursery or any other community facility and would consider the revision of the scheme to include certain larger community facilities if and where they are required in the local area. If both options were allocated than this would viable allow for the Tern Valley to be completely opened up as natural open space. We look forward to working with the Council to facilitate the exciting development which will make a significant contribution to the local community and environment of Market Drayton and to Shropshire. We respectfully request that MDR014 and MDR031 are considered for allocations within the plan. As demonstrated the sites suggested within the plan have a number of deliverability and viability issues which restrict them being brought forward in its current form the plan is unsound for Market Drayton.
A2412B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	We support the Point 1 and support aspirations to deliver around 1,200 homes in Market Drayton. We support the ability for windfall sites to come forward within the settlement boundary (Point 2). However, we object to delivery of the housing, the approach taken, the site selection the sustainability appraisal and the level of allocations per site - this is set out in our representation to S11.1 points 3 and Point 4, and also to S11.1 (i). Please
A2419B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	I am disagreeing with your stance on p54 that development on the land at Longford turning could be developed on. I disagree with Shropshire Councils assessment that land Longford Turning (MDR031) should be included in the local development plan. I also urge the council to retain this stance in the future. Other more appropriate areas for housing have been allocated within the local plan, without loss of local amenity green spaces. These other allocations more than satisfy our local need. The land at Longford Turning provides vital and easily accessible amenity space for our local community. It has been specifically vital during lockdown when we have been reminded how important these green spaces are to both our physical and mental well-being. There is also huge amount of wildlife and diversity within these spaces that we need to retain for the benefit of our community. Once woodland is lost it can not be replaced easily and providing open grass land as a replacement would not retain the biodiversity of plants and animals current found on this land. It also provides a natural boundary between residential dwellings and industry. Shropshire County Councils Countryside Access Improvement Plan (2018-2028) stipulates that dog-friendly access to the countryside, outdoor volunteering and outdoor recreation needs to be encouraged and safeguarded. The document specifically points out a need to "work with other partners... to maximise economic benefit, whilst protecting natural and cultural heritage"
A2468B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Policy S11 Market Drayton Place Plan Area seeks to deliver 1,200 dwellings and to make available 35 hectares of employment land over the plan period. It has been observed under submissions to Policy SP2 that the 1,200 dwelling figure for Market Drayton is on the low side compared to other Principal Centre settlements. As the policy states the town is a focus for strategic growth objectives in the north-east of the County. The figure of 1,200 dwellings appears arbitrary and has not been justified by any evidence. The Plan proposes the allocation of four sites, all located to the north and west of the A53 that provides a by-pass to the town. These allocations total 435 dwellings. The Plan states that the relocation of Market Drayton Sports facilities on land at Longford Turning is a central objective of the Strategy, and that housing development (MDR39 & MDR43) has been identified specifically to support its delivery. The Development Guidelines for MDR39 & MDR43 is explicit in stating that "the delivery of this proposal is subject to it supporting the proposed relocation of the Market Drayton Sports Association Facilities". However, explanation paragraph 5.154 confirms "that the proposed relocation of the sports facilities is not guaranteed, with the viability of the proposal being a particular consideration". Accordingly, the rationale and justification for allocating sites MDR39 & MDR43 is acknowledged in the plan to have clear deliverability concerns. This was a concern of the Examiner who's Report on the Examination of the Market Drayton Neighbourhood Development Plan in October 2018 found many of the proposed policies (including this one) to fail the Basic Conditions. Proposed allocation MDR39 & MDR43 is therefore considered unsound as it is not justified. Similar soundness failings are evident with proposed housing allocations MDR12 and MDR34 being the required links to a marina development. The Development Guidelines for both allocations state "Where a proposal for a new marina in this location is suitably advanced development on this allocated site will be expected to contribute to initial feasibility work as a contribution to supporting this opportunity. The delivery of both these sites are therefore contingent on the delivery of a new marina - the location of which is not identified on the Policies Map - and is therefore subject to significant uncertainty". Again, due to significant deliverability concerns proposed allocations MBR12 and MDR34 are not justified. Appendix 5 to the Plan sets out where the supply for each settlement is coming from; for Market Drayton the total potential supply, including the 435 in proposed allocations and 206 in windfalls, add up to 1,200 dwellings exactly. There is no buffer and no evidence to support the predicted delivery of 206 windfall dwellings. Additional provision should therefore be made at Market Drayton in order for the plan to be positively prepared and to ensure that at least 1,200 dwellings as a minimum are indeed delivered over the plan period. Finally, it is not clear in the Plan or in the evidence base how the sites for allocation have been selected, having regard to the reasonable alternatives. Submissions are made in respect of the SA, but it is noted that the SLAA purports to be a 'live' document and that sites can be submitted at any time (SLAA paragraph 1.22). The SLAA is clearly an important resource as part of this site selection process. Whilst site MDR048 is considered as part of the SA, it is not included in the SLAA. Greater clarity is required on the site selection process in order for the plan to be justified.
A2470B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Gladman suggest that Market Drayton as a principal centre can and should support more than 1,200 dwellings over the course of the plan period. This figure equates to only around 3.9% of the total housing requirements whereas the requirement for 35ha of employment land is around 11.6% of the employment target. There is a clear imbalance between the two figures, to support the development of the level of employment land anticipated and to avoid unsustainable commuting patterns, further strategic housing growth should be allocated to Market Drayton. MDR042 should therefore also be considered as an allocation, adjacent to the current preferred option MDR006
A2470B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Site is in proximity to many of the town's facilities and services, and will provide affordable housing and sports pitches.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2470B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	Support this allocation and are working with the landowner. This policy is supported. As currently defined, the area and shape of the proposed allocation does not seem to lend itself to a well-conceived and high-quality form of development. We would be happy to work with the Council in determining an appropriate shape and area which reflects the development quantum across this and site MDR039, as assessed in the Sustainability Appraisal.
A2474B1	Viability and Deliverability of Proposed Site	Draft Policy Area S11 Market Drayton Place Plan Area		
A2477B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	My client and respondent to this submission is the sole owner of the site hereby (known as MDR015) proposed for development and which this submission supports as a key development site. The site is free of any legal or contractual impediment and there are no known technical constraint This site is proposed as a residentially led or residential site in advance of or in addition to site MDR006 which is at present allocated for housing development in this draft plan. Please amend the plan by including site MDR015 in the plan ahead of or in addition to site MDR006. In the council's own Market Drayton Place Plan site assessment MDR015 scores fair and -2 whereas site MDR006 scores only -4. By the council's own assessment site MDR006 is the more suitable and sustainable than the presently allocated site. No sound planning reason has been found in council documents to justify setting aside the council's own intent to place sustainable decisions and sustainable site allocations at the heart of their own policy formulation. To remedy this the plan should be changed by allocation site MDR15 ahead of or in addition to site MDR006. It can be proposed as a wholly residential application or a residentially led allocation
A2477B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Disagree	Clause 7 of the policy should change by including site MDR0015 as an allocated residential or residentially led site. All the development guidelines that apply to site MDR006 can be met on site MDR015 and it can deliver the same if not more housing units. Paragraph 5.5156 says this: 5.156. In order to provide further certainty to housing delivery and to ensure the proposed local housing requirement is achieved by 2038, the Local Plan also proposes the inclusion land off Adderley Road shown on the Policies Map for around 125 dwellings. It is considered this site complements the delivery of the objectives of the town and can be delivered relatively early in the plan period. These sentiments apply also to site MDR15 with the added benefit of the site scoring higher against the council's own sustainability and suitability appraisal. Site MDR015 lies adjacent to an existing employment area which already projects Northwards out of Market Drayton. Site MDR015 would be contiguous with this settlement form whereas MDR006 would not be to the same degree. My client is aware of the findings of the independent inspector who reported on the draft Market Drayton Neighbourhood Development Plan on 30th October 2018. In dismissing that draft plan the examiner noted: "2.18 A Health Check was undertaken on the (amended) plan in August 2017 (and is included as Section 7 of the CS). It made a variety of helpful suggestions, particularly to improve drafting, as well as highlighting two issues of concern: "...the methodology of site selection and discounting must be more clearly expressed in order to robustly back up the sites included and excluded from the plan"; and "The consultation between the parishes prior to and after designation, in preparing the plan, is an area of very significant, fundamental concern." 2.19 The question arises as to what the Town Council did about these two key recommendations. I raised both topics as part of the hearing agenda. As to the site selection process, I did not find any development of a methodology as suggested. I accept that such assessments must be proportionate to the task in hand. Nevertheless, I felt that the Town Council simply carried on in its belief that no further exercise was necessary; in one case, as it was the only site with a willing owner it was considered to be sufficient to conclude on its suitability." These findings and the abandonment of a plan because it was not soundly prepared ought to be a clear indicator to the local planning authority that it cannot advance sites in a plan ahead of other sites especially where the favoured site scores less in its own sustainability and suitability checklist than the site not favoured for adoption at present. This applies in respect of sites MDR006 and MRD015. Site MDR015 is the more sustainable and suitable development site, is free from technical or legal constraint and has an owner willing to release it quickly for development. There is no sound planning reason not to advance it ahead of MDR006
A2483B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A2491B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area	Agree	I agree with your conclusion that land at Fordhall Farm should NOT BE INCLUDED within the Local Development Plan now or in the future. The land should remain as high quality, vastly diverse organic agricultural land and therefore be available for Fordhall Farm to purchase. This facility is a vital resource to our local community. I whole heartedly support Shropshire Councils current view that it is not suitable for development, now or in the future. I would urge the Council to retain this view in any future consultations and urge you to look favourably on a proposal to designate it as a "Local Green Space" to ensure this land is retained as a green gateway to the town and a community resource for us all. Fordhall Farm is a vital community resource and a flagship for our area, both locally and nationally. It needs to be protected.
A2507B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S11 Market Drayton Place Plan Area		In response to the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, we set out comments on behalf of the Landowner. This consultation report should be read in conjunction with both Part A and Part B of the consultation response forms; the response was made in September 2020. The Landowner is in support of sites HHH001 and HHH014 being allocated for residential development and can confirm their availability to come forward early on in the plan period. Their allocation further supports sustainable growth of Hodnet which in turn is vital to support the key services that exist for the benefit of the local area. The sites have been identified as providing 40 dwellings as part of the Hodnet Community Hub (page 217 of the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan), incorporating sustainable drainage and flood management strategies as well as conservation of local habitats and heritage assets. Given the size of the sites then an allocation of 40 houses and associated open space requirements could be enhanced to increase the number of houses to 60 with a more coherent masterplan approach to open space taken especially given the space coming forward through a nearby existing consent and the other green facilities already available. We further believe that the Plan should allow for further windfall sites and allocations at future stages of review to continue this growth which should be focused in spatial planning terms in the southern part of the village to avoid detrimental impact on the character and landscape area of the settlement. We support the proposed affordable housing percentage at 15% of the development as the sites lie within area B on the Shropshire Council Affordable Housing Area map and that this area would fall outside of the Community Infrastructure Levy (CIL) boundary – to date other sites subject to CIL historically have been delayed or limited by the burden of CIL when these consents have also delivered into local facilities in addition.
A0002B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Agree	When describing amenities within hubs /villages public houses, churches and other very active groups are not mentioned. Thankful that the future development of Pontesbury will be limited. So important that we assess the effect the extensive estates will have on the roads and traffic through the village.
A0006B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Disagree	Water Drainage a problem in Pontesbury for quite some time. Sites area liable to flooding. There are numerous underground sources of water. The Quarry is planning to re-commence blasting which will bring more traffic to the area. The fact that users of the cycle path have to re-join the road near the quarry entrance is dangerous.
A0160B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Agree	Support the designation of Minsterley as a Community Hub as this will help the vitality and viability of the village. Consider that the housing guideline for Minsterley should be increased to reflect the extension of the plan period by 2 years and to at least match past levels of completions - consistent with Governments aspirations to significantly boost the supply of homes. If past delivery is matched, this would equate to around 185 dwellings rather than 155 for Minsterley (and 205 rather than 175 for Pontesbury). To be consistent with national policy, residential guidelines should be expressed as minimums.
A0160B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Agree	Strongly support allocation MIN018, as it offers the village the opportunity for: A crossing of the A488 for pedestrians using the footpath/cycle link to Pontesbury; Better management of surface water draining from the A488 into Little Minsterley Brook - An FRA has been prepared for the site (submitted in September 2019 and attached to this submission). The FRA concludes that 94% of the site is in FZ1, development of the site could have an overall low risk of on or off-site flooding and presents an opportunity to reduce existing local flood risk issues. The development guidelines for MIN018 reflect these opportunities in their requirement for studies including, "flood risk and drainage with their recommendations clearly reflected in the proposed development scheme."; Slowing traffic entering the village by moving the 30mph speed limit extent and providing visual cues that encourage drivers to slow down on approach to the village; An attractive entrance to the village that helps meet local needs for a range of housing; A site that is relatively unobtrusive in the landscape and that will not affect the AONB to the south of Minsterley (within the least sensitive parcel identified within the Shropshire Council LVSS for Minsterley), although the Sustainability Appraisal is incorrect as the site should be in the low landscape sensitivity category; A site that is well located for both Minsterley's facilities and Pontesbury's additional facilities including the secondary school. The proposed site density is 20dph, this density conflicts with policies SP1, SP3, SP5 and DP1. We would suggest a capacity of 30dph. The site is highly deliverable and viable. It is likely to be delivered earlier than the Local Plan's current forecast of 2025-2030 with the 2021-2025 period more appropriate in Local Plan Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations.
A0306B065	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Disagree	We are concerned about firstly, the proximity of this site to a SSSI and secondly, the lack of mitigation measures mentioned in the plan:
A0376B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Agree	Pleased to noted that PON002 has been identified as having Long Term Potential for residential development within the SLAA. Consider that the sites could be considered to have short term potential as The land is currently available and there is known interest from developers. Land opposite has recently been the subject of residential development. The site is deliverable. The site is level and easily developable. It performs 'good' within the SA. The site adjoins, to its south, land defined as suitable for development within the SLAA. Access can be secured from Hinton Lane. Further evidence and layout plans can be provided as required.
A0376B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Agree	Pleased to noted that PON028 has been identified as having Long Term Potential for residential development within the SLAA. Consider that the sites could be considered to have short term potential as The land is currently available and there is known interest from developers. Adjacent land has recently been the subject of residential development. The site is deliverable. The site is level and easily developable. It performs 'poor' within the SA, however this is unfair compared with other sites in the settlement. The site has direct access onto Station Road. Further evidence and layout plans can be provided as required.
A0609B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S12 Minsterley and Pontesbury Place Plan Area	Agree	Would not want the proposed residential guideline of 175 dwellings for Pontesbury to be exceeded.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0044B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain open countryside, over 300 residents have said this, we moved here to get away from the town. village will not be able to cope with growth esp Dr & School.
A0051B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage to remain open countryside. disagrees with the Points score that causes Cressage to qualify as a "hub" Pharmacy/Dispensary, No post Office, Mobile/Permanant Library, Health centre/school insufficient capacity
A0052B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Cressage to remain Open Countryside. 300+ opposed Hub status last time. Doctors Surgery Full, School classes are full.
A0060B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Disagree with designation of Cressage as a hub. Errors in scoring. Disagree with development of land adjoining the vicarage. Raby proposal on Shore Lane has quite rightly been rejected.
A0060B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Agree with small development at The Eagles.
A0061B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside. Errors were made when scoring Cressage as a community Hub. When this was last discussed over 300 residents said they did not want to become a hub. The infrastructure in Cressage cannot cope with the extra housing.
A0066B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside. Errors were made when scoring Cressage as a community Hub. When this was last discussed over 300 residents said they did not want to become a hub. The infrastructure in Cressage cannot cope with the extra housing. Reject the Raby estate proposals. School is not accepting new pupils. Increasing wait times to see our doctor.
A0072B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Remain open countryside. We are not a community Hub, we are a village in a green belt area. The local infrastructure is insufficient for more houses, Doctors, Schools full.
A0073B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The Village infrastructure is not sustainable for the current population. Both sites have no safe public access. Roads are narrow with little or no footpath. Road is beyond capacity and narrow. Bus services finiah early in the afternoon. No taxi service locally. Doctors are not coping with appointment a long wait.
A0074B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside. Errors were made when scoring Cressage as a community Hub. When this was last discussed over 300 residents said they did not want to become a hub. The infrastructure in Cressage cannot cope with the extra housing. Reject the Raby estate proposals. School is not accepting new pupils. Increasing wait times to see our doctor. I support the Eagles site re-development
A0075B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open Countryside. 300 villagers opposed the hub last time. Extra houses would worsen the situation with Doctors and schools which are full. traffic is already high through the village, would be a huge risk to the community.
A0076B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open Countryside. 300 villagers opposed the hub last time. Extra houses would worsen the situation with Doctors and schools which are full. traffic is already high through the village, more could have disasterous consequences.
A0123B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Distinctiveness of the town, its attractiveness to the tourism industry and hence its tourism economy will be undermined by growth proposal. The setting of the town will be negatively affected as demonstrated by Inspector's Report 2006 on Bridgnorth District Plan. Profusion of recent housing development in nearby settlements constitutes building over and above local need, is unjustifiable and no other historic town has been surrounded by so many new homes in this period. The core principles and policies in the Much Wenlock Neighbourhood Plan have been ignored. A single large site is a contradiction of the policies of the Neighbourhood Plan - the reliance on small sites has been ignored as has the preference to avoid unacceptable traffic impacts. The volume and intensity of traffic has greatly increased in recent years causing hazards to motorists and pedestrians and 120 houses will have a greater adverse impact than the rejected proposal from the 2006 Brignorth District Plan. The Neighbourhood Plan has been producing housing completions higher than the agreed rate up to 2017. These agreed figures have now been replaced without community consultation by larger totals. The level of growth fails to acknowledge completions or permissions in the pipeline. Recent rapid growth has exceeded infrastructure capacity and the local sewage works discharges have breached regulations. Works to remedy this have not increased capacity. The town was without a water supply in July 2015 and summer 2020. The medical centre capacity is already exceeded and cannot meet the needs from growth in the town and Cressage. The growth level is therefore too high.
A0123B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	This site was the location for the first games of the Oylmpian Wenlock Society. It is also the highest quality agricultural land and its development is contrary to sustainability guidelines in the NPPF. The site was chosen without any community consultation and as a result of pressure from the landowner and developer. The site is liable to flooding and there is no publicly available information to suggest otherwise. Flood attenuation ponds in other parts of the town would not protect site MUW012VVAR and are not designed to prevent flash flooding which is a serious danger. An on-site attenuation pond would be difficult to design and even more difficult to maintain. SUDS associated with individual domestic properties would be ineffective because the land becomes saturated in times of prolonged and persistent rainfall. Clear warnings of the risk of SUDS failure are in the Halcrow Report of 20017. The entire catchment has been designated as a Flood Rapid Response Catchment in the highest category. New homes would increase flood risk on this site and elsewhere in the catchment, contrary to policy DP23. Attenuation ponds on the parkland beyond the site ignores the fact that this area is subject to a Covenant with the National Trust. Flood alleviation should be both in advance and contractually separate from development. The development boundary should not be extended until all relevant parties take agree and take action to remedy existing flood issues. The assurances given that the adjacent Hunters Gate development would eliminate flood risk are completely wrong and the community have no confidence in developer led solutions. The bid for funding to reduce flood risk has not been made public and no plans for action have been confirmed. The new roundabout is not compatible with the Neighbourhood Plan and was rejected in 2006 by the Inspector for the Bridgnorth District Plan.
A0124B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Distinctiveness of the town, its attractiveness to the tourism industry and hence its tourism economy will be undermined by growth proposal. The setting of the town will be negatively affected as demonstrated by Inspector's Report 2006 on Bridgnorth District Plan. Profusion of recent housing development in nearby settlements constitutes building over and above local need, is unjustifiable and no other historic town has been surrounded by so many new homes in this period. The core principles and policies in the Much Wenlock Neighbourhood Plan have been ignored. A single large site is a contradiction of the policies of the Neighbourhood Plan - the reliance on small sites has been ignored as has the preference to avoid unacceptable traffic impacts. The volume and intensity of traffic has greatly increased in recent years causing hazards to motorists and pedestrians and 120 houses will have a greater adverse impact than the rejected proposal from the 2006 Brignorth District Plan. The Neighbourhood Plan has been producing housing completions higher than the agreed rate up to 2017. These agreed figures have now been replaced without community consultation by larger totals. The level of growth fails to acknowledge completions or permissions in the pipeline. Recent rapid growth has exceeded infrastructure capacity and the local sewage works discharges have breached regulations. Works to remedy this have not increased capacity. The town was without a water supply in July 2015 and summer 2020. The medical centre capacity is already exceeded and cannot meet the needs from growth in the town and Cressage. The growth level is therefore too high.
A0124B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	This site was the location for the first games of the Oylmpian Wenlock Society. It is also the highest quality agricultural land and its development is contrary to sustainability guidelines in the NPPF. The site was chosen without any community consultation and as a result of pressure from the landowner and developer. The site is liable to flooding and there is no publicly available information to suggest otherwise. Flood attenuation ponds in other parts of the town would not protect site MUW012VVAR and are not designed to prevent flash flooding which is a serious danger. An on-site attenuation pond would be difficult to design and even more difficult to maintain. SUDS associated with individual domestic properties would be ineffective because the land becomes saturated in times of prolonged and persistent rainfall. Clear warnings of the risk of SUDS failure are in the Halcrow Report of 20017. The entire catchment has been designated as a Flood Rapid Response Catchment in the highest category. New homes would increase flood risk on this site and elsewhere in the catchment, contrary to policy DP23. Attenuation ponds on the parkland beyond the site ignores the fact that this area is subject to a Covenant with the National Trust. Flood alleviation should be both in advance and contractually separate from development. The development boundary should not be extended until all relevant parties take agree and take action to remedy existing flood issues. The assurances given that the adjacent Hunters Gate development would eliminate flood risk are completely wrong and the community have no confidence in developer led solutions. The bid for funding to reduce flood risk has not been made public and no plans for action have been confirmed. The new roundabout is not compatible with the Neighbourhood Plan and was rejected in 2006 by the Inspector for the Bridgnorth District Plan.
A0149B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Proposal does not comply with the Neighbourhood Plan which is still valid. This contrary to national government policy. Not fair or democratic that local plan policy says the Neighbourhood Plan will only continue to apply where the policies and proposals conform to the Local Pla; MUW012VAR adjacent to Hunters Gate is subject to significant flooding, the worst site in Much Wenlock for flooding and therefore not suitable for additional housing which will make the situation worse. Identified developer led solution to address the flooding risk not acceptable as previous development industry provided local have failed and flooding in Hunters Gate has got worse. Additional traffic generated will add to the traffic congestion together with that from proposed developments at Buildwas and Tasley. Proposal to build a roundabout on A458 will create a rat run through the town via Merrywell Lane and Barrow Street to avoid the bottleneck at the Gaskell Arms Corner. Whole town solutions to address traffic issues (bypass) & flooding required rather than development on a known flood site. Infrastructure issues need to be addressed prior to growth, with sewage system & water supply capacity problematic, and insufficient doctors surgery capacity which will also need to serve additional homes in Cressage.
A0161B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Object to the proposed development guideline as it is too high, contradicts the Much Wenlock Neighbourhood Plan and exceeds local need. MUW012VAR is contrary to the Much Wenlock Neighborhood Plan which indicates that large scale developments are not acceptable to the community. The sites capacity exceeds local needs and will endanger the unique character of the Town - changing from an attractive market town to a surban dormitory. Infrastructure is at capacity and the impact of the proposed development has not been fully addressed.
A0161B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	MUW012VAR is contrary to Policy DP20 due to water supply and sewage disposal issues. In Much Wenlock, water pressure at times falls to danger levels and water has to be brought in by road tanker continuously for days on a 24 hour basis. The current sewage system is working at full capacity and is in no position to receive the amount of effluent that the proposed development will produce.
A0161B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	MUW012VAR is contrary to policy DP22 due to flood risk. The site is notorious for its flooding after heavy and persistent rainfall. On these occasions homes are flooded and gardens submerged in Hunters Gate and beyond - the most recent occasion being 16th February 2020. Historically the flooding problem was not addressed correctly when Hunters Gate was developed in 2002. It is necessary that a solution should be found and implemented before consideration is given to any new development. It must not be left, as before, to the developers.
A0161B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	MUW012VAR is contrary to policy DP29 as the road structure is insufficient to handle the increased traffic flows. Currently at peak times traffic now becomes congested, particularly at the Gaskell Arms corner. The traffic arising from the new development will make matters worse. The proposed large developments at Bridgnorth and the power station site at Buildwas can only add to this congestion. There no provision for a by-pass to alleviate this.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0171B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Agrees 200 dwellings but strongly disagree with MUW012VAR this is the wrong site as flooding still occurs there, whereas MUW008 has had flood attenuation work and is ready for development council missed this so flawed site assessment . Town councillors who live near MUW008 did not point this out. MUW008 vastly better, re flooding, road link to Telford, nr recreation facilities, no impact on Gaskell Arms junction.
A0177B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Reject the preferred site. This rep is submitted by a community group on behalf of the community. Shropshire Council has not engaged with the community neither has the Town Council - this has prompted our response. Shropshire Council has failed to recognise the agreed policy approach in the Much Wenlock Neighbourhood Plan. Object to increase in housing guideline from 150 to 200. Feel that the approach to Much Wenlock is fundamentally flawed. No explanation of how the Draft Local Plan housing proposals will meet local needs, as claimed, or why the levels of development are set at the scale suggested. This site is contrary to the SCI. Consultation on the LPR has been completely inadequate and at a level which is contrary to statutory guidance and legal expectation. An alternative approach using small scale sites provide a better solution than this single large site. There is no up to date catchment wide strategic assessment of the risk to life and property from surface water flooding and lawful obligations set out in national policy have not been met. Strong opposition to the concept of development-led flood alleviation derives from costly local experience. Development is contrary to current National Flood Risk Management strategy which emphasises working with communities to develop resilience to risks. The LPR must not override the Much Wenlock Neighbourhood Plan - advice given to us by MHCLG. Shropshire Council has failed to consider relevant evidence, significant community feedback, the legally made Much Wenlock Neighbourhood Plan and set aside national policy and guidance including the function and importance of Neighbourhood Plans. The site allocation is not a strategic proposal: truly strategic sites for development include the major redevelopment of the Iron bridge Power Station within the Much Wenlock Place Plan area. The housing this will deliver is being ignored. There is no deliverable programme of investment in the significant and obvious weaknesses of the town's infrastructure that is necessary to make growth sustainable. There is no assurance that the delivery of employment opportunities needed by the town if the objective of 'balanced growth' is to be achieved. The development choice does not address a response to the climate emergency facing Shropshire, the UK and the Council itself. There is no consideration of the strategic implications of its wider proposals for the town; in particular the cumulative effects of the large scale development in Much Wenlock combined with the 1000 houses at Iron-bridge Power Station and 500 houses on the livestock market and 1,050 at Tasley - if that's the site selected instead of Stanmore - at Bridgnorth, which will overwhelm the road infrastructure and the pinch point at the 'Gaskell corner' in Much Wenlock. Shropshire Council has: not explained why it cannot fulfil its legal responsibilities to address flood risk without requiring major development; imposed/allocated a site in the area of the town at the highest risk of flooding; determined not to consider alternative, non-development led approaches (as previously undertaken in the town); not sought funding from the hugely enhanced budgets allocated to the Environment Agency for flood risk management; ignored the effective delivery mechanism of the MWNP for housing at a scale and rates which are compatible with the historic market town; the scale of the site, which is without explanation, hides the fact that it will lead to over development. Given current requirements for 5 year reviews of housing land, we can anticipate 3 more proposals by SC to allocate large sites. If these are commercially led as currently proposed, this might generate another 360 houses by 2038. In total the scale of development would reach 600-700 houses, even excluding further small scale and exceptions sites. There is; a lack of a clear commitment and delivery mechanism to provide employment during the plan period; lack of a proper strategic approach to managing and mitigating the transport and traffic implications of the development; a skewed emphasis which describes community benefits from the site allocation as addressing existing flood risk, and omits a coherent approach to the weaknesses of health facilities, public transport and other infrastructure. The proposal by Shropshire Council to bring forward this site (MUW012VAR) as its LPR Preferred Site is flawed from a Transport and Accessibility perspective. Greater consultation with the community and Shropshire Council's own housing and Homepoint figures, (see the Housing Report on the Refresh Group web site) show that there is a greater need for smaller homes to suit young buyers and downsizers, as well as single level dwellings for older residents. The overall target for housing development should be reduced from 200 to 165 by 2038. The 'preferred option' site MUW012VAR should be deleted. We propose that the exact scale, location and type of the additions to overall housing development should be addressed through a review of the MWNP so that it can be accommodated on terms expressed by the community. Employment land should be actively brought forward. To achieve balanced growth, the Draft Local Plan should identify and commit to a delivery plan for employment land. The release of the housing site(s) should be linked to the provision of employment opportunities. As with housing sites, the allocation should be subject to the flood risk assessment. A strategic flood risk assessment must be undertaken as a priority and used to underpin all future development policy and decisions. The Draft Plan commits to undertake the flood risk assessment for the whole catchment and to consider development proposals in the context of clearly defined options for addressing the risks. Shropshire Council should commit to proper and lawful community engagement to revise the LPR. The Draft Plan should include a commitment to a meaningful consultation process about the future of the town which is based upon working with the community on a review of the MWNP and which integrates solutions to flooding, infrastructure and development needs. There should be a deliverable programme of infrastructure to meet the town's needs. A deliverable programme of improvements to Much Wenlock's local and associated strategic infrastructure should be identified and agreed with the community alongside funding arrangements. Clear links should be made to development proposals so the benefits are recognisable. Funding arrangements for any infrastructure development should be set out in advance to ensure public confidence and support.
A0178B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Much Wenlock flood group support 120 houses on Hunters Gate2 site on grounds 1. Idea is to prevent further flooding on site & Walton Hills adding a surcharge to Barrow Street Culvert hopefully control excess water to the bowl. 2. existing pipe at Wenlock Parkland. 3.Parkland has existing ponds suitable for attenuation slowing water and protectin Down Mills & Farley. 4. Supports developer led development funding for flooding, allowing council to control attenuation ground work done before development starts. 5. no money available via DEFRA EA or RPA work needs to be done soon or no priority given. 6. We want CIL money to be used for flood relief in other parts of town. Correctly installed in the high risk areas could reduce 30% going into sewers & stop catastrophic flooding
A0181B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly believe that Cressage should remain OPEN COUNTRYSIDE. I believe that numerous errors were made when scoring Cressage as a Community Hub. The last time Community Hub status was proposed, over 300 residents responded saying they di not want to become a Hub. Our infrastructure cannot cope with extra housing as it is.
A0200B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	The Parish Council support a guideline of 80 dwellings for Cressage hub in the period to 2038. In the Parish Plan 2017, 57% were in favour of up to 20 homes over 5 years and 80 homes over the Local Plan period is circa 20 homes every 5 years. The Parish Council does have concerns re road safety in relation to CE50005, The Glebe Field and it is important that this is addressed if the site is to be developed.
A0207B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	This site gives the best opportunity for some limited development in the village as long as the site access and main road traffic speeds can be controlled. Any traffic calming on the A458 would have the benefit of improving traffic speeds at the Severn Way junction. The pedestrian links to the nucleus of the village are well established and would easily accommodate the extra footfall directly to the school, shop and doctors together with the childrens play facility and recreation ground. The visual impact of this suggested site would be minimal for the majority of the residents and passing traffic.
A0207B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	I am in favour of development of this site but am concerned that the highway benefit may be compromised by the listed status. The footway is very substandard. Retail premises in the village have been closed over recent years and converted to residential use, and the same would be suitable here.
A0217B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Strongly disagree with the allocation of MUW012VAR. Large sites are contrary to the Much Wenlock Neighbourhood Plan (NP), which has successfully delivered housing on small-sites for a number of years. Whilst the plan period has been extended beyond that of the NP, there is no explanation/consultation on why this approach cannot continue or about local wishes/needs. Guidelines for MUW012VAR reference delivery of housing needs and addressing flooding issues, these two issues should not be linked together. The guideline for Much Wenlock represents a 15% increase to dwellings, exceeding projected population and household growth for England over the period to 2038. The Local Plan requirement equates to a 22% increase in dwellings to 2038 which is also highly contentious. There are natural limits to development (nature/character bowl) in Much Wenlock, as identified within the NP. Infrastructure is insufficient to support the increased population. The plan considers flooding, but not traffic, medical, school, recreational open space, water supply pollution etc. There is also the cumulative effect with the redevelopment of Ironbridge Power Station. How will affordable housing for local people be delivered on the site? The plan proposes that development of MUW012VAR will address flooding issues on site and in adjacent area, but Much Wenlock is designate a Flood Rapid Response Catchment in the highest category, so why any development? The proposed scheme is untested and there is no existing watercourse across which an attenuation scheme could be built. Proposals also fail to address existing flood risk in the town, these need to be addressed first. No confidence flood alleviation measures will be effective, given past failures at the Hunters Gate site.
A0225B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	MUV12VAR – Development of hoises near Hunters Gate seems to provide a suitable location for housing for all age groups, being located close to the town centre and amenities, including the primary school and reasonably level access to the town for an older demographic. The provision of a traffic roundabout A458 Bridgenorth Road, would provide much needed traffic calming – slowing traffic, when entering the town.
A0232B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Excessive houses for Much Wenlock which is a lovely quaint old town More traffic & traffic noise on and around the A458 and the Gaskell Arm's hotel and through Much Wenlock an issue. Flooding in the town (including Hunters Gate, High Street)is a serious issue that needs resolving before any development Schools and the GP surgery will suffer with extra residents in place. Need to retain green fields & consider wildlife? Bypass might be worth considering
A0242B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	There should be no new housing in Much Wenlock. Government is seeking to reduce transport use and greenhouse gas emissions (recent consultation). Best way to do this is locating houses near jobs. Much Wenlock has few employment opportunities. Jobs for the population resulting from development proposed cannot be accommodated within the town. As such they will need to travel to find work (for instance Telford, Shrewsbury or the West Midlands Conurbation) adding additional traffic, congestion and use of fossil fuels/greenhouse gas emissions. It would make more sense to place new development where there are jobs, such as the fringes of large urban areas, reducing the need to travel - and increasing viability of available public transport due to increased numbers of user.

Page 200

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0250B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	<p>Strongly support designation of Cressage as a Community Hub. Cressage has a good range of services and facilities (as per the Shropshire Council Hierarchy of Settlements Assessment), lies on the A458 (identified in paragraph 3.26 of the Local Plan as a strategic corridor), is well placed with good links to Shrewsbury, Telford, Much Wenlock and Bridgnorth and there are also a range of local employment opportunities in proximity, such as The Leasowes Business Park (2km), Atcham Trading estate (7km) etc. High speed broadband also allows people to work from home.</p> <p>Support the proposed residential guideline of around 80 dwellings as a minimum level of growth for the village, this equates to 1.08% growth per annum over the 22 year plan period. ONS 2018-based SNHP for Shropshire forecast 1.13% growth, equating to 83.5 dwellings for Cressage over the 22 year period, therefore a housing guideline of at least 80 dwellings is justifiable in order to meet the village's own growth, not including its rural hinterland.</p> <p>Strongly support proposed allocation CES005. The site is supported by the Council's site assessment work, scores well against sustainability criteria and has no technical constraints to development.</p> <p>The site offers community benefits in the form of a suitable mix of housing, quality public open space, traffic calming and good vehicular and pedestrian connections.</p> <p>Proposed allocation CES005 is highly deliverable and viable. It is likely to be delivered earlier than the Local Plan's current forecast of 2025-2030 with the 2021-2025 period more appropriate in Local Plan Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations.</p> <p>Supporting information provided in relation to proposed allocation CES005, specifically: Indicative Site Layout Plan for site CES005, Historic Environment Assessment for site CES005, Ecological Assessment for site CES005 and Arboricultural Assessment for site CES005</p> <p>Proposed allocation CES005 offers the following benefits:</p> <ul style="list-style-type: none"> A mix of housing to meet local needs including 20% affordable housing, starter homes, family homes and homes for elderly residents (the indicative layout shows 56.7% of homes as two or three bedroomed); Safe footways through the development and that cross the A458 to link to the existing safe pedestrian route on the eastern side of the A458 and down Severn Way to the village shop, school, GP surgery, etc; Traffic calming features at the southern entrance to the village, where they are most needed as traffic comes down the hill, including visual cues to drivers that they are entering a built-up area with houses on both sides of the road; Feature houses on the site frontage to provide a gateway feature on entering the village; Good relationship to the built form of the settlement; Public Open Space that provides an attractive centre to the site that links to Wood Lane; Screened in the wider landscape by the woodland on Wood Lane and the natural change in levels; No impact on any Tree Preservation Order (TPO'd) trees; No adverse impact on the historic field patterns of the village; No harm to the setting of any listed buildings; No harm to the character of the village; No harmful impacts on ecological and arboricultural considerations - demonstrated by Ecological Assessment and Arboricultural Impact Assessment. <p>The Council's LVSS states in relation to Landscape Susceptibility that, "there is a small area in the north of the parcel, close to the (western) settlement edge, which is made up of small scale fields that would be vulnerable to change in landscape pattern." This is the site CES002.</p> <p>CES002 would also affect the setting of five listed buildings, a number of significant trees subject to TPO protection, the character of the village by altering the western approach and is disconnected from village facilities, with separation caused by land around the War Memorial junction and with the only connection via an inadequate, narrow footway along the busy Shrewsbury Road.</p> <p>Site CES005 (land adjoining the vicarage) is far preferable to the alternative site CES002 (land west of Shore Lane) and strongly support the allocation of their site CES005 in the Local Plan.</p>
A0274B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the facilities to constitute such.
A0275B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A0276B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	Development at The Eagles pub should be prioritised. Only support additional housing (other than at The Eagles pub) if something was done to address speeding traffic and the lack of pavements in the village.
A0277B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Do not support building on land adjoining the Vicarage. I live in Cressage for health reasons and the view from my house is important. Development of this site would affect the re-sale value of my house. If I stay I would want compensation for the loss in value. This is causing me great stress and worry.
A0279B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside. It should not be changed to a Hub.
A0286B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as countryside. School and doctors already over-subscribed. Some of the scoring is wrong - Cressage has a dispensary not a chemist, no pub, no post office but a tiny shop.
A0301B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Concern over infrastructure deficiencies due to Ironbridge development, in particular, highways, traffic and demand on water supply.
A0303B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Scale of development excessive and contradicts the 2017 Shropshire Local Plan Review and Much Wenlock Neighbourhood Plan. Style of housing inappropriate, traffic congestion already major concern and proposed roundabout will not alleviate. Valuable agricultural land being used in conflict of Policy H3 in the MWNP for use of brownfield sites. Ignores the need for additional play areas. Sewage, water supply and flooding concerns in particular around Hunters Gate.
A0307B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Contradicts clear policies of Much Wenlock Neighbourhood Plan. Scale of development of 150 houses is excessive compared to needs expressed in 2017 Shropshire Local Plan Review. Style of housing is inappropriate, infrastructure concerns ie water supply, sewage system, burden on primary school and medical practice numbers and flooding.
A0340B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The statement 'New housing and employment development will respond to local needs' is bogus. Housing target has been increased to 200 without consultation. SC has ignored the Inspectors adjudication from 2006 public enquiry. The housing delivery rate was on target to deliver the original 150 houses, does not think adding 2 years to the plan necessitates increasing dwellings by a further 50. the proposed MUW012VAR of 120 dwellings is not representative of local need and ignores the wishes in the MWP of small developments (max 25 dwellings). overdevelopment will bring problems such as flooding, drainage and sewage (Barrow Street), school capacity, medical facilities capacity, traffic congestion, pollution, damage to the environment and towns unique landscape. the EA define the area as being 'very high risk response catchment' with risk to life and property. similar fears were expressed prior to the Hunters Gate Dev, they were ignored and subsequently properties have flooded twice in 13 years. Challenge to 'employment development will respond to local need' employment will continue to be in Telford with Much Wenlock becoming a commuter town increasing pollution and congestion within the towns streets. The 1000 dwelling sites at Buildwas and Tasley will generate increased traffic on the A458.
A0355B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	No guarantee on the range of house or tenures, what extent will be for local need or reservation of homes for local people, not in line with MWNP, no guarantee of open space and rec facilities, economic benefit will be limited people will drive to the larger towns, the water supply is insufficient as is the foul sewage network, flood concerns - flood alleviation needed. pressure on gp surgery and school. The housing target can be met through infill inline with the MWNP
A0359B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A0361B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status.
A0363B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status.
A0365B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status.
A0366B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status.
A0367B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0383B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Site is wholly sustainable to come forward for development immediately. The parish council should be encouraged to come forward with a new neighbourhood plan and request to be a cluster. Site plan attached.
A0384B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The statement 'New housing and employment development will respond to local needs' is bogus. Housing target has been increased to 200 without consultation. SC has ignored the Inspectors adjudication from 2006 public enquiry. The housing delivery rate was on target to deliver the original 150 houses, does not think adding 2 years to the plan necessitates increasing dwellings by a further 50. the proposed MUW012VAR of 120 dwellings is not representative of local need and ignores the wishes in the MWP of small developments (max 25 dwellings). overdevelopment will bring problems such as flooding, drainage and sewage (Barrow Street), school capacity, medical facilities capacity, traffic congestion, pollution, damage to the environment and towns unique landscape. The EA define the area as being 'very high risk response catchment' with risk to life and property. similar fears were expressed prior to the Hunters Gate Dev, they were ignored and subsequently properties have flooded twice in 13 years. Challenge to 'employment development will respond to local need' employment will continue to be in Telford with Much Wenlock becoming a commuter town increasing pollution and congestion within the towns streets. The 1000 dwelling sites at Buildwas and Tasley will generate increased traffic on the A458.
A0398B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	I support additional housing in Much Wenlock and agree the site behind Hunters gate is the best available location. Here are the 'buts' commonly voiced by residents and their representatives..... Concerns:-DP20 – water resources – Severn Trent tanker water several times a year spending up to three days doing so. This is evidence that the current supply is inadequate and an additional 200 houses will require an average of 35000litres per day of water. DP23 3SuD I understand that the Severn Trent map of drains is inaccurate. Local builders frequently find drains in unexpected places or those mapped as foul drains being mixed or vv. Much Wenlock frequently suffers from surface flooding due to its topography surrounded by hills assisting water straight down the High Street, Back Lane, Shenton Street and the BullRing. Climate change increases the frequency of 'sky rivers'. Attenuation ponds have helped mitigate this but not in any way solved the issue. Each new development reduces surface area for water absorption. Previous developments including Hunters Gate (no I don't live there) were built on the promise of adequate drainage. Much Wenlock will require more than a developer's reassurance in terms of addressing flood risk. Much Wenlock Town Council voted to permit additional houses on the site on the basis that this was the only option available to solve recurrent flooding of properties in Hunters Gate. The developer states that the development (which is on a field sloping down to Hunters Gate), will actually stop Hunters Gate flooding rather than adding to the flooding. Please insist on the drainage plans being available for independent expert inspection prior to approval. DP19 Air quality 2a) Baseline of air quality – Much Wenlock has this measurement at the Gaskell junction of 5 roads. This is a heavily congested area particularly at peak times including school runs. Locals know to avoid the long queues around this time. This does not and will not affect me so no personal axes to grind! However, the combined effect of the Buildwas development (with its erroneous prediction for traffic not impacting on Much Wenlock) and the Much Wenlock development, will only add to this. It is a major route to Telford, Buildwas, Shrewsbury, Bridgnorth etc. I anticipate the increased traffic will force the building of a bypass in the long term. It would be a shame to divert people away from Much Wenlock and impose this cost when local authorities have been squeezed to the point of losing staff and having minimal financial resources.
A0401B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Development of MUW012VAR offers the opportunity to establish a storm water extraction system and foul water extraction system that will serve the site, surrounding area and open up land for development along the valley. It also offers an opportunity to meet community commitments to resolving flooding issues around the town and follows proposals in the Much Wenlock Urban Drainage document (Option 3), resolving several flooding issues in and around this area and provide opportunities to aid other failed developments. It is logical to open up this area by taking storm water extraction away from Much Wenlock towns internal storm water system by directing water from the site and Hunters Gate to the Shilte River via the Great Pool area. This will free-up capacity within the Much Wenlock towns internal storm water system. Support development of MUW012VAR subject to: Development proposals address all pluvial water that affect this site and the surrounding area (Merrywell Lane along to Walton Hills and Hunters Gate). Provision of a large roundabout access which slows traffic to a stop to enter the town. Storm water connection points should be provided around the roundabout to connect systems serving Calloughton Ash and Oakfield Park and run-off from Calloughton Lane and the Graveyard. This would mean that the pipe extracting water from the lowest point through Hunters Gate must be sufficient to deal with all this water. No or little on site storm water pool, water should go out to the off-site great pool. This saved space should be used as open space. If possible, storm water from Swan Meadow should also be incorporated into this system. Whilst supportive of MUW012VAR object to the proposed site guideline regarding flood risk. When undertaking water flow calculations, there is a need to consider not just the water on the site but that in the wider area and ensure that the system has sufficient capacity to accommodate this development and future development in the area. The Great Pool needs to be large enough to contain the storm flows expected from this valley. Additionally, sufficient suitable collection/connection point need to be made available to allow multiple feeds into the water extraction proposal and to deal with exceedance water from the area. Hunters Gate and Calloughton Ash are prime examples where only water collected within the development boundaries were considered to be in need of management. These clearly demonstrate that without sufficient consideration of external pluvial flows adding to the needs of water extraction from a described site boundaries, developments will flood. Now is the time to consider the infrastructure capacity of future development - at the inception of a new route for storm water. Make it sufficiently large enough to deal with and resolve our growth issues, rather than have to dig up what is already laid (again) when we next need to connect more Homes.
A0401B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Oppose development of MUW008 as better opportunities exist. The site assessment for MUW008 refers to planning permission for an attenuation pond that has already been built. This attenuation pond would not serve MUW008 which would require an additional careful review of rainwater extraction requirements if developed, adding extra cost. Do not consider that MUW008 is currently available for development. MUW008 does not offer the town of Much Wenlock any additional benefits (other than new homes). Other potential sites that are available around the town offer Much Wenlock Town the opportunity to reduce flooding in several key areas. This area (the Sycote tributary to the Shilte) has had that problem resolved already. Other areas around the town require flooding prevention solutions to be applied before this area is developed further
A0406B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	MUW012VAR is already at the case that water and sewage services are at capacity in Much Wenlock. Any large development such as the proposed site would have to await immediate improvement to both water and sewage services.
A0406B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Does the use of site MUW012VAR for housing development fulfil all the requirements of paragraphs 1 to 12 in DP22? What does the Sequential Test show for this 120-house development site?
A0406B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	It would be necessary to ascertain the existence of any historic monuments in this parkland before flood defences involving such a large disturbance of land were created, so that the points made in paragraphs numbered 1 to 3 in DP24.
A0406B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The Local Plan seems to ignore the Neighbourhood Plan's intention that developments should be small and should give priority to local needs, eg. social housing for rent and retirement properties of limited size. Such a development would have large traffic issues.
A0406B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The selection of site MUW012VAR would appear to have little to do with lack of risk, but more to do with availability, because the owner of the site had an agreement with a developer. Sites for development should be taken out of consideration if they lie in a Rapid Response Catchment area, in the case of MUW012VAR next to a housing development where a number of houses have been flooded in recent years. How was site identified when the instruction seems to veer towards disregarding such sites, even if they are available?
A0409B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	CE5006 should remain a commercial site due to its position, with close links to the A458 It is of value to the community and this cannot be replicated elsewhere in the village. It offers the potential to provide much needed improvements to infrastructure. For instance: It could be linked to the village hall via the contaminated land of the former garage, which could be landscaped and the home of the village war memorial, allowing space for improvements to road junctions. Use of the site for shops or post office would provide services that are currently only available in nearby Much Wenlock and Cross Houses. The site could offer local employment and capture passing trade on the A458 Main concerns about the site are: The A458 severs the site from the rest of the village and the existing services and facilities. Access to the village will need to be addressed, however the speed of vehicles on the A458 is high. This is a particular issue for the site, which is on a slope where cars naturally speed up. Speed cameras help but this is focused at the Shrewsbury end of the village. the density of development proposed, given its location to the west of the A458, will impact on the environment of the village and surrounding countryside. The density of development in villages should be lower than towns. As the site is on a hill, water run-off will go into the river causing possible pollution Cressage should remain open countryside. There are insufficient amenities available to cope with the proposed number of houses that comes with Community Hub status. Scoring for the village within the HoS is incorrect as there is no library, pharmacy, functioning place of worship or post office. The shop is small and the bus service sparse. The medical centre and school are already stretched and could not support additional people. The draft Policy states that employment development will be delivered, but allocates the most commercially viable site in the centre of the village with access to the A458 for residential. If new Community Hubs are to be identified, improvements to infrastructure need to be made so they can support the development proposals. Cressage should remain open countryside until these improvements are made
A0409B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Main concerns about the site are: The A458 severs the site from the rest of the village and the existing services and facilities. Access to the village will need to be addressed, however the speed of vehicles on the A458 is high. This is a particular issue for the site, which is on a slope where cars naturally speed up. Speed cameras help but this is focused at the Shrewsbury end of the village. the density of development proposed, given its location to the west of the A458, will impact on the environment of the village and surrounding countryside. The density of development in villages should be lower than towns. As the site is on a hill, water run-off will go into the river causing possible pollution Cressage should remain open countryside. There are insufficient amenities available to cope with the proposed number of houses that comes with Community Hub status. Scoring for the village within the HoS is incorrect as there is no library, pharmacy, functioning place of worship or post office. The shop is small and the bus service sparse. The medical centre and school are already stretched and could not support additional people. The draft Policy states that employment development will be delivered, but allocates the most commercially viable site in the centre of the village with access to the A458 for residential. If new Community Hubs are to be identified, improvements to infrastructure need to be made so they can support the development proposals. Cressage should remain open countryside until these improvements are made
A0409B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain open countryside. There are insufficient amenities available to cope with the proposed number of houses that comes with Community Hub status. Scoring for the village within the HoS is incorrect as there is no library, pharmacy, functioning place of worship or post office. The shop is small and the bus service sparse. The medical centre and school are already stretched and could not support additional people. The draft Policy states that employment development will be delivered, but allocates the most commercially viable site in the centre of the village with access to the A458 for residential. If new Community Hubs are to be identified, improvements to infrastructure need to be made so they can support the development proposals. Cressage should remain open countryside until these improvements are made
A0417B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I believe that Cressage should remain OPEN COUNTRYSIDE. Previous attempts to classify Cressage as Community Hub have been met with strong opposition from residents. The Settlement scoring facilities previously used were incorrect/misinterpreted to the few facilities we do have. We DO NOT HAVE a library, a chemist/pharmacy/a post office (or outreach service) or a functioning place of worship. Since I have been in the village (20 years) we have lost a post office (plus adjoining shop), a pub, a church is now limited and a small garage has gone. I believe that the proposed development for the land adjoining the Vicarage for building should NOT be permitted. The A458 is a main road and here are not safe crossing and no adequate pavements or walkways at this end of the village by this proposal. A development here would cut the village in two, with the A458 providing the dividing line. It runs the risk of being a separate village within the village. Current meagre facilities in the village are insufficient to allow for new housing and the residents they will bring. Cressage is also an area rich in wildlife. Given the concerns on climate that is prevalent in the press, we should be looking to preserve what we have and build sustainably. As this proposal is at the top of a hill, water runoff could impact buildings lower down the hill. I do not believe developers would carry out these works as it severely impacts their potential profits. I believe that the site of the former Eagles Public House (on the A458) should remain a COMMERCIAL SITE. It is central in the Village and very accessible and visible from the A458. It is prime commercial land and could continue to be used to viable business opportunities, not just for the village but also for passing traffic. Part of this land could be used to resolve the road issue at that corner, perhaps by placing a roundabout there. There is a contradiction in the proposals in that the 13.2 proposals state that employment development will be delivered, but the only commercially viable site in the village (the Eagles pub) is seeking a change of status. therefore no employment development will be delivered.
A0431B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside. It should not be changed to a Hub.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0432B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside. It should not be changed to a Hub.
A0452B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	CES005 land adjoining the Vicarage should only be developed for 15 - 20 dwellings. Cressage has inadequate infrastructure to support 80 dwellings on CES005. The proposed access from A458 will be dangerous and traffic from CES005 will cause congestion on this strategic highway. Wood Lane to the rear of CES005 and the adjoining Local Nature Reserve will be adversely affected by the development of CES005.
A0452B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	CES006 will improve the visual appearance and the safety of the former public house site and the A458/Sheinton Road junction through the provision of a public footpath across CES006. The provision of 5 dwellings and the protection of the listed building on CES006 are further benefits of the proposed development. Nevertheless, CES006 should be developed to provide affordable housing not open market executive dwellings.
A0453B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside
A0460B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain open countryside. Insufficient infrastructure to cope with development - GP, School. Affordable housing does not meet local needs
A0464B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Support measures proposed, but not enough. Near misses between pedestrians and vehicles common on the hill of the south of the village. Long term solution is fixed average speed cameras on the A458 and the entrance and exit of Cressage
A0467B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain open countryside because of a lack of services, and capacity issues at the primary school.
A0468B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain open countryside because of a lack of services, and capacity issues at the primary school.
A0484B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Residential Allocations: Much Wenlock Key Centre - The agreed number of dwellings for the Neighbourhood Plan adopted in 2014 was 80 no. for the site adjoining the Primary school and Hunters Gate in Much Wenlock. The number of dwellings has now been increased by 50% to 120 no. dwellings but to be accommodated on the same size piece of land. This must mean that the density of the houses will be increased and the amount of green amenity reduced. It also implies that properties are likely to be taller and with three storeys. The water and sewage system in this part of Much Wenlock is already running at capacity. We are concerned that without major infrastructure upgrades that the present system will collapse if added to. Upgrades will cause major disruption to local residents for an extended period of time. In order to accommodate the increase in the town's population (a minimum of at least 240 people, plus children) there will need to be resources found to expand the provision of health services, provide extra school places, postal services etc. None of these matters are specifically identified in the Plan
A0494B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Cressage should remain as open countryside and not be a Hub. Errors were made in scoring. The village does not have the infrastructure. Over 300 Cressage residents opposed Community Hub status.
A0495B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Cressage should remain as open countryside and not be a Hub. Errors were made in scoring. The village does not have the infrastructure. Over 300 Cressage residents opposed Community Hub status.
A0496B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Cressage should remain as open countryside and not be a Hub. Errors were made in scoring. The village does not have the infrastructure. Over 300 Cressage residents opposed Community Hub status.
A0497B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Cressage should remain as open countryside and not be a Hub. Errors were made in scoring. The village does not have the infrastructure. Over 300 Cressage residents opposed Community Hub status.
A0498B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Cressage should remain as open countryside and not be a Hub. Errors were made in scoring. The village does not have the infrastructure. Over 300 Cressage residents opposed Community Hub status.
A0499B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Cressage should remain as open countryside and not be a Hub. Errors were made in scoring. The village does not have the infrastructure. Over 300 Cressage residents opposed Community Hub status.
A0564B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The terms community hub and community cluster are confusing. I agree with the proposal for some additional housing but feel that the environmental impact and lack of sustainable infrastructure should inform the degree of building. CES006 requires sympathetic and careful planning and safe access for pedestrians and vehicles to Shrewsbury Road and Sheinton Street are a hazard. Where possible enhancing the community asset of the Eagles pub should be explored further. Raby estates proposal is not within the hub and unsustainable due to lack of infrastructure to support such development
A0570B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Disagree that Cressage is a hub as there is no pharmacy, post office and the school is at full capacity. The church is also only open for the main religious festivals and may soon close completely. Development of the Glebe site would increase traffic onto an already very busy road and increase pressure on village facilities
A0581B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A0582B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The road is already overloaded with traffic. Adding additional housing will make the risk to health worse. The Village has no facilities to support existing residents. No church, no pub, limited tiny local (expensive shop) The council should concentrate on building facilities for communities before further developing housing. Given a massive housing development will soon no doubt take place at the old Buildwas power station 1000 home site so we really need extra houses here. Also do not need the Raby Estate development either.
A0589B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The Neighbourhood plan should be respected. It allowed the town to grow and provide housing for renting and elderly in a coherent way. Building 120 housing on a flooding field in a block is an example of landowner and developers pressure. This site contradicts the wishes of the residents and the neighbourhood plan. As well as flooding there has been water supplies been cut off due to not enough pressure. The medical practice can't cope. There is also the traffic congestion at the Gaskell Arms corner which increases our pollution levels
A0591B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Environment Agency have warned that Much Wenlock is at high risk of flash flooding so building houses does not make sense. Rentals for old people is not being planned. We voted against large number of houses being built in a single development. It is far too big. It is too far out of town for older people. More problems with increased traffic at Gaskell corner. We run out of tap water several times - I support the neighbourhood plan not this new local plan.
A0593B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know/no opinion	Disagree with designation of Cressage as a community hub as its not supported by over 300 residents; scoring system for hubs is written in Council favour and labeling of services in Cressage such as pharmacy and mobile library are incorrect. Existing services are under pressure and concern about capacity of school and doctors to cope with increased numbers. Scale of development not constructive to the village and more consideration of residents views needs to be made
A0593B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Disagree with designation of Cressage as a community hub as its not supported by over 300 residents; scoring system for hubs is written in Council favour and labeling of services in Cressage such as pharmacy and mobile library are incorrect. Existing services are under pressure and concern about capacity of school and doctors to cope with increased numbers. Scale of development not constructive to the village and more consideration of residents views needs to be made
A0593B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Disagree with designation of Cressage as a community hub as its not supported by over 300 residents; scoring system for hubs is written in Council favour and labeling of services in Cressage such as pharmacy and mobile library are incorrect. Existing services are under pressure and concern about capacity of school and doctors to cope with increased numbers. Scale of development not constructive to the village and more consideration of residents views needs to be made

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0601B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Disagree with allocation of 120 houses at Hunters gate, reasons for opposing the designation are: Much Wenlock has already experienced growth in the last 30 years and with very significant development planned in Buildwas, Tastlet and Cressage this will create more traffic issue in Much Wenlock; concerns about flooding on the site and town in general and no catchment wide flood plan is a concern; concern towns infrastructure can't cope with this level of development; also concern results of Neighbourhood Plan are not reflected in this plan
A0602B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Object to development in Much Wenlock. Welcomed past development and fully support the Neighbourhood Plan which sets a coherent and sensible plan for the long-term growth of the town and was subject to community engagement/agreement. However, current proposals have not been subject to community consultation, with the extension of the plan period used as a reason to override community opinion. Much Wenlock has insufficient infrastructure to support large scale housing (traffic, health facilities, school places, water supply, sewage capacity, flooding etc). Other large scale development outside the town, particularly the Former Ironbridge Power Station, already threaten the viability of this infrastructure. The infrastructure benefits of large scale development are unproven, the proposed roundabout is only necessary to serve the development and statutory bodies should fund flood alleviation work, as occurred in other parts of the town. Past developments have failed to deliver (e.g. Hunters Gate flood attenuation infrastructure) and this has not been enforced, which does not bode well for future development. Subsequent identified remediation works have also not been implemented. There has been no assessment of the potential success of proposed flood prevention measures.
A0641B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Number of houses is far in excess of anything previously proposed for the site and directly contradicts the Neighbourhood Plan. Concerned about increased traffic flow and congestion.
A0650B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Concerns about traffic on A458 and passing through village. Walking would be dangerous. Development would be an add on to the village not part of it.
A0661B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		The target requirement to deliver 200 dwellings and around 2 hectares of employment development is too high and is not in keeping with the character of the town of Much Wenlock. I do not believe that SC calculations are in line with national Government guidelines for housing and employment land requirements.
A0661B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	A Neighbourhood Plan for Much Wenlock covering the period from 2013-2026 was adopted by SC in 2014. The draft Local Plan Review does not support the Much Wenlock Neighbourhood Plan. Restricted consultation on future developments has been led by developers and landowners, with little or no information from SC. This should be replaced by open consultations between residents, councillors from MW Town and SC, and developers, as is evidenced for developments in other parts of Shropshire. A review of the MWNPN is required to look at the "big picture" for Much Wenlock to include development requirements, the provision for more infrastructure (medical, educational, traffic etc) and a solution to the flooding for all of Much Wenlock. This will help Much Wenlock to continue being an attractive place to live and work.
A0661B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	MUW012VAR The preferred option site MUW012VAR should be removed and deleted. This large development outside the town boundaries is not in keeping with limited housing developments to meet local needs as agreed in the Much Wenlock Neighbourhood Plan
A0661B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	DP22 requires directing development to areas at least risk of flooding. Much Wenlock is designated as a Rapid Response catchment and no further developments should take place until a flood risk assessment for the whole of Much Wenlock has been completed. The provision of piecemeal flooding alleviation especially by a developer does not address the problem of flooding for all of MW especially as the same developer's previous development in MW has ongoing flooding problems.
A0662B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The preferred site takes no account of the Neighbourhood Plan. What was the point of all the effort put into it by the community? At the time we were told it would determine housing policy to 2026. We are fed up of having to allow major developments in order to get a few affordable homes. We have trialled a new approach which has been successful in increasing the affordable housing stock in Much Wenlock. Much Wenlock will be gridlocked with the traffic generated by the power station development and further housing in Cressage The local road infrastructure cannot cope with more traffic. People from Hunters gate find it too hard to walk into town so drive in. This development would exacerbate these pressures. Wenlock has flooded frequently in recent years and the existing site will not improve the situation.
Page 204 A0672B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Object to the proposed increase to the development guideline for Much Wenlock (from 150 to 200 dwellings). This is proposed as the capacity of proposed allocation MUW012VAR has increased due to site promoter claims about the viability of flood risk mitigation (without public consultation) and the fact that this increase when combined with windfall development the proposed guideline would be exceeded. Much Wenlock has a legally binding Neighbourhood Plan, the draft Local Plan should have identified levels of development and the Neighbourhood Plan should have been used to allocate. Consider it is wrong that the Local Plan Review takes precedence over the provisions of the Neighbourhood Plan. Attitude towards the status Neighbourhood Plans is of great concern - particularly Much Wenlock and Shifnal. Neighbourhood Plans are supported only in so far as they do not conflict with this proposed Draft Local Plan. Note one excuse for overriding them is that they were made up to 2026 and the draft Local Plan goes up to 2038. Much Wenlock Town Council were advised that the Neighbourhood Plan did not need updating and residents wanted to update the Neighbourhood Plan but cannot without Much Wenlock Town Council support. A Much Wenlock Neighbourhood Plan Refresh Group has been set-up, consulted with the community and made a submission to this review. Firmly support continued communitywide involvement with the Neighbourhood Plan. Object to proposed allocation of MUW012VAR. There has been no meaningful community consultation about proposed inclusion and changes to the site nor changes to the development boundary. Have previously raised this issue. This large site contradicts the Much Wenlock Neighbourhood Plan which calls for small-scale development because of flood risk; the town's medieval street pattern; and other infrastructure constraints such as medical facilities, water supply/disposal which cannot support large scale development. The capacity and extent of MUW012VAR has been arbitrarily increased on the demand of a site promoter who has stated they will include flood attenuation as part of the work. They also intend to include flood attenuation for the adjacent estate known as Hunters Gate which has been unfinished either by the original developer or Council since construction 10+ years ago. However, at a presentation the site promoter stated flood attenuation should protect the new development but refused to be drawn on the likely success of the work they were offering to do for the earlier development. They were definitely not intending to finish work identified in a 2011 report for the Council about flood alleviation for all of Much Wenlock. Much Wenlock has been identified as a Rapid Response Flood Catchment Area by the Environment Agency, on a par with Bosccastle. Consider this makes it imperative that development if first to meet local need and not in a location which is most likely to flood. Not convinced the Town Council have fully considered problems which may arise or were aware that other funding sources for flood alleviation were available (confirmed by Shropshire Council) when deciding to support development at MUW012VAR. According to draft policies, a scheme of 120 dwellings should provide 20% affordable dwellings (24). However, draft Policy DP3 sites where exceptional/unexpected costs are met by the developer there can be a reduction in the number provided. MUW012VAR makes extra costs a distinct possibility. Consider the choice of MUW012VAR as a preferred allocation is fundamentally flawed as the site assessments (Appendix N) had not been brought up to date before the assessment. For instance MUW008 is rejected because it does not have an attenuation pond, however the attenuation pond was in fact completed before assessments commenced. Draft Policy DP22 references a Sequential Test for assessing the level of risk so that sites with less risk of flooding are preferred over those with a greater risk. It states this has already been carried out for proposed allocations, but how can this be accurate when the site assessment and Sustainability Appraisal are out of date. Agree with the draft policy DP25 Conserving and Enhancing the Historic Environment. Consider proposed allocation MUW012 has the potential to cause unnecessary and unacceptable harm to the historic environment through the flood alleviation works necessary to develop the site. The site promoter proposes to divert excess water into a large attenuation pond in nearby historic parkland, designed to capture flood water and slow its passage down the brook to Farley. There is a causeway across the park the first 170 metres of which is a Scheduled Ancient Monument. There has been reference to recreating a 'Great Pool' behind this, however the 1830 Tithe Map shows no such pool. On the map the causeway which once provided an elevated path to Downs Farm has a stream passing through it at one point which may be the site of an historic sluice. Closing the sluice may have formed a temporary pond to regulate the flow of water to the many mills once located on Farley Brook. The 'tufts' shown marked on modern Ordnance Survey Maps suggest the ground is often already saturated. On the far side of the causeway the tithe map shows two ponds, one which is still in existence and has the appearance on the tithe map of having been a moat around a piece of open ground, traditionally for securing livestock overnight on important estates before fields were enclosed by hedges. These proposals could also well be contrary to Environment Agency policies not to displace water. Draft policy DP29 states the impacts of transport movements must be managed. However, those identified for the alleviation of the proposed development of the strategic settlement at the Former Ironbridge Power Station (within draft Policy S20) on the A458/A169 junction in Much Wenlock are considered inadequate. Additional traffic from proposed in Bridgnorth and Cressage will overload this junction without MUW012VAR. The new roundabout proposed at MUW012VAR will cause traffic to stop and idle, polluting the area; add noise of vehicles breaking/changing gears; and will do nothing to improve congestion at the A458 A189 junction. The Inspectors Report for the Bridgnorth District Plan (2006) stated the visual impact of a smaller site covering only part of MUW012VAR would detract from the setting of the town. Much Wenlock's economy is dependent on tourists visiting the Medieval streets, admiring historic buildings and enjoying hospitality. Proposals are more indicative of a declining quality of life and visitor experience through traffic (rat running or queuing). Cumulative plans in draft policies S13.1, S13.2, S20 and S3.1 are more likely to lead to damage to the local economy than boost it. The draft Local Plan (para 5.182) states, additional development will need to recognise potential impacts on flood risk, heritage assets and other policy objectives on the Neighbourhood Plan. This paragraph is reminiscent of shutting the stable door after the horse has bolted. Much Wenlock needs more housing. Support developments of a more modest scale, where it meets local needs and includes genuinely affordable homes, retirement properties and some market housing. Do not support MUW012VAR until at least the failure of the original developer (Hunters Gate) has been addressed and in any event not too much development on any one site.
A0677B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	disagree with this statement in the development guidelines as it constrains the developers opportunities to offer alternative solutions too tightly. "Development will be required to deliver substantial community benefits both on and off site by way of flood alleviation. Specifically, development must demonstrate how properties currently at risk of flooding at Hunters Gate and Forester Avenue will be protected, as well as removing exceedance water from the existing surface water and foul sewer systems. Given the importance of this issue, development proposal will be required to show sufficient information on how these measures will be achieved in practice in order for planning permission to be granted. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the green infrastructure / open space network. Flood and water management measures must not displace water elsewhere." It is clear that if we are too make this a viable development, the water will need to be directed away from this area or given a concise route that it can follow to meet this requirement. This implies that an area that is greater than the development boundary MUST be considered in the flow calculations and suitable collection/connection points will need to be made available to allow multiple feeds into the water extraction proposals. It has been stated that the Great Pool area will be utilized to support an area large enough to contain the storm flows expected to outfall from this valley development. It is clear that sufficient capable routes need to be provided to deal with exceedance water from the development and surrounding area. Otherwise it is likely that we will have another failed development. Like Hunters Gate 1 and Callaughton Ash that are prime examples where only water collected within the development boundaries were considered to be in need of management. Subsequent lessons that have been learnt clearly indicate that, without sufficient consideration given external pluvial flows entering the development site boundaries, developments will flood. Currently poorly constructed re-direction bunds and poor thought out swaths etcetera have proven ineffective. We must incorporate these additional overland flows into the extraction calculations and pipe these additional flows into the Great Pool. Now is the time to prove to Much Wenlock Town that Shropshire Council are planning for growth and development in a professional manner for considering future needs NOW. This is the best time, at the inception of a new route for storm water. Let us plan for the future NOW. Make it sufficiently large enough to deal with and resolve our needs now and future growth issues, rather than have to dig up what is already laid (once again) when we next need to connect more Homes. All developments may need to consider "capture & re-direct methods" whereby a lower level site green space area maybe given as a temporary "submergable" space which in turn is connected to a larger storm water extraction facility which removes the water to a larger space (Great Pool) as the flows slow. So. Please review this paragraph and ALLOW flood and water management solutions to displace water as needed (with suitable authoritative consultation) to give consideration alternative developers solutions rather than forcing developers into a singular solution scenario.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0677B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	<p>very supportive of developing this area providing that specific additional criteria are met. Developing this area with new homes will offer Shropshire County Council an opportunity to put in place a suitable supporting infrastructure (for storm water extraction and foul water extraction) that will allow further future developments to be placed along this valley. It also clearly indicates that we are following the proposal in the Much Wenlock Urban Drainage document. See this at :- https://www.shropshire.gov.uk/media/5972/much-wenlock-iudmp.pdf option 3 this will resolve several flooding issues in and around this area and provide opportunities to aid other failed developments. It clearly indicates that we are honoring our community commitment to resolve local flooding issues.</p> <p>It makes logical sense to open up this area by BREAKING off storm water extraction away from the Much Wenlock towns internal storm water system. Then feeding this area (MUW012VAR) and the Hunters Gate 1 development storm water outfall out to the Shilte river via the Great Pool area. This will free up Much Wenlock Towns storm water system by a considerable amount. This development could (with thoughtful planning) free up capacity within the towns current storm water drainage system allowing other areas to release water more effectively into what is "at this moment" an overloaded system. I am very supportive of developing this area (MUW012VAR) based upon these provisions: -</p> <ol style="list-style-type: none"> 1) The development should include a large roundabout at the site entrance point (on the A458) that is suitable enough to severely SLOW the main traffic down to a stop to go fully around the island. The island traffic should not be able to see through to the other side - enforcing a stop situation (not allowing a skim through at speed scenario (unlike Cross Houses) . 2) Around the island the developer should include sufficient suitably large storm water connection points to allow the Shropshire County Council to connect feeds from the failed Callaughton Ash development storm water system, the Callaughton lane runoff, the Oakfield park storm water system and the Graveyard runoff. This implies that pipe extracting this water at the lowest point (through Hunters Gate 1) must be sufficiently big enough to deal with all this flow of water. 3) Development proposals take into consideration ALL pluvial water that will collate and be required to be dealt with at the lowest point of this area (removed in a controlled manner) - A failing that is all to visible in other area (Callaughton Ash) and developments around the town. It is common practice to limit a development to only need to deal with surface water flows within the boundaries of the development - this site will need to exceed that normal rule. Consideration should be given to undertake collation and extraction of water from Merrywell lane all along to Walton Hills and Hunters gate 1. 4) There should be little or no "on site storm water pool" the land saved by removing storm water out to the Great Pool should be used to provide a managed a green play space for the sites families and children. 5) If there is sufficient funding then incorporated into this development should be the Swan Meadow storm water outfall. This should be broken out of the towns storm water system and linked into this new proposal to go out through the Great Pool route as well. This will release a larger amount of water immediately to the Shilte rather than burdening the MWT storm system - again releasing spare capacity back to the towns drain systems. This will bring considerably more benefit to the Town of Much Wenlock than developing smaller areas around the town.
A0677B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>against developing this specific area. Other more beneficial development spaces and opportunities exist in the town. Within this document MW008 also refers to planning permission for an attenuation pond that has already been built on higher ground. Can I point out that this attenuation pond would not serve any purpose in assisting a development proposal in this area. A new development on this site would require additional careful review of wastewater requirements in this area. If developed this would add additional cost to this proposed development site with little or no additional benefit to the town - currently a point not considered for local discussion. I also believe that this suggested site does not offer the town of Much Wenlock any additional benefits (other than more housing) within the area. Other potential development sites that are proposed around the town offer Much Wenlock Town the opportunity to resolve flooding in several key areas (with careful planning). This area (the Styche tributary to the Shilte) has had its flooding problem solved already. There are other areas around the town that require flooding prevention solutions to be applied before this area is developed further. I am aware that the landowner is not currently in agreement to release this plot of land for development at this time. It is being held back at this moment.</p>
A0695B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>MUW012VAR is the wrong site for residential development as: Severe local flooding issues have not been resolved, building more homes on a critical site is not the way to resolve these issues. Additional traffic from MUW012VAR will have a severely detrimental impact on the Gaskell Corner junction, which is already stressed and will be more so because of the impact of developments at the Ironbridge Power Station, Tasey and Cressage. The Transport Assessment for Ironbridge Power Station demonstrates associated additional traffic will more than double existing problems at the Gaskell Corner. Identifying MUW012VAR as a preferred site when it will add to that chaos is ridiculous planning. All that will be achieved is to dramatically increase the problem of rat-running through the town. A new roundabout on Bridgnorth Road is destructive, environmentally unacceptable, divisive and wrong in both planning and highway terms and completely unnecessary in 'gateway' terms. Identification of MUW012VAR as a proposed allocation is premature (as well as wrong), proposed allocations should be identified through the proper process - via the adopted Neighbourhood Plan.</p>
A0700B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>Cressage should remain open countryside. Oppose housing plans. The views of the local community (over 300 residents) should not be ignored.</p>
A0701B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>Cressage should remain open countryside. It is not a Community Hub.</p>
A0713B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>The proposals do not respond to local need. Increase in population will increase problems at Doctor's, flood issues in town, increased pressure on already overloaded wastewater system, traffic problems</p>
A0714B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>Development in Cressage will have a negative impact on traffic in Sheinton.</p>
A0831B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	<p>If a lot of houses are built in Cressage it will take away the rural character. Brownfield sites should be considered. The Eagles site would be much better and would tidy the place up.</p>
A0841B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>Number of dwellings proposed is too great for the town. Concerned about loss of character and subsequent loss of tourism. Major infrastructure problems ie highways, schools & medical practice. Flooding is also a major problem although acknowledge attenuation pool will help.</p>
A0847B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>Cressage should remain open countryside is does not qualify as a community hub. School and doctors at capacity, infrastructure cannot come with extra housing</p>
A0852B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>Opposes allocation of site MUW012VAR as area is subject to flooding; location of the development and Gaskell Corner junction suffer from traffic congestion; site is too far from centre for people to walk to so car use will increase</p>
A0854B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>I wish to write about an alternative site application of MUW008. This site has been put forward by the Neighbourhood refresh group as a possible alternative to other sites I object most strongly for this site to be considered as Chairman of the local flood group on their behalf and as an individual. 1. I am unaware that the Landowner has submitted this site as an option. 2. The topography of this site is wrong and would lead to soil and water run off into the houses on Southfield Road as attenuation could be a problem along the southern boundary. This happened in 2005 and 2007. 3. Part of the development would be skyline development. 4. access could be a problem as all round access is in the hands of one ownership. 5. The proposal is above the level of the present attenuation pool on the Styche site, and that pond would have little impact on the drainage of the housing, levels would not allow water to flood up hill! 6. Because of this the water would have to flow direct into the sewer/storm water drain, which is already at capacity and we risk further flooding on this side of town if we try to do this development. 7. The fact that the NPlan is critical in its comments as is Councillor Turner about building of up to 200 houses in the town up to 2036 on another site how many would they build on a similar sized plot here? I ask you to consider these objections carefully.</p>
A0856B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	<p>Opposes allocation of site MUW012VAR as area is subject to flooding; location of the development and Gaskell Corner junction suffer from traffic congestion; site is too far from centre for people to walk to so car use will increase</p>
A0861B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	<p>This site is located much too far from centre of Much Wenlock. The people from there will drive to other places rather than spend time in Wenlock. It is much too far to walk into town. This is why other sites are much more preferable. The traffic at the Gaskell Corner backs up continuously and is VERY dangerous for pedestrians. The so-called 'refuges' are constantly being struck by lorries so no-one in their right mind uses them. Hunter's Gate II will simply worsen this situation. Despite much talking, Much Wenlock has not yet benefitted from a proper strategic flood plan; therefore how is it possible to identify as a preferred site, the one that most suffers from flooding</p>
A0903B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	<p>It is accepted that Buildwas need not be provided with a development boundary and might be regarded as a Cluster rather than Hub, the existence of extant planning permission for the development of land in the village should be recorded in the description of the nature of development that is considered acceptable in the settlement in order to give certainty to the delivery of those developments. Site BUD007 enjoys two extant planning permissions.</p>
A0926B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	<p>This policy is supported as it recognises the role of Much Wenlock as a service centre for a large rural hinterland and its location on a 'strategic corridor' (the A458 Paragraph 4.91(e) of the Plan identifies that the A458 is a Strategic Corridor and Policy DP9: Strategic Corridors states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity". Given the above, it is evident that Much Wenlock should be a significant centre for growth in Shropshire, both socially and economically. The identification of land to the south-east the town (allocation MUW012VAR) is also supported as this land is unconstrained, lies in a highly sustainable location and will deliver substantial community benefits both on and off site by way of flood alleviation. The land will therefore make a significant and unique contribution towards meeting the growth needs of both the Town and the County.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0926B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Settlement Policy S13.1(i) - 'Residential Allocations: Much Wenlock Key Centre', Policy Map Inset S13 – 'Much Wenlock' and Local Plan Residential Allocation – 'Land adjoining the Primary School and Hunters Gate, Much Wenlock (MUW012VAR)' are supported. The site is a strategic allocation and would make a significant contribution towards the overall housing requirements for Much Wenlock up to 2038. We note and accept the development guidelines set by the Council and would comment as follows on the key issues: Drainage and Flood Risk: In respect of the drainage infrastructure an initial flood modelling study has been carried out by McCloys Consulting. McCloys are an industry leader in the water and environmental engineering sector. The aim of this study was to review the local flooding issue with a view of exploring what land take would be required to attenuate water entering the site from the wider catchment. The summary of the study is as follows: <ul style="list-style-type: none"> • During flood events significant volumes of water are shown to run across the site and down into the Hunters Gate development below. This accords with the known problems of flash flooding on Hunters Gate and the fact that the combined sewer in Barrow Street cannot cope at times of flash flooding. • It is predicted that we would need to attenuate between 10,000m3 to 30,000m3 of flood water on site if discharging this at a controlled rate. As an attenuation pond of this size would take up so much space, this makes the development proposal in its current form completely unviable. • The existing STW surface water drainage networks for the existing sites are at capacity even without any flood water entering them. Connecting the site to these networks in their current form would not be accepted by STW. • To deal with the above point, a new surface water drain/culvert would be required under the Hunters Gate adopted roads and would need to discharge to The Parks. Alternatively it may be feasible to upgrade/replace the existing STW surface water sewer here. In either case a very large pipe is required, so we estimate this would cost in the region of £600k to construct. • As a ball-park figure, we estimate the cost of constructing the culvert and attenuation features as being in the region of £1,000,000. This would need to be carried out very early on in the development prior to any house sales. Highways and Transport Infrastructure: We recognise that development on this scale will require a new roundabout access to be provided from the A458. The roundabout will help slow traffic coming into the town and by the school. The cost of a roundabout to the A458 is estimated at £600,000. The precise design is unknown at this stage and a supporting transport and highways assessment will be required as part of any future planning application. This will fulfil the second objective of the proposed development guidelines. Other Matters: At this stage we have carried out a massing exercise and can confirm that the site can accommodate a maximum of 120 dwellings together with the required roundabout and drainage infrastructure. The Estate are committed to delivering a high quality, beautiful development which will be in keeping with the surrounding landscape and local vernacular. There will be a requirement for natural open space within the development and it is envisaged that the current planted boundary to the site will need to be displaced and replace with compensatory planting on the new site boundary. It is proposed that the development will deliver a good mix of housing including fulfilling the policy requirement to build 20% of the overall housing numbers as affordable dwelling. The development will deliver a Community Infrastructure Levy (CIL) contribution of £59.64 per square metre of build and the development overall could generate overall CIL receipt somewhere in the region of £900,000 to spend on local projects. The Estate are not seeking to reduce either of these contributions on viability grounds. To conclude the Estate fully support the site allocation. Allocating the site in the final plan would solve the longstanding surface water flooding problems in the town, provide a new roundabout and deliver a high-quality sustainable development. This is a once in a generation opportunity. We understand there is a willingness amongst all parties to see this scheme delivered to address the current local flood problem and were very pleased to see the Town Council supported the site allocation in their recent consultation response.
A0926B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	Location plan and indicative layout for site
A0952B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A0953B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A0971B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Promotion of land owned by Raby Estate in Cressage at Shore Lane. S13.2 Cressage We support the allocation of Cressage as a Hub. We do not support the allocation of Land adjoining the Vicarage or The Eagles Pub. These sites should be deleted and replaced with land off Shore Lane promoted by the Raby Estate
A0971B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Promotion of land owned by Raby Estate in Cressage at Shore Lane. Historically there is an underdelivery of housing in the Much Wenlock Place Plan area, and the Market Signals and Housing Affordability Profile – Part II indicates that the median household incomes in the Place Plan Area are the highest in the county. . If the housing needs are not urgently met the existing population in the lower quartile of household incomes will find that they are repeatedly competing against those moving in to access higher paid employment causing an outmigration. Welcome inclusion of Cressage as a community hub, but argue that the windfall targets for Cressage can not be met based on the existing settlement boundaries, and this is contrary to paragraph 70 of the NPPF. . A more robust and national policy compliant position to ensure the appropriate delivery of housing in accordance with paragraph 59 of the NPPF would be to allocate the Shore Lane site which is of sufficient scale to accommodate the housing needs identified in the local plan. In the plan period, there is likely to be high initial demand for development to meet the unmet demand for housing need of Cressage and the lack of delivery across the place plan area. Development on the site off Shore Lane would be able to alleviate the housing pressures on the area early in the plan period.
A0971B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Supporting documents for allocation of Shore Lane Cressage within the Local Plan
A0987B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	No objection to housing allocation, and welcome the importance given to flood alleviation and the roundabout to be provided.
A0987B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	Concerned that no employment land included. There are also concerns for the Town Council relating to increased traffic from development at Tasley, Buildwas, Shrewsbury and other areas. We ask that steps are taken to lessen the impact.
A0991B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly believe that CRESSAGE SHOULD REMAIN OPEN COUNTRYSIDE. The facilities/amenities/services are not able to cope with the scale of housing proposals linked to the Community Hub status proposals. Cressage should not qualify as a Community Hub. Settlement scoring functions have previously been misinterpreted/incorrectly applied to the very limited facilities in the village. The village DOES NOT have a library, a pharmacy, a functioning place of worship or a post office. The shop facilities are very limited and the bus service is skeletal. The school and doctors surgery services are also stretched and would struggle greatly to accommodate a larger population. The Cressage Community Hub proposals stated with S13.2 state that employment development will be delivered, however the proposals go on to seek a change of use of the most commercially viable site in the village, that being the Eagles site – the only commercial site that is central to the village and with access directly off the A458. I strongly believe that if the Council wish to define new Community Hubs, improvements must first be made to existing local community services and amenities to ensure that they could meet future demand. Until these improvements have been made, the village SHOULD REMAIN OPEN COUNTRYSIDE.
A0998B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	From a civil engineering perspective I strongly disagree with the proposal to build 120 dwellings on this site. The phrase "flood mitigation measures" is glibly used in the Local Plan. The geology of this side of Much Wenlock is poorly understood at the moment. It was witnessed at the time of the February 2020 flood that a lake was formed in the field above Hunters Gate by a series of springs. When the next period of extreme rainfall occurs the short lived springs will again source water into gardens and even the houses themselves. How will a drainage system be designed when the precise mechanism of flooding may only be guessed at? No mention has been made of the provision of water to the dwellings. What will happen with any extra demand when there is already a struggle at peak times? A developer's sewer system will eventually have to be connected into the old single pipe that which runs the length of Barrow Street and Wilmore Street. And it is this link in the chain that will cause a massive headache to the local community.
A1028B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. I want to have affordable life in the future
A1029B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. I want to have affordable life in the future
A1030B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. I want to have affordable life in the future
A1031B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. Public enquiry needed!
A1032B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. Poor consultation we must have a public enquiry!
A1033B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. We must have a public enquiry!
A1034B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. The public have been ignored!
A1035B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1057B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. I want to have affordable life in the future
A1058B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. I want to have affordable life in the future
A1059B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. I want to have affordable life in the future
A1060B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. I want to have affordable life in the future
A1061B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1062B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1063B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1064B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1065B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1066B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1067B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1068B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1069B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The residents do not want any more large scale development, and so Cressage should not be a Hub. An assessment should be undertaken for the community to understand what the village wants. The residents have not been listened to. Scoring is unjust. Services are not available at all times (such as mobile library) and there is a lack of differentiation between Cressage and major towns like Shrewsbury regarding transport and roads. It should be countryside
A1070B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage does not have the infrastructure to support Hub status
A1099B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1100B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1136B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as countryside. There are errors in the scoring. The existing services (school, doctors) will struggle to cope with an increase number of housing. Existing speeding problems in the village.
A1137B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as countryside. There are errors in the scoring. The existing services (school, doctors) will struggle to cope with an increase number of housing. Existing speeding problems in the village. Residents have been ignored
A1148B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	In terms of Paragraph S13.2 Cressage is included within Schedule SP2.2: Community Hubs. This is a revised allocation for Cressage and is established by the associated evidence base for the review of the Local Plan, specifically the assessments and conclusions set out in the Shropshire Council Hierarchy of Settlements (August 2020). The Shropshire Council Hierarchy of Settlements (August 2020) sets out the key criteria within Table 4: Scoring of Services and Facilities (Page 12) and Table 5 Settlement Function Scoring (Page 14). These criteria set out the objective scoring for settlements within the Local Plan settlement affording the appropriate weighting appropriate to the associated category. In terms of Cressage the assessment calculations accord with those set out in Table 4 and Table 5 of the Shropshire Council Hierarchy of Settlements (August 2020). The scoring of Cressage is therefore objective and the total of the scoring confirms Cressage as a Community Hub Settlement. The principle of allocating Cressage as a Community Hub is strongly supported and this support follows the assessment of the settlement in the associated evidence (above), the related policy stating the proposed site allocations (Land adjoining The Vicarage on A458, Cressage (CES005) and The Eagles public house on A458, Cressage (CES006)), and the related policies of the Local Plan. The proposed site allocations provide a proportionate and logistically appropriate provision of housing sites. The sites are accessible and locationally appropriate for Cressage. Recognising the size and demographics of Cressage, and the variable nature of providing employment land it is supported to take the approach that new employment development will be delivered through appropriate small-scale windfall sites within the settlement boundary.
A1148B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	The principle of allocating the former Eagles Inn for residential development is strongly supported. This support follows the sustainability assessment of the settlement in the evidence provided by the Local Planning Authority in terms of the emerging Local Plan. The former Eagles Inn provides a centrally located site that is proportionate and appropriate in providing a housing site. The site is accessible and locationally appropriate for future housing in Cressage. Observations on the Development Guidelines and Provision for the site generate the following comments. The Development Guidelines for the site indicate 2 dwellings delivered by the conversion of the former public house, and 3 dwellings on the car park. The Development Guidelines therefore indicate 5 dwellings in total including the conversion of the former Eagles Inn. The Provision column states 4 dwellings and requires updating. In design terms this site has been discussed with the Council's Conservation Team and the design options included a continued frontage of appropriate design to complement and subordinate to the former Eagles Inn. This reflects the design and character of the recent residential development 100m (approx) south of the site. This form of design and density would provide for additional residential development on the site, development that is demonstrably required as enabling development. Enabling development is required as the former Eagles Inn is a Grade II Listed Building and the associated costs related to the surveys/assessments of the building relative to its heritage listing and the associated requirements for a sensitive conversion acceptable to the Local Planning Authority. In planning terms the revised status of Cressage to a Community Hub would provide material considerations for the assessment and determination of an application at the site for residential development. This would supersede the historical applications that were based upon and determined under the former policies of the Local Plan. Based upon planning densities for residential development, the needs to balance viability due to the need for enabling development related to the designated Listed Building a limited increase to 6 dwellings will assist on all these matters. The design of the scheme according with current discussions with the Council provides capacity to the east of the site, the site therefore remains able to accommodate this level of development whilst maintaining the local character and safeguarding the setting of the Listed Building.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1186B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	We are writing to endorse 100% the views of the Much Wenlock Neighbourhood Plan Refresh group. They have consulted, collated and represented the views of the majority of the local community in response to the Shropshire Local Plan Review and its proposals for Much Wenlock. They fully represent our concerns. We are residents of Much Wenlock and we cannot support the large scale development proposed at Hunters Gate for the following reasons: it is a site of high flood risk and we should not be reliant on developers to solve flood alleviation problems. Increased pollution of air and noise in the surrounding streets because of traffic (already on some occasions unbearable) as a result, would be completely unacceptable. Additional pressures on schools and medical facilities locally as a result of a large scale development would be untenable. The enjoyment of a public footpath running adjacent to the proposed site would be ruined. We understand fully the need for affordable housing but this could be achieved through the construction of a smaller number of houses in pockets around the town, which we believe would have a far less devastating impact on the community
A1187B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	1. Hunters Gate suffered from significant flooding in February 2020. It is undesirable to expect a developer to manage efficiently and comprehensively the complex flooding issues that need to be addressed at this site 2. increased pollution of air and noise in the surrounding streets as a result of building 120 new homes on this site will be completely unacceptable. Noise and air pollution from traffic passing through the narrow streets of Much Wenlock is already at peak times unbearable. 3. there is neither additional schooling nor medical infrastructure to support a large scale development at this site. 4. the enjoyment of public footpaths running adjacent to the proposed site will be severely impacted
A1267B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I think making Cressage a hub is wrong. The school is already near its maximum and have 30 plus children in each class and the library has been turned into an additional class room. Cressage has no bakery anymore and the Post Office has gone. Cressage needs to stay as open countryside
A1268B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage residents have voted before not to be a community hub. The scoring for the hub is wrong as we have no post office, the church is shut all but for a few days and we do not have a library, or a pharmacy (just dispensary which is quite different. Our Doctors surgery is at capacity and the school had to take on extra teachers this year but don't have the extra class rooms. Cressage needs to stay as open countryside we don't have the infrastructure
A1270B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1272B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Object to both the soundness of the draft Local Plan and the fundamentally flawed approach taken to the long term development of Much Wenlock. In particular object to site MUW012VAR, which despite local objection has been increased in size from 80 to 120 dwellings and also object to the increase in the proposed housing guideline for Much Wenlock from 150 dwellings to 200 dwellings. There is significant local opposition to MUW012VAR. The Shropshire Local Plan Review fails to satisfy and comply with national policies, fails to consider alternative and better planning solutions, it is based on flawed assessments, has failed to consult lawfully and meaningfully and ignores relevant evidence including that from the community. There has been no opportunity to purposefully engage the local community on their views, other than that organised by a local community group. As such the draft Local Plan fails in its legal and moral obligations to consult and engage with the community (this is contrary to the Councils Statement of Community Involvement). It also fails to recognise the importance of the agreed and effective policy approach in the Much Wenlock Neighbourhood Plan (MWNP) which proposed a scale and rate of development compatible with the historic market town (this is contrary to national policy and guidance and means the draft Local Plan cannot be positively prepared). There has been no consideration of alternative approaches, including substantial evidence which supports alternatives as the better planning solution to the single large site. The site assessment process is flawed and fails to adequately consider other brownfield and greenfield options - CPO could be used to purchase brownfield sites for redevelopment. Do not advocate any specific alternative site but consider the MWNP should be applied. There has been a failure to consider relevant evidence and significant community feedback. The risk of surface water flooding to property and human life has not been given due consideration through a catchment wide strategic assessment. The approach taken is also contrary to the current National Flood Risk Management strategy. There is insufficient infrastructure to support development proposals. MUW012VAR draft guidelines focus on flood risk but ignore other infrastructure constraints such as health facilities, public transport etc. A roundabout access is proposed to MUW012VAR, however this is not referenced within the Place Plan and do not consider this is necessary and would be detrimental. Many other sites benefit from better access to infrastructure, particularly public transport and pedestrian routes than MUW012VAR. As such the site fails to comply with the NPPF. MUW012VAR is not a strategic proposal, Draft Policy S13.1 states it will contribute towards growth, truly strategic sites are those such as Ironbridge Power Station. Therefore a departure from the approach in the MWNP is unjustified. There has been no proper consideration of other development (Former Ironbridge Power Station) in the same Place Plan Area. There is no explanation of how proposals will meet local needs or why the level of development proposed is required. There is no clear and deliverable programme of investment in infrastructure - particularly transport. Also concerned that unexpected costs such as managing flood risk could result in a reduced level of affordable housing delivery. Need is significant in Much Wenlock. Lack of assurances/commitment that necessary employment to balance housing growth will be delivered. Proposals do not respond to the climate emergency (local/national). The site will represent over-development (assuming past levels of windfall and delivery of MUW012VAR, the guideline for the town would be exceeded by 2026). Further, given the 5 year local plan review cycle, we can expect further site allocations before 2038, which could mean 600-700 additional dwellings by 2038, even excluding windfall. The guideline therefore enables MUW012VAR and small windfall. Inadequate consideration of strategic implications of cumulative proposals - Much Wenlock, Former Ironbridge Power Station, and sites as Tasley Bridgnorth, particularly in relation to the Gaskell corner pinch point. Shropshire Council has engaged more with landowners than the community. Explanation of the increase of MUW12VAR site size by 50% is unclear and seems to be based on a landowner request. There is no explanation given in the Draft Local Plan, the only logic seems to be that the development will solve the existing flood risk to properties at Hunters Gate. Object to this as the Council has not explained why it cannot fulfil its legal responsibilities to address flood risk without requiring major development; the site is in the area of the town at the highest risk of flooding; there has been no consideration of alternative, non-development led approaches (as previously undertaken in the town); the Council has not sought funding from the hugely enhanced budgets allocated to the Environment Agency for flood risk management, especially, for the River Severn catchment; a catchment wide study as was previously scheduled and funded (c20K) by the EA in the previous 6-year round of funding has not been undertaken and it ignores the fact that many more properties were affected by flooding elsewhere in the town in winter of 2020. Consider the following changes should be made to the Draft Local Plan: -The housing guideline for Much Wenlock to 2038 should be reduced from 200 to 165. -MUW012VAR should be deleted. The exact scale, location and type of sites to achieve the overall housing development should be addressed through a review of the MWNP. -Employment land should be actively brought forward. A delivery plan should be prepared. -A strategic flood risk assessment must be undertaken as a priority and used to underpin all future development policy and decisions. The draft Local Plan should commit to this. -Proper and lawful community engagement should be undertaken to inform the Local Plan Review. -A deliverable programme of infrastructure to meet the towns needs should be prepared. Clear links should be made to development proposals so the benefits are recognisable. Funding arrangements for any infrastructure development should be set out in advance to ensure public confidence and support.
A1288B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	At the moment the site is an eyesore and danger so the plan represents a considerable improvement to benefit the village. The safety of the road junction will be improved and the plan includes provision of a public footpath through what is now the car park. I am please that the historic part of the building will remain. A maximum of 5 houses seems reasonable but I put in a plea for affordable, not executive dwellings
A1288B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I am firmly against 80 dwellings on the vicarage field as being totally unsuitable for the village. Access to A458 would be dangerous and lead to congestion. There is a real danger too that Wood Lane with its wildlife and being a "green lung" for village residents would be spoilt. Although we have been designated as a hub, we do not have the infrastructure to support such a scale of development. We have an over subscribed doctors surgery, a primary school which has grown in recent years and is nearing full capacity, a redundant church and a very small shop - no post office, pub or chemist. The sewerage system is also at capacity. I could envisage 15-20 dwellings of modest size on that field but only if safety measures were installed on the A458 to slow traffic down
A1288B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I would be in favour of a smaller development here (upto 40 houses) provided that full slowing down measures were incorporated all along the A458 stretch through the village and the school and sewerage treatment works were shown to be adequate
A1288B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Support the development of the site as it will improve a focal point for the village. Maintaining the inclusion of a footpath across the site is important as is improvements to the junction onto the A458.
A1302B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should not be classified as a hub. This decision needs urgent review.
A1303B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1304B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1305B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1306B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1391B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Local Plan doesn't take sufficient consideration of differences experienced by residents in this area. Don't sacrifice beauty of Shropshire, preserve it. Traffic in Much Wenlock is heavy on A458 by the Gaskell Corner, to build more houses will add to these problems. Additional development and traffic may mean visitors no longer come to Much Wenlock and the town relies on tourism. Flooding has been an issue in the town and areas proposed for development. The doctors surgery is already overcrowded and has poor car parking and the primary school has a demountable classroom and the play group is over crowded. These proposals ignore the Neighbourhood Plan. More consideration of the residents of Much Wenlock is needed
A1480B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I want to remain open countryside, we don't think the infrastructure or service to accommodate the number of houses
A1481B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. Furthermore the Eagles site is clearly a commercial site its been for centuries and whereas the car park could be developed somewhat the pub should remain commercially viable and not entirely developed for housing.
A1482B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. Furthermore the Eagles site is clearly a commercial site its been for centuries and whereas the car park could be developed somewhat the pub should remain commercially viable and not entirely developed for housing. The eagles is very important to keep as commwical reason being - the main focus of cressage entrance and historic 400 year importance post COVID 19 more local facilities are needed.
A1483B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1484B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1485B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	As a long standing resident of Cressage I believe that the village does not have the seage capacity for mmore houses nor can the sewage capacity be increased. Roads , medical and schools facilires are also at a maximum capacity
A1486B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council. There is not enough sewage capacity to sustain more houses
A1487B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A1633B2	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	don't know / no opinion	There is no mention that I can see of the effect on the sewer works that I believe may be at capacity. Is there any plan to increase capacity in the event of severe weather to avoid downstream pollution and if so, who is to pay, the developer or the user through higher charges?
A1642B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The site assessment process was flawed as Appendix N is inaccurate in several places. In its entirety MUW008 is too large to come within the remit of the Neighbourhood Plan guidelines - I am not aware that there is any reason why the whole site has to be developed. The Neighbourhood Plan has been ignored and the LPR incorrectly claims that the LPR takes precedent. Much Wenlock should update its Neighbourhood Plan and that should be used to inform how development proceeds.
A1813B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	There is flood risk to the existing properties. When there is very heavy rain in Much Wenlock, the water treatment plant used to be unable to cope and to put it crudely the solids escaped the net bag and went straight into Farley Brook causing pollution Severn Trent have great difficulty in keeping the water pressure up during summer months - some people in Wenlock had no water at times let alone reduced pressure. The topping up went on for days at a time with sometimes up to 8 huge water tankers. How on earth will they cope with 200 extra houses in Much Wenlock? Wenlock needs housing for low income families to rent and smaller homes for elderly people to downsize into – those houses on Hunters Gate will no doubt all be built to make the maximum profits for the developers
A1833B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The site is on a moderately steep hill, and has dangerous access. Pedestrian crossings would be needed to access the village's facilities. The road is narrow at Wood Lane. Development to the East is preferred (Form 1). The scoring for Cressage is wrong - there is no Post Office, the Church and the library are not always available (Form 3).
A1833B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Agree with site. There is a need for local infrastructure.
A1836B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I am in favour of Cressage remaining as 'open countryside'. I understand that this village is at risk of being classed as a 'hub', which I struggle to understand based on overwhelming opposition from local residents. I know that 300+ residents opposed hub status back in 2019, and the opinion remains that Cressage should remain ope countryside. To reiterate my points from the 'Shropshire Local Plan Review - Preferred Scale and Distribution of Development', submitted in Jan 2019, I oppose further housing being developed in the village for the following reasons:1) Lack of facilities – we only have an oversubscribed primary school, a stretches GP Practice, and a tiny village shop2) The village is missing basic amenities including: pub/cafe; church; post office; library. 3) The traffic is already a major problem on Harley Rd, due to the existing volume and speed of traffic.4) The area has environmental importance and the impact on local flora and fauna, including the protected Slow-worm and bats, would be unacceptable5) Concerns over sewerage and drainage6) Lack of existing green space to walk I would also point attention towards a recent survey that the parish council instigated. I don't have all the results to hand, but did note the following which was shared at the parish council meeting on the 16th Sept by Rebecca Turner (Clerk):- 72% of respondents were against development on the glebe field - 69% of the respondents were against the resent suggestion from Raby estate - 76% of the respondents were in favour of developing the Eagles sitePlease factor responses like these into future planning. Cressage does not have the infrastructure to support expansion
A1843B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I wish to endorse the points made in the deposition from the Much Wenlock Neighbourhood Plan Refresh Group. This group of volunteers has put an enormous amount of work into collecting and collating views from the community. The refusal of Much Wenlock's Town Council to engage with it is both inexplicable and extremely sad. All who have participated, in any way, in the planning deliberations so far will be aware of the strength of feeling and, unfortunately, bad feelings which have been engendered. I hope the Council will be able to rectify this. More than lip service needs to be paid to honesty, transparency, efficiency and inclusiveness. Meetings must be advertised well in advance. All parties should be able to put their points and answer challenges. Much Wenlock responded to the call to produce a Neighbourhood Plan in 2014. If the Government now requires more from Shropshire Council, surely the way forward is to again work with the community.
A1843B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The policies and proposals within this Neighbourhood Plan which conform with the Local Plan continue to apply". This is misleading: what about the policies and proposals in the Local Plan which do not conform to the Neighbourhood Plan? In 2014, huge effort was put into preparing the Neighbourhood Plan (including 26 public engagemer over 18 months). The Government frequently repeats its support for Neighbourhood Plans. According to the Planning Policy Advisor in the Ministry of Housing, Communities and Local Government "Once a Neighbourhood Plan has been approved at referendum, it forms part of then statutory development plans and becomes the starting point in making plannind decisions". The Neighbourhood Plan calls for small-scale development to be matched by necessary improvement to infrastructure. The Local Plan ignores this and proposes a large number of houses (200) with insufficient detail on supporting infrastrucur
A1843B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Flooding This is a huge subject which is not addressed in sufficient detail in this Local Plan. The views of various experts need to be brought together. The public need assurance that all proposals to prevent flooding have been tested and a conclusion reached. This will not happen if proposals are made and accepted by only one party,
A1867B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as Open Countryside. The service in the HoS are not available at all times and so should not score as highly.
A1867B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The site is by speeding traffic. Site should be of low density housing
A1867B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Should remain as Commercial use. It is the only commercial site in the immediate area.
A1874B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as Open Countryside. The service in the HoS are not available at all times and so should not score as highly.
A1874B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The site is by speeding traffic. Site should be of low density housing

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1874B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Should remain as Commercial use. It is the only commercial site in the immediate area.
A1895B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>The statement does not recognise the potential impacts on flood risk or the policies and objectives in the Neighbourhood Plan.</p> <p>1. The proposal does not take into account the nature of flooding, most recently exhibited in 2020. The flooding follows a spring line above the proposed attenuation pond and the water flows mid way down the incline onto the existing Hunters Gate estate. Therefore the proposed solution will not address the existing issue and the additional building will exacerbate the problem.</p> <p>2. The Neighbourhood plan achieves the local planning policy objectives through incremental small scale development across the town that allows for local services to absorb the increase in population and need for local services. My specific objections are:</p> <ul style="list-style-type: none"> - a) This development is far in excess of the numbers previously proposed exacerbating the flooding risk to the existing Hunters Gate development and downstream in the Town. The flooding risk was highlighted by the Towns people before the current development. It would be criminal negligence to make the same mistake twice. The numbers of houses is far in excess of either local need or in within the context of historic growth Much Wenlock. This level of growth would seriously damage the character of a historic market town that has grown gradually over the last millenia. Market rate housing will be affordable for existing residents and will accelerate the exodus of the younger residents, instead the demographic will be skewed even more to wealthy older residents. This is evidenced by the experience of the existing Hunters Gate development which has very few young families as the houses are just not affordable to families on average wages. - b) The town medical and educational facilities will not be able to manage the additional influx of new residents - c) The Town would not be able to absorb the additional traffic from the large number of residents. There are a number of areas that are consistantly congested, therefore irrespective of the access the situation will be made worse. In particular congestion in Barrow Street as well as at the Gaskell Arms. This will be made worse with the proposed major developments in Ironbridge and Bridgnorth. - d) The development is predominantly market value housing and not affordable housing. There is no evidence of local need for this type of housing. It is therefore not adhering to the Neighbourhood Plan voted for by the population. - e) The proposal goes against its own infrastructure statement in para 2.25. There are known infrastructure constraints that make this proposal impractical i.e. a) drainage and sewerage pipes leading from the Hunters Gate into the centre of town reduced in bore size increasing the likelihood of backed up water and localised flooding, this also increases the likelihood of water contamination with human waste, b) the Hunters Gate and Foresters Avenue estates regularly have low pressure for Severn Trent fresh water supply, it would be folly to add another development with this known issue (it would also contravene DP20 point 4 "Proposals are required to demonstrate that they will be served by adequate water infrastructure in terms of water supply"), and c) the traffic issues on Barrow Street cannot take any additional volumes. In summary: The proposal is wholly at odds with the Neighbourhood Plan, contradicting the statement in para 2.26. Similarly this proposal contradicts para 2.18 which states it "seeks to provide a sustainable pattern of growth". In the case of Much Wenlock, this is not true as it goes against the incremental growth approach from the Neighbourhood Plan. On my behalf MP Philip Dunne sought clarification from the Secretary of State for Housing the Rt Hon Robert Jenrick MP on whether there had been a change in policy in relation to Neighbourhood plans. He confirmed that "Once a neighbourhood plan has been approved at referendum, it forms part of the statutory development plan and becomes the starting point in making planning decisions". There are too many examples of where the Shropshire Unitary Council has deviated from the Much Wenlock Neighbourhood Plan to believe that it has been the starting point in making planning decisions, instead it has actively gone AGAINST the key points within the Neighbourhood Plan and the wishes of the Towns people. The consequence of this will be increased flooding risk for the Town and its environs, increased traffic congestion and a crisis in local services such as health and education.
A1895B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>I do not agree with the following statements:</p> <p>1. "It is considered a maximum of 120 dwellings is acceptable in order to secure sufficient local housing supply and opportunity in the long term, but at the same time directly responding to and addressing the issue of flooding in and around the site, and with adjoining residential areas" Responses:</p> <ul style="list-style-type: none"> a) 120 dwellings is not acceptable, it is too many to be approved in one go and will exceed what the Town can absorb. The proposal goes against the Neighbourhood plan i.e. what the Town confirmed was required in the referendum to adopt the plan. In addition the need for Much Wenlock and wider Shropshire has been shown to be contracting not increasing ref Shropshire Council Local Housing Need Assessment dated August 2020 section 4 Previous Calculations. This shows the LHN has reduced from 27,947 in the 2016 calculation to 25,894 in 2020 with the average value now 27,137. b) It will all be approved in one go, there is no evidence of local need for this number or type of housing, the Neighbourhood Plan clearly states that the need is for affordable housing and c) there is little evidence that the proposed attenuation scheme will address the flooding, given the flow of flood water both onto Hunters Gate as well as down stream into the Town, Downs Mill and onto Farley. This development would in particular exacerbate flooding risk at Downs Mill and Farley. <p>2. "It is considered the allocation offers the opportunity for a well-designed scheme, integrating green infrastructure". Integrating green infrastructure means nothing – the development will take away high grade agricultural land. The development extends beyond the boundary previously proposed and given its distance from the centre of the Town will create additional traffic in an already congested Town. It is highly likely that the increased level of Traffic would give rise to additional costs and development to address traffic congestion. In summary: there is no justification for an increased allocation for Much Wenlock or the wider county, in addition no evidence has been provided in the consultation that the proposed major development site next to Hunters Gate will successfully address the flooding issues experienced in 2020 or previous years. Therefore I strongly object to the proposed plan.</p>
A1895B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>I do not agree that the plan is achievable. Flooding was identified as a risk prior to the current Hunters Gate development. The development went ahead and increased flooding occurred. The Neighbourhood Plan specifically looked at this issue and priorities small incremental development and recommended that separate flood alleviation action be taken. This should be prioritised ahead of any new development. The proposal does not explicitly state how the flooding issues will be resolved simply through the creation of an attenuation pond. The flooding issues of the environs around Hunters Gate have not been fully assessed, there are multiple causes of flooding in this area and down stream. The consultation does not provide ANY evidence to show that this development would substantially reduce the risk. The failure of the existing Hunters Gate development to manage the surface flooding and in fact making it worse for the rest of the town it would be negligent of the Council to propose / approve such a scheme. Extending the boundary and without a full and public flood risk assessment that takes into account the new spring line risk identified in the February 2020 flooding would be at best irresponsible if not negligent. Shropshire Council would need to consider indemnity insurance for the likely legal claims for damages from existing and new residents for damage caused by the future flooding that would occur.</p>
Page 211 A1895B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>I do not agree with the following: "The council began preparing the Local Plan review in 2017. At the core of this process is continuous and meaningful community engagement, in line with the Council's Statement of Community Involvement (SCI). In the consultation with Much Wenlock residents in 2019, the council was informed in the local meeting that the proposed development adjacent would:</p> <ul style="list-style-type: none"> a) Not address the flooding on Hunters Gate b) Would exacerbate flooding further down stream c) Did not address the local need for affordable housing. The agents appointed by the landowners confired after this public consultation to the council that the development was not commercially viable. At a town meeting called by the Agents in February 2020 (not by the Shropshire or Much Wenlock Town Councils), the Agents confirmed that Shropshire Council had approached them directly to see how the development could be made viable. It was only at this meeting that the population of Much Wenlock was made aware of the potential increase in the dwelling allocation (in excess of the Neighbourhood Plan) and that the dwellings would not be affordable housing. The proposal presented by the Agents did not demonstrate that the proposed development would successfully address the flooding issues, nor did it demonstrate how the previous failings of the original Hunters Gate development would be prevented and therefore INCREASING the risk of flooding. I object to the above statement on the basis that: <ul style="list-style-type: none"> a) Delegation of consultation activities to an organisation with a vested interest in the development is at best irregular and a conflict of interest. b) The Agents held a meeting with the town in February 2020, however only feedback from the Agents was to be sent to Shropshire Council and no means provided for residents to do so. c) The meeting included statements that were incorrect i.e. the availability of funding to take excess water from the estates into adjoining fields. This was subsequently found to be incorrect and the funds could not be used for this purpose. This would have left many residents in attendance with an incorrect view of the flood risk mitigation open to the town. d) When a request for comments was made by the council for a cabinet meeting on 6th July 2020 I provided my feedback as well as complaining about the above. My objections were incorrectly rejected. My request to appeal were ignored. In summary there has not been "meaningful community engagement", instead a less than transparent discussion between council and agents of the landowner has taken place, and attempts to challenge the legitimacy of the output from these discussions have been obstructed. If you require evidence of the above, then this can be found from the Council e-mail servers under the subject: "RE: QUESTIONS FOR CABINET MEETING ON 6 JULY 2020 - PROPOSED DEVELOPMENT OF 120 HOMES AT MU012, MUCH WENLOCK - Item 7". The e-mails and recipients are as follows: <ul style="list-style-type: none"> - e-mail 14th July to Councillor Macey - Portfolio Holder for Housing and Strategic Planning - e-mail 8th July to Tim Ward - e-mail 4th July to Julie Ward - e-mail 24th June to Tim Ward - e-mail 25th March to PlanningPolicy@Shropshire.gov.uk
A1897B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>Where is the justification for designating Cressage as a Community Hub?</p> <p>I have been told that up to 2017, when Cressage, a Countryside Settlement in 2015, was scored to see if it qualified as a Community Hub it fell short, but in 2017 it was decided that Cressage qualified although nothing material had changed at that time. Since then the C of E church has closed, the shop is hanging on by a thread (although it did benefit from lockdown) and the pub closed about 2014.</p> <p>There is strong and increasing feeling in the village that this designation was taken without consulting the residents and that the previous status of Cressage as "Countryside" should be reinstated. There can then be a full and open debate about how and Cressage might qualify as a Community Hub and whether it would be beneficial to the residents to do so.</p>
A1897B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	<p>This site is not at all suited to housing development other than perhaps 2 or 3 houses adjacent to the A458.</p> <ul style="list-style-type: none"> 1. The A458 is on a steep hill at the site of the access to the site. There are existing houses very close to the road on the opposite side from the proposed site which lies above the road. Despite the speed limit much of the traffic along the A458 ignores this limit and there does not appear to be any enforcement at the east end of the village – and very little at the west end. 2. Footpath provision is minimal in this area and there does not appear to be space to construct a roundabout. The only way to ensure safe access to the site would be by traffic lights. In addition a speed camera would help to slow traffic down to increase road safety. 3. It is hard to see how surface water can be directed anywhere but across Wood Lane into the Plocks Brook. This stream already runs at full capacity in winter. During winter 2019/20 the stream overtopped its banks three times causing much damage to trees and gardens on either side. The surface water from a scheme of this proposed size would constitute a huge addition to the volume of this small stream. 4. Given the evident difficulties with access to this site it might make more sense long term to look at a site to the east of Severn Way. There is space to make an entrance road south of Severn Way and foul drainage and surface water could be discharged direct to the sewage works and River Severn respectively.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1921B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Introduction. Just six years ago, in July 2014, the Much Wenlock Neighbourhood Plan (MWNP) was agreed following a public vote: it was endorsed by both the Town Council and Shropshire County Council. Created with regard to the National Planning Policy Framework it is designed to set the tone for the development of the town until 2026, incorporating the vision of the local community. In doing so the Plan takes account of the scale and size of the Parish, the natural and historic environment, employment, the rural and urban landscape of the area and the critical issues of flooding, traffic and affordable housing. The Plan takes a pragmatic approach to all these issues, recognising the pressures of the twenty-first century. In the Introduction of the draft LP it states at paragraph 2.26: "The Council has always taken a positive and proactive approach to Neighbourhood Plans and has always sought to work constructively with local areas to advance their aspirations." The MWNP was drawn up to cover the period 2014-2026, in line with the SAMDev Plan. However, Shropshire Council now intends to ride roughshod over the agreed MWNP, seemingly using the different time periods to justify this as indicated in paragraph 2.27. Moreover, under SP2 (Strategic Approach) it states at paragraph 7: "The production of formal Neighbourhood Plans will be supported and can identify development opportunities which will complement proposals in this Local Plan. In doing so, the Plan will be acceptable provided they accord with the Shropshire Local Plan and the views of local residents do not matter. This view is reinforced by the comment in 813 (Much Wenlock Place Plan Area) where it states at 813.12: "The Much Wenlock Neighbourhood Plan for Much Wenlock covering the period from 2013-26 was adopted in 2014. The policies and proposals within this Neighbourhood Plan which conform with the Local Plan continue to apply." Stakeholders have been given some opportunity to comment on the LP, but the tortuous methodology demanded by the Council suggests that few people will have the time or inclination to do so. Perhaps this is exactly what the Council wants. General - In paragraph 3.5 (Strategic Policies) the Government's Standard Methodology for assessing local housing need indicates that Shropshire requires 25,894 new houses by 2038, yet in paragraph 3.6 the Council has set a target of 30,800. This is 19% higher than the Government's target, but without any clear justification. As its contribution to this target the MWNP envisages a housing target of 130 dwellings during the Plan period (2013-26). Shropshire Council has now decided to impose a figure of 200 houses in Much Wenlock by 2038, 120 of which will be on a 0.30% increase in housing need. This is in sharp contrast to the MWNP which envisaged the increase being achieved via small windfall residential sites. Furthermore, the Council's figure of 200 is likely to be revised upwards over time, yet the repercussions of such an increase in housing need to have been ignored by the County Council. Furthermore, the Town Council appears paralysed and has merely noted the 0.30% increase in housing need for the Hunters Gate site. Residential development & traffic There is limited scope for employment in Much Wenlock which means that the 0.30% increase in housing need for these new residents will be commuting to work. There is no rail link and public transport is limited to a skeleton bus service which means that commuters will travel by car. In addition to the proposed development at Hunters Gate the Council is considering a development of 1,000 houses at Tasley on the edge of Bridgnorth as well as the construction of 1,000 houses at Buildwas on the site of the old Ironbridge power station. Many of these new residents are likely to be employed in and around Telford which will put considerable pressure on the A458 and most particularly at the Gaskell Arms junction. This junction is already a bottleneck with the A4169 and the B4378 both meeting the A458. In addition the B4371 joins the A458 just a few hundred yards from this junction. The likelihood is that Racecourse Lane and St Mary's Lane will become 0.30% increase in housing need for traffic cutting through the town centre via Barrow Street and Sheinton Street to avoid this junction. An increase in traffic in Racecourse Lane will adversely affect the Primary School causing congestion and health & safety issues, particularly at drop off and pick up times. The increase in traffic will inevitably increase carbon emissions in the town. Moreover, the pavements in the town are very narrow and in places almost non-existent which means that the increase in traffic will make pedestrians very vulnerable. For several years there was talk of a by-pass for Much Wenlock, but this has not been raised for some time, presumably because of the very significant cost. Affordable housing 0.30% The potential development at Hunters Gate is being driven by the landowner (Wenlock Estates) and the developer (Persimmon) with one aim in mind: PROFIT. There is no concern for the local community and its requirements and affordable housing is very unlikely to be a consideration, despite it being a key element in the Much Wenlock Neighbourhood Plan. The pitiful consultation exercise conducted by Berrys in February 2020 on behalf of Wenlock Estates demonstrates a complete lack of concern for the local community. Health & Education The Much Wenlock Medical Practice does not have the capacity to cater for the influx of significant numbers of new patients. Furthermore, the Primary School and William Brooks School are both at capacity and in any case an increase in the number of coaches bringing pupils into the town will only cause further congestion. Water & Waste Severn Trent Water was obliged to supply a number of houses in Much Wenlock by tanker during the very dry weather earlier this year: this demonstrates that there is already inadequate utility provision. The Severn Trent waste treatment plant on Downsmill Lane is already at capacity and will not be able to cope with the additional waste water: this could result in major pollution. Flooding - Much Wenlock has a long history of flooding. Following severe flooding in 2007 when 64 properties were flooded, including several houses in Hunters Gate, the Much Wenlock Flood Alleviation Scheme was initiated. This resulted in the construction of two attenuation ponds, one on the Sytche Brook and the second on the Shylte Brook. However, neither of these will benefit Hunters Gate as was very apparent during the flooding in February 2020 when a number of houses in the town centre were flooded. The 1401eildndsthe Park to the east of the Brsley road (B4376) were completely saturated with two feet of standing water in many places. Further house building and hard standing on the greenfield site next to Hunters Gate will only exacerbate this problem. Summary Unfortunately this is another example of centralised government failing to understand local issues and, worst of all, failing to undertake proper consultation in order to inform their decisions. The starting point for any new development should be the Much Wenlock Neighbourhood Plan. The housing targets set out in the Plan are easily being achieved through small scale, local developments. The imposition of a large scale development on a flood plain when there are many other options flies in the face of this Plan. It is naive to imagine that the Community Infrastructure Levy which would be paid by allowing the Hunters Gate development would be adequate to address the various infrastructure and other issues. It is important to recognise that the Much Wenlock housing targets were set before there were very sizeable projects at Tasley 0.30% on the Ironbridge power station sites were raised. If Shropshire Local Plan is to be acceptable then it must be informed by the Much Wenlock Neighbourhood Plan and be part of a democratic process involving the local community. The Town Council's inactivity is disappointing. As elected bodies the Town Council and Shropshire Council must ensure that sufficient time is allowed for proper consultation to take place and they must listen constructively to the outcome of that consultation as happened in 2014 when the original Much Wenlock Neighbourhood Plan was devised.
A1922B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area		Introduction. Just six years ago, in July 2014, the Much Wenlock Neighbourhood Plan (MWNP) was agreed following a public vote: it was endorsed by both the Town Council and Shropshire County Council. Created with regard to the National Planning Policy Framework it is designed to set the tone for the development of the town until 2026, incorporating the vision of the local community. In doing so the Plan takes account of the scale and size of the Parish, the natural and historic environment, employment, the rural and urban landscape of the area and the critical issues of flooding, traffic and affordable housing. The Plan takes a pragmatic approach to all these issues, recognising the pressures of the twenty-first century. In the Introduction of the draft LP it states at paragraph 2.26: "The Council has always taken a positive and proactive approach to Neighbourhood Plans and has always sought to work constructively with local areas to advance their aspirations." The MWNP was drawn up to cover the period 2014-2026, in line with the SAMDev Plan. However, Shropshire Council now intends to ride roughshod over the agreed MWNP, seemingly using the different time periods to justify this as indicated in paragraph 2.27. Moreover, under SP2 (Strategic Approach) it states at paragraph 7: "The production of formal Neighbourhood Plans will be supported and can identify development opportunities which will complement proposals in this Local Plan. In doing so, the Plan will be acceptable provided they accord with the Shropshire Local Plan and the views of local residents do not matter. This view is reinforced by the comment in 813 (Much Wenlock Place Plan Area) where it states at 813.12: "The Much Wenlock Neighbourhood Plan for Much Wenlock covering the period from 2013-26 was adopted in 2014. The policies and proposals within this Neighbourhood Plan which conform with the Local Plan continue to apply." Stakeholders have been given some opportunity to comment on the LP, but the tortuous methodology demanded by the Council suggests that few people will have the time or inclination to do so. Perhaps this is exactly what the Council wants. General - In paragraph 3.5 (Strategic Policies) the Government's Standard Methodology for assessing local housing need indicates that Shropshire requires 25,894 new houses by 2038, yet in paragraph 3.6 the Council has set a target of 30,800. This is 19% higher than the Government's target, but without any clear justification. As its contribution to this target the MWNP envisages a housing target of 130 dwellings during the Plan period (2013-26). Shropshire Council has now decided to impose a figure of 200 houses in Much Wenlock by 2038, 120 of which will be on a 0.30% increase in housing need. This is in sharp contrast to the MWNP which envisaged the increase being achieved via small windfall residential sites. Furthermore, the Council's figure of 200 is likely to be revised upwards over time, yet the repercussions of such an increase in housing need to have been ignored by the County Council. Furthermore, the Town Council appears paralysed and has merely noted the 0.30% increase in housing need for the Hunters Gate site. Residential development & traffic There is limited scope for employment in Much Wenlock which means that the 0.30% increase in housing need for these new residents will be commuting to work. There is no rail link and public transport is limited to a skeleton bus service which means that commuters will travel by car. In addition to the proposed development at Hunters Gate the Council is considering a development of 1,000 houses at Tasley on the edge of Bridgnorth as well as the construction of 1,000 houses at Buildwas on the site of the old Ironbridge power station. Many of these new residents are likely to be employed in and around Telford which will put considerable pressure on the A458 and most particularly at the Gaskell Arms junction. This junction is already a bottleneck with the A4169 and the B4378 both meeting the A458. In addition the B4371 joins the A458 just a few hundred yards from this junction. The likelihood is that Racecourse Lane and St Mary's Lane will become 0.30% increase in housing need for traffic cutting through the town centre via Barrow Street and Sheinton Street to avoid this junction. An increase in traffic in Racecourse Lane will adversely affect the Primary School causing congestion and health & safety issues, particularly at drop off and pick up times. The increase in traffic will inevitably increase carbon emissions in the town. Moreover, the pavements in the town are very narrow and in places almost non-existent which means that the increase in traffic will make pedestrians very vulnerable. For several years there was talk of a by-pass for Much Wenlock, but this has not been raised for some time, presumably because of the very significant cost. Affordable housing 0.30% The potential development at Hunters Gate is being driven by the landowner (Wenlock Estates) and the developer (Persimmon) with one aim in mind: PROFIT. There is no concern for the local community and its requirements and affordable housing is very unlikely to be a consideration, despite it being a key element in the Much Wenlock Neighbourhood Plan. The pitiful consultation exercise conducted by Berrys in February 2020 on behalf of Wenlock Estates demonstrates a complete lack of concern for the local community. Health & Education The Much Wenlock Medical Practice does not have the capacity to cater for the influx of significant numbers of new patients. Furthermore, the Primary School and William Brooks School are both at capacity and in any case an increase in the number of coaches bringing pupils into the town will only cause further congestion. Water & Waste Severn Trent Water was obliged to supply a number of houses in Much Wenlock by tanker during the very dry weather earlier this year: this demonstrates that there is already inadequate utility provision. The Severn Trent waste treatment plant on Downsmill Lane is already at capacity and will not be able to cope with the additional waste water: this could result in major pollution. Flooding - Much Wenlock has a long history of flooding. Following severe flooding in 2007 when 64 properties were flooded, including several houses in Hunters Gate, the Much Wenlock Flood Alleviation Scheme was initiated. This resulted in the construction of two attenuation ponds, one on the Sytche Brook and the second on the Shylte Brook. However, neither of these will benefit Hunters Gate as was very apparent during the flooding in February 2020 when a number of houses in the town centre were flooded. The 1401eildndsthe Park to the east of the Brsley road (B4376) were completely saturated with two feet of standing water in many places. Further house building and hard standing on the greenfield site next to Hunters Gate will only exacerbate this problem. Summary Unfortunately this is another example of centralised government failing to understand local issues and, worst of all, failing to undertake proper consultation in order to inform their decisions. The starting point for any new development should be the Much Wenlock Neighbourhood Plan. The housing targets set out in the Plan are easily being achieved through small scale, local developments. The imposition of a large scale development on a flood plain when there are many other options flies in the face of this Plan. It is naive to imagine that the Community Infrastructure Levy which would be paid by allowing the Hunters Gate development would be adequate to address the various infrastructure and other issues. It is important to recognise that the Much Wenlock housing targets were set before there were very sizeable projects at Tasley 0.30% on the Ironbridge power station sites were raised. If Shropshire Local Plan is to be acceptable then it must be informed by the Much Wenlock Neighbourhood Plan and be part of a democratic process involving the local community. The Town Council's inactivity is disappointing. As elected bodies the Town Council and Shropshire Council must ensure that sufficient time is allowed for proper consultation to take place and they must listen constructively to the outcome of that consultation as happened in 2014 when the original Much Wenlock Neighbourhood Plan was devised.
A2107B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Disagrees with designation of Cressage as a Community hub. Cressage can't be described as a significant rural service centre, it doesn't have the infrastructure or services to supply the needs that a growth in housing would demand. Cressage has limited services and some services listed in the criteria are no longer open in Cressage. 300 people indicated they wanted the village to remain as open countryside in 2018/19.
A2110B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Increased risk of air pollution. This site is right next to the primary school and traffic arising from this proposed development will directly impact on the air quality in the school vicinity. Road transport is a major source of air pollution that harms human health and the environment. It is well documented that primary school children are particularly susceptible to poor air quality as their airways are smaller and still developing. They breathe more rapidly than adults. Buggies and prams put them at the level of car exhausts. The proposal also states that a new roundabout access will be provided from the A458 into the site. Roundabouts cause tailbacks unless the traffic on each approach road is equal. These tailbacks of idling vehicles will be very close to the playground of the primary school. Increased risk of flooding. As an agronomist I have advised on this land and the surrounding fields and am aware of their potential to become waterlogged during spells of wet weather. This is an overdevelopment in an area prone to flooding. The met-office warn us that the flash floods we have experienced in the town due to intense rain events will increase in both frequency and intensity in the coming years. Lack of infrastructure to support a development of this size. The town does not have sufficient resources in the way of doctors surgery, shops, amenities, and sewage systems to cope with the increase in number of people and vehicles that would result from this development.
A2117B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly object to the proposals and believe Cressage should remain as OPEN COUNTRYSIDE. I believe numerous errors were made when scoring Cressage as a community hub as the facilities listed do not exist, are inadequate for current number of residents or are over-subscribed. The last time community hub status was proposed over 300 residents responded saying they did not want to become a hub. The existing infrastructure within the village cannot support hub status, or any further housing development. The roads are already clogged with cars making it difficult for buses and farm vehicles to pass. The main road (A458) through the village has seen a massive increase in traffic with the volume being massively disruptive and dangerous, particularly due to the speed of vehicles using the road and not adhering to the speed limits. The (small) village school is over-subscribed as is the Dr's surgery. The local shop is limited. There are no other facilities in the village and in particular no provision for young people. In summary, I STRONGLY OBJECT to the proposal referenced above and believe Cressage should remain as OPEN COUNTRYSIDE.
A2120B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The Glebe field—CES005 is not an appropriate site for development. The A458 road is far too busy for more residential dwellings and traffic calming measures would not be able to address the speeding concerns. The road is not suitable for a roundabout as most vehicles do not abide by the current speed restrictions and there is no reason I think motorists will abide by the presence of the roundabout in good time to be safe. The A458 is not wide enough to allow appropriate distance between vehicles/lorries to be able to manoeuvre around a roundabout. If the side-road at site CES005 has very low flows then the mini-roundabout will not perform well and drivers will start to treat it merely as an obstruction to be negotiated. This makes the site completely unsafe for development. Also with the groundwork that would be required to develop CES005, the steep slope in the field will cause significant drainage issues and this has not been addressed in plans.
A2120B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain OPEN COUNTRYSIDE. Despite what the Shropshire Council 'points' system states, the reality is the village does not have the drainage, sewage, road/pedestrian access, GP surgery, school provision, commercial opportunities, etc to cope with the level of housing associated with Hub status. The point system developed by Shropshire Council was faulty and not an accurate depiction of the village. Cressage residents opposed the Hub status in earlier consultation and the local Parish Council ignored the views. Cressage residents would like to remain Open Countryside.
A2121B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I have serious concerns over the plans for the development of the Glebe Field—the land adjoining The Vicarage. The A458 is an extremely busy road and adding residential properties to the flow of traffic is going to adversely impact the village. The traffic flow from the south into the village comes down a hill and VERY few motorists obey the 30 mph speed restrictions. It has been proposed that traffic calming measures could be implemented. At the time of writing, no such plans have been made public. With the nature of the road and the proposed development, a roundabout has been suggested but there are real concerns about its feasibility. A mini roundabout on the A458 at the entrance of the proposed development site would not meet the guidance and the volume of traffic required for such a measure. The speed restriction isn't adhered to now—why would that change? Especially with the road descending into the village and natural acceleration of vehicles, adding traffic calming measures will lead to an increase in collisions/accidents. Also with regards to the Glebe field, there are environmental concerns about once the contraction of land occurs to build what the impact will be on drainage. The sewerage works in the village are antiquated and to accommodate the proposed number of dwellings, major development works would need to be carried out and will adversely impact the surrounding properties. The proposed number of dwellings is also a concern. With the high number of homes proposed there is a concern about density and quality of life. If village life is to be sustainable, then why cram in as many homes as possible on a field? There is a loss of privacy and light and the detrimental impact on the environment. There is a plethora of species that rely on the field as part of their habitat—bats, deer, newts, slow worms, etc. These creatures deserve to have their habitats protected. No plans have been made public as to what the development may look like. The original plan suggested several years ago was for a fraction of dwellings.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2121B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Regarding the site of The Eagles Pub—I do think it would be a detriment to the village to see the pub demolished for more housing. Whilst sympathetic to the growing population of the country, there is also an economic need to provide employment. With The Eagles site being one of the very few commercial sites in the village, it would be worth keeping it as a commercial site. From a strategic point of view, it would be more beneficial to the village to have another local business that could be supported by residents. The village once had a vibrant bakery, Post Office, & pub. Any opportunity to resurrect these amenities will be lost if the site is converted to just residential dwellings.
A2122B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain OPEN COUNTRYSIDE. Despite what the Shropshire Council 'points' system states, the reality is the village does not have the drainage, sewage, road/pedestrian access, GP surgery, school provision, commercial opportunities, etc to cope with the level of housing associated with Hub status.The point system developed by Shropshire Council was faulty and not an accurate depiction of the village. Cressage residents opposed the Hub status in earlier consultation and the local Parish Council ignored the views. Cressage residents would like to remain Open Countryside.
A2122B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The Glebe field—CES005 is not an appropriate site for development. The A458 road is far too busy for more residential dwellings and traffic calming measures would not be able to address the speeding concerns. The road is not suitable for a roundabout as most vehicles do not abide by the current speed restrictions and there is no reason I think motorists will abide by the presence of the roundabout in good time to be safe. The A458 is not wide enough to allow appropriate distance between vehicles/lorries to be able to manouver around a roundabout. If the side-road at site CES005 has very low flows then the mini-roundabout will not perform well and drivers will start to treat it merely as an obstruction to be negotiated. This makes the site completely unsafe for development. Also with the groundwork that would be required to develop CES005, the steep slope in the field will cause significant drainage issues and this has not been addressed in plans
A2168B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The last time this community hub proposal was aired over 300 residents responded stating that they didn't want it and to remain open countryside and the scoring was flawed and numerous errors were made. This is still the case. We don't have the infrastructure to cope with additional homes or industry, our doctors surgery is full, we don't have a pharmacy only a dispensary, our school is having to hire additional teachers and has demountable classrooms as the main building is full. We MUST REMAIN OPEN COUNTRYSIDE
A2179B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	S13.1 Paragraph 2 I object to the Neighbourhood Plan for Much Wenlock being superceded by the Local Plan. The Neighbourhood Plan has been accepted and is in place. The new local plan should conform with the Neighbourhood Plan, not the other way around. Paragraph 7 I object to: a relatively large housing development of 120 houses; in an area where there are existing flooding issues and currently no provision for exceedence water and insufficient drainage systems in the nearby development of Hunters Gate. The Neighbourhood Plan focussed on small scale development, infilling, and brownfield sites so as to maintain the character and heritage of the town. It also states "minor housing development with no impact on surface water runoff".S13.1(i) Statement 1 I object to the increased number of vehicles that will discharge onto the A458. Although the A458 and A4169 have been declared a "strategic corridor" in Shropshire, there is no rail connection and the roads are narrow A roads with a considerable bottleneck at Gaskell corner. The planned developments at both Bridgnorth and Ironbridge along with the houses planned at this site will increase traffic on the roads and subsequently the narrow residential streets of Much Wenlock will become rat runs changing the quality of life in the town. Statement 2 I object to the need for the developer to " deliver community benefits offsite by way of flood alleviation" and "removal of exceedence water from existing surface water and foul sewer system" being included in the contract for the new development. The issues in the Hunters Gate area need to be addressed separately from the new development or the developer will be able to hold the Council to ransom through the number of houses he deems to be "viable" to cover the costs of the additional drainage work that is needed in addition to the requirements of the new development. Expanation 5.182 No mention has been made of the extra school provision that would be required for such a large number of new houses
A2186B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Oppose allocation of the site for a variety of reasons - better sites are available in Cressage; the A458 is a busy road and development on the site would add to traffic on the road; concerns about safety of vehicles entering A458 from new junction; need to improve pedestrian access from site to local services; mitigation measure of a new roundabout won't work; impact on wildlife from development of the field; potential for increased flooding
A2186B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Disagrees with designation of Cressage as a Community hub. Cressage can't be described as a significant rural service centre, it doesn't have the infrastructure or services to supply the needs that a growth in housing would demand. Cressage residents have voted against becoming a hub and feel that the scoring system for hierarchy of settlements is flawed
A2187B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I believe that a single housing estate of 120 units will seriously overwhelm the town, and would prefer arrange of smaller sites to be developed over the required period. At a time when the former IronbridgePower Station site will provide about 1000 houses, and with other sizeable developments in Bridgnorth andCressage, traffic and community services will come under impossible pressure.I understand that a reason for choosing a single site is to allow for a proportion of affordable houses, but Ialso believe that affordable homes should be distributed around the town, on sites specifically designed forthem. As we have seen in recent years in Much Wenlock it is perfectly possible to use exception sites toachieve this, and the resulting developments have been very successful, rather than tagged on to otherdevelopments just because it is a planners requirement.The development guidlines indicate that the development would deliver substantial community benefitsthrough flood alleviation measures, and I understand that the size of the development is needed to financethose measures. However, flooding in that part of town affects only a handful of houses, and I feel it quiteunnecessary to permit a huge development, which would of course require flood measures, merely to solvea small problem affecting a very small number of houses.
A2187B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I do not believe that a single housing site is appropriate for the community of Much Wenlock. There are other as yet undeveloped, smaller sites which over the period will become housing sites, and being smaller and developed over a longer period, will more easily integrate within the town, allowing for a more gradual uptake in demand for services, schooling etc. Additionally, given the flooding history of the town, especially in the Hunters Gate area, it seems extraordinary to propose further large scale development in that area.
A2197B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	No specific comments.
A2246B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A2247B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A2248B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A2249B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A2250B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	Cressage should remain as open countryside and not be a Hub. The village does not have the infrastructure: the school is full and the doctors are oversubscribed. We do not have a pharmacy, we only have one small shop and no library. The points for a Hub were thus wrongly awarded. Over 300 Cressage residents opposed Community Hub status and their views have not been considered by either the Parish or Shropshire Council.
A2306B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	object to the proposal to make Cressage a 'hub' and also to the additional proposal from Raby Estates. No expansion of Cressage can be contemplated without first addressing the A458 traffic safety issue by constructing the bypass initially proposed in 1991.
A2318B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	The Eagles Public house, this has been an eyesore for many years following several previous tenants failing to make a viable business of running the pub. The community as a whole want to see the site developed, preferably for commercial use of some sort but if not residential will do to rid the blight on the village that exists. Of recent time unfortunately the building has had listed status forced upon it and not at the will of the majority of residents to my understanding, which further limits the opportunities for developing this site as a whole. The building itself isn't fit for much, whilst also having limited footpath alongside, making it dangerous for pedestrians. The chance to have this building removed to improve the highways and implement either light industrial, commercial or residential developments provide vast visual improvements for most residents and those passing through. The site itself is ideally located to capture passing trade from the A458 and accessible to the whole village which lends itself to development for a village shop purposes, assuming space is retained for car parking to cater for the passing trade which would help in making it more commercially viable. Current applications have been to implement residential housing on the site and with listed status now on the Public House itself this restricts the development opportunities. I would be quite happy seeing almost any development of this site and am not opposed to it being residential.However this site is developed, and I hope it is, consideration should be given to the pedestrian needs and also that of those travelling by road at the junction of Sheinton Road as visibility there when joining the A458 is impaired.
A2318B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	The land adjoining The Vicarage on A458, Cressage has been identified to provide up to 60 homes, and for the largest planned development within Cressage I see this as the best location having least impact on the existing residents due to the main area of development being shielded by its surrounds. As this development would be on the opposite side of the A458 to that of the core of the Village traffic calming measures such as a pedestrian crossing similar to that Cross Houses, allowing residents to more safely cross to the School, Shop, Doctors or other amenities would be necessary and would hopefully help in general speed reduction when coming into Cressage from Much Wenlock direction. More generally the road infrastructure within Cressage will also need to have to deal with increase traffic from large scale developments at the Iron Bridge Power Station site where 1000 homes and business units will be built, further developments in Much Wenlock and Bridgnorth where 2000 more homes will be built. The likelihood is that traffic through Cressage will increase from these developments as residents commute. Cressage already has speed issues through the Village along with poor narrow footpaths along the A458 where passing Cars and Lorries come uncomfortably close to pedestrians. Additional practical traffic calming measures will be needed to control the speed of traffic and ensure the safety of pedestrians. Currently speeding through the Village is only ever addressed temporarily when the mobile speed van is present.
A2318B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	Cressage being defined a 'Community Hub' is an over statement, it is a small village within the countryside, which would be classed as 'Open Countryside' based on a visual assessment. The suggestion for Cressage to become a "Community Hub" I believe was following an assessment and grading process undertaken by the Council based on a facilities/services survey. The criteria used and points issued appears to have been questioned by some due to comparisons being drawn with facilities/grading's Cressage has with that of other Villages. Do the residents of Cressage want the Village to be classified a Community Hub? Do the residents of Cressage want the Village to remain Open Countryside? Putting a label on the Village is immaterial to many of the residents of Cressage, but what they generally want is small scale development spread over time which goes through a democratic planning process. My understanding based on what we were told by the council is we are better positioned to have some say on what development happens and where by being classified as a Community Hub, as opposed to being classed as Open Countryside. The Local Plan would appear to support my understanding in that the details from the Parish Plan which was ran by the community, appears to have been adopted by the Local Plan. However what concerns me is "Community Hub" sounds like an area identified for large scale development. What I/we don't want to see is large scale developments over and above that already outlined within the Local Plan and the defined development boundary. The Parish Plan identified two main sites for development within Cressage, these were The Eagles Public house and the Land adjoining The Vicarage on A458. These two locations with some other small-scale windfall residential developments would easily cater for the maximum developments wanted by residents of Cressage and meets the housing allocation detailed in the Local Plan. Assuming the advice from the council was accurate, I would have to support the classification of Community Hub, providing it does take into account the local residents views when it comes to any changes in and around the village.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2343B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I feel VERY STRONGLY that Cressage should remain OPEN COUNTRYSIDE As per the previous local plan consultation, when over 300 residents responded by rejecting becoming a community hub. I believe the numerous errors made when scoring Cressage to be up graded are still in evidence. Cressage does not have the infrastructure or services to support further housing. Our school is at maximum capacity with having to employ further staff who have to work in demountable classrooms. The Doctors surgery is full as are neighbouring practices. We don't have a pharmacy, only a dispensary. There is a mobile library not a perminant building. On these points I believe we should remain OPEN COUNTRYSIDE
A2348B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	1. The site is on a moderately steep hill and is difficult and dangerous to access unless there is a major road alteration with a roundabout and pedestrian crossings to allow children and cyclists to access the facilities in the main village: school, shop, health centre and playground. 2. Wood Lane is narrow and rural in character with a steep drop from the land adjoining the Vicarage where there has already been a flash flood through the listed building below (Jasmine Cottage, Wood Lane and also Jasmine Lodge). More building would increase the flooding risk, despite any drainage strategies. There is also from there another steep drop down to the former mill pond and lead on the Plocks Brook, and its junction with the A458 is equally dangerous. 3. To create sufficient site lines for a splayed entry several buildings to the west of the A458 would have to be demolished. The village is bisected by the very busy A458 with the majority of the housing and all the facilities to the east of the main road. This road is difficult as it rises up out of the village towards Harley and vehicles drive extremely fast despite the 30 mph limit. It would be more sensible if the village is to develop to extend the boundary to the east beyond Severn Way with access via the Sheinton Road. It is not clear why the recently built large house outside the village boundary to the north was given planning permission as it breaches the current village development boundary. 4. Another proposal has been submitted from Raby Estates (not in the Local Plan Review document) which if Cressage warrants Community Hub status, appears much more wellreasoned, and managed. However a number of points are not clear: -where any local workspaces would be sited? -where any infrastructure improvements to serve the increased population be sited? -compulsory purchase of the land adjoining Wood Lane to create the 'community park'? and who would be responsible for its ongoing maintenance. The Plock's Brook floods regularly at the current crossing so flood alleviation would have to be addressed.
A2348B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	1. Redevelopment of The Eagles site as windfall development would enhance this current derelict site and reinstate the Eagles, now designated as a Listed Building, at the core of the village from a visual point of view with great scope for enhancement. 2. The relocation of the footpath through the site, mowing it away form the A458 is essential, as well as improvement to the site lines from the Sheinton Road junction 3. If Cressage is defined as a Community Hub and there is programme of significant house building, there will be a need for more local infrastructure (see para 5.184). The Eagles could then be converted into a residential unit on the first and part of the ground floor, with a few rooms on the ground floor unit for community use, such as local café/ local farm shop/ meeting place. This proposal has strong local support in a village already severely lacking in sufficient amenities for the existing population.
A2348B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	1. Why has Cressage been allocated as a Community Hub when it does not score highly enough? Is it in fact?? The parish council is very unclear about what the current status actually is and it seems it is actually still classed as Open Countryside. 2. The numerical assessment for Cressage was incorrect identifying it as a potential Community Hub as it does not have a Post Office, the Church is closed (apart from festival services) and the Library van stops for 45 minutes every 2 weeks. In addition, the bus service is very poor, the doctors surgery is already full, there is no Pharmacy (a dispensary is not the same), the School is overflowing and already has to hire extra teachers. Thus there were numerous errors in the scoring system and it does not score sufficient points for Hub status. 3. Basically amenities and services in Cressage have reduced concomitantly with the building of the large 'new' estate in the 1960's/70's (viz loss of post-office which was also a shop, bakery, garage, pub, church). 4. When the idea of 'community hub' status was proposed previously over 300 residents responded saying they were opposed –but this democratic 'protest' does not seem to have been recorded or seriously addressed. 5. Why did Shropshire Council not carry out a full needs assessment of all communities in order that those such as Cressage could assess its ability to cope with this proposed housing BEFORE any Local Plan was foisted on them. It is clear Cressage does not have the infrastructure or services to accommodate the number of houses that Community Hub status would bring. 6a. There are many agreed brown fill sites (nationally) still not having been built on, but if more housing is definitely needed apart from these, then in Cressage the more suitable option (also incorporating some community amenities) is the Raby Estate proposal (see under Comment 1. – S13.2(1)/CES005). 6b. However the vast majority of the local community (not represented by the parish council) wish Cressage to remain as Open Countryside,
A2384B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I request that we REMAIN OPEN COUNTRYSIDE for the following reasons. 300+ residents opposed Community hub status last time. 1. The surgery is TOO small. It is already at capacity. 2. You claimed we had a functioning church. We DON'T. The building is there, but there are no services, and in fact the church authorities would have already closed it down if there were no restrictions put on them by a building grant they had from English Heritage. It will be closed when the time restriction runs out in a couple of years. 3. The school is already at capacity. Unless you are planning to increase its size! 4. There is NO Post Office and has not been one for a quite a number of years. 5. We have only one small shop which the council has refused to allow to expand. This existing shop did apply to have a Post Office which was also refused. 6. We do NOT have a public house and have not had on for 5 years or more. However you should know this as its one of the proposed sites of development. 7. TRAFFIC: This is a big problem and getting worse every year, and I say that as someone who has lived in Cressage for nearly 50 years. We some times, at certain times of day, have to wait upto 10 minuetts at the end of Severn Way before you can get onto the main road. The majority of Cressage is all on one side of the road including the limited facilities that we have. The majority of the planned building extensions will be on the other side, so any residence in those proposed properties will have to get across to the facilities, either by car or on foot. Each of the properties will almost certainly have at least ONE CAR, increasing the amount of traffic trying to access the main road
A2385B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The proposal for the additional 120 dwellings is contrary to the agreed Neighbourhood Plan for Much Wenlock which was adopted in 2014. The latter was agreed after much research and debate amongst the local inhabitants of the town. Flooding has been a serious concern for the residents of Hunters Gate, Barrow Street and Forrest Avenue for many years and I am not confident that the existing properties will be protected from flooding if the new development is allowed. Any new development which will be visible from the A458 will detract from the overall view of the town detract from the unique character of the town. The proposed roundabout access on the A458 will further disrupt traffic on this road and add to the queueing traffic which is prevalent on the A458 at busy periods. With the proposed housing developments in the area of Much Wenlock, notably those proposed for Cressage, Tasley (Bridgnorth) and Ironbridge Power Station, together with traffic from this proposed development, the current traffic bottleneck at the Gaskell Arms corner will become even more of a disruption to both local and through traffic. Social facilities in the Much Wenlock area, notably the Primary School and the Medical Practise are already at capacity and to add a further 120 households, as well as other infill developments which will be allowed, will make it even more difficult for the local populace to access. As stated in the Neighbourhood Plan of 2014, the town needs affordable family housing for local people who will use the High Street shops and community facilities rather than relatively expensive housing for commuters who see the town as a nice location but do not generally contribute great to the economic and social aspects of the town.
A2389B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Don't know / no opinion	The Environment Agency recommends that you apply the SFRA and WCS to help inform the appropriateness of these sites. I'm not sure whether your latest evidence (we haven't reviewed), prepared by JBA, reflects these additional sites so some additional work may be necessary to inform those.
A2433B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly believe that Cressage should remain OPEN COUNTRYSIDE. I believe that numerous errors were made when scoring Cressage as a Community Hub. The last time Community Hub status was proposed, over 300 residents responded saying they did not want to become a Hub. Our infrastructure cannot cope with extra housing as it is. I strongly believe we should remain OPEN COUNTRYSIDE.
A2449B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly believe that CRESSAGE SHOULD REMAIN OPEN COUNTRYSIDE. The facilities/amenities/services are not able to cope with the scale of housing proposals linked to the Community Hub status proposals. Cressage should not qualify as a Community Hub. Settlement scoring functions have previously been misinterpreted/incorrectly applied to the very limited facilities in the village. The village DOES NOT have a library, a pharmacy, a functioning place of worship or a postoffice. The shop facilities are very limited and the bus service is skeletal. The school and doctors surgery services are also stretched and would struggle greatly to accommodate alarger population. The Cressage Community Hub proposals stated with S13.2 state that employmentdevelopment will be delivered, however the proposals go on to seek a change of use of the most commercially viable site in the village, that being the Eagles site – the only commercial site that is central to the village and with access directly off the A458. I strongly believe that the Council wish to define new Community Hubs, improvements must first be made to existing local community services and amenities to ensure that they could meet future demand. Until these improvements have been made, the village SHOULD REMAIN OPEN COUNTRYSIDE.
A2449B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I have two main concerns for the site policy for the land adjoining The Vicarage. 1. The A458 is a very busy road, and the village of Cressage suffers from speeding traffic. This has long been an issue for residents and concerns are regularly raised. This site is on the opposite side of the A458 to the school, village hall, doctors surgery and shop. If housing developments are to be proposed for that side of the A458, TRAFFIC SPEEDS MUST BE ADDRESSED and safe crossings and walkways provided. That side of the A458 is very much cut off from the rest of the village at present - most residents on that side of the A458 chose to drive their children to school, as the road speeds are too dangerous and the footpaths are too narrow. A mobile police speed camera vehicle regularly operates at the Shrewsbury end of the village and is very successful. During the hours in which it is present, traffic speeds are noticeably lower and acceptable, however when it is not present, traffic speeds of up to twice the limit have been observed. This development is at the other end of the village where concerns regarding speeding are also regularly raised as well as out towards the Cressage bridge. CRESSAGE NEEDS A PERMANENT AVERAGE SPEED CAMERA SYSTEM through the village, ideally with 3 cameras - one at either end of the A458 and one out towards the Cressage bridge. The initial expense would easily be covered by the revenue such cameras would bring and the improvement to the village would be immeasurable. Such a system would also be least disruptive to traffic flow along the A458. 2. My second concern is simply for the density of any house development on this side of the village and its impact on the environment of the village and surrounding countryside. The existing fields are rich, with wildlife - hares, buzzards, yellow hammers, bats and deer are regular sitings among others. Village developments should be of a lower density than town developments and each property should have a suitably large garden space to facilitate the planting of trees and mixed native hedging. Lower density development is far better for wildlife and also reduces the impact of surface water runoff.
A2449B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly believe that the site of The Eagles public house on A458 should REMAIN AS A COMMERCIAL SITE as the land that it stands on is of outstanding community value that could not be replicated elsewhere in the village. The Eagles site is the only commercial site that is central to the village and directly accessible off the A458. It could offer wonderful, commercially viable business opportunities for much needed improvements to village shop services. No other site that is central to the village and with access directly off the main road could offer such opportunity. I believe that shop and post office services in this location, directly off the A458, would be far more commercially viable and offer much needed services to Cressage and its surrounding villages. As it stands villagers are forced to travel to Much Wenlock, Cross Houses or Shrewsbury on a near-daily basis, placing further strain on the road network. The sites position on the A458 is absolutely key to its commercial success and as such the whole community could benefit from the improved services that it would be able to provide, not to mention local employment opportunities. The traffic turning movements could also serve to calm traffic on the A458. The premises of the existing village shop at the top of The Moors could be redeveloped to have a hair salon or other business which would have a commercial viability that is less dependent upon the main road accessibility / passing trade. The village shop in its existing location does not benefit from passing trade and has always struggled commercially and I would say that there is a risk of Cressage having no shop in the future as a consequence, despite proposals for future residential development. The site could link very nicely, via the contaminated land of the former garage site to its rear, to the existing village hall, improving pedestrian access in the village. This contaminated land could be landscaped and potentially become home to the village war memorial in a pleasant garden setting, opening up the opportunity for much needed junction improvements adjacent to the Eagles and making a much more family friendly space for memorial services
A2450B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly believe that CRESSAGE SHOULD REMAIN OPEN COUNTRYSIDE. The facilities/amenities/services are not able to cope with the scale of housing proposals linked to the Community Hub status proposals. Cressage should not qualify as a Community Hub. Settlement scoring functions have previously been misinterpreted/incorrectly applied to the very limited facilities in the village. The village DOES NOT have a library, a pharmacy, a functioning place of worship or a post office. The shop facilities are very limited and the bus service is skeletal. The school and doctors surgery services are also stretched and would struggle greatly to accommodate a larger population. The Cressage Community Hub proposals stated with S13.2 state that employment development will be delivered, however the proposals go on to seek a change of use of the most commercially viable site in the village, that being the Eagles site – the only commercial site that is central to the village and with access directly off the A458. I strongly believe that if the Council wish to define new Community Hubs, improvements must first be made to existing local community services and amenities to ensure that they could meet future demand. Until these improvements have been made, the village SHOULD REMAIN OPEN COUNTRYSIDE.
A2450B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I have two main concerns for the site policy for the land adjoining The Vicarage. 1. The A458 is a very busy road, and the village of Cressage suffers from speeding traffic. This has long been an issue for residents and concerns are regularly raised. This site is on the opposite side of the A458 to the school, village hall, doctors surgery and shop. If housing developments are to be proposed for that side of the A458, TRAFFIC SPEEDS MUST BE ADDRESSED and safe crossings and walkways provided. That side of the A458 is very much cut off from the rest of the village at present - most residents on that side of the A458 chose to drive their children to school, as the road speeds are too dangerous and the footpaths are too narrow. A mobile police speed camera vehicle regularly operates at the Shrewsbury end of the village and is very successful. During the hours in which it is present, traffic speeds are noticeably lower and acceptable, however when it is not present, traffic speeds of up to twice the limit have been observed. This development is at the other end of the village where concerns regarding speeding are also regularly raised as well as out towards the Cressage bridge. CRESSAGE NEEDS A PERMANENT AVERAGE SPEED CAMERA SYSTEM through the village, ideally with 3 cameras - one at either end of the A458 and one out towards the Cressage bridge. The initial expense would easily be covered by the revenue such cameras would bring and the improvement to the village would be immeasurable. Such a system would also be least disruptive to traffic flow along the A458. 2. My second concern is simply for the density of any house development on this side of the village and its impact on the environment of the village and surrounding countryside. The existing fields are rich, with wildlife - hares, buzzards, yellow hammers, bats and deer are regular sitings among others. Village developments should be of a lower density than town developments and each property should have a suitably large garden space to facilitate the planting of trees and mixed native hedging. Lower density development is far better for wildlife and also reduces the impact of surface water runoff.

Page 214

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2450B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I strongly believe that the site of The Eagles public house on A458 should REMAIN AS A COMMERCIAL SITE as the land that it stands on is of outstanding community value that could not be replicated elsewhere in the village. The Eagles site is the only commercial site that is central to the village and directly accessible off the A458. It could offer wonderful, commercially viable business opportunities for much needed improvements to village shop services. No other site that is central to the village and with access directly off the main road could offer such opportunity. I believe that shop and post office services in this location, directly off the A458, would be far more commercially viable and offer much needed services to Cressage and its surrounding villages. As it stands villagers are forced to travel to Much Wenlock, Cross Houses or Shrewsbury on a near-daily basis, placing further strain on the road network. The sites position on the A458 is absolutely key to its commercial success and as such the whole community could benefit from the improved services that it would be able to provide, not to mention local employment opportunities. The traffic turning movements could also serve to calm traffic on the A458. The premises of the existing village shop at the top of The Moors could be redeveloped to have a hair salon or other business which would have a commercial viability that is less dependent upon the main road accessibility / passing trade. The village shop in its existing location does not benefit from passing trade and has always struggled commercially and I would say that there is a risk of Cressage having no shop in the future as a consequence, despite proposals for future residential development. The site could link very nicely, via the contaminated land of the former garage site to its rear, to the existing village hall, improving pedestrian access in the village. This contaminated land could be landscaped and potentially become home to the village war memorial in a pleasant garden setting, opening up the opportunity for much needed junction improvements adjacent to the Eagles and making a much more family friendly space for memorial services
A2480B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	The scale of development proposed for this site is inappropriate and out of character for the size of Much Wenlock and is not compliant with the Neighbourhood Plan which has been approved by Much Wenlock Town Council and Shropshire Council The town does not have the infrastructure in terms of increased road traffic, primary school capacity, medical surgery provision to support a proposal of this scale. Large scale development here will exacerbate the town's flooding issues unless the latter are addressed first (previous promises to address flooding as part of permitted development have not materialised). Shropshire Council has not undertaken a proper community consultation over this revised (and upscaled) proposal as required by law. The support for the proposal from Much Wenlock Council does not reflect the views of the community
A2482B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I firmly believe Cressage should remain open countryside. Numerous errors were made when previously scoring Cressage as a community hub. The last time community hub status was proposed, over 300 Cressage residents responded saying that they did not want to become a community hub, but seemingly those voices and opinions were not heard, listened to or counted. The Cressage infrastructure (Doctors, School, Roads etc) cannot cope with demands the extra housing proposals would place on the Cressage community. I trust that this time the opinions and desires of the vast majority of Cressage residents will be listened to and accordingly acted upon. Therefore Cressage must remain open countryside for the future well being of the village.
A2490B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Disagree	I disagree with the Much Wenlock Place Plan as the number of houses in the new development at Hunters' Gate has been increased to 120. The reason given for the increase in numbers is that the developer will pay for flood alleviation measures for the development and some neighbouring houses. However, this is a small area of the parish and many more homes were flooded on the High St than Hunters Gate in February. There is the additional problem of traffic congestion at Gaskell Corner, which a roundabout onto the A458 will do nothing to address. Along with the proposed 1000+ houses at Tasley, 1000+ at Ironbridge, 60+ at Cressage, the pressure at the Gaskell Corner will be horrific. Not only the increased carbon emissions due to increased cars but also the increased pollution. As we are in the midst of a climate emergency these issues need to be addressed. This is a conservation area and Shropshire's place on the tourist map is important to local businesses. It is very important to preserve our heritage. Will these houses be PassivHaus design as the ones at Callaughton Ash? How many affordable homes? This policy is totally contrary to Much Wenlock's Neighbourhood Plan. The speed of cars travelling through Much Wenlock needs to be addressed, before someone is injured. The Local Plan does not include any note of traffic calming strategies. The Public Transport needs to be prioritised to enable workers to get to their places of work in time for the working day. It is impossible for passengers to reach Telford by bus in order to work. There is very little work locally so without an increase in Public Transport every new inhabitant will be reliant on a car to get to work.
A2495B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S13 Much Wenlock Place Plan Area	Agree	We support the designation of the site adjacent to Hunters Gate/Primary School site as being the best available in Much Wenlock, capable of accommodating the scale of development required. The site can be well visually contained and would have a relatively low impact on the character of the town. Other potential sites of this scale tend to be on rising ground and if developed, would be conspicuous and have an adverse impact on the visual character of a very attractive settlement which has great architectural qualities and importance for tourism.
A0011B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Traffic noise and pollution issues with site, four schools nearby and retirement complex added risk of accidents, harmful effects of vehicle emissions upon the school infants and children, plus the elderly in the area the road is narrow and will not take more traffic. Destruction of biodiversity and historic green area, should be a conservation area. Increase of flood risk, lack of duty of care urges council to rethink.
A0019B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The village is hopelessly overdeveloped for the infrastructure. Drainage floods every time it rains, the public transport is now down to one bus every 2 hours, weekday daytimes only. Your assessment of the public transport IS A LIE - the service is unusably infrequent. Please remove the fudged 'regular' criterion and replace with 'usable' - that and the score for the site reduces to 'poor'. This does not take into account the difficult access to the main road and the impossible access to the narrow back roads. The threat of the bypass blights the area due to the possibility of increased noise, flooding, increased traffic and the devastation of the Shropshire plain below the village. The obvious answers of traffic calming, lorry ban except for access and speed limit enforcement continue to be ignored. areas LYH007 and nearby would also be a terrible place to live if the bypass were ever built. Part is pretty much built out and has almost no 'affordable' housing. Get the infrastructure up to usable standards, give us some public transport and then think about possible building.
A0022B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	1) We feel that any proposed construction traffic requiring access to a development of some proposed 70 houses should be totally separate from Donnett Close. 2) We then fail to see how a possible 140 vehicles safely exiting on to an already busy B- road, that is, two vehicles per household from a narrow Close which at present just about copes at the busy times of the day from the existing properties. 3) When purchasing our existing property we were made aware of the potential flooding issues, surely the proposed development would only compound this ?
A0039B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	I oppose the allocation. The road past the site is already very busy with traffic, further development will exacerbate this situation. The situation is chaotic during rush hour, when flow is restricted by parked cars. Residents of Trefonnen road will have additional inconvenience and danger when exiting properties. The site is defined as a priority habitat and is a UK Biodiversity Action plan site and it should be preserved not developed.
A0042B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Whittington The Parish Council wish to reiterate the need for a roundabout on the B5009 on the junction of Castle Keep. Any development behind the Donnett needs to exit at that point.
A0042B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Support but Park Hall is a cluster and needs to keep green space to protect & maintain rural integrity. PC asks that infrastructure needs to be in place before development starts, roads area problem highways need to upgrade before development. Re-iterate 2019 comments, acknowledge Oswestry has limited growth opportunities & Park Hall could be key site for housing & employment. Infrastructure needs to improve esp. roads. Bridge improvements at Twmpath Lane also widening of road here as well as North Drive. Extend footways & footbridge to cross by-pass. Drainage & sewage improvements a priority. PC ask for master-planning with Gobowen to look at bus routes link to Gobowen station, orthopaedic, Derwen College, Park Hall, Whittington & Oswestry town centre. A possibility to create a tram link from station to hospital stopping at Twmpath bridge.
A0058B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose the major housing development proposed for Trefonnen Road, Oswestry - OSW017.
A0059B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Strongly object to the proposed housing development on Trefonnen Road. This will cause totally unsuitable traffic loads to Upper Brook street, which is already overloaded.
A0070B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	WRPC object to any further Development in High Street, particularly Proposed Site WRP06. High street is a narrow road and unsuitable for further traffic. There is no footway on either side and no scope for improvement. it is a road safety hazard. Road is also blocked by cars parking further users will cause chaos. Any development change be confined to the Trehowell Lane location with access mitigated with appropriate road widening.
A0117B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Adequate land allocated for housing and the planning authority should not allocate additional. Inadequate consideration given to the need for infrastructure to support growth identified. In relation to Town Council services there is a need for the local plan to allocate land for burial purposes and allotments. The local plan addresses the need for employment sites but not the issues that are most important to the residents (schools, health facilities, traffic in the town centre, amenity space etc) As the Town will see significant growth local plan should specifically identify how infrastructure and services issues (e.g schools at full capacity) will be addressed in policies and allocate land to address requirements.
A0117B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	OSW 17 – Site should not be allocated as not suitable for development, nor any new sites within the boundary of the town as there is sufficient allocated land for housing which should be built out. Significant concerns regarding the extension of the town into surrounding green space and regarding traffic along the Trefonnen Road and into the town via Upper Brook Street. The development of up to 30 new homes would exacerbate this issue.
A0155B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The housing allocations should also incorporate smaller sites – having just 2 large ones excludes smaller local builders from the development process. Smaller sites are less disruption. The draft plan does not identify sufficient small sites – NPPF states that planning authorities should identify through the development plan and brown field registers, land to accommodate at least 10% of their housing requirements on sites no larger than one hectare. The land outlined in this rep is requested to be considered for allocation for 2 dwellings.
A0156B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonnen is identified as a Community Hub but the draft plan offers no guidance as to how the village is expected to develop over the plan period. On this basis it is impossible to plan improvements to community facilities, services and infrastructure. Statutory undertakers will not invest in better services, equipment, etc without some certainty on demand and as a consequence the people of the village will suffer. Site promoted for self-build development.
A0186B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Knockin PC does not agree to any further development until continuing safety issues on B4396 are addressed. The development boundary should not be changed. PC considers KCK009 is not suitable as low lying & prone to flooding, concerns over sewage management, road access to the site unsafe any improvement will be detrimental to adjacent properties
A0191B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		The public sewerage network can accept the potential foul flows from the proposed development site SMH031 however an assessment of the Sewage Pumping Station (SPS) would need to be undertaken to establish whether improvements are required. Potential developers need to be aware that this site is crossed by a sewer and protection measures in the form of an easement width or a diversion of the pipe would be required which may impact upon the housing density achievable on site. The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.
A0191B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		For site WRP006 a hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.
A0191B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		The public sewerage network can accept the potential foul flows from the proposed development site SMH038. The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0191B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		For WRP017 hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.
A0202B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The SLAA Nov 2018 in dealing with Windfall Developments it states that "small scale windfall sites of less than 5 dwellings have always represented a significant component of housing supply in Shropshire and it is anticipated this will remain the case".This being the case, we would request that this site might be reassessed as a potential development opportunity.
A0231B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The Canal Yard at Llanymynech which remains outside the development area is likely to be a strategic canal side site providing possibly car parking for canal and heritage area visitors. It might also be an ideal location for an extended canal basin located at the English/Welsh border and which could attract visitors to the village
A0244B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	An additional site should be allocated/included within the development boundary for Gobowen (land east of Whittington Road - part of GWR023) The site is located between two approved developments (15/04968/REM and 15/04473/REM), is adjacent to the development boundary and a natural/logical continuation of development in Gobowen and 15/04473/REM. Access would be via 15/04473/REM (map illustrates location). As the site is behind 15/04473/REM which is currently subject to development, it will not increase visual impact. The site is well located to access services and facilities in the village. This site would contribute to addressing the shortfall of deliver since the adoption of SAMDev and meeting the need for different types of housing identified in the NPPF and draft policies DP1-DP7. Housing delivery will become increasingly important if the revised housing methodology for Shropshire becomes national policy (increasing need from 1,400 to 2,129
A0298B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Concerned about proposed allocation OSW017 as it would represent a significant highway safety risk to local residents, particularly students and families attending Our Lady & St. Oswald's Catholic Primary School, Little Acorns Pre-School, the Marches Secondary School, Oswestry School, Church parishioners, by adding further traffic to overstreched route. This will also pose a danger to cyclists. Upper Brook Street (which becomes Trefonen Road) is very busy (vehicles and pedestrians), has narrow pavements and a pinch point (at Our Lady & St. Oswald's Catholic Primary School) where one way passing and pedestrian crossings occur. The route past the school has a history of near misses due to speed and volume of traffic, the narrow pinch-point and visibility due to parked cars. At 'safe school' events the safety of Upper Brook Street is always highlighted as an extreme concern.
A0334B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site assessment process for St Martins is unclear and as such it is unclear why the proposed allocations were selected The assessment of SMH041 is flawed. Its description of surrounding character (Residential to west, north and east. Agriculture (grazing) to south) gives the impression that it is adjacent to open fields, but it is a pocket of land surrounded by residential development. The development boundary has simply not been amended to reflect this (which is illogical given that the Local Plan Review includes a review of development boundaries). Errors flow from this description and have impacted on the assessment of the site. The development boundary should be updated to reflect recent developments. Part of the site was refused Planning Permission (and at appeal) only because it was outside the development boundary (appeal decision attached). In conclusion the Inspector found no harm arising from development of the site, other than the conflict with the policies of the then recently adopted development plan, which was assessed as being in compliance with the Framework. The Inspector attached significant weight to this in his determination
A0387B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagree that Morda has not been identified as a community hub. Potential for residential sites in Oswestry being limited, Morda is ideal via the B5069 for development and to become a hub.
A0388B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Believes that Morda should be identified as a community hub because of the facilities it has to offer.
A0395B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A0396B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A0407B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		Object to the inclusion of preferred sites for development in: Kinnerley; Knockin; Llanymynech; Pant; Ruyton XI Towns; Trefonen; West Felton; Weston Rhyn; Whittington; and all Community Cluster: Hubs and Clusters in rural areas do not constitute sustainable development as defined in the NPPF. Development in rural areas should be no more than required to meet local needs. Development needs of the A5 corridor can only be met in a sustainable manner if located where main services are close by, and where the development can foster and be served by an integrated public transport system. That is the message of Oswestry 2050. There are preferable means of meeting the needs for development land. For instance, development in the north-west should be focused along the A5 strategic corridor, in accordance with the principles outlined in Oswestry 2050. Major local employers and residential areas should be linked together. Low carbon development could occur. Attractive high frequency, economic and low carbon public transport services and cycle links should be provided. Sattelite villages could be formed at Park Hall and Middleton. The A5 may need to be diverted beyond the main urban area. This would be a sustainable means of accommodating all the development proposed in villages, with little adverse effects on rural settlements. This option has not been given serious consideration by the Council
A0412B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen should not be designated as a Hub. Hierarchy of Settlements 2020 - Para 5.41) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub. That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. (First and third forms are blank).
A0426B1	Viability and Deliverability of Proposed Site	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Site is viable and available for development, and the delivery timescales suggested are considered accurate.
A0427B1	Viability and Deliverability of Proposed Site	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Site is viable and available for development, and the delivery timescales suggested are considered accurate.
A0428B1	Viability and Deliverability of Proposed Site	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Site is viable and available for development, and the delivery timescales suggested are considered accurate.
A0429B1	Viability and Deliverability of Proposed Site	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Site is viable and available for development, and the delivery timescales suggested are considered accurate.
A0487B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The proposal is to agree a further 70 houses on this site totalling 150 new houses planned for this part of Whittington At present, access for the 80 new houses, already given outline consent on the opposite side of th B5009, is only onto this small, winding lane which is used as a diversion for traffic from the A5 / A483 when road works (of which more are planned) are carried out at Maesbury & the Whittington & Gobowen roundaboutsThe currently proposed access for WHN024 is through Donnett Mews, presently a cul de sac of 6 houses & 6 cottages. Further housing is apparently intended on this site bringing the development up to 200 odd houses eventually. This access is totally inadequate. Apart from the access problems, the village school is full, there is no GP in Whittington, there are already traffic problems, caused by frequent HGVs travelling up to Ellesmere & Whitchurch on the A495 (Station Road) & the developers of the site behind the school are seeking access for their site of 50 houses onto this road next door to the school. This will create more traffic congestion on the A495 & make the junction with the B5009 where there are already a number of accidents, even more dangerous. In addition the site is liable to flooding as a small stream runs through it & it is already zoned as such for insurance & other purposes.There are no employment opportunities in the village and bus services (to & from Oswestry & Ellesmere) are non-existent in the evenings & on Sundays. This means that most transport will need to be by car which is contrary to Government policies. The Whittington Local Plan, completed in 2016 specifically opposed more housing behind the school & in general in the village, unless there was an increased provision of infrastructure & traffic control.I oppose the zoning of WHN02
A0510B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	West Felton Parish Council have concerns about the potential implications of the government white paper 'Planning for the Future' on community hubs, particularly the uncertainty around the following issues: What implications will the white paper have for the Local Plan and community hubs and how will the Local Plan work alongside national planning policy? In particular, how will 'development zones', referred to in the white paper, be implemented in the Local Plan and what are the implications of the white paper for CL monies? In light of these uncertainties, the Parish Council have withdrawn their support for the status of the parish as a Community Hub.
A0516B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	a) The key criteria for "Community Hub" status ,requiring "significant employment opportunities; and "peak time public transport"clearly does not apply to Trefonen,and the idea that this can be overruled by virtue of a playground and green spaces(para 5.41) is irrefutably incorrect.Trefonen is the only settlement proposed as a Hub which fails to meet these key criteria. This factor alone shows that Trefonen cannot possibly be regarded as meeting the necessary criteria for a Community Hub status,and its designation as such is therefore Unsound.It should be allocated Other Ruual Staus,for which the criteria are met. In the absence of employment in the immediate vicinity,any new houses would need its occupants(should any be found) to commute,probably significant distances,eg to the East of the County,with consequent damage to the environment and to traffic congestion.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0516B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Site OSW017 Land at Trefonen Road, Oswestry30 dwellings on this site will increase traffic congestion outside schools on Upper Brook Street & Trefonen Road. We must also consider the proposals for the extra building in Trefonen, which will add to this congestion. Both these plans are also contrary to all efforts and regulations designed to minimise human damage to the environment.
A0516B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Objects to designation of Trefonen as a community hub, as it doesn't reach the criteria designation for employment opportunities and public transport. Any new homes would require people living there to drive outside the village for employment. Allocation is contrary to SC Climate Emergency Policy, NPPF and Governments Zero Carbon aims. Trefonen should be designated other rural and not have a settlement boundary. The proposals represent a 15% increase in the size of the village which would be excessive and destroy the village character
A0615B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Designation of hub status is inappropriate for Trefonen. It doesn't have significant employment opportunities or peak public transport, and having play areas and outdoor sports facilities do not compensate for this. Any new development would require people to commute to work as few employment opportunities exist in the village which is contrary to the spacial vision and SP3 Climate change
A0615B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Don't agree with Trefonen being designated as a hub due to low employment opportunities and lack of peak time transport - two key characteristics of a hub. Development in Trefonen would see many people commute out of the village which is in contradiction to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change. Village should be designated as "other Rural" settlement and development boundary removed. Proposed growth of 15% of the existing village is not proportional and would impact on the character of the village
A0616B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Designation of hub status is inappropriate for Trefonen. It doesn't have significant employment opportunities or peak public transport, and having play areas and outdoor sports facilities do not compensate for this. Any new development would require people to commute to work as few employment opportunities exist in the village which is contrary to the spacial vision and SP3 Climate change
A0616B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Don't agree with Trefonen being designated as a hub due to low employment opportunities and lack of peak time transport - two key characteristics of a hub. Development in Trefonen would see many people commute out of the village which is in contradiction to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change. Village should be designated as "other Rural" settlement and development boundary removed. Proposed growth of 15% of the existing village is not proportional and would impact on the character of the village
A0626B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The Hierarchy of Settlements is unsound, Trefonen should not be a Hub. Significant employment opportunities and peak time public transport do not exist. Limited village shop. Without employment or peak time travel significant daily car travel already exists and it would be increased by additional housing in any Community Hub - contrary to the "Spatial Vision" and SP3 which seek to minimise travel and maximise trips by sustainable travel. The proposed build rate represents an extension of the village by 15%, which is excessive and damaging to the community and rural character.
A0626B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Site would compound traffic congestion - school are nearby. Combined with the 50 houses in Trefonen, there will be an unsustainable on services and increases in CO2
A0632B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Do not support policy 14.2 - allocation of a single site in Ruyton XI Towns. The Council should be allocating a range and choice of sites "to deliver the strategic priorities of the area". The Right Home Right Place survey results for Ruyton XI Towns indicate a pressing need for a further 38 dwellings in the settlement. RUY005 should be allocated for 4 dwellings (illustrative site plan and arboricultural report are included in the rep to support this proposal).
A0633B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Additionally, without either employment c and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub. That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria.
A0633B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements para 5.41 Hierarchy of Settlements para 5.41 This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub. That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria.
A0678B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Support identification of Community Hubs. Support identification of St Martins as a Community Hub. The sustainable credentials of St Martins make it an appropriate location to accommodate future housing growth. Strongly support proposed allocation of SMH031. Proposed delivery of circa 60 new dwellings on SMH031, is considered appropriate to the scale of the settlement. Support 'retention' and 'saving' of SAMDev residential allocations. The sustainable credentials of this western end of St Martins were recognised when making the SAMDev Plan allocations. Existing service / facility provision in the form of education (St Martins School), employment (Top Bank Industrial Estate) and recreation facilities are focussed in the general location of SMH031 which highlight the sustainable benefits of locating additional residential development here. SMH031 can complement and integrate with existing consented development proposals at Rhos-Y-Llan Farm (SAMDev Policy S14.2(v) – STM029). Note the proposed site guidelines for SMH031 and agree with the principles of providing an appropriate estate road junction to the B5069; provision of a pedestrian crossing of the B5069 and completion of missing footways (subject to Highway Authority/landownerships); and incorporation of sustainable drainage. Reviewed draft policies and considered implications for proposed allocation SMH031 (particularly policies on residential mix and open space). Confirm that a capacity of 60 dwellings is an appropriate unit quantum. A draft Masterplan has been provided as an appendix to this representation, this illustrates a potential layout for 60 dwellings and around 0.5ha of open space, which broadly complies with draft policy DP16 (open space) - note that residential mix will have an impact on the precise quantum of open space finally sought. Visual impact of development can be assessed and managed through a robust landscaping and green infrastructure approach. This can ensure proposals are responsive to the topography of the site and relevant zone of visual influence. Note proposed delivery timescales for SMH031 in Appendix 7, which is considered a realistic forecast and will enable housing delivery to be advanced in respect of the existing and saved SAMDev allocation at Rhos-Y-Llan farm; distribute development at St Martins over a proportion of the plan period (taking account of other site delivery); and allow a suitable lead-in-time for development at SMH031, taking account of the Local Plan/Planning Applications processes. A residential scheme, on the basis of the draft Local Plan policy requirements, is viable and deliverable. Promoter has experience of joint venture delivery in conjunction with a development partner and it is envisaged that a similar approach will be utilised in respect of SMH031. This provides a model which removes initial land cost and provides for greater flexibility in project delivery. Confident this delivery model can be replicated for SMH031.
A0692B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The proposed residential guidelines for St Martins should be increased to ensure consistency with the NPPF with regard to meeting housing need; reflect that St Martins is the most sustainable village in the Oswestry Place Plan area; and recognise that St Martins has delivered a high level of housing in the past and can do so again. The NPPF requires housing requirements to be calculated using the standard method for calculating housing need. Government is consulting on changes to this standard method which would increase housing need in Shropshire to 2,124 dwellings per annum (151.7% higher than the proposed housing requirement). This increase couldn't be ignored by the Planning Inspector at examination who is highly likely to increase the housing requirement, particularly given Governments aspirations to 'build, build, build'. St Martins is one of the highest scoring (4th) proposed Community Hubs in Shropshire and the highest in the Oswestry Place Plan Area, with regard to services and facilities and should have a higher residential guideline than lower serviced settlements. St Martins has built 123 houses between 2016/17 and 2018/19 (Appendix 5 of the Draft Local Plan), equating to 41 dwellings per annum. If this rate continued over the total proposed plan period, this would be some 902 dwellings. Do not suggest this level of delivery but the residential guideline should be increased to let St Martins pull its weight. Suggest 540 dwellings (151.7% increase, consistent with the increase to the overall housing requirement resulting from proposed changes to the standard method). Evidence in the Council's 'Local Plan Delivery & Viability Study' shows draft policies, particularly on climate change and housing mix (which when combined with CL increase estimated costs by some £554,093/ha) pose serious problems for the viability and deliverability of development. This represents a challenge to meeting the 'effective' test of soundness. One way to overcome this is applying a 25% non-delivery rate and allocate 125% of the land required to meet housing need. Within St Martins SMH037 could be allocated for around 65 dwellings to ensure delivery of the draft housing guideline. SMH037 is suitable for development and should be allocated within the draft Local Plan/included within the draft development boundary as: -It has a suitable access, previous concerns have been resolved by a recent development of 10 dwellings which widened Cottage Lane to the sites frontage. A second access could also be provided through a council-owned parking court, with replacement parking provided on site. -It is a highly sustainable location, all services and facilities are within walking distance (services are no further than from SMH038) and a regular bus service is nearby. -It is lower-lying than surrounding houses and contained within the landscape by mature hedges. Recent development on Cottage Lane's already introduced urban development to the north-west of the site. As such development of SMH037 would nestle within the village between existing housing and a mature tree belt and fit well with local character. -It could provide a mix of housing adjoining the Cottage Lane social housing site. -There are no technical environmental constraints and it could enhance the local environment. -It will ensure St Martins housing guideline is achieved in a plan-led manner. Suggested draft guidelines provided.
A0724B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.
A0725B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.
A0726B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0867B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	There is continued support for the identification of Oswestry as a Principal Centre and to accommodate substantial growth through the Plan period. The Proposed Site Allocation, OSW017 ("the Site"), remains viable, deliverable and sustainable. The site will be made available upon adoption and any proposed housing scheme can be made in accordance with all draft policy requirements. We are aware of some comments made by a local resident and Oswestry Town Council. We wish to reply to these points:1) The Site lies in Flood Zone 1, on the Environment Agency map - the lowest level of flood risk. There is no surface water flood risk. 2) Ecology/Heritage - The Site is largely unconstrained, does not lie upon any sites of ecological/biodiversity importance, with only a single designated heritage asset in close proximity (approx. 250m south-west). Nonetheless a Preliminary Ecology Survey and Heritage Impact Assessment have both been submitted to the LPA, on the 29th January 2020, as part of previous consultations. Both surveys confirm that the development of this site can occur without causing any harm or loss of assets - habitats, species or assets. 3) Highways - Access to the site will be gained off Trefonen Rd, to the south. The Highways Authority have previously commented on the accessibility of this site, in which it was determined that subject to traffic calming (reducing local speed limits immediately adjacent the site) the development of this is acceptable from a highways perspective. The Site is afforded adequate visibility in both directions, commensurate to the proposed local highway conditions. 4) Landscaping - The trees of significance on the Site can be easily retained and incorporated into any housing scheme, ensuring their protection and retention. In addition, the proposed provision of 30 dwellings will result in the provision of open space policy requirements which will result in the enhancement of landscaping and improvement to the local biodiversity. 5) Visual Amenity - The Site represents a natural expansion of the Town, would not look out-of-character and is able to reflect the existing built pattern and context. 6) Oswestry, as a Town, is largely constrained in any further development expansion, through poor access to alternative sites, sites within Flood Zones or those that affect designated heritage assets. The Site adjoins the existing built environment, with good accessibility and will not negatively impact upon the existing built, natural and historic environments, with the ability to improve local environ offerings. 7) The Town Council's wish to delete this site should be resisted. Para S14.1 seeks to deliver 1900 homes with virtually all new allocations being at Park Hall - that lies several miles away. Residents would choose to drive to Oswestry for services and facilities, which is not sustainable. However, the Trefonen Rd sites will deliver a small scheme allowing people to walk or cycle to facilities in the town. This will deliver a sustainable development
A0881B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	New Site proposed which includes WEF002. Site has short term potential for development because site has no significant constraints; is well located, immediately available, fully deliverable with developer interest. Site could contribute to delivering housing required to meet target. The land is well positioned with direct highway access, which can be improved within land owned. Adjoins land recently developed for residential use and caravan storage.Option for an area to be provided for the primary school amenity/playing field/car park. Additional information can be provided as required to support bringing the site forward. Site location plan provided
A0899B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Object to Trefonen housing guideline of 'around 55 dwellings' although village appropriately designated as a Community Hub. Housing guideline is not explained and will not pass 'justified' test of soundness at examination. Recommend that Office of National Statistics' 2018-based household projections forecast growth of 27% for Shropshire over the plan period'. According to Council's 'Hierarchy of Settlements' report, Trefonen has estimated population of 779 in estimated 324 dwellings. Assuming around 320 households in Trefonen, 27% growth equates to additional 86 dwellings over plan period. Residential guideline of around 55 dwellings is substantially below this level and is an unnecessary constraint on natural growth. The higher 86 dwellings housing guideline conforms with NPPF paras 59 to significantly boost housing supply and paras 60 and 73 to treat housing guidelines as minimum requirement. The requirement should therefore be expressed as 'A minimum of 86 dwellings'. ¹ Shropshire's 135,452 households in 2016 are projected to increase to 171,876 households by 2038, an increase of 36,424 households (26.9% growth) over 22 years according to the ONS 2018-based household projections table 406 at https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland
A0899B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Object to Trefonen development boundary and absence of housing allocations. Spatial planning of Trefonen will not provide sufficient housing to meet the guideline because: development boundary too tight and sites will be backland or garden grabbing which will fail to meet Policy SP7. Development beyond boundary unlikely to deliver required scale of housing due to restrictions on supply of affordable and cross subsidy housing in Policy DP7. Recommend expanding development boundary to allow small scale sites including land east of Hyde Park (0.52ha) on Little London Lane. This site, preferably allocated for housing, will ensure growth plan-led and properly managed. This will improve highway at Little London Lane/Bellam Lane including new passing places, deliver CIL, provide low density development, respect local character, provide self-build homes. Shropshire Delivery and Viability Study also advocates provision of small greenfield sites of around 30 dwellings rather than 60 or 80 dwellings. Development guidelines submitted for land at Hyde Park.
A0904B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	There is a triangle of land that lies at the southern end of SAMDev site GOB012 between it and the recently completed housing development to the south. This triangle of land is consistently shown (on the Inset Maps for Gobowen in the previous Local Plan exercises) as excluded. There is no reason why this land should be excluded from the area to be developed - there are no boundaries to separate this land from the rest of the allocated site. It is suggested that the identified land should be included within GOB012 in order to ensure and continuous and comprehensive development.
A0907B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Expected can be delivered sooner than indicated. The site is readily available and there are no legal restrictions that would prevent its development early-on in the plan period.
A0916B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	This policy and its supporting text is supported as it recognises the strategic role of Oswestry as the principal focus for investment, employment, housing and development during the Plan period in the north-west of the County. In addition, the identification of 57ha. of employment land to meet the needs of the town and its hinterland (including saved employment land allocation ELR042) is supported as this land will make a significant and unique contribution towards meeting the employment growth needs of both the Town and this area of the County, realising the objective of the Shropshire Economic Growth Strategy to deliver a 'step change' in the capacity and productivity of the local economy.
A0916B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Employment Allocation 'land north ofWhittington Road' (ELR042) is supported. The saved employment land allocation ELR042 is unconstrained, viable, deliverable and developable. In addition, it is in a strategically importance location adjoining the A5 to the north-east of Oswestry - which has been identified as a significant direction of growth for the town with the allocation of this site, employment allocation ELR043e and the residential allocations at Park Hall. The site will therefore make an important contribution to meeting the employment needs of Oswestry as it represents a significant, and unique, opportunity to meet the economic needs of Oswestry during the Plan period and realise the ambitions of the Shropshire Economic Growth Strategy.
A0916B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Policy Map Inset S14 Oswestry is supported. The saved employment land allocation ELR042 is unconstrained, viable, deliverable and developable. In addition, it is in a strategically importance location adjoining the A5 to the north-east of Oswestry - which has been identified as significant direction of growth for the town with the allocation of this site, employment allocation ELR043e and the residential allocations at Park Hall. The site will therefore make an important contribution to meeting the employment needs of Oswestry as it represents a significant, and unique, opportunity to meet the economic needs of Oswestry during the Plan period and realise the ambitions of the Shropshire Economic Growth Strategy.
A0932B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen having no allocations as a Hub is inconsistent with the approach taken with the other hubs, and there is no evidence to justify a lack of potentially suitable housing here. There is a lack of evidence that there is greater need for affordable/low cost housing as opposed to open market. The outcomes of the Parish Council's survey differ to their conclusions. Open market housing is considered as something needed in this hub.
A0932B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	TRF014 provides an alternative option for providing the necessary housing for Trefonen and should be a preferred allocation. SA score is good and is within proximity to the services and has a flat topography.
A0933B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	disagrees, as believes that Morda village should be a hub- this has been scored differently in the Hierarchy of Settlements that in the SDLP
A0936B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	WRP006 Queries the widening of the footpath meaning vehicular and pedestrian access from the site would be onto the High Street - this is UNSUITABLE. Concerns include pinch point at mini roundabout, external walls to properties on the road edge, on street parking problems. STRONGLY advises the person making the decision to visit the area. proposed site WRP001 is a better option
A0936B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	In relation to the site WRP006 in Weston Rhyn and detailed on page 237 of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 dated August 2020 I have to question whether any person who has had an involvement in creating such a plan has actually visited the area. The first paragraph states "Necessary widening of High Street and a footway on the east side of High Street along the site frontage to be provided". This suggests that any vehicular and pedestrian access from the site WRP006 would be onto High Street. I consider High Street to be UNSUITABLE to take vehicles and pedestrians from a potential 60 properties. The bottom end of High Street, where it joins with Station Road at the mini roundabout is a pinch point where two small vehicles cannot pass each other safely and where pedestrians have to be acutely aware of vehicles approaching in either direction. There are external walls of a shop and residential properties directly on the road edge to the west side of High Street and to the east side of the street there is a large residential property behind the stone wall. Approximately 50 metres from the junction with Station Road there is another property (Tower View) that has a narrow concreted strip outside the property on which one, sometimes two, vehicles are parked. The strip is not wide enough for vehicles and therefore part park onto the road thus reducing the available road width. As stated earlier, the road width at the in this area is very narrow and there has never been an option to construct footpath along this stretch for this reason. The location map outlining the proposed site allocations is not a scaled version. To the un-informed, the width of High Street would appear to be of a similar width to Station Road. This is far from being correct and would lead to any recommendation / decision on this site being ill-informed. There is an issue with on-street parking with some vehicles parking up on pavements and further up High Street (close to the proposed site) the pavement on the eastern side of the street is so narrow that an adult and child would be unable to walk side by side. I would STRONGLY advise those responsible for making a decision on this site to visit the area first and see for themselves how any substantial development with access onto High Street would compound the issues that currently exist. A previous draft plan (November 2018) showed a different proposal. This had a site designation of WRP001 which is to the east of the current 2020 proposal and borders Trehowell Lane which, if developed would provide a better scope for vehicular and pedestrian access from the site. What happened to this site?
A0938B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	agree	Content with policy SP8 for this cluster
A0939B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Believe that the sites should be considered for short term potential not Long Term Potential. Land is immediately available, ideally situated despite being in a sensitive location - visual impact and landscape sensitivity can be carried out by the client
A0940B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagree with the development boundary at Kinnerley. KNN017 believe that the sites should be considered for short term potential not Long Term Potential. Land is immediately available
A0941B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		I am writing in response to the consultation for the regulation18: pre-submission draft of the Shropshire Local Plan, with regards to Upper Hengoed being designated as a Community Cluster within the Oswestry Place Plan. We are delighted with the designation due to our Client D H Eccleston having suitable land for development being part of UPH001 and therefore would like to ensure that this designation is carried forward into the adopted plan. Availability - Our Client has the benefit of full title to the land stated above and are willing to make it immediately available for development. Surveys - Our client is very keen to provide this site for residential development, therefore is happy to provide any information the Council deems as necessary as further evidence of the site being available and sustainable such as; environmental, habitat, flood or highways reports. In addition to this we would be happy to provide indicative layout plans to show how the development could be implemented.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0942B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	We are content with the policy SP8 with regard to the community clusters of Maesbrook, Dovaston and Knockin Heath and would like this to be confirmed within the new finalised Local Development Plan.
A0944B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	I am writing in response to the consultation for the consultation of the Regulation 18: Pre-submission draft of the Shropshire Local Plan with regards to land off Llwyn Road, Oswestry belonging to our client This site is currently an agricultural field located to the north of Oswestry, ref. OSW046. Under the SLAA consultation, we were pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation. This found the site to have no significant constraints, however it is not currently sustainable, but has future potential subject to further detailed assessment. I am writing as we believe this land can be considered for short term potential and therefore should be included within the the Oswestry policy map development boundary of Oswestry due to the following: Availability Our client has the benefit of full title to the land and are willing to make it immediately available for development. Deliverability and Sustainability We can confirm this is a fully deliverable site with an area of 8.66 ha. We believe this site is suitably placed to provide development in Oswestry towards the target of 200 dwellings by 2036. In the SLAA assessment, site OSW046 achieved a sustainability rating of FAIR, which is one of the better ratings compared to the other sites within Oswestry and the same rating as OSW017, an allocated site within the Oswestry policy map. The land is well positioned to provide additional growth and there is ability to provide appropriate access to the site, subject to highway approval. Physical, Environmental or Heritage Constraints The site is in a sensitive location within proximity of the Old Oswestry Hillfort Scheduled Monument and therefore the site requires a heritage impact assessment and archaeological evaluation which our client is happy to undertake. Furthermore, the site is also in proximity to a wildlife site and therefore our client would be willing to carry out further environmental surveys and provide mitigation works if any impacts were found. We believe that the site provides a natural extension to the already built form of the north of Oswestry and therefore the development boundary should be extended to reflect this Surveys Our client is very keen to provide this site for residential development, therefore is happy to provide any information the Council deems as necessary as further evidence of the site being available and sustainable such as; environmental, habitat, flood or highways reports. In addition to this we would be happy to provide indicative layout plans to show how the development could be implemented.
A0946B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	I am writing in response to the consultation of the Regulation 18: Pre-submission draft of the Shropshire Local Plan, with regards to land at Church Street, Whittington belonging to our client. This site WHN026 is currently an agricultural field located north of the centre of Whittington adjoining the current development boundary. We were pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation. This finds the site to have no significant constraints, however it is not currently sustainable, but has future potential subject to further detailed assessment. I am writing under this consultation as the land has not been included within the development boundary of Whittington and is not allocated for residential development. We believe this land can be considered for short term potential and should be included within the development boundary of Whittington due to the following: Availability our client has the benefit of the full title to the land and are willing to make it immediately available for development. Deliverability and Sustainability We can confirm this is a fully deliverable site with an area of 5.71 ha. We believe this site is suitably placed to provide development towards the target of 89 dwellings by 2036, adjoining the proposed development boundary, providing an excellent infill site and well located on flat, easily developable land. The location of the land shows it to be a natural extension of the built form of Whittington and therefore should be included within the development boundary or be allocated as a site for development. Access The proposed site has been challenged regarding how it may gain access from Church Street. As shown by the attached plan, this can be achieved by using the area hatched orange, also owned and occupied by our client. Conservation Area The site is located within the conservation area of Whittington and therefore been outlined as requiring a heritage impact assessment which our Client would happily provide. The impact of developing the site within the conservation area can be mitigated through the design of the dwellings by ensuring they are in keeping with the built form of the area. Surveys Our client is very keen to provide this site for residential development, therefore is happy to provide any information the Council deems as necessary as further evidence of the site being available and sustainable such as; environmental, habitat, flood or highways reports. In addition to this we would be happy to provide indicative layout plans to show how the development could be implemented. We believe that site WHN026 provide an excellent opportunity for infill development within Whittington and can be implemented with immediate effect
A0947B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	I am writing in response to the consultation of regulation 18: pre-submission draft of the Shropshire Local Plan, with regards to the employment site designation in the Oswestry Place Plan. In Oswestry there is no proposed employment sites but are existing allocations. We believe our Client has got a site which is perfect for the expansion of an existing allocated site (as shown by the attached plan in red). We believe this site is deliverable for the following reasons: Availability Our Client has the benefit of full title to the land stated above and are willing to make it immediately available for development. Oswestry Employment Guidelines Around 57 hectares of employment land is already committed in Oswestry and we believe that further land should be considered to enhance the employment opportunities for Oswestry. A major mixed-use urban extension was allocated in the existing Local Plan to the south east of Oswestry. The scale and complexity of the scheme and the need for significant infrastructure investment has delayed delivery to date, but work is expected to commence during the first part of the Local Plan Review period. New development proposals will need to complement the offer provided by this urban extension which we believe are client's site does. The Oswestry Civic Society and several local parish councils have recently endorsed the development of a longer term strategy for the Oswestry area which could cover the period to 2050. It is felt that such a plan would help to shape the future expansion of Oswestry through the potential development of interconnected villages, supported by a strong framework of public and road transport links, designed to foster community living and a low carbon economy. It is considered that expansion to the north-east of Oswestry would provide the opportunity to capitalise on existing assets such as Gobowen railway station, Old Oswestry Hill Fort and the sports facilities at Park Hall. Such an approach would also be consistent with the focus on development in strategic corridors, including the A5 corridor between Oswestry and Gobowen, which is identified in the Council's adopted Economic Growth Strategy. A Local Economic growth strategy is being prepared for Oswestry which will set out Shropshire Council's local economic delivery plan in this area, helping Shropshire Council to address priorities outlined in the overarching Economic Growth Strategy at a local level. This strategy will also have a key role in supporting existing business growth and attracting new business and investment into not just the town but also the surrounding areas. Identified critical infrastructure priorities for Oswestry include: • Waste water treatment and sewerage capacity. • Primary and secondary school provision. • Local and strategic highway improvements. • Provision of additional leisure, recreation, amenity and cemetery facilities. We believe the allocation of our client's site would help in achieving these priorities.
A0948B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	I am writing in response to the consultation for the Regulation 18: Pre-submission Draft of the Shropshire Local Plan, with regards to Chirk Bank being designated as a Community Cluster within the Oswestry Place Plan. We are delighted with the designation due to our Client having suitable land for development being part of CBG012 an therefore would like to ensure that this designation is carried forward into the adopted plan. We are fully in support of the SP8 policy as part of the consultation and hope that this is carried forward into the adopted plan. Availability Our Client has the benefit of full title to the land stated above and are willing to make it immediately available for development. Surveys Our client is very keen to provide this site for residential development, therefore is happy to provide any information the Council deems as necessary as further evidence of the site being available and sustainable such as; environmental, habitat, flood or highways reports. In addition to this we would be happy to provide indicative layout plans to show how the development could be implemented
A0949B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	I am writing in response to the consultation for the Regulation 18: Pre-submission draft of the Shropshire Local Plan, with regards to land off Weston Road, Oswestry belonging to our client. This site is currently an agricultural field located to the south of Oswestry, ref. OSW026. Under the SLAA consultation, we were pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation. This finds the site to have no significant constraints, however it is not currently sustainable, but has future potential. We now write as we believe this land can now be considered for short term potential and should be included within the newly adopted development boundary due to the following: Availability Our client has the benefit of full title to the land and is willing to make it immediately available for development. Deliverability and Sustainability We can confirm this is a fully deliverable site with an area of 6.65 ha. We believe this site is suitably placed to provide development in Oswestry towards the target of 200 dwellings by 2036, being situated adjoining an existing allocated housing site and well located on flat, easily developable land. Site OSW026 has achieved a sustainability rating of FAIR, which is one of the better ratings compared to the other sites within Oswestry and the same as the allocated site within this consultation, OSW017. Surveys Our client is very keen to provide this site for residential development, therefore is happy to provide any information the Council deems as necessary as further evidence of the site being available and sustainable such as; environmental, habitat, flood or highways reports. In addition to this we would be happy to provide indicative layout plans to show how the development could be implemented.
A0963B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	An alternative site (SMH024) should be allocated as part of the LPR in St Martins. This site will assist with the provision of the settlement's needs, and is a suitable location and would act as a logical/natural extension to the settlement. It is in close proximity to several services, including a supermarket, Post Office, Florist, Pharmacy, Petrol Filling Station and a coffee shop, schools, church, community centre. This site should replace the current preferred allocation SMH031 or should be allocated in addition to this site.
A0965B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Map provided of site location and boundaries. seeks to support the allocation of WRP001 2ha directly adjacent to the settlement boundary of Weston Rhyn is a highly sustainable location close to the services and facilities of the village. Weston Rhyn identified as a Community Hub and thereby a sustainable settlement where growth in the local area will be focused Site assessment assumes that sites availability for residential development is unknown-however land owner (details provided) is promoting site. Comparison between the allocated site WRP006 and the promoted site WRP001 shows that proposed alternative site WRP001 has better ranking (-5 vs -7); submitted plan /photos shows how proposed site WRP006 is poorly related to the existing pattern of development, particularly in relation to the access to the site. the principal High Street access serving the site has restricted visibility from roundabout & is narrow & restricted & without footpaths. Access clearly inadequate for the additional traffic. alternative site WRP001 has far superior access via Trehowell Lane with junction improvements possible to facilitate this & accommodate significant level of development. The owner of the WRP001 land is prepared to allow access across the site to serve the wider WRP006 site off Trehowell Lane as shown. Despite normal practice established by case law the owner is prepared to allow 'free' access to WRP006 subject to developers of the WRP006 site paying half of the cost of the access. This solution provides a good long-term strategic solution to the future housing development to the north of the village without exacerbating highway problems around the High Street access. It is considered that the proposal complies with NPPF including sustainability requirements with development providing economic and social sustainability benefits and meeting environmental sustainability requirements including : easy access to the local/frequent bus service ; accessible to & supporting local services & facilities, including increased spend; use of existing suitable infrastructure negating need to extend infrastructure; construction and associated jobs & spend ; housing to meet current and future need, including affordable; CIL income& benefits for village; create high quality built environment; sits within the natural settlement boundary of Weston Rhyn and would not negatively impact upon the natural, built or historic environment; no material visual impact upon the wider area; will incorporate best practice Building Regulation standards best practice Building Regulation standards, SUDs & retain trees/hedges. site would also include footpath routes to ensure it would be permeable, appropriate landscaping and open space and ecology report would inform the development. No known flood risk - Site in Flood zone 1 and not at risk of surface water flood. no known abnormal costs to the development of the site will allow the scheme to meet normal Affordable Housing & CIL requirements. No known physical or environmental constraints to development & utilities and services available. site has clear and defensible boundaries which will allow the development to be readily assimilated into the grain of the village. Site is available now & deliverable, single landowners for each of sites WRP001 & 006 . The site is viable, deliverable in the 'Short Term' (2020 to 2025) and there is a known market for houses in the village and local employment opportunities and services ad facilities. Potential delivery timescales Spring 2022 to – 2024 set out. The proposal scheme provides for a highly sustainable village expansion within timetable to be agreed with the Local Planning Authority. Suggest that combined alternative site shown (part WRP006 and WRP001) of 3.85 hectares would equate to around 115 dwellings similar to the original WRP006 site. Proposal superior to the Councils chosen site WRP006. Either illustrated part WRP006 and WRP001 site should be allocated or WRP001 be allocated in addition to the existing Regulation 18 Consultation site WRP006. Supporting information submitted: drone photos of locality; location & site plans; alternative access proposal
A0973B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	We support the allocation of site WHN024 in Whittington as identified in S14/S14.2 - Oswestry Place Plan Area Inset Map 14 Please see supporting report for additional information.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0973B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	We support the allocation of site WHN024 in Whittington as identified in S14/S14.2 - Oswestry Place Plan Area Inset Map 14. We support the Residential Development Guidelines and Residential Supply contained in Appendix 5 relating to this site
A0973B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	We support the allocation of site WHN024 in Whittington as identified in S14/S14.2 - Oswestry Place Plan Area Inset Map 14. We support the Forecast of Delivery Timescales for Local Plan Allocations relating to this site in Appendix 7.
A0973B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	We support the allocation of site WHN024 in Whittington as identified in S14/S14.2 - Oswestry Place Plan Area Inset Map 14. We support the Oswestry Place Plan Area Site Assessments relating to this site in Appendix O.
A0973B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	We support the allocation of site WHN024 in Whittington as identified in S14/S14.2 - Oswestry Place Plan Area Inset Map 14. We support Policy SP2. Strategic Approach.
A0973B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	We support the allocation of site WHN024 in Whittington as identified in S14/S14.2 - Oswestry Place Plan Area Inset Map 14. We support Policy SP7. Managing Development in Community Hubs
A0980B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagrees with content of proposed policies SP2.2, SP7, S14.2 and para 5.198. and provides evidence for inclusion of TRF006 within the plan. Supports designation of Trefonen as a Community Hub, but disagrees that no specific sites have been allocated in the settlement to enable the housing guideline of 55 houses to be delivered. Reviews of this site as a cross subsidy site have been undertaken which established it is unviable as cross subsidy site. It is therefore suggested that TRF006 receives a specific allocation in the proposed Policy S14.2 of the forthcoming Local Plan. It is proposed that the site would deliver 23 dwellings (via a local building company) to satisfy the unmet need and demand for smaller intermediate and starter housing and bungalows. It is apparent, by reference to the ONS 2018-based household projections for Shropshire, that the need for older persons' housing in Shropshire is rising rapidly. It is suggested, therefore, that Policies DP1 – DP7 are supplemented by specific allocations on sites of less than 50 dwellings which can deliver this type of housing. This approach is encouraged in the NPPF, para 61 and NPPG ref 63-013-20190626 In conclusion, it has been demonstrated that the TRF006 site is within a sustainable settlement, is not constrained by technical issues, is viable and can be delivered quickly in conjunction with a local housing developer.
A0981B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The former primary school site contains a disused playing field that has previously accommodated a mini football pitch. The wording of the policy incorrectly describes this as open space rather than playing field which should be addressed. The policy states that if the playing field is not demonstrated to be surplus, then an appropriate financial contribution will be required to fund equivalent or better provision. The proposed wording does not align with para 97 of the NPPF nor Sport England's Playing Fields Policy where the relevant criteria is to provide equivalent (ie equitable) re-provision in quantity and quality in a suitable location. It is recommended that the wording of the policy is refined to better align with the NPPF and Sport England's policy. The policy should reference that where re-provision is required, this will be in accordance with local priorities and recommendations of the Council's Playing Pitch and Outdoor Sports Strategy (PPOSS), and that the re-provision of playing field should be provided prior to the loss of this site to ensure continuity of playing field provision in accordance with Sport England's Policy
A0981B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Sport England supports the reference to the development securing the extended formal and permanent recreation ground on adjacent land, on the proviso that can be demonstrated to meet an identified need. Its not clear if this is intended to be for formal pitch provision or a more informal kickabout space to serve the surrounding community so this should be clarified?
A0981B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Sport England notes that the proposal involves the relocation of the existing playing field to the east of the site to Old Chirk Road. The policy map should identify the area of replacement playing field to demonstrate that this will be equitable for the quantity of playing field to be lost. The wording of the policy accords with para 97 of the NPPF and Sport England's Playing Fields Policy and so there are no objections in principle to how the loss of playing field is proposed to be addressed. The policy should require the replacement area of playing field to be provided prior to the loss of the allocated site to ensure continuity of use in accordance with Sport England's Playing Fields Policy and Guidance.
A0988B1	Viability and Deliverability of Proposed Site	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Site is deliverable and viable. Currently under Pre-app for 53 dwellings
A0992B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Site promoted to be an allocation. Previously was a preferred allocation but removed following SFRA L2. Site has come back in, shifted to the east to avoid the flood area, with access through the consented development which is due to commence in
A0994B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This land at Selattyn should be allocated – it is a natural extension to the village, which has a number of amenities and services. A LAP or LEAP could be incorporated on the site near to the school. This site would help reach the shortfall calculated by Lichfields.
A1131B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This should not be the only site included in Gobowen. Gobowen has more services than Park Hall but Park Hall has lots more housing allocations, Gobowen has more services and better roads/footways
A1132B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Issues with GWR023 (previous preferred allocation) have been solved with alternative access provided through the existing consented development. Gobowen is a better location for new houses than Park Hall as there are much more services here.
A1152B44	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	During the Preferred Scale and Distribution of Development consultation 1,800 dwellings and 19ha of employment land was proposed (based on the proposed balanced growth). This remained the same during the preferred sites consultation. In the draft Local Plan the housing guideline has increased by 100 dwellings and the employment land guideline by 38ha to 57ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed. This does mean that housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting. With regard to the proposed Park Hall allocations, -They are informed by principles in the Oswestry & District Civic Society's "Oswestry 2050" document. Those proposals were for a long term masterplan for the wider area encompassing Oswestry, Gobowen and Whittington, which should include a transport plan with the aim of reducing carbon emissions. An impression of such a plan was given within the "Oswestry 2050" outline, but it was not intended to be the plan. To make a single proposed allocation in the name of "Oswestry 2050" is to miss the point entirely. -The proposal includes provision for key worker housing for the RJAH Hospital and Derwen College, which is to be welcomed. However, no mechanism is proposed to ensure that this comes about, rather than market housing being supplied. -The site location itself presents conflicts, being identified to meet Oswestry needs but being located in Whittington Parish and close to employment sites in Gobowen Parish. What will happen to CIL? Due to distance from Oswestry, it should be treated as a Whittington Parish matter, particularly as we have argued above that there is no need for further allocations for Oswestry. -Para 5.194 of the Draft Local Plan refers to 'the Indicative Masterplan and Transport and Movement Strategy for Oswestry town', although we have been unable to locate such a document in the Evidence Base. -Note proposed allocations at Park Hall have been altered substantially since Preferred Sites, although no explanation is apparent. These changes include specific sites and overall capacity. The Residential Conclusions Map for the SLAA indicates PKH029 and PKH013 were rejected, so it is surprising they are now put forward as proposed allocations. Site PKH007 does not appear on the SLAA Residential Conclusion Map at all. <u>Based on the above it is illogical, and seemingly unsustainable, to treat allocations at Park Hall as being to satisfy need at Oswestry and some of the new allocations now proposed for Park Hall are in any case on rejected sites</u>
A1176B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagrees with designation of Trefonen as a community hub and feels it should be classified as "other rural" as it doesn't have significant employment or peak public transport. New development in the settlement would see people seek employment outside the village which would be contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. Equally if Trefonen does not qualify as a hub the development boundary should be removed. The proposed level of development would see a 15% increase in the size of the settlement and would be difficult for the character of the village to remain and put a strain on services. No consideration given to the setting of Offa's Dyke which runs through the village
A1176B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The Hierarchy of settlement document should give greater weight to key criteria such as employment opportunities and peak time public transport; the lack of these services can not be made up for from a range of other services. Without employment or a peak time public transport service the need to travel by car increases and the Councils SP3 Climate Change policies can't be delivered. This is the case in Trefonen and so the village should be designated as "other rural"
A1176B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Policy S.14.1(i) Residential Allocations Site OSW017 Land at Trefonen Road, Oswestry This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A1178B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The Hierarchy of settlement document should give greater weight to key criteria such as employment opportunities and peak time public transport; the lack of these services can not be made up for from a range of other services. Without employment or a peak time public transport service the need to travel by car increases and the Councils SP3 Climate Change policies can't be delivered. This is the case in Trefonen and so the village should be designated as "other rural"
A1178B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Policy S.14.1(i) Residential Allocations Site OSW017 Land at Trefonen Road, Oswestry This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A1178B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagrees with designation of Trefonen as a community hub and feels it should be classified as "other rural" as it doesn't have significant employment or peak public transport. New development in the settlement would see people seek employment outside the village which would be contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. Equally if Trefonen does not qualify as a hub the development boundary should be removed. The proposed level of development would see a 15% increase in the size of the settlement and would be difficult for the character of the village to remain and put a strain on services. No consideration given to the setting of Offa's Dyke which runs through the village

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1179B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The Hierarchy of settlement document should give greater weight to key criteria such as employment opportunities and peak time public transport; the lack of these services can not be made up for from a range of other services. Without employment or a peak time public transport service the need to travel by car increases and the Councils SP3 Climate Change policies can't be delivered. This is the case in Trefonen and so the village should be designated as "other rural"
A1179B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Policy S.14.1(i) Residential Allocations Site OSW017 Land at Trefonen Road, Oswestry This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A1179B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagrees with designation of Trefonen as a community hub and feels it should be classified as "other rural" as it doesn't have significant employment or peak public transport. New development in the settlement would see people seek employment outside the village which would be contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. Equally if Trefonen does not qualify as a hub the development boundary should be removed. The proposed level of development would see a 15% increase in the size of the settlement and would be difficult for the character of the village to remain and put a strain on services. No consideration given to the setting of Offa's Dyke which runs through the village
A1188B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	OSW049 and OSW050 should be preferred allocations. Oswestry's housing is being delivered by one large site in Park Hall – to much reliance on one site when smaller sites in strategic locations would be more sustainable.
A1394B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A1394B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A1394B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking, wheeling or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria. 2) Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page 330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1 per year – Guideline 18 Windfall Affordable Homes.
A1639B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The guideline for 60 dwellings is too high – it is out of proportion as there are only 149 existing dwellings (40% increase). County-wide, there is an increase of 25%, therefore Kinnerley guidelines should be for 37 dwellings. 23 new houses have been built since Nov 2012, so with the 60 guideline it would be a 66% increase in the numbers houses in the village. There is no justification for an increase on this scale. The figure should be no more than 50. We endorse the revised boundary on the Kinnerley map. The 2007 Design Statement and Landscape Character Assessment for the Parish of Kinnerley should be added to the evidence base. The Hierarchy of Settlements score should be amended following the re-opening of the Cross Keys Inn.
A1639B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Modest levels of development have occurred in Maesbrook, Dovaston and Knockin Heath – it is demonstrated that there will be 25 new dwellings here. The expectation in the Kinnerley Parish Neighbourhood Plan was that these settlements should have only 24 new dwellings. They are therefore already subject to more development than expected. Now that we are being encouraged by Shropshire Council to regard the village of Kinnerley as our Development Hub, we consider it inappropriate that local needs that are best met by sites close to Kinnerley village might be met in these outlying villages, which are not sustainable in the same way as Kinnerley village. In the absence of any updated and differently worded Type and Affordability of Housing SPD, we therefore wish to opt out of having Maesbrook, Dovaston and Knockin Heath designated as a Community Cluster, subject to the two sites in Maesbrook remaining as allocated sites.
A1782B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.
A1783B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.
A1784B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.
A1785B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.
A1786B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Oppose identification of site OSW017 as a site allocation.
A1834B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		Consider that proposed site allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032: traffic; A5/ A495 Whittington roundabout. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A1834B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		Consider that proposed site allocation PYC021 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: PYC021: traffic; A483 Section. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A1834B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area		Consider that proposed site allocation LYH007 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: LYH007: drainage; A483 Section. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1839B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Agree	Please note that whilst we have indicated that we agree with the site, we would say that given the choice we would prefer that this development didn't proceed. However we do note that a number of the issues that have been previously raised have been addressed and therefore feel that on this basis an outright objection is not appropriate. We would however take the opportunity to stress the following points: This site is appropriate in extent. Its fits with a natural division between village and countryside and it should not be used as a reason (excuse) to extend the development boundary further in the future. The allocation has been reduced to 25 dwellings and this must be honoured at the planning permission stage. This is one of the primary points previously raised and this housing density is more in keeping (although still considerably higher) with the surrounding existing residential properties. The woodland coppice bordering the development must be given appropriate protection as we are keen to ensure that this remains a 'sanctuary' for badgers, foxes, birds of prey etc. The proposed traffic calming measures and access design must ensure that the potential for decelerating and accelerating vehicles (of particular note large lorries at 3am) isn't increased. This would otherwise considerably increase the road noise/vibrations to existing properties in the village and would be unpleasant at best for the residents of the new properties.
A1844B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Development should not adversely affect the canal corridor in terms of its structural integrity, landscape, ecological quality and character. Development should respond positively to the adjacent canal corridor and maximise benefits for local communities. We also advise that there is a culvert under the canal (culvert 90) and future proposals will need to demonstrate that any discharge during or after construction will not adversely affect this.
A1845B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	OSW017 should not be a preferred site. It has issues with: Highways, Ecology, Heritage, Landscape, flood risk, proximity to amenities and facilities, scale and utilities. There are alternative sites within the Development Boundary which are suitable. Disagree with the Consultation Review on the site.
A1864B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change.
A1864B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking, wheeling or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria. 2) Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.
A1866B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	TrefonenThe Parish Council has raised many issues with this Plan and visited planners at the Shirehall, but nothing has changed. The Council has objected to the Hub status for Trefonen and the additional 50 dwellings up to 2038. Realistically what developer can afford to build one or two houses a year? They will either want to build the whole allocation or at least earmark a site for growth. Could this be what is planned for the site in Trefonen under the guise of Affordable/Cross Subsidy Exception sites? The Parish Council has invited the developer (STAR Housing) to discuss their plans with residents although no response has been received. No local needs has been identified, Trefonen does not have any "Significant employment" or "peak time transport" so the points system is flawed. Proposed "Community Hub" Status The Parish Council considers that Trefonen is NOT suitable to be designated as a "Community Hub" and argues as follows: 1) It is noted that, among other matters, hub status is assessed on a points basis and that Trefonen is said to have a "score" of 48 – the lowest for a community hub. It is clear that several of the matters considered give a false impression of the current level of sustainability and/or services. Whilst there is a bus service to and from Oswestry, it is very limited indeed. The school is very nearly full and it appears that it cannot expand on its current restricted site. It does not have a dedicated car park – the adjacent car park is technically limited to use by the village hall. There is a library but only in the form of a mobile visit every other week. The shop is somewhat limited in its capacity. Current usage and shopping patterns suggest that, in normal times (i.e. no Covid-19) many of Trefonen's inhabitants only use the shop in an emergency. They tend to use local supermarkets and/or home delivery. 2) It has been acknowledged that, effectively, there are no real employment opportunities. Given that, for the period between now and 2038, any future employment in the Oswestry area is likely to be focussed on the proposed enterprise site or business "parks" on the eastern side of Oswestry, it makes no sense to establish a hub to the south-west of the town; thus increasing traffic through and around the town. 3) Effluent from the village is passed down towards the water treatment near the Maesbury Road/A483 crossroads via a main sewer running to the north of Trefonen Brook. It has been stated in the past that the capacity of this outgoing sewer is sufficient for any future development of the village. Given that there have been reports that, on a number of occasions, there has been leakage after heavy rain from an manhole near the bottom of the field behind Woodland View, this assertion seems unlikely to be correct. 4) The matters referred to below also provide arguments against hub status: 2) Traffic and access to Oswestry and Beyond 1) The unclassified road through the village is a major through route from the Tanat Valley into Oswestry. Traffic is noticeably increasing. 2) Unless on a very small-scale further development in the village would result in significant additional traffic to and from Oswestry (and beyond) – particularly at the morning peak time. There are already increasing morning traffic hold-ups at the entry to the town – from before Oswestry School and on down Upper Brook Street. Increased traffic from Trefonen would exacerbate this rapidly growing problem. 3) The proposed development immediately outside the parish (see Pre-Submission Draft, Schedule S14.1(i)). Residential Allocations: OSW017 Land at Trefonen Road) would very significantly worsen the traffic holdups. 4) As mentioned above (para.1, ii), travel to and from places of likely local employment and further afield would, in the main, require access to use or cross the A5 (or the A483). Leaving aside any limited travel to the south, the only routes from Trefonen are Oswestry Road and through Morda (Weston Road). Neither route is suitable for significantly increased traffic. Proposed Residential Guideline Referring to Pre-Submission Draft, S14.2. Community Hubs: Oswestry Place Plan Area, it is noted that a Residential Guideline of 55 dwellings has been proposed. The Council considers the arguments for this number to be flawed. It is understood that this number has been developed on the basis of continuing the rate of completed dwellings during the 10 years preceding the plan period. Given that completions during that time amounted to around 1.5 per year, a rate of 2.5 per annum does not continue the current rate. Countryside Status, Development Boundary and Possible Long-term Sites 1) The Council has, at the time of the "Preferred Sites Consultation", expressed the view that Trefonen should continue to be "Countryside" with a limited number of "Affordable Homes" for local people and the current assessment policy for "Rural Exceptions" and "Affordable Housing" being applied. 2) The proposed development boundary changes may lead to speculative attempts to develop further sites adjacent to the small extensions on the west of the main road. These areas are almost all on the hillside with very limited access via narrow roads entirely unsuitable for increased traffic. 3) Whilst the Council reserves the right to make detailed comments if and when any of the sites suggested as Long Term Potential SLAA Residential Sites are subject to further consideration, the following comments are put forward at this stage: Sites 06, 08 and 010 have already been the subject of rejected development applications. Sites 04, 05, 010 & 011 give rise to concerns about access mentioned in (2) above. Sites 01, 09 & 015 All of these sites along the line of the Trefonen Brook have been the subject of rejection in past planning consultations. If built upon, significantly threaten the rural landscape of the valley along the stream. This area was in the past designated as of special landscape quality. Now that the "Planning for the Future White Paper" has been produced it blows holes in the draft Local Plan. New housing will be dictated by the government; not local planning authorities and no opportunity to object to development plans as there will be no local design code. New fixed rate infrastructure levy will replace S106 and CIL plus other changes. Should there be any significant development there must be improvements to local amenities, roads and transport links as it will impact on local roads, school places, crime and policing, employment opportunities and a knock-on effect to the surrounding villages and hamlets. 3) Rhydycroesau and Llanforda Realistically, apart from disused farm buildings being converted into homes, and although there is a local need for affordable housing in the area, the young people looking for affordable homes tend to look at Oswestry rather than areas within the parish of Oswestry Rural. Young people and their families cannot afford to buy homes in the ward. New people move in and it is them that do not want to see any new development; not the local families that have lived and worked in the area for generations. Rhydycroesau is a lovely village, with a church and village hall that is very pro-active, but there is no desire for any new homes. Other Comments The Parish Council supports the response made by the Trefonen Rural Protection Group.
A1868B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A1868B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking, wheeling or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria. 2) Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.
A1880B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen should not be a Hub. It would cause irreplaceable damage to the community.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1893B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Designation of Trefonen as a Community Hub settlementHaving studied the documentation, I do not believe that Trefonen meets the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6.Trefonen has no "significant employment opportunities; or "peak time public transport", and it appears that it is the only proposed Hub settlement with neither of these key requirements.Trefonen should therefore be designated "Other Rural" settlement, for which it meets the full criteria.Additionally, without either employment or peak time travel it is a certainty that daily car travel will be increased by additional housing in Trefonen. Walking or cycling to Oswestry are not safe or practical alternatives.That is contrary to Shropshire Council's Climate Emergency Policy, to the NPPF and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel.Therefore it is clear that the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound".It should be designated "Other Rural" settlement, for which it meets the full criteria.2) Settlement Boundary Maps - TrefonenTrefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary.3) Appendix 5: Residential Development Guidelines and Residential Supply- Page 330 Trefonen Development Guideline is proposed as 55 dwellings / Windfall Allowance of 50 additional dwellingsThat is a build rate of 3 dwellings per year and a 15% expansion of the village of the 324 existing dwellings. This is clearly not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen.Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a maximum rate of 1 dwelling per year – Guideline 18 Windfall Affordable Homes. B) Hierarchy of Settlements 2020 - Para 5.41 SP2.2 Strategic Approach and SP.2.2:Community Hubs) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services and facilities.The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport.This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed.b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub.That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria.Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. C) SP2 Strategic Approach - Para 2 Housing Requirement - target of 30,800 This target is 19% in excess of the identified need of 25,894 for Shropshire. Shropshire Council is still pursuing its "highly ambitious" High Growth target.The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5 Year Housing Supply assessments.Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, which are completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financially lead whilst in turn supply by developers is profit lead. Despite Government exaltations to "Build, Build, Build" the funding for Local Authority housing is limited and the supply is majority private sector.It is established fact that whenever there is a lack of demand, housing is not built, but developers pursue consent on otherwise unattainable land.An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025.By the next Partial Review (5 yearly) the repercussions of the Covid-19 pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand and supply is widely predicted.In view of the changed and rapidly evolving world circumstances I would again implore that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision I acknowledge the requirement for cross boundary co-operation with neighbouring authorities.However, my concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target.This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.I note the inclusion of Ironbridge Power Station strategic site into the housing supply calculation with 1000 potential homes, but that will not fulfil the full stated need. Sites need to be identified without impacting the Green Belt. D) Policy S.14.(i) Residential Allocations - Site OSW017 Land at Trefonen Road, OswestryThis site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street and Trefonen Road.When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable and will also increase pollution and carbon emissions from queuing contrary to policy SP3 Climate Change
A1926B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen should not be a hub – does not meet full definition in the HoS. It should be Open Countryside. There is no peak public transport or sig. employment opportunities – it is the only Hub without these. Reliance on car travel would be contrary to SP3. The planned growth is excessive given the recent trends and the character of the settlement. It should be affordable housing at a rate of 1 per year.
A1926B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site would have issues with traffic, health and safety (close to schools) and would increase pollution and carbon emissions (especially when coupled with the 50 proposed at Trefonen).
A1934B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen should not be a hub – does not meet full definition in the HoS. It should be Open Countryside. There is no peak public transport or sig. employment opportunities – it is the only Hub without these. Reliance on car travel would be contrary to SP3. The planned growth is excessive given the recent trends and the character of the settlement. It should be affordable housing at a rate of 1 per year.
A1934B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site would have issues with traffic, health and safety (close to schools) and would increase pollution and carbon emissions (especially when coupled with the 50 proposed at Trefonen).
A2101B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagree with designation of Trefonen as a community hub. It has no significant employment opportunities or peak time public transport; The lack of these facilities will require people to use private vehicles to travel to employment thus impacting on Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel & maximise trips by sustainable travel. Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. Guideline for development in the village is too high and would change the character of the village
A2101B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen should not be designated as a Hub. Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "large range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub. That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A2101B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A2102B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagree with designation of Trefonen as a community hub. It has no significant employment opportunities or peak time public transport; The lack of these facilities will require people to use private vehicles to travel to employment thus impacting on Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel & maximise trips by sustainable travel. Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. Guideline for development in the village is too high and would change the character of the village
A2102B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen should not be designated as a Hub. Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "large range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub. That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A2102B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A2103B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Disagree with designation of Trefonen as a community hub. It has no significant employment opportunities or peak time public transport; The lack of these facilities will require people to use private vehicles to travel to employment thus impacting on Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel & maximise trips by sustainable travel. Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. Guideline for development in the village is too high and would change the character of the village
A2103B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen should not be designated as a Hub. Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "large range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub. That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A2103B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A2147B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change

Page 227

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2147B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A2147B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking, wheeling or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria. 2) Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.
A2149B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A2149B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with itsinherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road.When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which hasno employment or peak time public transport) this increased pressure on existing restricted infrastructurewill be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3Climate Change
A2172B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	a) The key criteria for "Community Hub" status ,requiring "significant employment opportunities; and "peak time public transport"clearly does not apply to Trefonen,and the idea that this can be overruled by virtue of a playground and green spaces(para 5.41) is irrefutably incorrect.Trefonen is the only settlement proposed as a Hub which fails to meet these key croteria. This factor alone shows that Trefonen cannot possibly be regarded as meeting the necessary criteria for a Community Hub status,and its designation as such is therefore Unsound.It should be allocated Other Ruual Staus,for which the criteria are met. In the absence of employment in the immediate vicinity,any new houses would need its occupants(should any be found) to commute,probably significant distances,eg to the East of the County,with consequent damage to the environment and to traffic congestion.
A2172B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Site OSW017 Land at Trefonen Road, Oswestry30 dwellings on this site will increase traffic congestion outside schools on Upper Brook Street & TrefonenRoad.We must also consider the proposals for the extra building in Trefonen,which will add to thiscongestion.Both these plans are also contrary to all efforts and regulations designed to minimise human damage tothe environment.
A2172B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Objects to designation of Trefonen as a community hub, as it doesn't reach the criteria designation for employment opportunities and public transport. Any new homes would require people living there to drive outside the village for employment. Allocation is contrary to SC Climate Emergency Policy, NPPF and Governments Zero Carbon aims Trefonen should be designated other rural and not have a settlement boundary. The proposals represent a 15% increase in the size of the village which would be excessive and destroy the village character
A2173B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Our review of this document concluded that there is no baseline rationale provided with regard to value and sensitivity and the statements within this report appear to be very subjective. The Introduction states what they are but not how the evidence has been arrived at. The statements appear to largely contradict the Natural England National Character Area NCA Profile: 63 Oswestry Uplands (NE548) in relation to the content of landscape and settlement underpinned through work undertaken in conjunction with Historic England. We consider that it comprises notes around poor "parcel" boundaries; poor choice, quality and application of photographs, some of which are incorrectly recorded or duplicated, which err to showing the "low quality" areas that they have seen rather than the good quality aspects and prospects of the village and its setting and surroundings. The splitting of Offa's Dyke SAM between two different "parcels" of their assessment and then saying they are short lengths within them indicates a fundamental lack of appreciation that Offa's Dyke is a historic linear feature running along the length of the national border. The Report fails to consider the views of and over Offa's Dyke SAM from Offa's Dyke Path National Trail where it emerges from the current village boundary along The Gutter HER - PRN30616 We attach our own Trefonen - Landscape & Heritage visuals to show our village in the way that we believe that it warrants. Prior to unification, Oswestry Borough Council designated all the countryside surrounding Trefonen as an "Area of Special Landscape Character", completely different to Gillespie's opinion. Within the original Trefonen Treffach & Nantmawr Village Design Statement there is a "green wedge" coming into the centre of the village. There is strong resident support for this remaining, confirmed by:- many objections to Application Ref 14/00426/OUT (SLAA Site 006) and in the updated 2016 VDS:- -"Landmarks and strategic views in and out of the settlements must be protected and promoted." -"The character of Trefonen must be maintained by the protection from development of the open land and countryside of outstanding beauty which surrounds the present settlement." -"There are no sites outside the former development boundary suitable for development." The views both in and out of the village are highly valued by residents and visitors and are fundamental to maintaining the rural character of the village It is fundamentally key that Village Design Statements are formally acknowledged in the Local Plan as being "material considerations" for both Policy and Development Management decisions.
A2173B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Lack of appreciation of the value of Offa's Dyke SAM and ODP National Trail and Shropshire Way –heritage, landscape, leisure, and economic benefits.Lack of appreciation of Highways issues – "subject to appropriate access"There are serious constraints on the internal road network within Trefonen that would be exacerbated byany additional traffic, which cannot be resolved due to physical constraints.This should have ruled out many of the sites from "Future Potential"Long Term Potential for Employment developments" is suggested on all the sites around Trefonen.That form of development is patently going to be severely detrimental to the rural landscape and characterof a small rural village and its surrounding. Less impact would be from small scale rural diversification byre-development / re-purposing of existing building whilst providing employment opportunities.
A2173B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with itsinherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road.When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which hasno employment or peak time public transport) this increased pressure on existing restricted infrastructurewill be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3Climate Change and Sustainability Objectives SO11 & SO12.
A2173B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy ofSettlements Tables 2 & 6The full definition requires Hub settlements to have a combination of services and facilities; and have"significant employment opportunities; and public transport with a "regular service at peaktime" (employment businesses with more than 5 employees – Classes B, A2 Sui-Generis) (peak timebuses between 06.00-09.00 and 15.00-18.00 Mon-Fri all year).Trefonen has no "significant employment opportunities; or "peak time public transport"It is the only proposed Hub settlement with neither of these key requirements.Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.2)a) Hierarchy of Settlements 2020 - Para 5.41. SP2.2 Strategic Approach & SP.2.2:Community HubsThis still includes a relaxation of these key criteria for "Community Hub" status requiring "significantemployment opportunities; and "peak time public transport"; as well as a combination of services &facilities.The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack ofthese fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sportsfacilities & amenity green space cannot possibly compensate in any way for lack of employment and/orpublic transport. Additionally that "larger range" is not defined, and is purely subjective.This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and shouldbe removed.2)b) Hierarchy of Settlements 2020 - Para 5.41Additionally, without either employment or peak time travel it is certa that daily car travel will be increasedby additional housing in Trefonen.Other forms of Sustainable Travel are not safe or practical on a daily basis throughout the year.i) Walking – whilst there is a pavement on the main road to Oswestry this is narrow and impeded byhedges for the majority of the year forcing pedestrians onto the carriageway. There is no street lighting.ii) Wheeling – the width of the pavement would not accommodate wheelingiii) Cycling – is possible but the route involves steep hill with crests & corners with double white lines. Atpeak times the road is busy with commuting & school traffic and school, and used by agricultural anddelivery vehicles of all sizes. There is no street lightingiv) Buses – there is a no daily peak time service and very limited public service at other times (only 1mid-morning outward – 1 early-afternoon return daily)That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's ZeroCarbon aims. It is contrary to the "Spatial Vision" and SP3 Climate Change and Sustainability ObjectivesSOS, SO6, & SO12 which seek to minimise car travel and maximise trips by sustainable travel, and toreduce carbon emissions.
A2173B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	2)b) Hierarchy of Settlements 2020 - Para 5.41 cont/The travel routes to employment and services involve passing through Oswestry town centre withadditional traffic adding to congestion with its inherent safety and health issues outside schools on UpperBrook Street & Trefonen Road; or through Morda & Weston with impact on those settlements which already suffer excess traffic problems. Contrary to Sustainability Objectives SO11 & SO12.Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and itshould be designated "Other Rural" settlement, for which it meets the full criteria.3) Appendix 5: Residential Development Guidelines and Residential SupplyPage 330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellingsThat is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings.This is not "similar" to the recent rate and cannot be considered to be a "modest amount".From our local knowledge and check of the SC planning portal, the build rate 2006- 2016 was 1per year(not 2per year stated in previous consultation), so the proposed 3per year is not a similar rate of growth.Using the terminology of the Council, 15% is considered to be "highly ambitious" High Growth, whereas 5%is Moderate Growth.The proposed growth would be excessive for the scale, layout, topography, historical assets and characterof Trefonen. It would also increase the risk of future pressures from developers for Open Market housingshould there be a shortfall of Housing Supply during the Plan period, which would not provide AffordableHousing for local people as intended.Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulativeimpact amounting to the same, or arguably greater impact, as a large development over the course of time.We do not believe that this is the intention of NPPF in allowing Rural Exceptions outside rural settlements.Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly"Affordable Homes" for local people – at a guide rate of 1per year – Guideline 18 Windfall AffordableHomes.We are also concerned that the proposal for 50 additional dwellings is only a "guideline" and not a definitivelimit, and that future pressures from developers for housing above that "guideline" would be approvedunder the "presumption in favour of sustainable development" adjacent to Trefonen if allocated Hub status.The core aim of "Rural Exception" policies is to deliver the "identified local needs" for Affordable Housing.This can equally be provided under "Other Rural – Countryside" status, which minimises this risk.We believe that Trefonen should retain its current "Other Rural – Countryside" status

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2173B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	4) S.14.2. Community Hubs Settlement Boundary Maps - TrefonenTrefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. Without prejudice to the above, we are extremely concerned that the proposed Settlement Boundary creates "arms", which would encourage speculative applications for "infill" in the spaces between them outside of the proposed new boundary on the premise that they are "enclosed on 2 or 3 sides", particularly at the north. This could lead to an uncontrolled expansion of the village outside the proposed boundary.
A2173B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Evidence questioning the number of housing completions in Trefonen between 2006 and 2016. Level of past delivery is smaller than listed in the plan and so a smaller figure for future development should be included in the plan
A2173B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Photo evidence to show importance of Offa's Dyke path to historical importance of sites in Trefonen
A2178B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change and Sustainability Objectives SO11 & SO12.
A2178B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. The full definition requires Hub settlements to have a combination of services and facilities; and have "significant employment opportunities; and public transport with a "regular service at peak time" (employment businesses with more than 5 employees – Classes B, A2 Sui-Generis) (peak time buses between 06.00-09.00 and 15.00-18.00 Mon-Fri all year). Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. 2) a) Hierarchy of Settlements 2020 - Para 5.41. SP2.2 Strategic Approach & SP.2.2: Community Hubs This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space cannot possibly compensate in any way for lack of employment and/or public transport. Additionally that "larger range" is not defined, and is purely subjective. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. 2) b) Hierarchy of Settlements 2020 - Para 5.41 Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Other forms of Sustainable Travel are not safe or practical on a daily basis throughout the year. i) Walking – whilst there is a pavement on the main road to Oswestry this is narrow and impeded by hedges for the majority of the year forcing pedestrians onto the carriageway. There is no street lighting. ii) Wheeling – the width of the pavement would not accommodate wheeling. iii) Cycling – is possible but the route involves steep hill with crests & corners with double white lines. At peak times the road is busy with commuting & school traffic and school, and used by agricultural and delivery vehicles of all sizes. There is no street lighting. iv) Buses – there is no daily peak time service and very limited public service at other times (only 1 mid-morning outward – 1 early-afternoon return daily) That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is contrary to the "Spatial Vision" and SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 which seek to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions.
A2178B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	2) b) Hierarchy of Settlements 2020 - Para 5.41 cont/ The travel routes to employment and services involve passing through Oswestry town centre with additional traffic adding to congestion with its inherent safety and health issues outside schools on Upper Brook Street & Trefonen Road; or through Morda & Weston with impact on those settlements which already suffer excess traffic problems. Contrary to Sustainability Objectives SO11 & SO12. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page 330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". From our local knowledge and check of the SC planning portal, the build rate 2006-2016 was 1 per year (not 2 per year stated in previous consultation), so the proposed 3 per year is not a similar rate of growth. Using the terminology of the Council, 15% is considered to be "highly ambitious" High Growth, whereas 5% is Moderate Growth. The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. It would also increase the risk of future pressures from developers for Open Market housing should there be a shortfall of Housing Supply during the Plan period, which would not provide Affordable Housing for local people as intended. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. We do not believe that this is the intention of NPPF in allowing Rural Exceptions outside rural settlements. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people – at a guide rate of 1 per year – Guideline 18 Windfall Affordable Homes. We are also concerned that the proposal for 50 additional dwellings is only a "guideline" and not a definitive limit, and that future pressures from developers for housing above that "guideline" would be approved under the "presumption in favour of sustainable development" adjacent to Trefonen if allocated Hub status. The core aim of "Rural Exception" policies is to deliver the "identified local needs" for Affordable Housing. This can equally be provided under "Other Rural – Countryside" status, which minimises this risk. We believe that Trefonen should retain its current "Other Rural – Countryside" status
A2178B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	4) S.14.2. Community Hubs Settlement Boundary Maps - TrefonenTrefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. Without prejudice to the above, we are extremely concerned that the proposed Settlement Boundary creates "arms", which would encourage speculative applications for "infill" in the spaces between them outside of the proposed new boundary on the premise that they are "enclosed on 2 or 3 sides", particularly at the north. This could lead to an uncontrolled expansion of the village outside the proposed boundary.
A2268B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen does not meet the criteria as a community hub, it has no significant employment opportunities or Peak time public transport. Without either of these things, daily car travel will be increased which is contrary to SC's Climate Emergency Policy, to NPPF and the Govt's zero carbon aims.
A2268B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site for 30 dwellings would compound traffic congestion, with its inherent safety and health issues outside schools on upper Brook St and Trefonen Rd
A2277B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen does not meet the criteria as a community hub, it has no significant employment opportunities or Peak time public transport. Without either of these things, daily car travel will be increased which is contrary to SC's Climate Emergency Policy, to NPPF and the Govt's zero carbon aims.
A2277B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site for 30 dwellings would compound traffic congestion, with its inherent safety and health issues outside schools on upper Brook St and Trefonen Rd
A2291B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen does not meet the criteria as a community hub, it has no significant employment opportunities or Peak time public transport. Without either of these things, daily car travel will be increased which is contrary to SC's Climate Emergency Policy, to NPPF and the Govt's zero carbon aims.
A2291B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site for 30 dwellings would compound traffic congestion, with its inherent safety and health issues outside schools on upper Brook St and Trefonen Rd
A2292B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen does not meet the criteria as a community hub, it has no significant employment opportunities or Peak time public transport. Without either of these things, daily car travel will be increased which is contrary to SC's Climate Emergency Policy, to NPPF and the Govt's zero carbon aims.
A2292B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site for 30 dwellings would compound traffic congestion, with its inherent safety and health issues outside schools on upper Brook St and Trefonen Rd
A2296B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Trefonen does not meet the criteria as a community hub, it has no significant employment opportunities or Peak time public transport. Without either of these things, daily car travel will be increased which is contrary to SC's Climate Emergency Policy, to NPPF and the Govt's zero carbon aims.
A2296B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The site for 30 dwellings would compound traffic congestion, with its inherent safety and health issues outside schools on upper Brook St and Trefonen Rd
A2308B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	KCK009 lies approximately 2km to the north-west of Nesscliffe Training Area and less than 1km south of Knockin Airfield, which is utilised by the MOD. Flying activity within these locations, undertaken in support of training for the front-line, produces a significant amount of low frequency noise which can be disturbing. Therefore, the proposed allocation would represent a cumulative increase in sensitive receptors to noise within this location and as a result has the potential to lead to an increase in noise complaints. For KCK009 to be in accordance with Para 95 of the NPPF (ensuring operational sites are not affected adversely by the impact of other development proposed in the area) and para 182 of the NPPF (existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established, with a requirement for the applicant to provide suitable mitigation before the development has been completed), it should make reference to a requirement for planning applications to be submitted with an appropriate noise assessment which takes into account noise arising from defence activities and provides appropriate mitigation solutions such as soundproofing. Applicants should engage with MOD in the production of such assessments. Furthermore, the site promoters of KCK009 should provide measures to enable future occupants to be made aware that military aircraft may be seen and heard operating in the area and that aircraft may overfly the site. The mitigation of noise in external areas may not be possible. Future occupants should also be made aware that aircraft types, flight paths and ground based activity can vary over time and this may cause disturbance.
A2369B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements 2020 - Para 5.41 * The criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. Para 5.41 suggests that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. ** Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A2369B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Policy S.14.1(i) Residential Allocations Site OSW017 Land at Trefonen Road, Oswestry There is already traffic congestion on Trefonen Road, especially as it enters Oswestry. A site of 30 dwellings will only add to this congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. With 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2369B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking, wheeling or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria.** Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.
A2371B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Hierarchy of Settlements 2020 - Para 5.41 * The criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. Para 5.41 suggests that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. **Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria.Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A2371B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Policy 5.14.1(i) Residential Allocations Site OSW017 Land at Trefonen Road, OswestryThere is already traffic congestion on Trefonen Road, especially as it enters Oswestry. A site of 30 dwellings will only add to this congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road.With 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A2371B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking, wheeling or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria.** Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.
A2378B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The development of housing, on the potential sites 006, 008, 010, 015 & 017 would have an adverse impact on both the setting of Offa's Dyke (a Scheduled Monument) and the Offa's Dyke National Trail path.The Offa's Dyke Association (ODA) would be very concerned in particular, at the prospect of any development on Trefonen 008. This field contains a section of Offa's Dyke (SM) along the entire eastern side of the site - inside the hedge-line and clearly visible to walkers from the National Trail path. Any development of this field, would be contrary to the guidance laid down in the Offa's Dyke Conservation Management Plan (ODCMP 2018) - which has been adopted by regional authorities along the length of the monument, including Shropshire Council.Section 7 of the ODCMP: 'Planning and Other Policy Relevant to Offa's Dyke Observations and Recommendations, states: "Appropriate regard should be had for the setting of the monument, so that the Dyke's social, historical and landscape context is protected and its purpose may be better understood. The setting of the monument should be protected from inappropriate development. Setting should take account of the line of the monument, whether or not Offa's Dyke survives as an upstanding earthwork. An appropriate and effective cordoned area should be maintained between the defined boundaries of the monument and the boundaries of development. This boundary should be formally defined as part of the planning process; and planning conditions should be used to enforce this".The ODA would also have very strong reservations in the event of housing development on Trefonen 010, as this would be immediately adjacent to (and overlook) the Offa's Dyke National Trail path.Development on 006, 015 & 017 would not affect the monument as much as on 008 & 010, but would still go against the core principles of the Offa's Dyke Conservation Management Plan. The above ODCMP recommendations would also apply in these cases.The Offa's Dyke Conservation Management Plan provides a proactive plan for the entire monument and details the conservation principles which will help to preserve it for the future. If required, the ODA would be pleased to provide a copy of this important document, to ensure that all lengths of the monument in Shropshire can be suitably protected.
A2402B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	Do not agree to the proposal - Weston Rhyns current infrastructure wont be able to welcome new and sustain extra housing. Roads are already narrow plus have constant parking from current roads leading to one way system ability only. Through traffic already dont do the speed limit so putting more traffic on the roads will lead to more accidents and cause Weston Rhyn not to be safe environment for childrens. Sewage is limited and field floods given any rain. The countryside community feel will be disrupted and the current beautiful view will be ruined. House prices will plummet and council tax will increase leaving many families unable to financially survive.
A2443B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	In earlier discussions with the Officer it was agreed that a total of 51 houses for the whole Parish would be developed up to 2036, this would be in addition to the 35 already planned for Meadowdale at the rear of Llanymynech village hall. Making a total of 86 in all, and that most of those homes would be developed in Llanymynech with a mix of house types and sizes. It was agreed that due to the landscape in Pant there were no suitable sites for development. Further now that the Llanymynech & Pant Bypass consultation and site investigation has been agreed by the Government any planning proposals for the villages of Llanymynech & Pant must be stalled until such time as a route has been agreed in principle.
A2443B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	There are existing water pressure issues in the village, this site would make this worse. Penygarrag Lane would be an unsuitable access. Unsuitable location along busy road, with fast vehicles and blind bends. Poor air quality in the village, and this would cause noise pollution. The dwelling number (25) is too high for the site. There are protected species in the woodland nearby. Some of the site floods. The site being adjacent to the very busy A-road is perilous and objectionable. The Llanymynech & Pant Bypass consultation and site investigation has been agreed by the Government and any planning proposals for the villages of Llanymynech & Pant must be stalled until such time as a route has been agreed in principle.
A2453B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The SLAA appraisal was a flawed process. The cutoff benchmark for what constituted a community hub was quite arbitrary. Communities on either side of this mark could easily have disagreed with the outcome. In North Shropshire the decision to distribute more housing into smaller communities where infrastructure was more limited was mistaken. Other constituency areas had a better balance going to the larger settlements where existing infrastructure will be able to cope with new development. CIL /s106 money would have not been sufficient to cover the gaps in infrastructure. So in the north more development should have been allocated to the larger settlements. This has distorted allocations with less sustainable sites being allocated where other more sustainable sites were available within the settlement itself or in another settlement. West Felton is just over the threshold to be a community hub. The village has twice voted to stay as open countryside. The parish council has recently withdrawn its support for hub status. This was due to the implications of the White Paper and on sustainability grounds. Not with standing that the site allocated is the wrong site. There are other more sustainable sites nearer to the core of the village that are nearer to public transport, the shop, the pub, the school and have better access
A2455B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	1) Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with neither of these key requirements. Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria. Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking, wheeling or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria. 2) Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page 330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.
A2455B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change
A2455B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2461B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The northern boundary of Shropshire abuts Wrexham local authority and the boundary of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). Therefore, development within Shropshire has the potential to impact the purpose of the AONB. Planning Policy Wales edition 10 requires the setting of designated landscapes in Wales to be considered within strategic planning and site-specific development management considerations (this requirement is reflected in part 15 of the National Planning Policy Framework - February 2019). We note that housing allocations are proposed in Weston Rhyn and St Martins and advise that the visual setting of the AONB would be a material planning issue.
A2462B01 NRW	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Disagree	The northern boundary of Shropshire abuts Wrexham local authority and the boundary of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). Therefore, development within Shropshire has the potential to impact the purpose of the AONB. Planning Policy Wales edition 10 requires the setting of designated landscapes in Wales to be considered within strategic planning and site-specific development management considerations (this requirement is reflected in part 15 of the National Planning Policy Framework - February 2019). We note that housing allocations are proposed in Weston Rhyn and St Martins and advise that the visual setting of the AONB would be a material planning issue.
A2473B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S14 Oswestry Place Plan Area	Don't know / no opinion	The Llanyrnech Canal and River Trust Yard should be developed to enhance the use of the Montgomery Canal which is subject to an ongoing and current restoration project. It is expected that in future years the canal will be a vibrant part of the wider community and should offer facilities and opportunities for visitors to the area. It is important that the current heritage facilities such as the Hoffman Kiln and the Llanyrnech rocks with their history linked to the canal are enhanced and this should be encouraged in all its forms.
A0056B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0065B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0069B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0083B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0084B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0095B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Loss of countryside at Lamlodge Lane will significantly reduce local amenity; impact on views and personal wellbeing and health. Growth will also exacerbate traffic problems through the town, particularly on Aston Street and at Victoria Road junction. The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate
A0096B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0099B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0104B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0240B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>2.18 NPPF paragraph 11b is clear that strategic policies should, as a minimum, provide for housing needs and other uses 'as well as any needs that cannot be met within neighbouring areas.'</p> <p>2.19 It is also clear that Local Plans should be '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' (paragraph 35c).</p> <p>2.20 Principally, L&Q Estates welcomes the Council's recognition of its functional relationship with the Black Country and commends the positive dialogue undertaken between the relevant bodies through preparation of the DSLP11.</p> <p>2.21 However, there is significant concern regarding the quantum of the proposed contribution at 1,500 dwellings.</p> <p>2.22 Within its evidence base, the Council has published its correspondence with the Association of Black Country Authorities ('ABCA') comprising the following communications:</p> <ul style="list-style-type: none"> • 12.07.2018 - ABCA with Shropshire Council • 08.02.2019 - ABCA with Shropshire Council • 26.04.2019 - Shropshire Council with ABCA • 13.05.2019 - ABCA with Shropshire Council • 30.09.2019 - ABCA with Shropshire Council <p>2.23 In its correspondence of 13.05.2019, Wolverhampton Council (on behalf of the Black Country Authorities) welcomes the opportunity to provide additional evidence to enable Shropshire Council 'to make a positive recommendation to members to allocate land at M54 junction 3 for employment-led mixed use development'12.</p> <p>Crucially, the Black Country Authorities not only indicate a broad location considered appropriate in meeting their employment and housing shortfall, but suggest that a quantum of 3,000 dwellings would be an appropriate contribution:</p> <p>'With the exception of Shropshire, and those areas summarised above, other local authorities are either not currently progressing Local Plan reviews, have very limited physical capacity themselves or consider themselves to be too remote from the Black Country to be able to reasonably meet our needs. In this context, the strategic opportunity at M54 J3 of some 50ha of employment land, supported by provision of 3,000 homes to contribute towards meeting both the employment and housing needs of the Black Country would therefore make significant quantitative headway in addressing unmet needs for both employment land and housing in the Black Country.'13 [Emphasis added]</p> <p>ABCA later submitted further communications on 30.09.2019 strongly supporting the potential for land at M54 Junction 3 to be allocated in the DSLP, as well providing further justification relating to the strong functional economic relationship between Shropshire and The Black Country.</p> <p>Resultingly, strongly objects to the Council's proposed contribution of 1,500 dwellings to the Black Country unmet housing need, as opposed to a significantly larger contribution as suggested by ABCA.</p> <p>In the absence of a statement of common ground confirming ABCA's agreement to this quantum of contribution, the Council risks its plan being considered unsound by failing to satisfy NPPF paragraph 35c requiring 'joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.'</p> <p>Consequently, considers it entirely appropriate for the existing safeguarded land at Land between Revells Rough, Lamledge Lane and the eastern rail line to be allocated for housing in order to further contribute to the Black Country's unmet housing need.</p> <p>This land has already been removed from the Green Belt and safeguarded through the Adopted Core Strategy to meet future housing needs. It is therefore recognised as being suitable for development and is available now in order to come forward through the early years of the new plan period.</p>
A0240B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Don't know / no opinion	Brochure setting out proposals for the enhancement of Shifnal Town Centre as part of a site promotion for SHF022 and SHF023 as well as Land between Revells Rough, Lamledge Lane and the eastern rail line, (which is currently identified in the Draft Plan as existing safeguarded land).
A0240B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Don't know / no opinion	Flood risk and drainage strategy for promoted site SHF023
A0255B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate.</p> <p>There are many empty units in Telford - these should be used first.</p>
A0280B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:</p>
A0280B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:</p>
A0281B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate.</p> <p>Highways should take priority over population growth</p>
A0281B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate.</p> <p>Highway support should take priority over population growth</p>
A0283B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate.</p> <p>Concern over GP services</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0284B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0285B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0287B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0289B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Infrastructure is not being improved despite recent development and a lot more on the way
A0290B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Indeed, the town cannot cope with what has recently been built. Proposals do not account for existing and proposed employment areas within 10miles of the settlement and existing provision in the town. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate
A0310B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	[Part 1 of 2] Employment Minimal amount of green belt should be lost. Windfall numbers are unsustainable, and no evidence provided. Safeguarded land & greenbelt will be subject to exception housing. Exceptional circumstances not possible if based uncertain figures. Housing site sizes not included. SHF013 & SHF015-29 – different densities in SLAA & PS – no explanation. Too much land allocated for guideline. Housing should be delivered post-2026 to allow for infrastructure provision to catch-up. Unclear how much employment land is needed. Ambiguity throughout re how much has been needed, and no justification, and site sizes. More land is allocated than needed. Increase in employment only in Shifnal and nowhere else – double counting 40% the total employment guideline figure. There are no local circumstances to justify the increase from 16ha to 41ha, as the 16ha originally proposed and announced to the TC, already included these adjustments which were applied to the whole County. There is, therefore, no exceptional circumstance to justify the removal of an additional 25ha of land from the Green Belt. ". The proportion of employment land to anticipated housing is higher than other settlements with no explanation. A recent application submitted an employment land assessment which concluded that a maximum of 2ha employment land for Shifnal could only be justified up to 2026. The Council have stated that the previous figure was "wrong". No reason was given why it was wrong. By allowing a disproportionate amount of employment land, it is more likely that this will lead to increased commuting into these employment areas from outside the town and result in pressure from developers to provide more housing, with potential adverse impacts on protection of Safeguarded Land and Green Belt. The proposed employment land is excessive - a cautious approach should be taken with employment land supply, which can then be reviewed when the effects of Covid-19 can be better assessed. There is already high provision of employment in this area along the M54 corridor (W Midlands Interchange, I54, Featherstone), as well as nearby areas (including Telford and the Black Country). No evidence for removing Green Belt and establishing that exceptional circumstances apply. No evidence for providing suppliers to Bridgnorth employment sites. No M54 access N onto M6. SC say that planned provision of new land for employment opportunities in the past has been limited. This is an incorrect statement. No evidence shown that a number of proposals for deliverable employment land in the town had been received. SC then stated in Oct 2019 that no formal approaches or expressions of interest to invest had been received. Strategic Sites & Employment Areas Assessment states there are no employment issues for the Shifnal Place Plan area & recommended no new allocations for Shifnal. Concern that the employment figure is proposed for beyond 2038 – casts doubt over 41ha in green belt justification. The balanced growth calculation for 1500 houses would require 16ha not 41ha. The Local Economic Growth Strategy has not progressed - SC have failed to progress a strategy for Shifnal. In 2018, the TC agreed to co-operate in a strategy for the town, but SC have not taken this any further. NO SC response to the TC's objections to SHF 18b and 18d. Illogical to allocate land in green belt when there is undeveloped land between it and the town boundary. SHF018a/P14 should be developed first. No evidence for improvements to Stanton Rd. The Green Belt Review states that releasing the land from the Green Belt would lead to a level of encroachment into the countryside to the E of Shifnal and a narrowing of the gap between Shifnal and Albrighton and weaken the integrity of neighbouring Green Belt. SHF018a/P14 would minimise these adverse effects. The release of western section of P13a would lead to a High level of harm to the Green Belt. The Green Belt Review States there is no clear boundary. The employment allocation should state High harm. SC have not examined fully all other reasonable options. The TC are concerned that SC have pre-determined the allocation of this site and failed to properly evaluate alternatives or to fully take into account comments received on the allocation. No viability assessment accompanied the Preferred Sites consultation for SHF18b & d, and it has a 'limited' SA rating.
A0310B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	[Part 2 of 2] Safeguarded Land Plan fails to give parcel references to the proposed Safeguarded Land, nor are these individual parcels identified on the proposals Map. Inconsistencies in the size of parcels of land included as proposed Safeguarded Land. Despite legal requirements to the contrary, the Plan does not consider the detailed objections raised to the original proposal (at Preferred Sites), how these have been taken into account and the reason for overriding these concerns. The TC object to the inclusion of the whole of SHF18/P14 as Safeguarded Land. The principal reason for the substantial release of Green Belt is to meet SC's underlying objective to expand the town to become a strategic centre. The TC object to this. The sites proposed do not satisfy the exceptional circumstances criteria. There is plenty of already committed employment land in neighbouring authorities in the M54 corridor. Covid-19 is likely limited demand for new land in the near future. Shifnal cannot compete with its proximity to Telford in terms of capacity/services. Concern that no strategic infrastructure will be delivered. The town does not want to be a strategic location where a large amount of development is allowed, substantially altering the existing character of the town. Local Plan is contrary to Neighbourhood Plan in places. The Plan does not address any of the points raised by the TC re the proposed neighbourhood community extension. No local public consultation on new strategic highway, the TC are against such a route. The TC has doubt that the highway would meet the full costs of the works, which would result in some costs falling on the public purse which is unacceptable. There is no traffic justification for the so called "by pass" and so no exceptional circumstances on this basis for the loss of Green Belt. The proposed bypass would not assist the traffic in the town centre. The TC rejects that the housing extensions will provide improvements at Five Ways and Innage Road. SC cannot know what the housing needs of the town will be beyond 2038. There is no evidence to substantiate that the railway arch between parcels P17a and SHF017north can physically take the full volume and type of traffic envisaged. The TC rejects that the housing extension will provide increased access to community facilities and commercial services and potential to offer further services. The TC rejects that the housing extension will provide a significant gain in Green Infrastructure and management of flooding. The TC reject that the housing extension will provide improved access into the town, to recreational open space and countryside in the Green Belt to enhance environmental quality and access. The proposed extension not to meet the needs of the town itself, but to meet some future strategic need, the TC objects to this. High Level of harm to Green Belt at land between the A4169 and railway land. SC should have consulted the local community when proposing Safeguarded land for development. TC objects to effectively allocate future development proposals on Safeguarded Land. Only Shifnal has proposals in Safeguarded Land, no other settlement does. Changes to Greenbelt boundaries should be reviewed by the Neighbourhood Plan. Shifnal has water supply and sewerage constraints. Protecting Greenbelt more important following Planning for Future from government. It is considered that no exceptional circumstances have been put forward to explain why only part of this Sub Opportunity Sh-1a has been designated as Safeguarded Land and not the whole area. The TC and Shifnal Matters consider that the amount of land proposed to be removed from the Green Belt and allocated as Safeguarded Land is excessive
A0310B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Concern over infrastructure deficiencies. The proposals do not "reflect the character, needs and opportunities of [Shifnal]," – NPPF. SC have failed to take into account the views of the local community and the TC - the town retains the character and feel of a village and the community largely wish it to remain so. SC have disregarded the long standing community views despite claiming local comments would be fully taken into account. Inconsistent proposals for deciding land being removed from greenbelt. No clearly defined Green Belt boundaries. The proposals take no regard to the Neighbourhood Plan's emphasis on the importance of the character of the town for existing and new residents. The loss of so much Green Belt is unjustified and not supported by credible evidence. The TC question why it was considered appropriate to mention the need to reflect the Neighbourhood Plan objectives at Market Drayton but not Shifnal. No credible evidence has been given to support the reason for changing the original proposal on employment land. The proposals take no logical and reasoned account of the Green Belt Review. The TC consider the proposals brought forward by Nurton Developments is unacceptable (land to the south of Shifnal adjoining either side of Upton Lane
A0310B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Concern over implications in the White Paper Planning for the Future, which particularly applies to the extensive changes from green belt to safeguarded land proposed for Shifnal where there must be a danger that safeguarded land could immediately be classified as a "Growth" area immediately developable rather than a "Protected" area not developable until post 2038. Recommend that SC consider its implications in determining the next stage of the review.
A0353B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0360B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0362B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0368B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0369B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0430B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to S15.1 for the following reasons: S15.1(1) states: "Shifnal will fulfil its role as a Key Centre and the largest settlement in the north of the Shropshire Green Belt. Shifnal will be the focus for investment, employment, housing and development on the M54/A5 Strategic Corridor through Shropshire with access to Junctions 4 and 3 with proximity to Wolverhampton and the i54 major investment site." But this is only true for the period to about 2025 and thereafter any new housing development is restricted to small windfall development. Shifnal can deliver more housing in the plan period and is suitable for more growth given its position within the M54/A5 Strategic Corridor. Support S15.1(2) refers to the Shifnal Neighbourhood Plan 2014-2026 and will respect policies and proposals that conform with the Local Plan. Similarly, support S15.1(11) says proposals should respond positively to the Neighbourhood Plan, as well as other community-led plans, community strategies, and masterplans adopted by Shropshire Council. S15.1(3) states: "Shifnal is inset into the Green Belt and planned development will only occur within the development boundary shown on the Policies Map. Development in the Green Belt may be permitted in 'very special circumstances' in accordance with national and local Green Belt policies that specify the appropriate land uses at the acceptable circumstances for this development." There is no issue in principle here although it is recommended that safeguarded sites be included within the development boundary. S15.1(4) says: "Shifnal will have a key role in providing homes, jobs, services and facilities to the Place Plan area, other Green Belt communities and the M54/A5 Strategic Corridor. Over the Local Plan period, the town will deliver around 1,500 dwellings and make available around 41 hectares of employment land to provide choice and competition in the market. New housing and employment will make provision for the needs of the town and surrounding hinterland, including attracting inward investment and allowing existing businesses to expand." There is no issue in principle here but the residential guideline of 1,500 may be being unnecessarily constrained and Shifnal could be considered suitable for a higher level of housing growth. Locating safeguarded land within the settlement boundary, the residential guidelines in the town would increase to around 2,765 homes. This might seem like a significant increase, only 1,495 homes would be from new allocations, including 1,265 at the safeguarded land and 230 from other housing allocations. Shifnal can accommodate this number of new homes from allocations, particularly with the necessary infrastructure in place, secured through reasonable s106/CIL contributions. S15.1(5) says new residential development will primarily be delivered through the saved SAMDev allocations and the new residential allocations in Schedule S15.1(i) and on Policies Map. 15.1. The SAMDev Plan residential allocations include: SHIF004a – Land south of Aston Road; SHIF004b – Land between Lawton Road and Stanton Road; SHIF006a – Land north of Wolverhampton Road. Appendix 5 shows the SAMDev Plan allocations have been completed or have planning permission. The new residential allocations at Schedule S15.1(i) include: SHF013 – Land adjoining Meadow Drive, Shifnal (65 homes); SHF015 & SHF029 – Land adjoining Beech House between A464 and Park Lane (65 homes); SHF022 & SHF023 (part) – Land between Windmill View and The Monument on A464, Shifnal (100 homes). Paragraph 5.204 says that given the past rate of housing delivery in Shifnal, all the supply of housing land could be delivered in its entirety by 2025. Thus, most of the housing provision set out S15.1(5) could be completed very quickly and then new housing in Shifnal would be limited to windfall development in the development boundary. This is a risky strategy putting pressure on land outside the settlement boundary. S15.1(6) says Shifnal will deliver a significant, new investment opportunity on the employment allocation in Schedule S15.1(ii) and on the Policies Map. This is supported since Shifnal is ideally placed for economic and employment growth being within the M54/A5 Strategic Corridor and would benefit from improved self-containment of the working population. S15.1(7) says land beyond the development boundary that is not part of the Green Belt is safeguarded for Shifnal's future development needs, as in Schedule S15.1(iii) and the Policies Map. The safeguarded land at Schedule S15.1(iii) includes: 4.5 hectares - Land adjoining junction of Stanton Road and Lamedge Lane; 9.4 hectares – Land adjoining Shifnal Hillcrest School and Shifnal Industrial Estate; 10.4 hectares – Land between Revells Rough, Lamedge Lane and the eastern rail line; 9.6 hectares – Land between A464 (south) and Park Lane; 46.1 hectares – Land between Park Lane and A4169 at Lodge Hill; 12.8 hectares – Land between A4169 and the western railway line The latter three sites comprise the land safeguarded for housing. There is no issue in principle here but it is considered that the settlement boundary could include safeguarded land, and there is a strong case to include a robust monitoring / 'Plan B' policy. Alternatively, this safeguarded housing land could be allocated. The benefits associated with the Site are set out at paragraph 5.214 of the plan. These objectives are commended for inclusion in the plan and consider that they could come forward in the plan period. S15.1(7) says that: 'Development of this [safeguarded] land during the Plan period will only be permitted in 'very special circumstances' to meet Shifnal's longer term development needs in accordance with national and local Green Belt policies.' S15.1(8) says: "To support Shifnal's role as a Key Centre and the importance of the town's distinctive retail offer and the need to sustain a vital and viable town centre, the town centre identified on the Policies Map is the preferred location for new or enhanced retail development. There is a presumption against out of centre retail development with the exception of the release of safeguarded land to the west and south of Shifnal in 'very special circumstances' to meet the longer term development needs of the town." Since there is no national requirement to demonstrate very special circumstances for development on safeguarded land a more robust approach may be to include a monitoring / 'Plan B' policy for safeguarded land, as previously highlighted. The recognition that retail development at the safeguarded housing land is appropriate is supported and indeed potential retail facilities will provide a choice and retain expenditure within the town. However, if the Site was allocated or included in a monitoring / 'Plan B' policy, then retail development could be controlled through Policy DP10. S15.1(9) is supported which says that development in the town will have regard to the town's natural and historic features, heritage assets, green corridors and spaces; and, the improvement of environmental quality, including the protection and enhancement of the corridor of the Wesley Brook and the effective drainage of river and surface water through the town particularly from the discharge of flood waters. S15.1(10) states that Shifnal will be a significant focus for the provision of infrastructure and services to meet the needs of the town and its wider catchment area, with current priorities set out in the Shifnal and Surrounding Area Place Plan which is supported and will contribute to the implementation of infrastructure through reasonable s106/CIL contributions arising from the development of safeguarded housing land which given the scale of this land would be significant.
A0430B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to the application of SP6(4) to the safeguarded land at Shifnal. SP6(4) indicates that development outside settlement boundaries would only be considered acceptable where there is clear evidence that the residential guidelines appear unlikely to be met or where there are specific considerations set out in the Settlement Policy: Obviously, the deliverability and the developability of sites in the plan may change over time, so there needs to be an element of flexibility to allow other sites to come forward, so this part of the policy is commended. However, it is suggested that the Council also add to this policy a hierarchy of sites that would be considered suitable for development in the event that the Council are unable to demonstrate a five year supply of housing land or in the event of other criteria being triggered. This should include the potential delivery of safeguarded sites before non-allocated sites. Such an approach would be aided by a monitoring / 'Plan B' policy similar to that applied by West Lancashire in their Local Plan. This would negate the requirement to formally review and update the plan before safeguarded land is brought forward. In this case, it is also noted that the Site is depicted as falling outside of the proposed Shifnal settlement boundary. This does not have to be the case. The NPPF simply confirms that safeguarded sites should be located between the existing urban area and Green Belt land. This means the settlement boundary can lie either side of the safeguarded allocation. However, including the safeguarded sites within the settlement boundary, would provide a helpful visual indication that such sites are deemed to be suitable for development (even if this is at a point in time in the future).
A0457B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement.
A0458B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement.
A0459B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement.
A0469B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Level of growth will swamp roads, health services, schools and rail services; Duty to Cooperate should pick up cross boundary employment zones; Shifnal has seen 54% growth compared to 23% for the Shropshire area; Safeguarded land area far exceeds Shifnal's needs and will destroy village atmosphere; employment growth scale will exacerbate the traffic gridlock; green belt must be retained, especially to the West - avoid Shifnal becoming a suburb of Telford; inadequate assessment of flooding, climate change, air quality, loss of prime farmland and other environmental constraints;
A0470B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement.
A0503B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0555B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive. Shifnal Planning Matters newsletter attaches
A0556B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive
A0558B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive
A0560B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive
A0561B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive
A0562B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive
A0563B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive
A0573B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Support S15.1 proposal to safeguard land from the Green Belt for future development. Support Green Belt Exceptional Circumstances Statement to build on the strategic location and accessibility of Shifnal. Issues to consider in selecting land for safeguarding include: Housing Need - in Shifnal local need is driven by historical constraints with low rates of development, early completion of more recent ambitious growth targets, prevalent and significant affordability ratio, proposal to partially meet Black Country needs and final completion of historical safeguarded land around the town. SHF018c is proposed for safeguarding on eastern edge of town as strongest opportunity to meet Black Country needs. Green Belt Assessments - sites SHF032, SHF018b, SHF018c and SHF108d make only limited contributions to purposes of Green Belt designations. This shows that a materplanning approach to manage siting, massing and landscaping of development would permit all three sites to be released from the Green belt for development to enable a significant extension to the north-eastern quadrant of the town. Preferred SW Safeguarded Land - this actually has the greatest impact on the Green Belt if released for development including coalescence of Shifnal and Telford contrary to NPPF para 134. Removal of parcel P17a from safeguarding also prevents delivery of full by-pass of A464. This requires use of A4169 and Five Ways Roundabout without any significant benefit to the strategic road junction, further impacts on town centre and on traffic associated with school to the east. Potential safeguarded land to NE has good relationship to school and proposed new employment area. The issues with SW safeguarded land will affect confirmation of exceptional circumstances for releasing Green Belt land for development. Sustainability - comparative assessment of land to NE and SW through SA and Site Assessment Environment Report shows SHF018c has better numeric sustainability assessment but SW land preferred due to perceived benefits. Removal of parcel P17a challenges this through the effect on the proposed by-pass. Rationale for removing SHF032 residential allocation is unclear because only limited weight made of proximity to Grade II* Aston Hall and land considered less sensitive to housing use than to employment use. It is unclear whether SHF032 properly assessed as a housing allocation. Heritage - SHF032 assessed as being in open landscape close to Aston Hall. Submitted heritage Impact Assessment is relative, mature planting screens the asset, already residential uses in ancillary and farm buildings and Hall mainly open to SE on opposite side of Hall. Historic England GPA3 Setting of Historic Assets states that assessment of setting almost always considers effect of views. Appropriate analysis under GPA3 indicates site has a marginal and residual relationship to heritage asset, secondary level of contribution to significance and minimal legibility of Hall from SHF032 which should be safeguarded for residential development. Supporting documents provided for site promotion.
A0573B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Support S15 commitments to: Shifnal as a location for significant growth between Wolverhampton and Telford Between Juncs 3 & 4 of M54; as a Key Centre and primary development location in northern Green Belt serving many Green belt communities; as a significant focus for infrastructure and services to meet the needs of its growing community and wider catchment. Approach to allocations and safeguarded land is questioned for the following reasons: except for SHF018b and SHF018d employment allocations that meet a clear need for additional employment in Shifnal the other identified sites are not the most suitable, available or justified. Although single storey restriction on development of SHF018b and SHF018d for supply chain industries in A5, M54 M6 corridors will constrain capacity of these strategically important sites to meet market demands and requirements. Aspiration for campus development better served by more limited footprints of two storey or higher developments. Historically constrained housing development justifies the release of SHF032 as this was previously accepted and justified for release from the Green Belt being located close to new residential development and providing a sense of place on Coppice Green Lane. Safeguarding of SHF018c will also provide for highly sustainable extension to Shifnal in a strategically significant location with good accessibility, service provision and proximity for active travel that could deliver new health/medical facility and new day care nursery.
A0573B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Support S15.1 to release SHF018b and SHF018d as two inter-related employment sites to significantly improve employment land offer, commercial premises, business representation and to promote and replenish employment in Shifnal. Two sites will support significant housing growth in the town bringing new labour into the local market. Location adjoining existing Shifnal Industrial Estate will create strong edge of town employment area providing modern commercial premises. Shifnal IE and two new allocations can be linked through future planning application rather than being a precursor for development. Proximity of new allocations to Stanton Road and Upton Lane will provide for active travel between town and employment area without physical links to existing built form of town. S15.1 must allow for broader range of employment uses on new allocations reflecting new Class E uses including former Class B1(a) office uses. Development guidelines should use submitted design approach within indicative masterplan and delete requirement for vision, design code and masterplan prepared as Supplementary Planning Document in consultation with public. These requirements are considered overly restrictive in relation to NPPF paras 81 and 87. Submitted indicative masterplan already facilitates flexible and responsive approach to design and delivery recognising contemporary economic requirements due to impacts of Covid-19. Transport considerations address sustainable location and proximity to town enabling promotion of active travel. However, the requirement to investigate Park & Ride is too restrictive and can be met using a conventional bus offer. Forecast 2026 indicates insufficient vehicle flow (200-300 vehicles/hour) to ensure adequate vehicle capture to deliver a satisfactory passenger pool for a P&R site and requirement should be removed from S15.1. Requirement for improvements along Stanton Road as the primary access to the employment allocations should be removed and only considered at planning application stage in relation to an appropriate traffic safety and capacity assessment.
A0573B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Schedule 7A should record sites SHF018b and SHF018d as deliverable in short to medium term. Submitted Employment Land Study shows no reason to delay the delivery of these two employment sites that will meet a current identified need and contribute to economic regeneration of Shifnal and Shropshire.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0596B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0606B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0624B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate
A0625B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?
A0663B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0673B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0702B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement. Further emphasis given to the suggestion that infrastructure constraints affect the capacity of the town to support further development and the need to protect agricultural land around Shifnal.
A0709B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement. Further emphasis given to the suggestion that infrastructure constraints affect the capacity of the town to support further development and the need to protect agricultural land around Shifnal. Further emphasis was given to the limitations of transport infrastructure considered to be inadequate to support the planned expansion of the town and likely to cause more congestion.
A0710B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement. Further emphasis given to the suggestion that infrastructure constraints affect the capacity of the town to support further development and the need to protect agricultural land around Shifnal.
A0711B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement. Further emphasis given to the suggestion that infrastructure constraints affect the capacity of the town to support further development and the need to protect agricultural land around Shifnal.
A0712B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0827B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0833B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive

Page 240

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0835B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive. Infrastructure cannot cope and homes are not affordable for young people
A0837B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive. School bus traffic issue
A0839B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears to be excessive.
A0842B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0845B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0846B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services and infrastructure would not be able to cope and congestion is already causing many problems Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Horrified by the massive changes taking place in Shropshire/Shifnal. Appreciate need for more housing and the importance of the economy, but not at the risk of destroying the countryside. Views/landscape visible from the Wrekin are being destroyed by eyesores.
A0848B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0889B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Nurton Developments Limited are actively promoting their landholdings at Upton Lane, Shifnal for residential development and associated supporting uses. The site has been considered within the Stage 2 and 3 Assessments undertaken by Shropshire Council's Local Plans Team (site ref. SHF035). These assessments form part of the Council's site identification process and are published within the Sustainability Appraisal prepared in support of the Local Plan Review. The key findings of this review are as follows: • The Authority has erred in the site assessment process and, as such, the identification of site SHF034 for safeguarding is considered inappropriate and unsound; • There are a number of inconsistencies, alterations and omissions contained within the Stage 2 and 3 site assessment process and, as such, the evidence base which has informed the site identification process for the Local Plan Review is not robust and should be reviewed prior to any Regulation 19 Consultation or formal submission of the plan for Examination in Public; • The evidence base upon which the Stage 2 and 3 site assessments were undertaken is inconsistently utilised, does not follow best practice in principle and unfairly favours the sites identified for allocation or safeguarding early in the local plan review process. Our client's site is therefore considered to have been disadvantaged by an inconsistent approach to the site assessments; • Nurton Developments Limited are concerned that the evidence base requested by the Authority, and duly provided by the promoter, for site SHF035 does not appear to have been taken into account in the site assessments which support the current Regulation 18 consultation; • Despite information requests made by Nurton Developments Limited, there is a lack of technical evidence to support the selection of site SHF034 for safeguarding. Should such evidence exist, the Authority should have published this for public consultation and made clear reference to the assumptions upon which judgements were based. Without this evidence base, it is not possible to confirm that the site has been properly and appropriately assessed, nor does it allow objectors and interested parties to consider the relative merits of promoted land alternatives; • The Authority has erred in its judgement in identifying a single additional site for safeguarding beyond the plan period which will fail to offer the opportunity to identify appropriate development options in future; thereby committing to a significant future allocation which may not be the most suitable or sustainable option for the future growth of Shifnal; • The Authority has erred in the site assessment process and, as such, the identification of site SHF034 for safeguarding is considered inappropriate and unsound. The site is not sequentially preferable from a flood risk perspective, whilst the apparent driver for its safeguarding (the delivery of a new link road) is neither suitably tested nor deliverable; and Site SHF035, as evidenced through the submission of a range of site assessments and technical reports, is considered to perform better than SHF034 and should, therefore, be safeguarded for future allocation beyond the current plan period. More land could be safeguarded to provide the Authority with greater choice and flexibility in the future, particularly given the 'need' and 'affordability' challenges surrounding Shifnal; and having regard to likely Green Belt review restrictions as a consequence of the current White Paper (albeit that the substance of this might be altered). On the basis of the above, it is considered that the current Draft Local Plan Review, as contained within the Regulation 18 Consultation, is unsound, the evidence base should be updated and made publicly available for consideration, and that policies DP25 (Green Belt and Safeguarded Land) and S15 (Shifnal Place Plan Area) need to be amended. 5.1 Summary Nurton Developments Limited are disappointed that the evidence base requested by the Authority, and duly provided by the promoter, for site SHF035 does not appear to have been taken into account in the site assessments which support the current Regulation 18 consultation, notwithstanding assurances by the Authority. Furthermore, despite information requests made by Nurton Developments Limited, there appears to be a lack of technical evidence base to support the selection of site SHF034 for safeguarding. Should such evidence exist, the Authority should have published this for public viewing and reference made to where these assumptions have been used to inform either the Stage 2 or 3 assessments. Without this evidence base, it is not possible to confirm that the site has been properly and appropriately assessed, nor does it allow objectors and interested parties to consider the relative merits of promoted land alternatives. On the basis of the above, this report seeks to outline Nurton Developments' principle concerns with the regard to the site assessment process from both a technical and compliance perspective. The key points raised within this report are as follows: • SHF035 has not been properly considered and the evidence submitted to date has not been fully considered by the Authority in undertaking the site assessment process; • There are clear inconsistencies in how the evidence base has been applied in undertaking the site identification process, leading to errors, omissions and inaccuracies in the Authority's consideration of the sites assessed for allocation and safeguarding, rendering the plan unsound; • There are a number of inconsistencies, alterations and omissions contained within the Stage 2 and 3 site assessment process and, as such, the evidence base which has informed the site identification process for the Local Plan Review is not robust and should be reviewed prior to any Regulation 19 Consultation or formal submission of the plan for Examination in Public; • The evidence base upon which the Stage 2 and 3 site assessments were undertaken is inconsistently utilised, does not follow best practice in principle and unfairly favours the sites identified for allocation or safeguarding; • The Authority has erred in judgement in identifying a single additional site for safeguarding beyond the plan period which will fail to offer the opportunity to identify appropriate development options in future; thereby committing to a significant future allocation which may not be the most suitable or sustainable option for the future growth of Shifnal; • The Authority has erred in the site assessment process and, as such, the identification of site SHF034 for safeguarding is considered inappropriate and unsound. The site is not sequentially preferable from a flood risk perspective, whilst the apparent driver for its safeguarding (the delivery of a new link road) is neither suitably tested nor deliverable; and • Site SHF035, as evidenced through the submission of a range of site assessments and technical reports, is considered to perform better than SHF034 and should, therefore, be safeguarded for future allocation beyond the current plan period. 5.2 Conclusion Why do we consider the plan as drafted is unsound? The Plan is considered to be unsound as the evidence base for the identification of SHF034, has not demonstrated that the site is deliverable and its release will lead to unsustainable development and will fail to address the Climate Emergency Agenda. Moreover, its allocation was predicated on the delivery of a link road which is now not part of the proposals. Furthermore, there are other more sustainable and appropriate sites which have not been considered on a level playing field and have been discounted without fully taking account of the evidence provided, namely SHF035. SHF035 has been demonstrated to be preferable to SHF034 through our submitted evidence base, when considered in its own right. Finally, the cumulative benefits of allocating/safeguarding SHF035 have not been considered, particularly in terms of its relationship with employment allocations SHF18b and SHF18d and development currently underway to the west which enables the provision of direct and dedicated green cycle and footpath accesses straight into the town centre. What changes do we propose? With regard to Policies DP25 (Green Belt and Safeguarded Land) and S15 (Shifnal Place Plan Area), we are seeking an amendment to the policies to allow the allocation (or safeguarding) of site ref. SHF035 for housing to be developed in association with the employment allocation sites SHF18b and SHF18d during this plan period. This might include some of the site being safeguarded for later in the plan period to ensure delivery aligns with housing need and to secure the early upgrade to Upton Lane and removal of an accident hotspot. This could either be in association with the safeguarding of SHF034 for later housing need, or in preference to this allocation, given the benefits and sustainability credentials of site SHF035 which are supported by a full evidence base. Representation then includes: Appendix 1 SHF035 Contextual drawings APPENDIX 2 Combined Summary Tables for Stage 2a Assessments APPENDIX 3 Transport Appraisal Report APPENDIX 4 Flood Risk Appraisal Report APPENDIX 5 Green Belt Appraisal Report APPENDIX 6 Landscape and Visual Appraisal Report APPENDIX 7 Heritage Appraisal Report APPENDIX 8 Ecology Appraisal Report

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0889B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>Disappointed that the evidence base requested by the Authority, and duly provided by the promoter, for site SHF035 does not appear to have been taken into account in the site assessments which support the current Regulation 18 consultation. This is notwithstanding that the Authority have indicated that the reports have been fully reviewed, considered and taken into account in the most recent site assessments. Further contextual drawings regarding the potential delivery of SHF035 are provided within Appendix 1.</p> <p>Furthermore, despite information requests made by Nurton Developments Limited, there appears to be a lack of technical evidence to support the selection of site SHF034 for safeguarding. Should such evidence base exist, the Authority should have published this for public consultation and made clear reference to the assumptions upon which judgements were based. Without this evidence base, it is not possible to confirm that the site has been properly and appropriately assessed, nor does it allow objectors and interested parties to consider the relative merits of promoted land alternatives.</p> <p>Representation then includes an assessment of national policy and guidance (5 pages_ which is not included in this summary.</p> <p>In reviewing the Stage 2 and 3 Site Assessments contained within both the Strategic Site Assessments and Shifnal Place Plan Assessments, it is noted that there are a number of inconsistencies, alterations and/or omissions. In undertaking this review, we have also compared the Stage 2 and 3 Assessments published as part of the evidence base for the following consultations which have taken place as part of the Local Plan Review:</p> <ul style="list-style-type: none"> • Preferred Sites Consultation (November 2018); • Strategic Sites Consultation (July 2019); and • Local Plan Review Regulation 18 Consultation (August 2020). <p>As outlined within the sections below, it appears that there have been various amendments undertaken between the successive Stage 2 and 3 Assessments which have not been clarified and/or appear to be incorrect when compared against previous iterations. On this basis, we must raise significant concerns that the evidence base upon which the Local Plan Review is based is not robust and should be reviewed prior to any Regulation 19 Consultation or formal submission of the Plan for Examination in Public.</p> <p>In undertaking this review, we have also sought to sense check and compare the scoring results for Nurton Development's site (SHF035) with the site which has been identified for safeguarding (SHF034) within the current Local Plan Review Regulation 18 Consultation for Shifnal. In undertaking this comparison, we are of the view that SHF035 performs equally to or better than this competing site when errors, omissions or the correct evidence base information is taken into consideration.</p> <p>Inconsistencies, Alterations and Omissions: It is noted that whilst reference is made to Sustainability Objectives SO5 ('encouraging the use of sustainable means of transport') and SO6 ('Reduce the need of people to travel by car') that no relevant scoring criteria for this was included within either the Stage 2a assessments for the Preferred Sites Consultation (2018) or the Strategic Sites Consultation (2019). It is not until this latest Local Plan Review Regulation 18 Consultation Sustainability Appraisal that a new Criteria 6 has been introduced into the scoring matrices for 'Site boundary within 480m of a public transport node with regular service offered during peak times'.</p> <p>Furthermore, it is noted that the Local Plan Review Regulation 18 Consultation Sustainability Appraisal does not provide any explanation as to why the criteria was excluded from previous Stage 2a Assessments nor any confirmation that it has been introduced into this latest Stage 2a Assessment matrices and why. Indeed, we would also question whether this criteria meets the requirements of the Sustainability Objectives SO5 and SO6 as set out within the Sustainability Appraisal.</p> <p>As evidenced by the Combined Summary Tables provided within Appendix 2, it is also apparent that the Local Plan Review Regulation 18 Consultation Sustainability Appraisal Stage 2a Residential Assessments for the Strategic Sites (Appendix T) and those prepared for the Shifnal Place Plan Area (Appendix P) are inconsistent in their approach. Given that sites SHF034 and SHF035 are considered within both assessment tables, it is unclear why their scores would alter given that neither the site boundaries nor the basis for the scoring criteria have altered between these two Stage 2a Assessment documents. No adequate explanation has been provided for this altered scoring within the Sustainability Appraisal. The two sites scored as follows:</p> <ul style="list-style-type: none"> • SHF034: <ul style="list-style-type: none"> o Strategic Sites (Appendix T) - Score -2 (Good); o Shifnal Place Plan Area (Appendix P) – Score -9 (Poor); • SHF035: <ul style="list-style-type: none"> o Strategic Sites (Appendix T) - Score -7 (Fair); o Shifnal Place Plan Area (Appendix P) – Score -9 (Poor); <p>In this regard, we draw your attention to the following scoring inconsistencies within both the Local Plan Review Regulation 18 Consultation Sustainability Appraisal Stage 2a Residential Assessments for the Strategic Sites (Appendix T) and those prepared for the Shifnal Place Plan Area (Appendix P):</p> <ul style="list-style-type: none"> • Under Criteria 3 – 'Tree Preservation Order (single or group) within or on-site boundary' – Site SHF034 is scored incorrectly for this criterion within the Shifnal Place Plan Area (Appendix P); • Under Criteria 5 – 'Site boundary within 480m of one or more of the following (record all that apply)' – Site SHF034 is scored incorrectly for proximity to a primary school, children's playground, outdoor sports facility and amenity green space within the Shifnal Place Plan Area (Appendix P); • Under Criteria 5 – 'Site boundary within 480m of one or more of the following (record all that apply)' – Site SHF034 is scored incorrectly for proximity to a GP surgery within the Strategic Sites (Appendix T). This is due to the exclusion of land north of the railway line (formally site P17a) which therefore increases the distance to this community facility; • Under Criteria 9 – 'All or part of site within Flood Zones 2 or 3' – Site SHF034 is scored incorrectly for this criterion within the Shifnal Place Plan Area (Appendix P); • Under Criteria 11 – 'Site is wholly/partly classified as brownfield or is wholly/partly within an area with a previous industrial or potentially contaminative use' – Site SHF034 is scored incorrectly for this criterion within the Strategic Sites (Appendix T). In this regard, SLR notes that the mapping for SHF034 has been amended under the Local Plan Review Regulation 18 Consultation with land to the north of the railway line (formally site P17a) being excluded, whilst buildings at Lodge Hill Farm are included. The inclusion of the Lodge Hill Farm buildings within the site, and thereby ensuring a positive score under criteria 11, is disingenuous given that the publicly available promotional material submitted for site SHF034 clearly excludes this land and shows that these buildings are retained as part of the proposed Masterplan layout. On the basis of the site area being promoted for development (i.e. excluding the Lodge Hill Farm buildings) site SHF034 contains no land which would accord with Criteria 11 and it should be scored accordingly.
A0889B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>Climate Change Emergency: Shropshire Council resolved to declare a 'Climate Emergency' at a Committee Meeting on the 16th May 2019, outlining that they would write to the Secretary of State for the Environment, Food & Rural Affairs to encourage Government to be ambitious in its plans for carbon reduction targets and aiming for Carbon Neutrality.</p> <p>In doing so, the Council committed to the preparation of Carbon Emissions Appraisals for all policy reports, the creation of a Climate Action Partnership of stakeholders and the wider community, and to review its progress on addressing the climate emergency on an annual basis.</p> <p>It is considered that the current Local Plan Review and the associated Sustainability Appraisal have not given due consideration to the aims and objectives of the Climate Emergency position adopted by Shropshire Council. The evidence base documents are insufficient in this regard and the site assessments undertaken do not adhere to the key sustainability objectives identified as part of this process.</p> <p>Furthermore, it is considered that site SHF035, as evidenced within the submitted reports and masterplan vision, would be an exemplar in sustainable development practises, aligning itself to achieve all 17 of the United Nations sustainable development goals and helping to overcome the global challenges we face. Each of the 17 sustainable development goals are interconnect and will build on each other to create a best practice scheme that is truly socially, economically and environmentally sustainable. Just some of the ways we will achieve these goals are through:</p> <ul style="list-style-type: none"> • Mixed-tenure homes and housing types that are genuinely affordable • A wide range of local jobs within easy commuting distance of homes • Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities • Educating the community about the natural environment and gaining an affiliation with nature, with opportunities to grow food within the neighbourhood • Development that enhances the ecological systems, providing a comprehensive green infrastructure network and net biodiversity gains • Zero-carbon development and energy-positive technology to ensure resilience against the climate emergency • Strong cultural, recreational and shopping facilities within a walkable, vibrant and sociable neighbourhood • Integrated and accessible transport systems with walking, cycling and public transport designed to be the most attractive modes of movement <p>The site has been carefully selected for its proximity to valuable existing services and amenities, to be able to work with Shifnal's existing assets and create a new sustainable community for all.</p>
A0889B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>Affordability: Concerned that the affordability ratio for Shropshire could worsen in future were insufficient sites allocated or safeguarded for future development. This affordability issue is also highlighted at a submarket level when reviewing the Strategic Housing Market Assessment (2020).</p> <p>As highlighted by the tables below (taken from the Strategic Housing Market Assessment 2020), the Shifnal area has the 4th worst affordability ratio within the County based on median household income; house prices being 7.9 times the median gross household income. This is well in excess of the affordability ratio for the County as a whole which is identified as being 6.8 times the median gross household income.</p> <p>Only Bishop's Castle area (8.4 times the median gross household income), Church Stretton area (8.6 times the median gross household income) and Craven Arms area (8.3 times the median gross household income) have worse affordability ratios than Shifnal. (Figure 3: Median Household Income (2019) by Shropshire Place Plan Area not reproduced in this summary)</p> <p>This position is worsened when the affordability ratio is based against lower quartile household incomes, with the Shifnal area becoming the 2nd worst for affordability; house prices being 10.9 times the lower quartile household income. Again, this is well in excess of the affordability ratio for the County as a whole which is 8.7 times the lower quartile household income. Indeed, this trend is also true for Church Stretton area which becomes the least affordable area based on lower quartile household income which is 11.4 times lower quartile household income). (Figure 4: Lower Quartile Household Income (2019) by Shropshire Place Plan Area2 not reproduced in this summary)</p> <p>Identification of insufficient land for housing allocation and or safeguarding for beyond the plan period will worsen the affordability ratio within Shifnal. This pressure will be felt hardest by lower earning households who will be unfairly disadvantaged and likely be forced to move away from the Shifnal area.</p> <p>This does not meet either the sustainability or climate emergency agenda that has been adopted by Shropshire Council.</p> <p>On this basis, Shropshire Council should recognise the ongoing Housing Market pressures placed upon Shifnal and that restricting sufficient housing land provision within the town will place further pressure upon the affordability of the housing stock in this area of the County in the longer term.</p> <p>On this basis, SLR would recommend that further sites be identified for housing land supply and safeguarded for release from the Green Belt to ensure that such demand and housing market pressures are recognised both for the plan period (2016-2038) and beyond. Failure to safeguard sufficient sites for Green Belt release will only worsen the affordability position within Shifnal and fail to allow for the release of the necessary level of housing land at the appropriate time (i.e. allowing the Council differing options for allocation beyond the plan period).</p>
A0935B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>Shifnal is identified as a focus for investment, employment, housing and development on the M54/A5 Strategic Corridor through Shropshire with access to Junctions 4 and 3 with proximity to Wolverhampton and the i54 major investment site.</p> <p>New employment is proposed to be provided through a significant new employment allocation on land east of Shifnal Industrial Estate. Consider this is only capable of meeting local needs.</p> <p>The SEA at Land at J3, should the Council consider it to be proposed as part of a Strategic Site Allocation in the Plan, would meet sub-regional and regional needs but, importantly, would also be complementary to the local employment offer at Upton Lane in Shifnal and assist in addressing its jobs/homes balance to 2038 as required under the Plan.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0950B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Agree	<p>The following representations have been prepared by Savills on behalf of Lord Stafford Estates, the owner of land at Admiral's Farm, Shifnal. The site is currently allocated as 'Safeguarded Land' in the adopted Shropshire SAMDev Plan. In the Proposed Submission Draft of the Shropshire Local Plan (SLP) it is identified as Site Allocation SHF013 Land adjoining Meadow Drive, Shifnal, which will provide residential development in the north of Shifnal. The inclusion of allocation SHF013 Land adjoining Meadow Drive, is welcomed. The background to the consideration of Admirals Farm is that it is safeguarded land, as set out in Policy S15 (Shifnal Area) of the SAMDev Plan 2006-2026. As such it is 'Land beyond the development boundary that is not part of the Green Belt is safeguarded for Shifnal's future development needs beyond the current Plan period' (part 4 Policy S15). This designation was brought forward from the Bridgnorth District Local Plan (2006), Policy S4. The Policy protected safeguarded land to meet the future development needs of Shifnal. The Inspector when considering Policy S15.1 of the SAMDev 2006-2026 noted that on Shifnal's northern and eastern sides a significant buffer of 'safeguarded land' existed between the town and the Green Belt and that the land was safeguarded for the town's long term future development. The Inspector went on to note that some of the safeguarded land had already been subject to a number of planning applications that had been determined favourably for residential development in the absence of the Council being able to demonstrate a five year supply of housing land. In relation to the undeveloped safeguarded land that still remained, which included the land adjoining Meadow Drive, the Inspector concluded 'it is appropriate to continue to safeguard it' (paragraph 252, Inspector's Report October 2015). Thus the Inspector considered the site was capable of delivering residential development to serve the future needs of Shifnal. The evidence of Shropshire Council. The land has therefore been safeguarded to meet residential needs as identified through the emerging SLP. The site is now identified as SHF013 (Land adjoining Meadow Drive, Shifnal) in the emerging SLP and contributes to the currently identified housing need in Shifnal. As set out in paragraph 5.209 of the SLP, the objective is now to 'place shape' the neighbourhoods in Shifnal by 'completing the pattern of development, creating a permeable townscape, enclosing the urban form, creating a strong and legible boundary between the town and the Green Belt, largely using existing safeguarded land.' The development of SHF013 will accord with these aims by 'filling-in' a relatively small piece of undeveloped land which is surrounded on all sides by development, including the M54 motorway. The motorway now forms a strong and defensible edge to the Green Belt and to the northern edge of Shifnal. It is noted that the Green Belt boundary and Development Boundary for Shifnal fall to the south of the M54, with the tree-covered bund which screens the northern edge of Shifnal from the motorway being located in the Green Belt. This accords with the existing adopted Green Belt boundary. This is considered to be an appropriate boundary for the Green Belt as the bund and associated trees are within the ownership of Highways England. The accompanying Vision Document (Appendix A), produced by Savills, identifies the key features of the site and surrounding area and how these inform the development of the site. This has been informed by the following assessments: - Flood Risk Assessment & Preliminary Drainage Strategy (Appendix B) - Noise Feasibility Assessment (Appendix C) - Air Quality Feasibility Assessment (Appendix D) - Access and Impact Assessment (Appendix E) The illustrative masterplan included in the Vision Document demonstrates one example of how a high quality development could be delivered on site. The masterplan includes usable areas of open space to provide a high quality environment for future residents as well as biodiversity corridors through the site. Allocation Boundary A revised allocation boundary to allocation SHF0013 is proposed. This entails minor changes to the western boundary of the allocation to enable the creation of an appropriate vehicular access from Admiral's Close. As shown in the access drawings created by Systra, the access is proposed to join into the site north of the existing field gate. This will pull the access away from the bungalow at the end of Admiral's Close, thus minimising any impact on the existing residents. The creation of the access will involve earthworks and the recontouring of the southern end of the existing bund. Requested change – A revision to the allocation boundary is requested, as set out in the accompanying masterplan in the Vision Document (attached as Appendix A). This will accommodate the necessary work required to provide a vehicular access to the site.</p> <p>The following documents are included in the representation but not summarised here:</p> <ul style="list-style-type: none"> Vision document Flood Risk Assessment & Preliminary Drainage Strategy Noise Feasibility Assessment Air Quality Feasibility Assessment Access and Impact Assessment
A0950B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The Development Strategy for Shifnal Town (S15.1) acknowledges the importance of the settlement by confirming it will be the focus for investment, employment, housing and development on the M54 / A5 Strategic Corridor, in accordance with Policies SP10 'Shropshire Economic Growth Strategy' and DP9 'Strategic Corridors'. Its proximity to Wolverhampton and the i54 major investment site, along with it being the largest town in the north of the Shropshire Green Belt, are all highlighted as key locational advantages. As set out in our representations to Policy SP2 it is considered that the overall housing requirement identified in the SLP does not represent a boost to the supply of homes in the area, as is required to support the economic growth aspirations of Shropshire Council. A higher housing requirement should be considered by the Council. In light of the locational importance of Shifnal, the provision of additional housing delivery within the town should be considered over the plan period. As set out in section 5 of the policy, it is agreed that new residential development should be delivered through new allocations and allocations saved from the SAMDev. With regards to the two saved allocations in the area, SHF006 and SHF004a/b, it is noted that both sites are consented for residential development and are in the process of being built out. As such the delivery of further housing to meet the identified need in Shifnal rests with the proposed allocations in the SLP, including the SHF013 (land adjoining Meadow Drive). As identified in Appendix 5 of the SLP, even with these new allocations, there is an identified 92 unit windfall allowance included for Shifnal, highlighting the need for further residential land to be identified during the plan period. Requested Change – To support the economic growth aspirations of Shropshire Council, higher housing requirement should be considered. Shifnal's housing delivery figure should be increased and further sites identified for allocation.</p>
A0950B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>S15.1 (i) - Development Guidelines (SHF013 – Land Adjoining Meadow Drive, Shifnal) Housing Mix – In terms of the type of housing that would be appropriate on site and the likely demand, it is confirmed that in the opinion of Savills Development the site will be attractive to the market, both to housebuilders and house buyers. At this stage it can be confirmed that negotiations are close to being completed with a potential housing developer for the site. It is self-evident from the development and successful sale of properties at Coppice Green Lane to the east and Haughton Road to the west, with both of those neighbouring sites being similar to SHF013 in location and outlook, that this general location within Shifnal is attractive to both housebuilders and house buyers / occupiers. Market evidence of sales rates and sales values from four current active housing development sites in Shifnal evidences the strong levels of delivery and sales. A fact that is noted in paragraph 5.204 of the SLP, which states that 'the development of housing in Shifnal has achieved high rates of delivery at around 200 dwellings per annum from 2016'. Market evidence for Shifnal shows that over the past 1 to 1.5 years there has been significant take up of new build housing. The summary attached as Appendix A shows that across 4 active sites a total of 569 houses are being delivered. With sales rates of between 2 and 3.4 units per month on each site (11.3 units per month across the 4 sites) and healthy values being achieved. This evidences that there is clear demand for open market housing in the Shifnal area. The data suggests that the unit mix/type affects sales rates in the area, with sales rates being higher on units under £300,000 (circa 1,100 sq. ft.). The Bovis sales rate over the past year has been lower than the market average due to the large unit type being sold as part of the scheme. This makes the properties unaffordable for first time buyers, who are able to proceed quickly. The higher sales rate for smaller / lower cost units also reflects the findings of the Shropshire Strategic Market Assessment (Part 1) (March 2020), which highlights that the median household income in Shifnal falls below the Shropshire and national median household income (paragraph 3.281). However, conversely Shifnal saw the second highest median house prices in Shropshire in 2018 (paragraph 3.227). This imbalance means there is a need for market units, including units within the price range of those on lower incomes, such as first time buyers and young families. In terms of the market information above and the identified housing need in the area, it is considered that the text proposed in the Development Guidelines is appropriate: 'Site proposed for broad range of housing with dwelling types and sizes to help meet local housing needs with potential for lower cost housing, age specific housing and policy compliant affordable housing'. Highway Access – The accompanying Access and Impact Assessment produced by Systra considers three access options to serve allocation SHF013. The assessment and detailed plans demonstrates that the preferred access option is via the general location of the existing field gate, joining onto the spur road off Meadow Drive. In terms of the capacity of the local highways network, the assessment identifies that the development traffic will dissipate quickly within the local highways network beyond the site access. Off-Site Highways Works – The inclusion of specific reference to the consideration of off-site highways works and drainage work is not necessary within the policy. Any application for the development of the site would need to be accompanied by an appropriate highways assessment, which would consider the capacity of the existing highway network and would identify any highways works required to enable appropriate vehicular access of the site.</p> <p>The reference to highway drainage improvements to address existing surface water flooding constraints should also be removed. Any scheme for the development of the site should only be required to address drainage issues which would result from the proposals or would restrict the scheme from coming forward. The developer of the site should not be required to address an existing surface water issue in the area. Landscaping and Open Space – It is noted that the trees which surround the site do not form part of the Admiral's Farm site and are understood to be in the ownership of Highways England. It is recognised that a high quality landscape scheme would be a key element of bringing forward a residential scheme on site. Open Space – With regards to the creation of a new footpath link to the adjacent Coppice Green Lane scheme, the principle of this is supported. It is, however, stressed that there is a strip of land between SHF013 and the Coppice Green Lane scheme, which is in the ownership of a third party. As such it will not be possible for the developer of the Meadow Drive site to deliver a link into the Coppice Green Lane site. Any layout for the site would be able to include a footpath up to the site boundary. This would then allow Shropshire Council to deliver the short link over the third party land to the Coppice Green Lane scheme. Air Quality – The baseline air quality modelling carried out to date for the site (Appendix B) demonstrates that the whole site falls within Air Pollution Exposure Criteria (APEC) A, the lowest criteria category, as set out in the Air Quality and Planning Guidance. As such, as set out in the APEC, air quality should not be a ground for refusal. It is also noted that the site is not within an Air Quality Management Area (AQMA). In light of this it is not considered appropriate to include reference to mitigating any impact from emission from the M54. Requested change – Reference to the following is not considered necessary or appropriate for inclusion in the Development Guidelines: - Off-site highways works; - Off-site drainage works; - Air quality mitigation. The proposed development management policies of the SLP set out suitable and robust policy requirements for new residential development, to ensure that appropriate schemes come forward. These do not need to be repeated in the Development Guidelines for the site.</p> <p>The following appendices are included in the representation but not summarised here:</p> <ul style="list-style-type: none"> Appendix A – Shifnal Housing Sales (key sites) Air Quality Feasibility Assessment for site SHF013
A1102B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:</p>
A1103B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:</p>
A1104B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:</p>
A1105B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1152B45	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	During the Preferred Scale and Distribution of Development consultation 1,500 dwellings and 16ha of employment land was proposed (based on the proposed balanced growth). During the Preferred Site consultation the housing guideline remained the same but the employment guideline increased by 24ha (250% increase) to 40ha to 'address local circumstances'. In the draft Local Plan the guidelines are substantially the same although employment land has increased to 41ha. Nowhere in the draft Local Plan or the Shifnal section of the Green Belt Release Exceptional Circumstances Statement does there seem to be any cogent justification for the massive proposed increase in the employment land allocation from 16ha to 41ha, or for the departure from balance with the housing guideline. The Green Belt Release Exceptional Circumstances Statement states "The level of need and opportunity is based on two key assumptions. Firstly that employment land is developed out to 40% of the total land area, which takes into account the need for suitable levels of buffering, landscaping, servicing, access arrangements, and other on-site issues contributing to the delivery of a sustainable employment development. In applying this approach, it is considered that about 40ha will deliver around 16ha of built development. Secondly, it is assumed that commercial buildings will be developed as single storey properties". This statement suggests double-counting of the 40% factor for Shifnal as this was also included in the balanced growth assumptions. The Council now seems to be incorrectly grossing up again at 40% for a second time in moving from the 16ha to 40ha. Do not agree that the proposed allocation of 39ha of employment land at SHF018b & SHF018d is needed, justified or sound. As we consider the need for housing and employment land at Shifnal is misjudged, also do not consider that any need has been soundly evidenced for the release of safeguarded land from the Green Belt, as listed in Schedule S15.1(iii). Note that no site references have been given for the land listed in Schedule S15.1(iii), which make it more difficult to cross-check to other evidence documents.
A1156B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Agree	We welcome and support the allocation of site SHF015 and SHF029 Land adjoining Beech House between A464 and Park Lane, Shifnal with the emerging Shropshire Local Plan. We consider the site has the capacity to accommodate approximately 65 dwellings and is well positioned and benefits from good connections to local services and facilities by non-car modes of travel resulting in the site being highly sustainable. A plethora of surveys have already taken place and further surveys will be instructed and revised to ensure the most accurate information is submitted to the Council when required. The landowners are keen to move forward with a planning application as soon as reasonably possible. We do not consider there are any constraints of the site that cannot be mitigated for when a planning application is submitted. The landowners are keen to create a new sustainable development delivering a range of new homes designed to the highest quality standards to suit local needs. We can confirm that our proposed housing scheme is in accordance with the draft strategic policy requirements identified within the Regulation 18 Pre-Submission Draft Local Plan. We have considered Draft Policies DP1, DP3, DP12, DP13, DP15, DP16, DP17, DP18 and DP24 which generally align with our proposals and that will be subject to detailed discussions on the specifics of the proposed scheme prior to submission. Given the location of the site adjacent to the current development boundary and to the north of the newly proposed safeguarded land, we consider the site is an obvious, appropriate and sustainable allocation to allow growth in Shifnal. However, we must stress the necessity to ensure a level of flexibility is applied to the delivery of allocated sites with regards to both the proposed timeframes for delivery of dwellings and in regards to the requirements imposed on sites as a result of the policies in the plan. It is important that the Council acknowledge the importance of viability in all developments. That being said, we do consider the site is highly viable and deliverable having regard to the policies set out in the Regulation 18- Pre- Submission Draft Shropshire Local Plan. In regards to the assumptions set out in Appendix 7 of the 'Regulation 18' Pre-Submission Draft of the Shropshire Local Plan we consider the assumptions are too late – delivery is likely to occur earlier in the Local plan period, within the Short term (2020/21-2024/25) timeframe. The land owners are committed to working with the Council to deliver residential development on the site.
A1200B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1201B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1202B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1203B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1204B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1205B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1206B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1207B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Page 244

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1396B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Excessive amount of land allocated for industrial use No justification for building on Green Belt Traffic congestion on Aston Street and Market Place has not been resolved and unrealistic to think people will use M54 junction 3 and station road to access the new development No plans for increased rail link facilities to Telford for residents commuting to Telford/Wolverhampton, or additional parking at the station. Shifnal car parks already taken up with Telford residents using cheap car parks in the town for all day parking when they commute
A1397B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Excessive amount of land allocated for industrial use No justification for building on Green Belt
A1398B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1399B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1401B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1402B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1403B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1406B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Shifnal has been over developed and in this rural County, there is no justification for releasing 94 acres of prime Green Belt land along Staton Road for industrial development that will result in Shifnal merging with Tor
A1407B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1408B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1449B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Strong objection to remove the site from the Green Belt. RAF and museum have been able to develop already under the current designation so there is no need to make a major change here. The current local plan policies specifically permit specific developments proposed for the site through policy CS5 and MD6; The document mentions the Defence Review, but this occurred during the last Local Plan and didn't require a change to the green belt policy so there is no clear conclusion this review will require a change in policy; So no exceptional circumstances have been demonstrated to require a change to Green Belt policy; While the plan refers to development of military, museum and a complementary Aviation Academy being developed these will not be compromised by the site being in the Green Belt; it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specified developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained. It would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development through its Invest in Shropshire brochure. In view of the current economic climate and effects of COVID-19 on the , economy. it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non-site related developments as proposed in the Plan. Additionally does not believe there is sufficient evidence for the Proposed Midlands Air Ambulance Charity site to be relocated, and if a move is required this could be accommodated through existing policies for the green belt as was the case with the M54 Service station at Shifnal. In conclusion the development proposals for the Costford site can be accommodated through existing policy and there is no need to remove the site through a change to Green Belt policy
A1449B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1450B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Strong objection to remove the site from the Green Belt. RAF and museum have been able to develop already under the current designation so there is no need to make a major change here. The current local plan policies specifically permit specific developments proposed for the site through policy CS5 and MD6; The document mentions the Defence Review, but this occurred during the last Local Plan and didn't require a change to the green belt policy so there is no clear conclusion this review will require a change in policy; So no exceptional circumstances have been demonstrated to require a change to Green Belt policy; While the plan refers to development of military, museum and a complementary Aviation Academy being developed these will not be compromised by the site being in the Green Belt; it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specified developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained. It would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development through its Invest in Shropshire brochure. In view of the current economic climate and effects of COVID-19 on the , economy. it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non-site related developments as proposed in the Plan. Additionally does not believe there is sufficient evidence for the Proposed Midlands Air Ambulance Charity site to be relocated, and if a move is required this could be accommodated through existing policies for the green belt as was the case with the M54 Service station at Shifnal. In conclusion the development proposals for the Costford site can be accommodated through existing policy and there is no need to remove the site through a change to Green Belt policy
A1450B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1451B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1452B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1453B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. We walk in this area a lot its beautiful lve it alone and build on Brown field
A1454B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1455B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1456B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1468B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1469B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1470B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1471B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1472B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1473B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1474B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1475B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1476B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. For half a century i have lived in Shifnal and the facility proviosn has deteriorated to an unbelievable level. All because we lost our council control to Shrewsbury County (SDhropshire) who disregard our need and use us as cash cow . Go and destroy another area elsewhere and leave us in peace repair our wounds.
A1477B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. The plan takes no account of all the recent industrial and potential housing land in Telford and 10 mile radius and must have a duty to cooperate. The plan takes no account of future changes needed as a result of COVID 19 where families needs to be encouraged in urban and city centres to enable regeneartion.
A1478B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. The plan does not take into account the vacant available land in Telford (less than 3 miles away!!) and should be co-ordinates with thi

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1479B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate.
A1488B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1489B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. The current infrastructure of Shifnal cannot cope with anymore development at peak times Shifnal is in Grid Lock. the doctors will not cope with an influx in the population and ther is not enough car parking. We , shifnal residents do not want any further development in our town. How will the school cope with more population?
A1490B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1491B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1492B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1493B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Shifnals desirability depends on staying a certain size and not being absorbed into priorsless/telford. Too many faceless housing estates will make idsall degenerate in anywheresvilles England and destroy the very character which makes it sought after. Road traffic systmes needs to be imaginatively rationalised and existing housing renovated and refurbished first where possible
A1494B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1495B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1496B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1497B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1548B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1549B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1550B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1551B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	I agree with the objections. I also believe a full review of all transport issues should be mandatory before any planning applications are allowed to go forward. Shifnal already experiences many traffic issues as a result of the developments which have already been allowed. Roads, Doctors and schools are at full capacity The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1552B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1553B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1554B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1555B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1556B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Industrial zoning on the station Road is not warranted, there are empty units in Stafford Park and Horton Wood in Telford and would provide sufficient space for business. Why 36 acres is allocated to the Air Ambulance when the national "norm" is 2-3 acres this smells badly of industrial creep. The fact Shropshire Council appear to have litt regard for the residents of Shifnal basically says it all. The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1557B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1558B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1592B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1593B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1594B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1595B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1596B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1597B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1598B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1599B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1600B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1609B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	In relation to an alternative scheme promoted by Nurton Developments, Shifnal Matters do not consider that the development of this large site in the Green Belt with an open vista to the south is acceptable. The size of the development is too large in the context of Shifnal taking into account the character and historic nature of the town. There is no adequate infrastructure to support the scheme which would be bounded by a major A road into Shifnal and the railway line to the east. There are no exceptional circumstances to justify releasing land from the greenbelt. Development proposed would cause significant traffic issues around the town, particularly given the existing poor conditions that are in places single carriageway. Several junctions in the town have reduced visibility and are very busy already. Very narrow footways along the busy roads. Pollution increase with housing numbers, as well as there already being a significant number of cars in and around the conservation area. Average peak time hourly flows surveys have been carried out, indicating that there is Street traffic, the subsequent right turn onto the A464, creates very significant queuing back up Aston Street as far as the first roundabout with Carriers Lane, a distance of over 0.5 km. This, amongst other readings, indicate significant existing traffic problems in the town. The proposed employment development land located off Stanton Road will create a substantial increase in traffic on Stanton Road and Aston Street even if commercial vehicles could be effectively restricted from using this route. We do not believe there to be justification for a bypass around the west of Shifnal - the excavation needed would significantly affect the stability of the bridge, Network Rail are unlikely to accept this, commercial traffic between Telford and Shifnal would have to be re-routed thus not alleviating the traffic at Five Ways roundabout, there would be a conflict of use of the underbridge with the high voltage National Grid electricity cables running between the pylon immediately to the north of the structure and the substation in Innage Road to the south of the railway, the gyratory would increase journey distance between Telford and Shifnal and it is likely that existing residential areas would be used as 'rat-runs.' No information has been provided within the LPR which enables the likely traffic impacts on Shifnal's highway infrastructure and environment to be assessed. The only information regarding highways assessment is a couple of slides from a presentation by Shropshire council officers given in Shifnal in December 2018.
A1609B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	We hope that Shropshire Council can please provide information on (1) the methodology applied when calculating Shifnal's employment need, (2) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (3) the heritage assessment used to inform their site selection process.
A1609B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The Shifnal Dental Practice does not offer an NHS service to adult patients. HSA score =3 should be 0, there is no petrol station in Shifnal. These scoring errors have been the case since at least Jan 2019 and were advised to Shropshire Council in previous consultations. When these errors are corrected Shifnal scores 90 instead of 97 and placing it towards the bottom end of the ranking of the "key centres".

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1809B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1810B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites. I support the decision not to develop land to the east of Coppice Green Lane. Development there would cause the removal of historic woodland, an SSI and cause a high level of harm to the ecological environment
A1834B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area		Consider that proposed site allocation SHF013; SHF015 & SHF029; SHF022 and SHF023 (part); and SHF018b & SHF023 (part) would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: SHF013: traffic, boundary; M54 section, M54 J3 and M54 J4. SHF015 & SHF029: traffic; M54 J3 and M54 J4. SHF022 and SHF023 (part): traffic; M54 J3 and M54 J4. SHF018b & SHF023 (part): traffic; M54 J3 and M54 J4. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A1847B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1849B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1863B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	all references relate to Settlement Policy S15 (Shifnal Place Plan Area) of the Shropshire Council's 'Regulation 18: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038' dated August 2020.A) Ref. S15.1.1: The new Development Strategy is contrary to the views of the electorate & residents as correlated in the Shifnal Neighbourhood Plan (2014-2016) and ignores prior public consultations with preference to commercial interests. Refer to: http://www.shifnalplan.co.uk/B) Ref. S15.1.1, S15.1.4, 5.203, 5.204: The immediate implementation of the new Development Plan whilst building works are still on-going under the previous 2000-2016 plan, would, I consider, represent severe over development to one area. The proposed safeguarded land area is excessive and far exceeds Shifnal's future local housing needs. The result will be to replace Shifnal's unique "village" character with that of an urban fringe to a conurbation.C) It has been noted that the size of Shifnal housing growth may have been calculated utilising a low housing density which may not have included for housing already approved but not yet built. The corrected figure may therefore show Shifnal with a growth of 54% which would far exceed the 23% proposed for other Shropshire areas. The growth is also in excess of local needs with the inference that Shifnal is being proposed as an overflow settlement for other areas.D) Ref. 5.214d, 5.215: The proposed by-pass with sections of one-way traffic is impractical and would only provide a service road for any 'infill' housing developments. The use of the existing cartway bridge under the railway is also unrealistic due to its restrictive width which would therefore pose a risk to both traffic and pedestrians.E) Ref. 5.202, 5.212: The proposed extent of employment land to the East of Shifnal is unrealistic. If implemented it would result in an increase of both private and heavy commercial traffic through Shifnal & surrounding roads, exacerbating local air-borne pollution levels and posing new risk factors for the health & safety of Shifnal residents. Such an increase in traffic would not be alleviated by the proposed 'by-pass' (refer to item D above). The proposal for commercial traffic to be deterred from the centre of Shifnal and instead be encouraged to travel eastwards to Junction 3 on the M54 would be unenforceable due to the reduction in policing over the last ten years. The suggestion of deterrence also ignores that trade would be deterred with Telford making the increased travel times unviable for businesses.F) Ref. 5.202, 5.212: With the proximity of Telford there already exists extensive commercial developments, some presently unused and waiting for tenants. Also, the competition from similar zoning within 10 miles of Shifnal may make the proposed commercial sites redundant. By allocating the land proposed for commercial / industrial use does not guarantee that it would be used for this purpose; if left undeveloped or 'banked' it has been known, following commercial pressure, for a subsequent planning application for a change of use to housing to be allowed.G) Ref. 5.202, 5.212: For the reasons listed in items E and F above I would suggest that the largest extent of the employment land proposed for Shifnal should therefore not be considered both in terms of sustainability and the resulting detrimental effect upon the character of the town.H) Education & medical facilities are already severely compromised by a growing population. Waiting times at the medical practice continue to deteriorate; both due to a shortage of doctors nationally and appropriate premises. A permanent police presence in Shifnal was terminated in the early part of the last decade. Both of these factors, I suggest, pose a serious risk to the health, safety and security of Shifnal residents. The provision of all levels of school places will need to be extended heavily and will be dependent upon funding which in turn may become limited due to further economic restrictions nationally.I) Refs. S15.1.3 & 7; 5.214 & 5.216: Shifnal should not be extended towards Telford as agreed by the Development Strategy Plan of 2000-2016. This policy was to prevent an expansion into the Telford conurbation and to protect green belt land; the implementation of the proposed development boundary is counter to this original objective. The assessment of the environmental impact of the proposed loss of green belt and prime farmland is also inadequate, not taking into account the eradication of wildlife habitats, localised flooding, deterioration of air quality and other factors associated with CO2 generation and climate change in general.J) The allocation of 36 acres for the Midlands Air Ambulance at Tong appears surprisingly excessive. With no development plans available there is no way to justify the utilisation of such a large area. It is noted however, that the development of both the existing site at Cosford and other air ambulance sites amount only to 2-3 acres. Further clarifications are required.K) I support the decision NOT to proceed with the Bradford Estates proposals at Tong.L) Ref. 5.204 & 5.209 It is noted from these items that any 'respite' after 2025 is only a wish of Shropshire Council and not a promise. As construction works are still being implemented by planning applications made under the previous Development Strategy Plan of 2000-2016, it is unreasonable to allow any further developments under these new proposals without an immediate extended respite for the people of Shifnal. Such a respite would also allow investment to be made to offset problems already encountered by the rapid expansion of Shifnal's population. A delayed and unguaranteed respite until 2025 is unreasonable and any 'pipeline investments' in infrastructure should have already been implemented to accommodate the physical and social consequences of those developments recently built. Consequently, I would not support any further development unless balanced to local needs and growth together with a realistic assessment of the existing infrastructure of Shifnal.M) Ref. 5.209 This item states that 'The approach in the Local Plan is to seek new, additional housing allocations around the edge of Shifnal to complement new housing areas brought forward by the SAM Dev Plan which extend the footprint of the urban area'. Does this infer that Shropshire Council has decided to implement these proposals in the face of substantial opposition from the Residents and Electorate of Shifnal; and as such, are the people of Shifnal being told to accept these proposals as a fait accompli?
A1872B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1879B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1885B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Natural England (Gov uk) state the importance of protecting our natural environment, helping protect England's nature and landscapes for people to enjoy. The plan for Shifnal will destroy areas that are essential for food production, or for use in agri-environments and green corridors to maintain biodiversity, wild life, flora and fauna essential for the whole UK! During COVID times the wonderful walks around Shifnal have directly supported mental and physical health of its residents and visitors. These open, car free areas help keep us fit and health in the long term, far outweighing short term monetary gain.....

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1911B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1912B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1913B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1914B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1914B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to Shifnal housing and employment needs because the Local Plan is seeking to meet needs imposed by central government. The consequent changes to the Local Plan will remove the current support for the Shifnal Neighbourhood Plan that is widely supported by the community of Shifnal. This housing need is created by an uncontrolled world population expansion, a barely controlled immigration and 'economic migration into the UK, an uncontrolled population increase in the UK (primarily from the immigrant population); and in Shifnal migration of UK residents westwards towards the town frequently from the West Midlands conurbation. It is NOT local need or even Shropshire need that is driving the proposed increase in development. summary, this is nearly all about migration and not need created by Shifnal and the residents of the town have had enough development as a result of a huge increase in residential development both on large site developments and as a result of there being no improvement in facilities to cope with the current 2014 Plan let alone further development in the town. Finally, where is the democracy in this consultation process? We know Shifnal Matters has campaigned alongside residents of Shifnal, and I see no effect on the proposals put forward by Shropshire Council. This Draft Local Plan is being IMPOSED not consulted upon. The sections of the Local Plan that are specifically objected to are as follows: P16 - C3.7: No evidence to support the need to provide housing for the Black Country because delivery opportunities are constrained'; P20 - Policy SP3: Building housing or industrial units on green belt land does the opposite of the intention of this Strategic Policy; P24: it destroys historic hedgerows and wetlands; it creates more damage to the environment as attracting people from the West Midlands creates more not less commuting; P90 Policy DP13: All development negatively impacts on the environment; P123 - Policy DP25 – para 4.218: This table indicates an excessive contribution of green belt land from 'the Shifnal area, even if sacrificing green belt was acceptable; Para 4.216: Green Belt Review outcomes should be repeated; Site P173 and SHF017: Grade 2 agricultural land with High harm to Green Belt; Sites SFH017 South and P16a: Grade 2 agricultural land with High harm to Green Belt; Sites P15b and SHF019: Grade 3 agricultural land with High harm to Green Belt; Re develop the environmental disaster at Shifnal Industrial Estate, not build more; P240 – para 315.1: The word WILL is used throughout this document. Is the draft plan a consultation or an imposition? P249 – para 5.204: The phrase long period of respite is used. How long and can the authorities be trusted? P249 – para 5.206: It is clearly acknowledged that the residents of Shifnal want no further development; P250 – para 5.209: Creating a strong and legible boundary is actually crudely drawing a ring around the town and proudly announcing that you have place shaped for future development by encroaching further into the Green Belt. This is so simplistic, gobble up some more land to complete a circle. It is not clever planning. it is contrary to the wishes of the residents of Shifnal; P250 - para 5.211: Recognises that high harm will occur. Also assumes that employment will be attracted away from Telford and the West Midlands, by council bureaucrats not business people. P250 – para 5.212: 'Assurance' that the land use is for employment only. Can this statement be trusted? P250 – para 5.213: Recognises that high harm will occur; P251 – para 5.216: The 'structural constraints' do not need to be addressed, just leave Shifnal alone. Who has decreed, in such an assertive manner that they need to be addressed, they only need to be addressed if additional development is forced upon the unwilling town residents.
A1915B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1915B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to Shifnal housing and employment needs because the Local Plan is seeking to meet needs imposed by central government. The consequent changes to the Local Plan will remove the current support for the Shifnal Neighbourhood Plan that is widely supported by the community of Shifnal. This housing need is created by an uncontrolled world population expansion, a barely controlled immigration and 'economic migration into the UK, an uncontrolled population increase in the UK (primarily from the immigrant population); and in Shifnal migration of UK residents westwards towards the town frequently from the West Midlands conurbation. It is NOT local need or even Shropshire need that is driving the proposed increase in development. summary, this is nearly all about migration and not need created by Shifnal and the residents of the town have had enough development as a result of a huge increase in residential development both on large site developments and as a result of there being no improvement in facilities to cope with the current 2014 Plan let alone further development in the town. Finally, where is the democracy in this consultation process? We know Shifnal Matters has campaigned alongside residents of Shifnal, and I see no effect on the proposals put forward by Shropshire Council. This Draft Local Plan is being IMPOSED not consulted upon. The sections of the Local Plan that are specifically objected to are as follows: P16 - C3.7: No evidence to support the need to provide housing for the Black Country because delivery opportunities are constrained'; P20 - Policy SP3: Building housing or industrial units on green belt land does the opposite of the intention of this Strategic Policy; P24: it destroys historic hedgerows and wetlands; it creates more damage to the environment as attracting people from the West Midlands creates more not less commuting; P90 Policy DP13: All development negatively impacts on the environment; P123 - Policy DP25 – para 4.218: This table indicates an excessive contribution of green belt land from 'the Shifnal area, even if sacrificing green belt was acceptable; Para 4.216: Green Belt Review outcomes should be repeated; Site P173 and SHF017: Grade 2 agricultural land with High harm to Green Belt; Sites SFH017 South and P16a: Grade 2 agricultural land with High harm to Green Belt; Sites P15b and SHF019: Grade 3 agricultural land with High harm to Green Belt; Re develop the environmental disaster at Shifnal Industrial Estate, not build more; P240 – para 315.1: The word WILL is used throughout this document. Is the draft plan a consultation or an imposition? P249 – para 5.204: The phrase long period of respite is used. How long and can the authorities be trusted? P249 – para 5.206: It is clearly acknowledged that the residents of Shifnal want no further development; P250 – para 5.209: Creating a strong and legible boundary is actually crudely drawing a ring around the town and proudly announcing that you have place shaped for future development by encroaching further into the Green Belt. This is so simplistic, gobble up some more land to complete a circle. It is not clever planning. it is contrary to the wishes of the residents of Shifnal; P250 - para 5.211: Recognises that high harm will occur. Also assumes that employment will be attracted away from Telford and the West Midlands, by council bureaucrats not business people. P250 – para 5.212: 'Assurance' that the land use is for employment only. Can this statement be trusted? P250 – para 5.213: Recognises that high harm will occur; P251 – para 5.216: The 'structural constraints' do not need to be addressed, just leave Shifnal alone. Who has decreed, in such an assertive manner that they need to be addressed, they only need to be addressed if additional development is forced upon the unwilling town residents.
A1916B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1917B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1918B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2091B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2092B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2093B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2094B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2095B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2096B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2097B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2097B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Despite many promises, pledges and proposals, no significant improvements have been made to the key roads and junctions in the town centre, nor to any of the basic infrastructure. The current Shropshire proposals to increase the size of the town can therefore be seen to be untenable and impractical, as well as being comprehensively rejected at public meetings held pre COVID 19. The Neighbourhood Plan has been ignored. There is no credible evidence that more houses or other development is needed in Shifnal or its surroundings. There are alternative areas for development, such as Priorslee, Stafford Park and Halesfield. There are no proposals in the Plan to ensure adequate provision of infrastructure, which should include highways, parking, school capacities, and medical demand. Promised improvements but never delivered. Shifnal has not had its fair share of funds – S106 monies only spent on roundabouts to support the developments, CIL has not come back into the community, and the New Homes Bonus should have provided funds. These funds must be being used to balance the council's books, to assist with the purchase of the town centre property and sale of Shire Hall. There is no evidence of need or demand for more development in the area.
A2098B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2099B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2109B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Schedule A7 sets out 'indicative' timescales for the developments, with sites SHF015 & SHF029 (Land adjoining Beech House between A464 and Park Lane, Shifnal) listed for the 'medium term'; 2025-2030. As the owner of site SHF029, and also on behalf of Guy Thomas as the owner of site SHF015, I would like to assure the Council that we know of no impediments to these sites being available for development very much sooner, and given Shifnal's key position as the preferred investment location in the M54 corridor and the significant growth in demand for housing, we believe these sites should certainly be considered for the short term, 2020-2025.
A2118B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2128B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	No comment

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2275B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2293B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2294B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2295B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2304B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Object to planned growth of Shifnal and removal of land from Green Belt for housing and industry without assessing full environmental impacts: loss of openness, loss of farmland, CO2 generation, flooding and climate change. Green Belt must be retained especially to west to separate Shifnal from Telford. The planned scale of growth will increase the population by 54% (compared to average growth of 23% in the County) and swamp the town's highway, transport, health and education infrastructure. Housing growth increases the existing scale of new development but this is concealed on low density sites. Employment growth takes no account of other large employment sites around Shifnal (10 mile radius) and will exacerbate traffic congestion in the town centre. Safeguarded land (equal to 130 football pitches) exceeds Shifnal's future housing need and destroys the town's village character. The presentation of this plan is riddled with contradictions, missing evidence and limits to public involvement.
A2305B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2308B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPP SHF015 & SHF029: Safeguard Zone - RAF Cosford Plan AT 45.7m and 91.4m. SHF022: Safeguard Zone - RAF Cosford Plan AT 45.7m and 91.4m. SHF023: Safeguard Zone - RAF Cosford Plan AT 45.7m. SHF018b and SHF018d: Safeguard Zone - RAF Cosford Plan AT 45.7m
A2309B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2314B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. The loss of greenbelt that Shropshire Council state we are blessed with stunning countryside that we need to protect and ancient woodlands that only yesterday Shropshire council stated nature also plays a huge roles in the battle against climate change by storing carbon in trees as the trees mature they will become more effective at storing carbon and along with other initiative contribute to the wider target of the county reaching net zero carbon by 2030 must apply to shifnal too. I am not against development but it must be proportional. I am surprised that Nurton Developments proposal is not being considered for land staddling Upton Lan and off the main road A464 as it seems a compromise, provided it is accessed from the A464. Additional housing on that site would merely be an extension to the recent new housing anf the land proposed is mainly scrub land and not used by the town for recreation purposes in the same way as the Lodge Hill and Coppice Green Lane greenbelt. There would need to be major investment in the crossroads as this is a blackspot for accidents
A2320B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. The loss of greenbelt that Shropshire Council state we are blessed with stunning countryside that we need to protect and ancient woodlands that only yesterday Shropshire council stated nature also plays a huge roles in the battle against climate change by storing carbon in trees as the trees mature they will become more effective at storing carbon and along with other initiative contribute to the wider target of the county reaching net zero carbon by 2030 must apply to shifnal too. I am not against development but it must be proportional. I am surprised that Nurton Developments proposal is not being considered for land staddling Upton Lan and off the main road A464 as it seems a compromise, provided it is accessed from the A464. Additional housing on that site would merely be an extension to the recent new housing anf the land proposed is mainly scrub land and not used by the town for recreation purposes in the same way as the Lodge Hill and Coppice Green Lane greenbelt. There would need to be major investment in the crossroads as this is a blackspot for accidents

Page 303

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2323B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area		<p>Shifnal is an inherently sustainable location, indeed consider it is one of the most sustainable settlements in Shropshire, which we consider should receive a higher level of housing growth within the plan period, and that the safeguarded sites identified around Shifnal, should not be safeguarded but allocated for delivery within the plan period.</p> <p>If the proposed safeguarded land in Shifnal remains as such, there should be mechanisms built in to the plan for safeguarded sites to come forward during the plan period should the need arise. It would be beneficial to allocate site reference numbers to each of the safeguarded sites identified with the draft Plan so that the Policies Map can be cross referenced at the appropriate points within the Local Plan Review.</p> <p>Shifnal's location on the M54/A5 East growth corridor, and the strong connectivity benefits this creates, form an important context for understanding both current demand pressures but also the extent to which these are likely to continue to increase where the corridor's investment is realised. At a local level, there has evidently been success in recent years in elevating the regularity of rail services to Shifnal. This has reinforced its connectivity into the corridor and specifically the national rail infrastructure which itself will continue to be enhanced through the delivery of HS2. This investment in improvements to rail connectivity has also responded to Shifnal's own growth. This again forms important context to its ongoing credentials for accommodating sustainable growth.</p> <p>The Council's evidence indicates provision of new homes and employment space will serve to support existing businesses and public services in Shifnal, delivering benefits for current and future residents and ensuring the resilience of this part of its employment base.</p> <p>Proposed allocation of a large employment site in Shifnal is strongly supported as a means of sustainably accommodating inward investment and enabling local business to grow building on the advantages of the M54 corridor. This will, it is agreed, offer the opportunity to create a more sustainable balance between housing and employment in Shifnal over the plan period. However, it is important to recognise that there is a realistic prospect that where the provision of housing is curtailed on the basis of the proposed requirement for the town, this is likely to occur in parallel to a period in which new employment would be starting to be delivered on the allocation. Where some level of displacement of people living in Shifnal and working elsewhere to living and working in Shifnal could occur, the enhancement in the provision of rail transport services alongside other factors is likely to make it challenging to realise this quickly.</p> <p>Where the creation of jobs will elevate demand for housing locally this suggests that to realise the benefits in full associated with its location on the M54 corridor the Draft Plan should recognise the need for greater flexibility in the advancement of safeguarded land within the plan period.</p> <p>Site promotion for SHF019 and P15b. Supporting documents provided include a vision document, landscape visual assessment, transport note, A464 and Park Lane access proposals, initial heritage appraisal, preliminary ecological appraisal and flood risk assessment.</p> <p>The site is some 12.7ha and has been identified as proposed safeguarded land within the draft Local Plan. It has capacity for 175-200 dwellings and is in a single ownership.</p> <p>The site lies to the south of Shifnal and comprises two grass intermittently used grazing fields. The site is enclosed by hedgerows and vegetation and contains three mature oak trees.</p> <p>The A464 forms the site's north eastern boundary, beyond which are further agricultural fields and a large fishing pond. There are a number of trees along the north-west boundary, beyond which is a large residential property known as Beech House. To the south-west is The Terrace, a Grade II listed residential dwelling. Park Lane, the north to south route into Shifnal, forms the sites western boundary. The whole site is in the Green Belt.</p> <p>The site is located within close proximity of a range of local services and facilities. Indeed, consider the site meets each of the requirements of draft policy DP29. Shifnal is an inherently sustainable location which we consider should receive a higher level of housing growth within the plan period, and that the safeguarded sites identified around Shifnal, should not be safeguarded but allocated for delivery within the plan period. Consider the site is located in a highly sustainable location and benefits from good access to existing public transport with the opportunity for everyday activities to be made by use of existing active transport opportunities, thereby assisting in reducing carbon emissions. This therefore provides a strong evidence base for bringing forward residential development in this location.</p> <p>There is no formal vehicle access to the site but the site is well served by the strategic and local road network and would be accessed off the A464 Wolverhampton Road and Park Lane. A transport note has been prepared for the site and in conclusion safe access can be provided into the development, which itself will lead to a series of well-designed estate roads which will form an important part of the scheme's overall design. Furthermore to enhance pedestrian and cycle connectivity into Shifnal Village Centre, a new footpath is proposed to the west of the site access along the southern side of the A464. There are no formal PROW on the site.</p> <p>The site is not subject to any overriding environmental or physical designations or constraints that would prevent the site from delivering residential development.</p> <p>With regard to Heritage, an Initial Heritage Appraisal has been undertaken. This indicates the site is to the north-west and north-east of the grade II listed 'The Terrace', and therefore the setting of this asset is an important issue to be addressed as part of any emerging scheme. In considering the relationship between the site and grade II listed 'The Terrace', the Initial Heritage Appraisal informed the design of the Illustrative Masterplan through a range of design opportunities, including: Opportunity to establish a buffer of open space to the west and immediate north of the Terrace could be provided to maintain prominent views of the Terrace from within the western part of the site and from along Park Lane; A comprehensive landscaping scheme should be considered to screen and soften views of the proposed development from the grounds of The Terrace. The hedgerow to the western boundary with Park Lane could be enhanced with additional hedgerow trees; The existing mature trees contribute to the landscape character and parkland qualities of the site and should be retained where possible; The arrangement, scale, massing and design of the proposed development will also need to be carefully considered and opportunities to create a development that perpetuates the parkland characteristics of the site should be explored; and Access and highway interventions should be carefully considered, ensuring that engineering works and associated infrastructure are kept to a minimum where possible. There is an opportunity to reinstate estate railings along Park Lane and into the development to maintain the parkland character of the site.</p> <p>With regard to ecology, a Preliminary Ecological Appraisal has been undertaken, which identified that with the exception of boundary habitats, the site is of low ecological value. Provided appropriate mitigation measures (identified in the study) are incorporated into the final design, no significant impacts are envisaged as a result of the proposed development. The Illustrative Masterplan illustrates how these mitigation measures are integrated.</p> <p>A Flood Risk Assessment has been undertaken for the site. It is evident from the Flood Risk Assessment that there are no constraints to the development of the site for residential development, with the entirety of the site being located within Flood Zone 1 and located away from the identified flood risk within Shifnal, around Wesley Brook.</p> <p>Whilst the exact form of Surface Water Management Strategy will need to be confirmed in due course further to detailed site investigations, the proposed development has been designed to provide suitable space for Sustainable Urban Drainage infrastructure which can be incorporated into the wider open space network / strategy on site.</p> <p>The landscape assessment concludes that due to the site's location, within an enclosed landscape, it is considered to be appropriate for development in landscape and visual terms. This assessment has informed the vision document and illustrative masterplan prepared for the site, which include the following design principles: Opportunity to maintain some of the site's parkland character through an area offset from the southwest and western boundary of the site; Potential to retain existing trees and hedgerows within site; and Opportunity for residential properties along the south-eastern boundary of the site to be outward looking to create a positive edge to the countryside.</p> <p>The site is located within the Green Belt but is already proposed to be safeguarded for future development beyond the draft Local Plan period. The Council's evidence base demonstrates that it, together with preferred housing allocation SHF022 and part SHF023, are located in the least harmful direction of growth surrounding Shifnal.</p>
A2328B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate.</p> <p>36 acre site for Air Ambulance appears excessive in comparison with other sites.</p> <p>Land straddling A464 and Upton Lane should be considered instead</p>
A2382B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites:</p>
A2383B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites:</p>
A2400B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	No Comments in Q4
A2478B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area		<p>The level of growth is too high for Shifnal – services would not be able to cope.</p> <p>Proposals do not account for existing and proposed employment areas within 10miles of the settlement.</p> <p>Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out.</p> <p>Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere.</p> <p>Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route.</p> <p>Green Belt must be retained, particularly to the west.</p> <p>Site assessments have been inadequate, there are contradictions and missing evidence.</p> <p>The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites:</p>
A2487B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	<p>The plan for Shifnal demands a level of growth that will swamp available roads, health service, schools and rail services</p> <p>The plan for Shifnal takes no account of huge employment zones already planned within 10 mile radius (duty to cooperate).</p> <p>The size of Shifnal housing growth is concealed by using low housing density and it comes on top of houses already approved and not built. This will give Shifnal growth of 54% compared with 23% for the Shropshire area.</p> <p>The proposed safeguarded land area (equivalent to 130 football pitches) far exceeds Shifnal's future local housing needs and will destroy Shifnal's village atmosphere for ever.</p> <p>The suggested scale of the industrial development will exacerbate the traffic gridlock already experienced in the town centre at peak periods as the resulting additional commuters will inevitably travel by car using this route.</p> <p>The green belt must be retained, especially to the west side, and protected to prevent Shifnal becoming another suburb of Telford.</p> <p>Most of the Shifnal land earmarked for housing and industrial is being removed from the green belt with inadequate assessment of flooding, CO2 generation, climate change, air quality, loss of prime farmland and other environmental considerations.</p> <p>The presentation of this plan is riddled with contradictions, missing evidence and an effective denial of public access.</p> <p>Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2496B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2496B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2499B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites.
A2500B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites.
A2501B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other sites.
A2502B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2503B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	1. The plan for Shifnal demands a level of growth that will swamp available roads, health services, schools and rail services 2. The plan for Shifnal takes no account of huge employment zones already planned within 10 mile radius. (duty to cooperate). 3. The size of Shifnal housing growth is concealed by using low housing density and it comes on top of houses already approved and not built. This will give Shifnal growth of 54% compared with 23% for the Shropshire area. 4. The proposed safeguarded land area (equivalent to 130 football pitches) far exceeds Shifnals future local housing needs and will destroy Shifnal's villages character forever. 5. The suggested scale of the industrial development will exacerbate the traffic already experienced in the town centre at peak periods as the resulting additional commuters will inevitably travel by car using this route 6. The green belt must be retained, especially to the west side, and protected to prevent Shifnal becoming another suburb of Telford. 7. Most of the Shifnal land earmarked for housing and industrial is being removed from the green belt with inadequate assessment of flooding, traffic generation, climate change, air quality, loss of prime farmland & and other environmental considerations. 8 . Presentation of this draft plan is riddled with contradictions, missing evidence and an effective denial of public access. 9. Support the decision not to proceed with the Bradford Estates proposals at Tong. 10. The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air ambulance sites are 2-3 acre:
A2505B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2506B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S15 Shifnal Place Plan Area	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A0016B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Only Brownfield sites should be considered for Bayston Hill. traffic is too busy for proposed site. Don't agree that the Development boundary is being moved. Recently four different planning appeals, including one public enquiry, have refused building on farmland surrounding Bayston Hill. Each Inspector recognised that Bayston Hill is separate from other communities and is already a large settlement with poor access and few amenities for an existing community of 5,200 residents.
A0018B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	As a member of a Residents Group and are currently in the process of arranging a meeting with CEG, the main land agent developing the Master Plan for this area. A key area of immediate interest is how this development will fit in with the 2 new proposed schools within SHREW030/R due to begin construction in 2021(?). Access to these schools is already of concern when considering the current road layout of Squinter Pip and Red Deer Rd and the issues that even local traffic already has with the tight narrow bends and corners and parking issues which would pose significant concerns for the safety of the students. There have already been collisions on the stretch of road adjacent to the proposed school site. Access to Park and Ride from Myton Oak Rd in the North makes sense and it is assumed this will be the start point of any inner link road through to Hanwood Rd. Where this access will be is of great interest given traffic issues both roads see when in holiday season and there is congestion on the A5. Ideally nothing would begin until the NWRR is completed, which will hopefully reduce the volume of traffic travelling to the West of Shrewsbury. A local centre will be welcomed by all and the North of SHR158 could be the most suitable place for it to be considered central and accessible to new and existing residents. The schools are much needed and the suggestion of a Medical Centre is welcomed. A key area of interest for the residents Group is the consideration of green infrastructure corridors and the acknowledgement of the environmental network to the East of the site, particularly that bordering SHR060 and SHREW094 and SHREW019 is welcomed. This natural pond is teeming with wildlife and is a resting place for swans, wild geese, ducks, moorhens etc and therefore a wide green corridor is required between the pond and any further new development to prevent the loss of this natural haven. This would also neatly flow into the corridor already created between SHREWS030/R and SHREW094. A robust residual surface water plan are very much needed as we are already seeing levels of the current ponds and streams rising year by year, and this is while the area is able to flood and create temporary pools in the lower points before it is turned into hard standing.
A0020B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Site Allocation: Land south of Sundome Road, Shrewsbury. There is a requirement for a planting "buffer to the former Shrewsbury Canal." I support this buffer, but it must not be such so as to interfere with the canal's restoration i.e. it should ensure that machinery and equipment can be utilised for the required restoration work without any undue impediment.
A0026B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	The Parish Council strongly supports the level of development for Cross Houses in the Local Plan. The residents, at two public meetings, let it be known that Cross Houses had received a large number of housing due to five year land supply issues and asked that this additional housing be taken into account when Shropshire Council in this refresh of the local plan. The 9 wind fall houses allocated to the proposed development boundary is considered acceptable.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0030B1	Viability and Deliverability of Proposed Site	Draft Policy Area S16 Shrewsbury Place Plan Area		Richborough Estates believe delivery is likely to occur earlier in the plan period than currently shown in Appendix 7. We believe delivery is more likely in the short term period 2020/21 – 2024/25.
A0037B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Not a suitable site as it experiences noise and pollution, which risks the health and wellbeing of residents. The local plan should not change for this area and new applications should be judged on the policies as they currently exist. To reduce future pandemic risks and fight climate change, it is essential that this site is retained as countryside and not developed. I am concerned that the developer has not fully taken into account the sources of noise and pollution relying on weekday peaks but ignoring key weekend periods where there are clashes between retail, football and seasonal holiday traffic using the A5 trunk road.
A0049B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Longden being a Community Hub. The settlement is half the size of the next smallest proposed Community Hub with only 135 dwellings. The Longden Village Development Statement, endorsed by the Parish Council, reflects the view that half the residents want to stay as a Community Cluster. The Hierarchy of Settlements is flawed as there is no weighting to reflect the size of services and its capacity to cater for additional residents. Feel less points should have been given to Longden by the Hierarchy of Settlements because they only have a mobile library, very small village shop which doubles as Post Office (but both get points), the pub is very small and only opens part time, the primary school and nursery are very small, superfast broadband is only available by satellite link, outdoor sports facility should be grouped with childrens playground, the 546 bus service does not allow for connections to other public transport in Shrewsbury and Longden does not have sustainable transport links to other nearby settlements. A lack of employment opportunities means residents have to drive to work so, development in Longden would generate significant carbon emissions - this is against government and Shropshire Council policy. Having Longden as a Hub will have a negative impact on the climate whilst staying as a Community Cluster means growth would be by infill and minimise carbon emissions. New development would result in loss of mature hedgerows and replacement ones will take time to mature, thus reducing carbon capture and storage. The Right Home Right Place survey indicated 18 houses were needed so residents feel the guideline of 50 (27 after consideration of completions since 2016 and existing commitments) is a betrayal of trust in the Council. Future Local Plan reviews are likely to add more houses: this engenders mistrust from those residents who have engaged with the Council so far. Residents fear that exception sites will be identified on an ad hoc basis and valuable agricultural land will be lost. If agricultural land around the village were developed, flooding from tributaries of the Reabrook will occur. <u>Wish to remain a Community Cluster and not be a Community Hub.</u>
A0053B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Longden being a Community Hub. The settlement is half the size of the next smallest proposed Community Hub with only 135 dwellings. The Longden Village Development Statement, endorsed by the Parish Council, reflects the view that half the residents want to stay as a Community Cluster. The Hierarchy of Settlements is flawed as there is no weighting to reflect the size of services and its capacity to cater for additional residents. Feel less points should have been given to Longden by the Hierarchy of Settlements because they only have a mobile library, very small village shop which doubles as Post Office (but both get points), the pub is very small and only opens part time, the primary school and nursery are very small, superfast broadband is only available by satellite link, outdoor sports facility should be grouped with childrens playground, the 546 bus service does not allow for connections to other public transport in Shrewsbury and Longden does not have sustainable transport links to other nearby settlements. A lack of employment opportunities means residents have to drive to work so, development in Longden would generate significant carbon emissions - this is against government and Shropshire Council policy. Having Longden as a Hub will have a negative impact on the climate whilst staying as a Community Cluster means growth would be by infill and minimise carbon emissions. New development would result in loss of mature hedgerows and replacement ones will take time to mature, thus reducing carbon capture and storage. The Right Home Right Place survey indicated 18 houses were needed so residents feel the guideline of 50 (27 after consideration of completions since 2016 and existing commitments) is a betrayal of trust in the Council. Future Local Plan reviews are likely to add more houses: this engenders mistrust from those residents who have engaged with the Council so far. Residents fear that exception sites will be identified on an ad hoc basis and valuable agricultural land will be lost. If agricultural land around the village were developed, flooding from tributaries of the Reabrook will occur. <u>Wish to remain a Community Cluster and not be a Community Hub.</u>
A0063B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Appeal to us to re-consider a site owned by the respondent in Preston Montford
A0068B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	There is an increasing need for open space as more green land is built on. When Shirehall is vacated the sports pitches at the back of the site could be a green lung. It would be a mistake to sell Shirehall for more housing and why is it not included in the Plan? Planning process is sadly lacking and should be better or there will not be a Shropshire to develop.
A0081B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with Longden's Hub status. Disagrees with the large-scale development this will bring, due to flooding, cycle and walking routes will be disrupted, roads would not be able to manage the development.
A0082B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with Longden's Hub status. Development would impact the roads, which are not fit for more cars than it already serves. Lack of, or insufficient public transport means reliance on cars from the village. Concerned change in status would result in development which Longden could not cope with. Acknowledges that development is needed, but Hub status would result in too much for the village.
A0085B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with Longden's Hub status. Limited existing infrastructure & services cannot support this. Roads are currently poor with regular horses. Primary school cannot take more numbers, small village reputation is its selling point - more houses would ruin this. Poor public transport. The village can sustain large growth.
A0087B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	We wish to have the Town Centre part of the map redrawn to exclude St Alkmunds Square in the same way as Town Walls, Belmont, St John's and Swan Hill, and designate it residential. I would point out that St Alkmund Square is bordered by Church St and over this boundary road is St Alkmund Place (this is not part of the Square; as designated on some old maps) which is Commercial and often confuses individuals.
A0088B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The school is too small for the existing numbers and the roads in the village are poor. The public transport services are also too poor.
A0090B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Longden being a Community Hub against local community wishes. Infrastructure inadequate to service additional population including capacity of local shop and unreliability of buses leading to dependence on private motor vehicles which is not climate change prevention compatible or affordable for some. Issues with amount of speeding traffic on road with 30mph limit. Longden's rural setting central to its character and would be lost by building standard modern estate housing on surrounding fields. Development would conflict with ecological requirements and addressing climate change. Proposed changes to central government planning combined with proposed Hub status for Longden will exacerbate the situation with resulting lack of opportunities for local community voice to be heard and result in inappropriate significant development levels which do not benefit the village or community simply to meet targets. Evidence from elsewhere demonstrates that development does not necessarily support the retention of local services and facilities such as schools. Broader perspective of impacts versus target requirements needed
A0098B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Allocation contrary to community view expressed at public meeting. New houses unnecessary. Lyth Hill Road access busy and inappropriate for additional use. Capacity of local infrastructure, dentists, schools, roads, including access to A49 etc an issue
A0100B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	New line for development boundary suggested. Objection to non-inclusion of promoted site (SHR185) north of Dobbies across A5 and separate promotion document provided. Sustainable, deliverable site, with no environmental or right of way designations, no listed buildings, outside conservation area, no flood risk in a mixed use area well connected to main growth centre of Shrewsbury and its amenities. Access available and potential for additional access. Could be considered with adjacent promoted land SHREW036 (as SHR182) and discussion ongoing with a view to master planned development (residential led with employment element) for greater site. Sustainable location for housing and commercial development which would benefit from prominent roadside location, infrastructure & connectivity. Would deliver infrastructure and sustainability benefits, help provide development needs in line with spatial strategy that focuses growth in Shrewsbury. Development in this location would retain the A5 as a strategic buffer between Shrewsbury and Bayston Hill. The A5 provides a fixed defensible and logical boundary. Development would have a positive impact on Shrewsbury town centre, Meole Brace Retail Park and the local services south of the A5 & an opportunity to provide fully integrated cycle and pedestrian routes through and around the site.
A0100B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Recognition of Shrewsbury as main Strategic Centre of Shropshire and primary focus for development in the County, is supported. In addition to main provision through residential allocations, well located, sustainable windfall sites within and on the edges of Shrewsbury should help meet housing and employment development needs.
A0108B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	This village voted to be a cluster. The scoring system does not take into account limited nature of the services. Poor roads in and around village, which are also fairly narrow. The parish has already had properties developed in excess of the current Local Plan
A0114B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Development site affects National Grid assets or are in close proximity including 400kV Overhead Transmission lines. A plan showing details of the site locations and details of National Grid's assets provided.
A0114B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Development site affects National Grid assets or are in close proximity including 400kV Overhead Transmission lines. A plan showing details of the site locations and details of National Grid's assets provided.
A0115B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to the proposed development of Longden village by the Local Plan. Hub status inappropriate, Longden a very small village with limited road and other infrastructure and not capable of supporting further development or vehicles. Existing issues with HGVs. Agricultural rural setting central to local leisure opportunities & the character of the village. Additional development will result in loss of village identity.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0119B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to development off Lyth Hill Road. Not supported locally. Access and pedestrian safety issues due to busy road & parked cars which would be exacerbated by additional development. Capacity of services (schools and GPs) is a significant issue together with limited access points to the A49 and additional congestion.
A0120B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Proposals offer the opportunity for the Council to rectify its maladministration of Darwins Walk development (SHREW019 and SHREW094) which has resulted highway and residential safety issues, in particular a 'rat run', through provision of a relief road and traffic calming. The proposed development should include appropriately located link road between Hanwood Road and Mytton Oak Road which does not impact on residents. The proposal for a school will exacerbate an already unacceptable situation.
A0121B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	The Parish Council supports the allocation of Nesscliffe village as a community hub and the policies, map and supporting text associated with this.
A0121B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	The Parish Council supports the rest of the parish, outside of the Nesscliffe development boundary being classed as "Open Countryside".
A0134B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Support Baschurch being identified as a Community Hub. The settlement has a good range of services and facilities and good sustainability credentials. Indeed it is one of the higher serviced Community Hubs identified. Support proposed allocation BNP024. The site forms a natural extension of the existing allocation (BAS017) being developed by Galliers' Homes, which also allows for vehicular access. It is within short walking distance of all village facilities. Scores 'good' within the Sustainability Appraisal. Is highly deliverable and will provide a suitable mix of housing to meet the needs of families together with older and younger residents, improving the range and choice of housing in Baschurch. Can provide a generous area of open space and footpaths will link to open space on the adjacent Galliers' Homes site and to the wider PROW network. Development will improve the vitality of the village, support local services and increase the range and choice of housing available. There is a need to clarify the proposed site guideline regarding 'low-density', 'significant open space provision' and consider the proposed site capacity of 35 dwellings as this represents a density of only 11.7dph and could conflict with Policies SP1, SP3 and SP5 which require efficient use of land. Whilst Policy DP1 requires a higher proportion of smaller dwellings. The existing allocation (BAS017) being developed by Galliers' Homes is at a density of 17.5dph, although these are predominantly larger detached properties. Reflecting the proposed policies a density of 20dph would be more appropriate, with a minimum guideline of some 60 dwellings. This is still below assumptions in the SLAA. There is also a need to clarify the proposed site guideline regarding 'supporting delivery of the medical centre', wording is vague and not consistent with Para 34 of the NPPF (setting out contributions expected from development). Policy requirements 'squeeze' the viability of development, as demonstrated within the Local Plan Delivery and Viability Study. BNP024 can achieve policy requirements, however 'low-density' and 'significant open space provision' further limits saleable floorspace on the site relative to other proposed allocations. As such it is important that policy guidelines are realistic about the means by which the development might, "support the delivery of the medical practice". CIL is the best means of contributing to provision of a medical centre, such contributions should not be in addition to CIL, and policy guidelines should recognise this. The site is highly deliverable and viable. It is likely to be delivered earlier than the Local Plan's current forecast of 2020-2030 with the 2021-2025 period more appropriate in Local Plan Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations. There are local housebuilders keen to deliver the site as soon as possible.
A0138B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Policy S16.1 makes no specific provision for Shrewsbury's significant need for specialist housing for the elderly. To make the Plan more robust and meet local needs, we would suggest a specialist Retirement Village comprising a range of types of older persons' housing including bungalows, assisted living and extra care housing, located opposite the recent development of retirement flats at Shire Living, the Coppice, Holyhead Road. Site promotion (5.5h) included in Rep. Site has an existing access, is well screened in the landscape, is served by public transport and close to the countryside and other older person accommodation and other complementary services. The site would complement the health/care development on the existing allocation (Shrewsbury West SUE). The site is outside the groundwater source protection zone and due to topography would not drain into the one to the north. The site is considered viable and deliverable within the time period 2020-2030. Retirement villages have proven to be a successful model, providing opportunities for residents to move from more independent accommodation to more supported accommodation as their needs change and enable couples to remain geographically close even when their needs differ. Furthermore, a concentration of older people better supports a good range of specialist services for the elderly, benefitting those on the site and wider area
A0146B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to the proposed Hub status of Longden village which will create extra traffic. Cluster status should be retained. Longden has limited road and other infrastructure and not capable of supporting further development or vehicles. Existing road safety and traffic issues. Attractive countryside setting should be retained
A0150B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Longden being a Community Hub. The settlement is half the size of the next smallest proposed Community Hub with only 135 dwellings. The Longden Village Development Statement, endorsed by the Parish Council, reflects the view that half the residents want to stay as a Community Cluster. The Hierarchy of Settlements is flawed as there is no weighting to reflect the size of services and its capacity to cater for additional residents. Feel less points should have been given to Longden by the Hierarchy of Settlements because they only have a mobile library, very small village shop which doubles as Post Office (but both get points), the pub is very small and only opens part time, the primary school and nursery are very small, superfast broadband is only available by satellite link, outdoor sports facility should be grouped with childrens playground, the 546 bus service does not allow for connections to other public transport in Shrewsbury and Longden does not have sustainable transport links to other nearby settlements. A lack of employment opportunities means residents have to drive to work so, development in Longden would generate significant carbon emissions - this is against government and Shropshire Council policy. Having Longden as a Hub will have a negative impact on the climate whilst staying as a Community Cluster means growth would be by infill and minimise carbon emissions. New development would result in loss of mature hedgerows and replacement ones will take time to mature, thus reducing carbon capture and storage. The Right Home Right Place survey indicated 18 houses were needed so residents feel the guideline of 50 (27 after consideration of completions since 2016 and existing commitments) is a betrayal of trust in the Council. Future Local Plan reviews are likely to add more houses: this engenders mistrust from those residents who have engaged with the Council so far. Residents fear that exception sites will be identified on an ad hoc basis and valuable agricultural land will be lost. If agricultural land around the village were developed, flooding from tributaries of the Reabrook will occur. <u>Wish to remain a Community Cluster and not be a Community Hub.</u>
A0167B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Employment at both Castle Foregate and Sentinel Works is identified as protected employment land. It is assumed that protected employment land status is supportive of the expansion and improvement of existing employment operations. There is significant concern that proposals for the North West Relief Road, applications within the SUE West and other development in this locality will have a detrimental impact on the future viability of the Oxon Hall Caravan Park. Positive dialogue is very important.
A0167B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Policy S16.1 makes reference to the proposed alignment of the NWRR and the Councils principle of support for it. We have significant concern about the impact of the NWRR and similar concerns in relation to criteria 7 of this policy. Specifically the proposed support for potential commercial uses along the NWRR corridor. We would not support any proposals which increase the extent of development in proximity of Oxon Hall Caravan Park, particularly uses which would create noise and disturbance. Criteria 7 should be amended to reflect these concerns. Determination of Planning Applications on the SUE West should accord with the adopted Masterplan, as set out in policy
A0167B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Comprehensive information provided regarding a Planning Application on SUE West (SAMDev Plan allocation). This included consideration of local and national policy. Key considerations identified included: noise; safe crossing of existing and proposed roads; construction management; and safe access for caravans.
A0174B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	SHR060 is a greenfield site outside development boundary in open country so it's open market residential and is contrary to policy, there is no road frontage, no access via SHREW019. Viewed along with SHR158 & SHR161 a large proportion of SHR060 should be open greenspace. Towards western side of site sloping makes it less viable, developed it would have high impact on Violet Grove & Bluebell. This will also impact on pond, housing impacting on the ponds ecosystem. On the western side flocks of Canadian Geese, swans, moorhens feed. Rich biodiversity contacted with pond and reedbeds, greater spotted woodpecker, pied wagtail etc along with frogs toads & newts, dragonflies, mayflies a rich ecosystem well established also providing cover for hibernation. High value site that could contain protected species. The site is within 250meters of wildlife site. Impact was made when Darwin Walk was built and this is far larger development. Development would be contrary to SC policy. Country Park Estate was promoted by press and Peter Nutting planning committee 01/07/14 supported 37 acres of public open space. This was never carried out. There have been trees felled and a loss of habitat. Big town plan objectives support openspace & green corridors. SHR060 should be used to support this. SHR060 could be an ideal location for community recreation, education, bird hides, direct green access for planned primary school
A0182B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Longden being a Hub. The village is small and has 135 residential dwellings and the thought of it becoming a Community Hub is total madness! We believe that the points system is severely flawed, when you compare Longden with Minsterley, Hanwood and Pontesbury. The pub is only open part-time and part of it has already been converted into 3 living spaces. The library is only in the village every 2 weeks for about 10 minutes. The shop/PO is very small. The school is full. The village isn't easily accessible from the main bypass in Shrewsbury and there is already a considerable traffic problem in the village and at Radbrook at school times. If Shropshire Council are so short of housing stock, why not tap into some of the 400,000 land banked that Developers have already got planning permission for?
A0192B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to the proposed designation of Ford as a community hub. Hierarchy of Settlements assessment scoring system has been misapplied to Ford and the correct score is 42 points this reflects <ul style="list-style-type: none"> •Inaccurate recording of available amenity green space at Quail Ridge which when identified non amenity or duplicate areas (detailed in rep) within it are deleted becomes less than 0.2ha threshold. •Peak Bus service – There is not a return service between 3pm and 6pm within the specified distance of the village (services & locations detailed in rep) •Outdoor sports facility- the former Bowling Green does not qualify as in private ownership, not accessible to the public & has no arrangements in place for use of the space as a Bowling Green. There is a planning application for storage units pending consideration. Additionally disagree that mobile libraries should only get 1 point less than permanent libraries as service is far more limited. Hub designation also inappropriate because of: Conservation Area, limiting potential for infill and potential harm to character of Conservation Area; Soil Grade 2 or 3 which is good or very good for agricultural & warrants protection; Ford village is in a mineral safeguarding area and development would therefore contravene policies SP13 and DP31; Right Home, Right Place Housing Survey (2020) showed that the scale of demand in Ford is low and it has been hard to find tenants for affordable housing recently completed at Cross Gates Meadow and this was reflected in officer comment; concerned that hub status will be permanent and lead to development beyond the boundary in the medium to longer term.
A0192B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Ridge and furrow soil pattern at FRD011 should be protected as per policy DP24; Ford village is in a mineral safeguarding area and development would contravene policies SP13 and DP31; EIA needed for site FRD011; Ford village is in a mineral safeguarding area and development would therefore contravene policies SP13 and DP31; the scale of housing demand in Ford is low

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0213B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Uffington has been removed as a Community Cluster without justification. This is surprising given the SAMDev housing requirement for Uffington has not been delivered. It is considered that Uffington should remain as a Community Cluster with further sites allocated to address the shortfall in delivery since the SAMDev was adopted and meet the growing need for the different types of housing identified in the NPPF and the draft Local Plan (Policies DP1 – DP7). This will become increasingly important if the revised housing methodology for Shropshire becomes national policy in late 2020
A0215B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Longden being a Community Hub, as: There are already nearby Community Hubs at Pontesbury and Dorrington. Shropshire is a rural county, making Longden a Community Hub would change the nature of the village and surrounding area. Fields and PROWs around Longden village are essential to the health and wellbeing of residents. Development on greenfield sites around the village would negatively impact wildlife and their habitats, including mature trees. Traffic will increase and cause highway safety issues, particularly for pedestrian, cyclists and horse riders (Shrewsbury Road is well used and has many blind bends). There are also no pedestrian pavements between Longden and nearby villages. Increased traffic will also make journeys to Shrewsbury more difficult. Longden bank is virtually impassible in winter. Longden is prone to flooding and certain areas are therefore unsuitable for development. Development will also exacerbate flooding to existing properties and roads by removing natural drainage - increasing highway safety issues. There are few services and amenities in the village and little to occupy young adults
A0226B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Current main road through site is often dangerous: it is bendy, cars are parked on it and vehicles speed. School pupils commute through on foot and by bike. Building a new school will cause access issues with already problematic traffic. The Park and Ride is a good idea but again the main road will not cope. What will be done to protect the spectacular wildlife when the school is built?
A0229B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Vehicular access will be inadequate, especially if from the existing estate. I would hope that noise levels are carefully considered for new residents. New housing on the west of the town means that residents will have to commute through the town to employment in the north and the North West Relief Road seems crucial for this as is a better organised, easy to use and cost effective public transport system to reduce car usage. Quiet roads to the town centre should be put in place. A green gap between the new development and Bowbrook Meadows would be beneficial and likely to be highly used. It would be great if the wildlife returning to Bowbrook Meadows now construction has slowed down, had an area left for them on the new development site.
A0245B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Site promotion (part of BAY027) should be considered for development (low density / high-quality self-build housing, leisure/hospitality facilities or holiday lodges) The site is associated with the small settlement of Redhill, with access to services and facilities in Hook-a-Gate (part of a proposed Community Cluster) and a short journey to services and facilities in Shrewsbury. It benefits from an access off Longden Road, already used for railway maintenance and 15 or so houses. It is well screened, so will not overlook existing properties.
A0249B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Site BIT015 should be identified as a site allocation within the Local Plan. The site is in a sustainable location in the heart of Bicton, within easy walking or cycling distance to services and facilities. It is also under 2km from services and facilities in Bicton Heath, with regular bus services between Shrewsbury and Oswestry available from a nearby stop. Development of the site would help meet future housing requirements and support growth of Bicton Community Hub. The site is currently a semi-derelict farm. There is only one allocation (BIT022) which will intrude into the countryside and be a dominant feature when passing through the village. It appears that this site has only been allocated due to its location adjacent to the B4380 and will not provide any benefit to the village or contribute to the wider character of the area. The proposed development boundary is odd, excluding the historic centre of Bicton.
A0258B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	The parish council supports the Hanwood community hub, and support the separate classification of Hanwood Bank as Open Countryside. Development must not be allowed to encroach outside the development boundary of Hanwood
A0258B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Part of the site for this 1,500 home extension is within Great Hanwood parish. The parish council objects to its allocation for development as it encroaches into the parish and the increased traffic at Edgebold will have an adverse impact on Hanwood; Edgebold roundabout and the A488 are already high risk areas for accidents and speeding and this development will worsen this issue.
A0260B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	I support the approach outlined in policy S16.1 'Development Strategy: Shrewsbury Strategic Centre' including the allocations for new housing development identified in Schedules 16.1(i) and 16.1(ii), and on the Policies Map. This appears to provide a balanced provision which meets the development requirements for Shrewsbury over the Local Plan period. I also support the aims outlined in Para 12 of this Development Strategy which recognise the special character of the town and its particular environmental challenges. This aims to ensure that the development of the town will have regard to '...the promotion, conservation and enhancement of the town's natural and historic features, heritage assets, green corridors and spaces, and ...Environmental quality, including the corridors of the River Severn and its tributaries, the town centre and the registered battlefield...' I am particularly concerned that the Kingsland /Rad Valley which provides a priceless mature asset, should be recognised as a key element of the Green Infrastructure within Shrewsbury. This river corridor should not be vulnerable to entirely inappropriate development proposals, similar to the recent Planning application ref: 20/03270/FUL.
A0267B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Evidence submitted for inclusion of site BNP037 in Baschurch. Statement outlines that the site is available and deliverable, and is suitably located near road networks and local services including a medical practice. The site has the potential to also relocate Baschurch Bowling Club with access directly onto Yeaton Lane, which has previously been discounted by Shropshire Council. Whilst the new bowling green would require enabling works in the form of residential development between the northern boundary of the bowling green and properties to the rear of Perrfield Road, the land owner would be providing the land for the club on a peppercorn rent. Additional site plan information also submitted
A0268B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Support proposed allocation of SHR197VAR. The site is ideally located to deliver vital employment land, adjacent to Shropshire main growth point, Shrewsbury. It is capable of expanding on the existing commercial focus of Shrewsbury towards its north east and the area around Hariescott whilst making the very most of two of the County's strategic transport corridors of the A49 and A53 (offering excellent transport links). It is also well located to allow access from/benefit from pedestrian and public transport links to the nearby range of employment, commercial and community uses as well as Shrewsbury Town Centre. It also benefits from PROWs that provide access into the Sandourne area of Shrewsbury, which could be diverted/upgraded to increase accessibility into town and from town into the countryside. There is a pressing need for more employment land in Shrewsbury, this has been consistently identified throughout the Local Plan review. Development of SHR197VAR can contribute to achieving the draft Spatial Strategy (urban focus and levels of employment land, identified within draft Policy SP2 and its explanation) and the objectives of the Economic Growth Strategy for Shropshire. In particular SHR197VAR can contribute to two specific objectives in the strategy, these being: directing economic growth towards a number of specified transport corridors and economic hubs in the County, two of which are identified as the Shrewsbury urban area and the A49 corridor; and targeting growing in under-represented sectors, including research and development and creative and digital technologies. Analysis identifies a steady decline in the delivery of Class B1(a), B2 and B8 since 2007, albeit it is acknowledged that there remains a demand for these uses. In parallel there has been an increase in both the delivery of and demand for Class B1(b) and B1(c) uses (this growth appears to have taken place across a network of 'Community Hubs' due to the ability to deliver more bespoke units at a lower market drawing a high proportion of start-ups and pioneer uses away from the current employment allocations and SUEs around Shrewsbury. There is therefore a need for sufficient sites at Shrewsbury to balance the delivery of traditionally popular, albeit space intensive, Class B2 and B8 uses with the emerging trend of new Class B1b and B1c uses. SHR197VAR can directly meet the qualitative needs of Shropshire, confirmed by an assessment of current market and employment trends undertaken by a local agent who concluded "likely to be a good demand for employment land in this location over the next 10 years. Considering the population of Shrewsbury and its status as the county town of Shropshire, the level of B1c users is generally low. There is a pent-up demand from employers who reside in Shrewsbury and wish to work in the town, but there is currently a complete lack of available sites and facilities", "a surge towards requirements from other employment sectors, in particular research and development, laboratories for the food industry and data storage, as well as some more general commercial uses for larger premises, which have been stymied through lack of opportunities", "available units in Shrewsbury are historically fairly small and therefore do not offer prospective occupiers the opportunity to expand in the future" and "demand for employment space in this location will increase over the next few years, specifically from the food industry. This would complement the start-up units at Shrewsbury Food Hub". SHR197VAR has a net developable area of 7ha and can accommodate approximately 20,000m2 of new employment floorspace (Gross Internal Area) comprising a mix of Class B1c, B2 and B8 uses - it is entirely flexible employment land that can respond to changing needs and help meet needs of Shrewsbury and Shropshire more widely. It will allow a rebalancing of employment growth at Shrewsbury away from the more traditional Class B2, B8 and office-based industries and provide more of a focus on information and technology industries. This will help effect the 'step change' required by the Economic Growth Strategy of the plan. SHR197VAR can also deliver structural landscaping and screening around the fringes of the site, including a landscaped drainage attenuation feature at its southern end, linkages to the existing road, footpath and public transport networks including enhanced footpath linkages across the site; and ecological enhancements throughout the site focused on the new landscaping features. SHR197VAR is immediately available, devoid of any environmental, infrastructure or legal constraints and demonstrably deliverable and developable. Development of SHR197VAR would be in full accordance with the wider suite of general policies of the emerging Local Plan - it has the ability to meet all of the standards set out in draft Policy DP12 and provide a range of employment units that deliver significant energy efficiencies was considered from the earliest point of the site's promotion. Site promoter has undertaken a thorough approach to site promotion and prepared significant assessments already which will allow for an early application and delivery to occur, this should provide confidence about deliverability. In terms of the specific merits of SHR197VAR there are no constraints that would hinder the development of the land - physical, commercial or otherwise. Market analysis has been undertaken by an agent and informed conclusion that the site would represent a highly attractive and sought-after location for a wide number of employment uses, especially those with a customer facing format. Due to the location of the site at what is effectively the northern gateway to Shrewsbury it will provide a high degree of immediate visual prominence from the strategic road network, maximising its attractiveness to commercial operators. It also benefits from good access to the strategic road network and potential to form part of a growing commercial hub, which adds to its attraction as a location. Due to the flexibility offered by proposed site guidelines (allowing Class B1, B2 and B8 uses), SHR197VAR there is flexibility to respond to needs and the market, although consider that it would be particularly well suited to Class B1(c) uses as targeted by the Economic Growth Strategy. It could similarly lend itself to a range of larger or even a single Class B2 unit in the sector of engineering, agri-food or agri-tech, helping to further the ambitions of the Big Town Plan. Also note continual need for Class B8 floorspace across Shropshire, particularly along the main distributor routes such as the A53 and A49 corridors. The site is well located, devoid of any barriers to delivery and resultantly would be subject of a high level of market demand. Appendix 7 of the Draft Local Plan suggests delivery between 2025 and 2035, however would expect delivery much more quickly in a maximum of two phases (based on market attractiveness of the location and site promoters commitment to delivery). Marketing will begin as early as possible once the allocation is secure with an expectation that it will be purchased by a commercial developer quickly. On this basis we would anticipate the quicker delivery of the site in its entirety, likely over the short to medium term of 2020 through to 2030 at the latest. There may be a need to clarify uses on the site given recent changes to the Use Class Order. An illustrative masterplan is provided as an appendix to this representation. Proposals respond to Council ambitions to create a more vibrant and diverse economy across Shropshire with Shrewsbury as its focus, whilst also delivering sensitive design that complements nearby existing and proposed uses. A viability report, access strategy, environmental opportunities and constraints technical note, heritage statement, Great Crested Newt survey and archaeological desk based assessment are also provided as appendices to this representation. SHR197VAR bolsters the Council's employment land strategy, one which would otherwise be partially reliant on two further allocations in Shrewsbury that are inflicted by a range of infrastructure and environmental constraints. It also offers flexibility and greater choice to the market. Consider delivery of SHR197VAR would complement the key requirements of draft policy SP1 entirely, specifically in the way in which it will provide a new modern employment development at a highly accessible location on the edge of Shropshire's key growth point, Shrewsbury. One of the key pillars of the strategy in draft Policy SP2 is the delivery of at least 15ha of employment land per annum over the plan period until 2038 focused primarily on Shrewsbury as the Strategic Centre of the County. SHR197VAR would help directly fulfil the spatial ambitions of the plan. SHR197VAR can also successfully and viably incorporate a range of low carbon energy systems and energy efficient fabrics and design. Its design and layout can also comfortably accommodate additional network of planting across the site as well as SUDs - masterplan provided as an appendix to this representation. SHR197VAR represent one of the most preferable locations for commercial development when assessed against the sequential approach described by draft Policy DP9. Major new employment development can be delivered at the site in such a way that does not have a harmful impact on the prevailing landscape character or nearby heritage assets. The orientation of the site, being bound by the strategic road network and both existing and proposed employment development beyond on two sides, would result in the delivery of a development that would both complement and strengthen the growing commercial hub at Battlefield Roundabout. SHR197VAR can be delivered in a way that is entirely sensitive to a combination of local habitats and existing trees and hedgerows. It does not contain any statutory or non-statutory ecological designations - the wider site features a number of potential habitats capable of supporting protected species, but none lie within the proposed allocation

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0272B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Promotion of an extension to site BNP035. The 2.15 acre site is a logical extension to BNP035 and would be directly accessed through this site. Development of the site could comply with guidelines proposed for BNP035 in that it would provide for a low density scheme which will include the delivery of a firm development edge to the eastern part of the site to ensure development is suitably contained, and would be served by a safe access through to Shrewsbury Road. The site would not encroach further north east than the adjacent estate to the north west and will result in a defined limit to the development in the area. Developer who is legally committed to develop BNP035 has indicated an intention to commit to this additional site, should it become a preferred option, demonstrating deliverability.
A0272B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Confirmation that site is deliverable immediately and is adjacent to residential development and with safe access. It is considered this site represents the most suitable site for housing in the village. The site is well located adjacent to residential development and with safe access. It is also considered deliverable with developer interest - a legal agreement (subject to planning) has been completed with Shingler Group Ltd to purchase and develop the site. Concept layout plan prepared by Shingler Group Ltd indicating how 23 units of mixed house types including "affordable units" can be provided together with three areas of open space, one of which would act as a small village green is provided. A separate submission promotes the area of land immediately to the north east of the identified site for further development as a natural progression of the site BNP035.
A0299B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Support the settlement strategy for Shrewsbury. Recognise the need to consider constraints to development, but consider its important that the Local Plan does not preclude opportunities to bring forward residential development on brownfield sites in the flood zone, particularly where an acceptable design solution can be identified that will ensure that new housing is not at risk of flooding and risk elsewhere is not increased/reduced.
A0306B064	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	We are concerned about firstly, the proximity of this site to a SSSI and secondly, the lack of mitigation measures mentioned in the plan:
A0313B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Alternative site promoted - as a hub Ford should have more than one allocation (FRD011 should also be allocated).
A0314B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Alternative site promoted - but not named. For a medical centre and dentist
A0316B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The sprawl needs to end. Battlefield village is now encased by industrial development. Lion Coppice is the last remaining wild green space inside the A49. By allowing this development to spill out over the A49 it opens the floodgates to more development along the A49 and the A53. This development means that there can be no expansion of the capacity of the A49. With the proposed North West Road channelling traffic onto the A49 via the Battlefield Link Road from the Ellesmere Road Roundabout, the A49 (already prone to traffic jams) will need widening to accommodate this traffic. By building along the edge of it it's stopping the opportunity to solve this problem.
A0321B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Support the letter sent by Longden Village Action Group. This makes the following points. Object to Longden being a Community Hub. The settlement is half the size of the next smallest proposed Community Hub with only 135 dwellings. The Longden Village Development Statement, endorsed by the Parish Council, reflects the view that half the residents want to stay as a Community Cluster. The Hierarchy of Settlements is flawed as there is no weighting to reflect the size of services and its capacity to cater for additional residents. Feel less points should have been given to Longden by the Hierarchy of Settlements because they only have a mobile library, very small village shop which doubles as Post Office (but both get points), the pub is very small and only opens part time, the primary school and nursery are very small, superfast broadband is only available by satellite link, outdoor sports facility should be grouped with childrens playground, the 546 bus service does not allow for connections to other public transport in Shrewsbury and Longden does not have sustainable transport links to other nearby settlements. A lack of employment opportunities means residents have to drive to work so, development in Longden would generate significant carbon emissions - this is against government and Shropshire Council policy. Having Longden as a Hub will have a negative impact on the climate whilst staying as a Community Cluster means growth would be by infill and minimise carbon emissions. New development would result in loss of mature hedgerows and replacement ones will take time to mature, thus reducing carbon capture and storage. The Right Home Right Place survey indicated 18 houses were needed so residents feel the guideline of 50 (27 after consideration of completions since 2016 and existing commitments) is a betrayal of trust in the Council. Future Local Plan reviews are likely to add more houses: this engenders mistrust from those residents who have engaged with the Council so far. Residents fear that exception sites will be identified on an ad hoc basis and valuable agricultural land will be lost. If agricultural land around the village were developed, flooding from tributaries of the Reabrook will occur. Wish to remain a Community Cluster and not be a Community Hub.
A0326B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to any proposal to build new houses off Lyth Hill Road as such a development would lead to dangerous traffic conditions and a threat to public safety.
A0329B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The site is unsuitable for development as it is prime agricultural land. Agricultural land is essential for ecological, sustainability and economic reasons. This will become more acute after we leave the E.U. Building on this agricultural land compromises the ability of future generations to meet their own needs. This site is currently outside the development boundary. Extending the development boundary would adversely affect the character and identity of the settlement of Bayston Hill. Development of this site will also be detrimental to wildlife as it forms a green extension to Lyth Hill Country Park. Light pollution would be particularly detrimental to nocturnal wildlife.
A0330B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The site is unsuitable for development as it is prime agricultural land. Agricultural land is essential for ecological, sustainability and economic reasons. This will become more acute after we leave the E.U. Building on this agricultural land compromises the ability of future generations to meet their own needs. This site is currently outside the development boundary. Extending the development boundary would adversely affect the character and identity of the settlement of Bayston Hill. Development of this site will also be detrimental to wildlife as it forms a green extension to Lyth Hill Country Park. Light pollution would be particularly detrimental to nocturnal wildlife.
A0331B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	BAY039 should be removed from the draft Local Plan as: It is opposed by the local community, the previous Preferred Sites Consultation summary does not properly reflect this. It will result in unacceptable and dangerous increases to vehicles on Lyth Hill Road. There is no evidence of a comprehensive traffic survey having been undertaken, it had it would have noted existing traffic is considerable; numerous vehicles park on Lyth Hill Road obscuring vision - causing problems for pedestrians, cyclists, and vehicles (particularly large ones); a particularly obscured point is near the junction of Lyth Hill Road and Cornwall Drive/Clarkefields; and work on the A49 regularly disrupts traffic in Bayston Hill. These problems would be exacerbated by development of BAY039. Issues noted during the Preferred Sites consultation remain relevant, specifically: • The site is located beyond the current development boundary. • The level of traffic arising from development on surrounding unsuitable roads including Lyth Road. • Additional traffic will deter non-motorised users accessing the Country Park. • The site doesn't accord with the aspiration of the Bayston Hill Community Led Plan (2028) which desires small housing sites spread around the village and retention of the gap between Bayston Hill and Shrewsbury. • The site is remote from and has poor road access to most of the existing facilities in Bayston Hill. • Better alternative sites exist at the area to the northwest of BAY039. • Planning permission has already been refused for good reasons. • Would result in the loss of greenfield land.
A0345B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Hierarchy of Settlement Para 5.234 the criteria for designating hub status has been misapplied - querying the allocation of points for the size of the amenity space, bowling green, Library, Public Transport Forms 1 - 4
A0345B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Oppositor to building on site FRD011 - lack of infrastructure the village lies in a conservation area, is an ancient ridge, is a designated mineral safeguarding area, biodiversity present in and adjacent to the proposed site, following the recent housing needs survey the results found the demand for housing in Ford to be low with difficulty letting the recently built affordable housing Forms 5 - 9
A0346B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Hierarchy of Settlement Para 5.234 the criteria for designating hub status has been misapplied - querying the allocation of points for the size of the amenity space, bowling green, Library, Public Transport Forms 1 - 4
A0346B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Oppositor to building on site FRD011 - lack of infrastructure the village lies in a conservation area, is an ancient ridge, is a designated mineral safeguarding area, biodiversity present in and adjacent to the proposed site, following the recent housing needs survey the results found the demand for housing in Ford to be low with difficulty letting the recently built affordable housing Forms 5 - 9
A0347B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Regarding the recent plan review letter of objection sent to the Shropshire council by Longden Village Action Group. confirm total agreement with these views addressed in the letter of objection, which are widely shared by many locals.
A0349B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree on designation of Ford as a community hub. Believes the calculation of points has been misapplied. Not an adequate bus service, no bowling green and restaurant is outside the village. Ford has suffered from over development and contrary to national policy.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0350B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree on designation of Ford as a community hub. Believes the calculation of points has been misapplied. Not an adequate bus service, no bowling green and restaurant is outside the village. Ford has suffered from over development and contrary to national policy.
A0351B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Regarding the recent plan review letter of objection sent to the Shropshire council by Longden Village Action Group. confirm total agreement with these views addressed in the letter of objection, which are widely shared by many locals.
A0364B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Longden should remain a Community Cluster and not become a Community Hub. Longden cannot support more houses. The roads cannot cope with more vehicles or pedestrians. Residents want the village to remain peaceful and quiet. Development will destroy the way of life in the village. The character of other villages and towns has been destroyed by sprawling development and associated vehicles
A0374B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wattlesborough is wholly sustainable with shops, school, village hall, employment and direct access to the A489 Trunk Road It is extremely frustrating to see the Parish Council maintain their open countryside status. A mixed residential development on WAH009 would ensure that young and old residents are able to stay in the village and contribute to the community. WAH009 is available and could come forward for development immediately
A0375B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wattlesborough is wholly sustainable with shops, school, village hall, employment and direct access to the A489 Trunk Road. It is extremely frustrating to see the Parish Council maintain their open countryside status. WAH012 is available and could come forward for development immediately.
A0377B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disappointed Halfway House is being classed as open countryside. The Parish Council should consider the benefits of Community Hub or Community Cluster status, especially given the availability of a superb road network, shops, school, employment etc. Site HYH004 is available and it can come forward immediately for development.
A0378B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disappointed that sites STA005 has been identified as not having 'long term potential' for residential development within the SLAA. The site is available, adjoins existing built form within the settlement of Stapleton, with an established access to Council Road, is flat and wholly sustainable by virtue of Stapleton being part of a Community Cluster and as such presents a logical and suitable site for a modest residential development. Further evidence and layout plans can be provided as required.
A0379B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Pleased to note that BIT015 has been identified as having Long Term Potential for residential development within the SLAA. Consider that the sites could be considered to have short term potential as The land is currently available. Adjacent land has recently been the subject of residential development. The site is deliverable. The site adjoins existing development (to its north) is level, brownfield and easily developable. It performs 'fair' within the SA, which is better than many of the sites in Bicton. The site has direct access onto Bicton Lane which in turn leads to Holyhead Road. Further evidence and layout plans can be provided as required.
A0380B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disappointed to see that site MFB003 is classed as not having long term development potential. This site is ready for immediate development.
A0382B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Pleased to see site NES012 is identified as a long term potential SLAA residential site. We feel the site should be considered for short term potential due to availability, deliverability, accessibility and sustainability having achieved a fair status rating and could be delivered in a two phase approach. We are keen to offer the site for mixed residential development. Site plans attached.
A0392B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Risk(s): The provision of a new Medical Centre has been identified as a priority by Baschurch Parish Council to support the development within the village and catchment area of the existing surgery, with work progressing on development of a Business Case. The provision of a road from Station Road to Eyton Lane has been identified as a priority by Baschurch Parish Council to alleviate the congestion and safety issues adjacent to the schools in Eyton Lane. Comment(s): The following to be added to support the proposed New Medical Centre: "Land has already been allocated through a 106 Agreement to support a new Medical Practice which is to be further supported by the requirement to allocate additional land to this project from the adjacent allocated site. The provision of a new Medical Centre is a priority for the residents of Baschurch and the catchment area of the existing Surgery due to the significant existing and planned development within the catchment area." The following to be added to support the link road: "A link road, suitable for use by coaches, between Station Road and Eyton Lane is a priority to alleviate the traffic and safety concerns adjacent to the schools in Eyton Lane. Any future development in adjacent sites will need to contribute towards this
A0392B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Risk(s): That the statement that Shrewsbury is the primary focus for new development in the County will be read across to the Community Hubs, Community Clusters and the Countryside within the Shrewsbury Place Plan area. These should be developed with the same priority as all other similar areas with the County. Comment(s): There is a risk that the whole of the Shrewsbury Place Plan will be deemed as the primary focus for new development instead of just the town itself as the strategic centre. The wording needs to be made clearer to prevent the whole place plan area being subject to a priority within the County.
A0392B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Risk(s): Experience has shown that numbers are being treated subjectively and the addition of the word "around" makes that even more subjective and open to interpretation to a much higher number. There is already the ability for the numbers to be increased through a process in SP6, so there is no need for an approximate value in this table. Comment(s): The settlements' residential guidelines show for Baschurch "Around 360 dwellings". The term "around" is too loose and open to a very wide interpretation without any limit in the upward direction. It is accepted that the Residential Guideline can be exceeded but this is in accordance with SP6 Paragraph 3 where additional considerations need to be addressed. Therefore, there is no reason for the word "about" or "approximately" to be used and a firm number will ensure that the requirements of SP6 Paragraph 3 will apply at that number and not at 110%, 120% or whatever number can be subjectively applied by an applicant at the time.
A0392B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Risk(s): That a solution to the junction onto Shrewsbury Road is not adequate for the traffic from the current and allocated development sites accessing Shrewsbury Road. Comment(s): The Development Guidelines state "All necessary highway improvements, including to the main access junction onto Shrewsbury Road will be undertaken." To make clear the improvements required, this shall include "....., where at least a mini roundabout shall be provided."
A0392B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Risk(s): That a solution to the junction onto Shrewsbury Road is not adequate for the traffic from the current and allocated development sites accessing Shrewsbury Road if BNP035 is developed before BNP024. That there is no community benefit from this site so therefore the provision of affordable housing should be increased to 20% instead. Comment(s): The Development Guidelines state "An appropriate highway access will be provided and all necessary improvements to the local highway network implemented." Should BNP035 be developed before BNP024, then the road improvements to the main access junction onto Shrewsbury Road shall be undertaken, where at least a mini roundabout shall be provided. This site allocation has no other community benefit within the guidelines and therefore a requirement for a minimum of 20% affordable housing in accordance with DP3 shall be provided on this site, even if this means enlarging the site to accommodate the additional Affordable Dwellings only. We appreciate that the target in DP3 is 10% in the north and 20% in the south, but we would like to ensure 20% in the north where no other community benefit is being provided
A0392B16	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Risk(s): To provide an additional allocated site within the already allocated Residential Guideline. Comment(s): This site is in the area of what was BAS034 in the previous plan period. Still being reviewed, to be presented at Parish Council Meeting 5 October 2020 and submitted separately. Note we have an informal extended deadline to accommodate our further work in this area. The submission will include a comment to stipulate the area allocated to parking for the station should be conditioned in S106 to be available for the duration of the plan period (2038

Page 310

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0415B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I am writing to say that I agree in its entirety with the "Objection from the Longden Village Action Group" to the "Shropshire Council Local Plan Review". I also agree with the "Longden Village Development Statement 2017-2027". 1. Also, connecting Longden to the rest of Shropshire are very poor. I understand that the best road, which is the main Shrewsbury road, was downgraded by the council in the 1960s to no longer be a B road. There are many blind corners on this Shrewsbury Road. This is a dangerous road. A little North of Hook A Gate is a weak railway bridge that it is not recommended to drive large lorries over. I understand that this Shrewsbury Road cannot be improved by for example building bypasses because it runs within a narrow valley. Longden is a gateway to the Shropshire Hills and so road building here is much more difficult and expensive than it would be in the North Shropshire Plain. Many people in Longden do not work in Shrewsbury because of the limited job opportunities there. Instead they work in Telford or Wolverhampton or beyond. The most important road out of Longden is the single track road to the A49. With increased traffic in recent years I have met far more oncoming cars on this road than I used to. This bottleneck would become much worse if a significant number of new houses was built in Longden parish. This road emerges onto a hill on the A49 with poor visibility of cars travelling North on the A49. It is not a good spot for a new improved road to emerge onto the A49. I do not believe that it would be viable to build more than a the number of houses proposed in the Longden Village Development Statement without a dramatic and expensive improvement to the roads around Longden. 2) The last bus from Shrewsbury to Longden is at 18:05 and the first bus from Longden in the morning is at 08:10. I believe that even for someone working in central Shrewsbury it would not be possible to commute to and from Longden using the bus service. Leaving work early each day at 17:30, especially if you had not got in until 09:30 that morning, would be unacceptable to most employers. For a commuting bus to be viable, the last bus would need to be at 19:00 or later. Commuting to a more likely centre of employment such as Telford would of course be impossible using the Longden bus service. 3) A number of "facilities" around Longden have been awarded a points score similar to that of Pontesbury to justify Longden also being defined as a hub for house building. Pontesbury Library is open for 4 days a week, including Saturday. The library bus that turns up infrequently in Longden offers a much poorer service. Similarly the opening hours for Longden shop are much shorter than those for the Coop in Pontesbury which unlike the shop in Longden has a good range of reasonably priced products. The Tankerville Arms in Longden seems to only be open erratically due to a lack of customers. I suspect that it will shut. Similarly the Church (when it was open) did not have weekly services. Annscroft Church is the only well attended Church in this group of parishes
A0423B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Condoover should be a Hub
A0423B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Policy 16.2 put forward in the Plan Review omits to include this significant settlement from the list of proposed Community Hubs in the Shrewsbury Place Plan. Condoover is a significant settlement in the rural area south of Shrewsbury and this proximity makes it more important that it should deliver a mix of housing based on identified land allocations in the Local Plan. We disagree with this omission. In our view it is not correct to rely on a Neighbourhood Plan given the clear housing need for the types of housing identified in the HNA.
A0439B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to proposed allocations BNP024 & BNP035 and consider BNP021 would represent a more preferable allocation. BNP021 is located adjacent the Corbett Secondary School, Pre-School, Baschurch Village Hall and Sports fields. It could be developed to accommodate the proposed housing growth for Baschurch, replacing the proposed allocations (BNP024 & BNP035). BNP021 would form a natural and logical addition to the built form of the village/committed developments and allowing comprehensive development and a 'rounding off' of the settlement. It performs 'good' within the SA and had 'long term potential' with the SLAA (consistent with the proposed allocations). It is considered misleading that the full extent of committed developments are not included within the development boundary. The committed residential sites to the north, afford the opportunity for access and linkage, thus limiting the impact/congestion on Eyton Lane and providing an opportunity to improve traffic links to Station Road. BNP021 could be phased to deliver across the plan period. BNP021 is largely void of substantial landscaping and has low ecological potential (owing to them being in active agricultural use). As such there is potential to enhance and improve the landscape and biodiversity of the site and its surroundings. BNP024 & BNP035 are too remote from core facilities of the village and can't provide the localised road network betterment that development of BNP021 can. The Parish Council are keen for ned development to deliver tangible community benefits. BNP021 affords the opportunity for improvements to Eyton Lane, which is busy with school traffic (both pedestrian and vehicular).
A0450B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Biton Parish Council object to scale of housing development in Shropshire and proportion of housing in Shrewsbury due to impacts on environment and urban infrastructure specifically the page 6, para 2.2 - proposed scale of housing development increases dependency on private vehicles and is not consistent with objective to achieve net zero carbon economy page 6, para 2.5 - housing requirement for over 30,000 dwellings is excessive (equal to 20% of current 138,000 households in Shropshire) page 8, para 2.19 - Local Transport Plan should have been deposited with the Local Plan to help assess the transport impacts of the scale of development page 10, para 2.25 - Infrastructure Plan should have been deposited with the Local Plan to help assess whether social and other infrastructure had been adequately improved before development commence
A0450B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Policy S16.1 and para should not require Shrewsbury and the surrounding rural area to achieve such a disproportionately large quantity of the housing development proposed in Shropshire. Shrewsbury could become so densely populated and developed that it deters further business growth and inward investment. In para 5.222, the development and infrastructure provision for Site SHR057/SHR177 cannot realistically be presented as necessary to support improvements to Shrewsbury's green infrastructure. In para 5.223 the detailed masterplanning of this development will also require a strategic planning input and investment from the local authority to avoid any adverse impacts from this development on Shrewsbury. The development guidelines for this site should also address the following impacts of the proposed housing development: 1,500 dwellings will accommodate over 2,500 private vehicles which will conflict with traffic on Mytton Oak Road especially ambulance movements traffic from the development will increase movements on the A5 by-pass and is likely to exceed existing capacities of some roundabout junctions and it is difficult to see how planned road improvements could mitigate for the growth in traffic movements the impacts on social and other infrastructure in the west of Shrewsbury should be mitigated by both site SHR057/SHR177 and by site but this latter development does not appear to be providing any additional infrastructure investment:
A0451B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Longden should not be designated as a Community Hub. The infrastructure of the village can only support a small number of new houses and cannot support the larger scale of development being proposed in the village.
A0455B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Development of BAY039 will result in the loss of agricultural land with an environmental value that is of value to the country. Where new housing is required it should be built on brownfield land. New housing on Lyth Hill Road will increase traffic use along this road (used to relieve flows along the A49) which is already heavily used and affected by speeding. This traffic will also increase volumes at the A49 junctions in Bayston Hill and at the Lyth Hill junction north of Dorrington. These traffic impacts will also be driven by residents accessing local services. The development of BAY039 will also increase pedestrian movements along Lyth Hill Road, increase the flood risk and impact on the capacity of local services. The development on this land has already been refused and this proposla must show how it is different, improved or better.
A0455B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Development of BAY050 which includes BAY012 The Glebelands will result in the loss of amenity land with habitat. Plans submitted for plannign approval for these sites indicate the proposed development provide only limited open space and a replacement vicarage whereas Bayston Hill still has a functioning vicarage. This will increase traffic at the heavily used and dangerous A49/Lyth Hill Road junction and increase demands on local services with limited capacity. Development and the increasing population in Bayston Hill will forever alter the character of Bayston Hill.
A0477B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to designation of Longden as a Community Hub as the village should remain a Community Cluster. In the Settlement Hierarchy assessment of Longden - the public house is struggling to remain open following recent temporary closures and broadband and mobile phone not-spots affect the village. School Lane in Longden is an unadopted, single lane road affected by inadequate passing places, severe flooding, increasing through traffic, increasing services vehicles to the Golden Arrow Court business park, traffic volumes damage roadway servoces including watrer pipes and further development will affect amenity uses along the lane.
A0488B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I object to any Development on the land bounded by Longden Road to the west, the A49 to the east, the A5 to the south and the southern edge of Meole Village (Washford Road, Pendle Way, Milnthorpe Close and Waterside Gardens). This land should be designated 'open Countryside' and not subject to development, without full consultation with Meole Residents. I object to the Development on SHR 145 unless this includes additional vehicular access to Meole Brace Retail Park, sufficient to fully relieve traffic congestion on the Park and also to facilitate walking and cycling, consistent with Government Strategy (Strategy for Investment in Cycling and Walking 2017) and the recent update (Feb 2020) plus The Low Traffic neighbourhood and Shropshire Climate. Partnership Strategy (due for publication December 2020). The Meole Traffic Group requests a Professional Assessment of the provisions for traffic, including cycling & pedestrians for the Meole Area & adjacent roads and parking, as part of this review, to include consultation with Residents at all stages, including Terms of Reference, Scope of Assessment, publication and implementation. I formally request a review of the Meole Community infrastructure, including the need for a Doctors' Surgery or satellite of existing Surgery, Pharmacy provisions & a modern Community Centre immediately.I formally request that Shropshire Council should facilitate a Local Neighbourhood Plan for Meole, as it is an ancient village with fewer Community Facilities than neighbouring Wards, with multiple recent Housing Developments impacting on Meole, including traffic issues, and there is a pressing need to implement several Government Papers and both National and local Initiatives, including (among others) those described in Paragraph 2 of this page
A0501B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Paragraph 5.224 It is incompatible with the council's own declaration of climate emergency to make planning decisions that will increase carbon emissions. New roads bring more traffic as a result of the induced traffic effect. More cars and more car journeys results in more fossil fuel being burnt, and there is the carbon from the building and maintenance of the road, plus carbon sequestration lost in the destruction of habitats to make way for the road. Transport carbon emission are rising in Shropshire and now stand at 37%. This local plan needs to contain targets in every sector for % reduction in CO2 emissions year on year. As a direct consequence, the proposal to build a North West Relief Road is incompatible with a climate emergency and the requirement to reduce the county's carbon footprint. The large amount of tax payer money that the council has committed to this road should be spent on carbon reduction projects throughout the county. £17 million could be wisely spent in ways that benefit the whole county and genuinely support efforts to mitigate climate crisis. I disagree with paragraph 5.224 because the NWRR proposal should be abandoned. https://bettertransport.org.uk/roads-nowhere/induced-traffic
A0509B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Development of 125 new households in Ford contradicts the Council's stated aims on climate change and the environment 1. Ford does not have a regular bus service – and none at all in the evening and on Sundays 2. Ford no longer has a railway station 3. Ford does not have any local industry People moving to Ford, if they work, will need to drive to Shrewsbury or beyond, and return in the evening. ONS statistics show an average of 1.3 vehicles per household. 125 new dwellings will yield 162 new vehicles in the village. This is probably an underestimate because all working age people who move to Ford will need to drive. If environmental protection and tackling climate change were to be taken at all seriously by the Council, it would site new development near transport hubs and places of work
A0509B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagrees with Ford classification as a hub and questions scoring given to some services in Ford.
A0509B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to allocation of the site as 1. Lower Farm has been the centre of the village for centuries 2. It is home to bats, swallows, crested newts and many other endangered species 3. It is in the Ford 'Conservation' area Any building, other than for farming and improvement should never be allowed on this key environmental site at the heart of the village. Any attempt to build on it will meet with the strongest opposition at both local and national level
A0509B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concern that there are insufficient school places at Ford Primary school to accommodate increase in pupils from the new housing being proposed
A0513B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Supports proposed Development Boudnary, but would also be appropriate to include the MB park and Ride site within the dev boundary as a natural extension.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0513B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	MD&DP support the Council's approach of identifying Shrewsbury as the primary focus for new development within the County. This focus of growth would aid in meeting Shropshire's Strategic Objective of continuing to maintain Shrewsbury as the County's Strategic Centre and develop it into a sub-regional centre. Shrewsbury is already well established to manage the expected housing and economic growth and should be the focus of new homes, new jobs, further retail and leisure and where necessary infrastructure improvements. This is considered the most appropriate and sustainable area for the County to grow and MD&DP support the Council's approach to implementing this through the Reg 18 Local Plan.
A0513B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	MD&DP further supports the Council's allocation of Land to the south of Meole Brace Retail Park as Site SHR145 as a housing allocation within the Reg 18 Local Plan. It is considered that this site represents a sustainable location and should be kept as an allocation for new housing site with the capacity to include extra care/assisted living facilities. Notwithstanding the recent refusal of this site at planning application stage (19/04389/OUT) the application process established (and officers accepted) that there were no technical reasons why the site couldn't come forward for residential development. There were no technical objections from any Council Department nor any Statutory Consultee. No specific issues raised by highways, regulatory services, flooding and drainage, or archaeology, ecology and trees. The allocation is deliverable in the short term. In addition, as part of the planning application it was agreed that the development of the Site would provide a number of public benefits. However, would like to see site guidelines amended to... "Vehicular access will be provided off Hereford Road to serve the development and the adjacent park and ride site. Any mature trees, hedgerows and priority habitats will be retained and where appropriate be enhanced and expanded to form part of the green infrastructure network. Acoustic design, layout, green infrastructure and appropriate building materials will be used to manage noise arising, including from the adjacent Meole Brace Retail Park, Hereford Road, A5, the railway line and the Park and Ride. This will need to follow Good Acoustic Design principles set out in ProPG and associated supplementary guidance. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."
A0518B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The Council appears to have removed the community cluster status of Uffington without justification. This is all the more surprising in the circumstances that the SAMDev housing requirement for Uffington has not been delivered by the development of the allocated UFF006/10 site which has only provided a single dwelling. It is Les Stephan Planning's client's view that development status of Uffington should remain as a "cluster" with further sites being allocated to address the shortfall in delivery since the SAMDev was adopted and meet the growing need for the different types of housing identified in the NPPF and the draft Local Plan (Policies DP1 – DP7). This will become increasingly important if the revised housing methodology for Shropshire becomes national policy in late 2020
A0520B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Objects to designation of Longden as a hub. Further development should also be avoided as the road access to Longden is narrow and would create more traffic passing Meole and Priory schools in Shrewsbury; other small local roads are regularly used by large agricultural vehicles and not suitable for commuter traffic. Longden only has a limited number of services and parking for these is limited. Longden also has lack of employment opportunities and people would have to commute out of the village
A0526B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Proposes sites BNP033/BNP040 for housing allocation on the southern edge of Baschurch in Prescott further to the landowners submission to the Strategic Land Availability Assessment. BNP040 contains an equestrian centre with stables, menage and paddocks adjoining a single residential property fronting onto the B5067 and is contiguous with adjacent paddocks under BNP033. A planning appeal decision is submitted for a similar land use in Lavendon near Milton Keynes in Buckinghamshire. In the decision, the Inspector concludes an equestrian centre and the related paddocks may all be regarded as previously developed land. In the context of NPPF test of sustainable development, planning permission was granted for the redevelopment of the lands for housing. It is suggested BNP033/BNP040 also be allocated for housing development on the same grounds.
A0538B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Cross Houses should remain a Hub. Cross Houses has had enough house building in recent years. Cross Houses' residents should have had the option to remain as Open Countryside. The points scoring is flawed – only have mobile library, only 1 children's playground, 1 amenity green space, the outdoor play facility is just a field. The Inspector should inspect all the facilities to determine whether SC is correct.
A0557B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with Ford becoming a Community Hub as it doesn't have the infrastructure or amenities to support 125 new houses. Don't believe that the overgrown bowling green can be classes as a sports facility. Ford lies within a conservation area. Local housing survey 2019/20 showed demand for new housing is low. Also the site allocated for 75 dwellings FRD011 is an ancient ridge and furrow field that should be protected. Development on this land conflicts with DP24. This land should be protected.
A0571B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Support allocation of site SHRD60 Hanwood Road Shrewsbury, along with neighbouring SHR158 and SHR161 which form a sustainable location for future development. Initial designs for the site suggest it can accommodate 439 properties, along with 0.5ha of employment land and a green wildlife corridor. Proposals for a local centre, medical centre and increased education capacity in this area of Shrewsbury will in close proximity to this site and easily accessible via sustainable forms of transport including walking and cycling. Highways reports indicate that Hanwood Road will provide adequate access to new development on the site. Whilst the SC viability study list the site as marginal we believe this is a worst case scenario and would welcome further discussion with SC on this matter. We consider the site is deliverable and viable within the plan period
A0572B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	The majority of the site allocation (SHR158) is promoted for development by CEG who are a strategic development and investment company operating across the UK. CEG have been leading discussions between the two other landowners forming the draft allocation; Mr Roger Parry (on behalf of Davies Parry (Oakfields) Limited Site SHRD60) and Shropshire Council (via their Estates Team Site SHRD61). CEG confirm that the proposed site allocation is both viable and deliverable. We have extensively reviewed the policy requirements and 'Development Guidelines' provided in respect of the Site's allocation in the Regional 18 Pre-Submission Draft Shropshire Local Plan and do not anticipate any issues in the Site's deliverability or viability in this respect. Notwithstanding the above, we would welcome the opportunity to discuss the assumptions made within the Study. The Study makes various assumptions regarding the delivery of the allocation, in particular a £17.38m cost of abnormal site infrastructure costs, which the Study's author states is a high level assumption provided by the Council. It would be most helpful to CEG to understand the assumptions behind this cost in more detail, and we would welcome a process of engagement with the Council over the coming months. CEG confirm that the assumptions made with regards to the timescales for the delivery of the proposed site allocation are correct, given the scale of the development proposed. In respect of deliverability CEG are committed to bringing forward an outline application as soon as possible and in advance of the Examination in Public. Some early discussions with housebuilders have taken place and it is expected that a proportion of the site will be available early in the plan period. Naturally, a site of this scale will be phased, and a phasing plan will form part of the outline application.
A0598B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wishes to see Cross Houses designated as Open Countryside, not a community hub; concern Parish Council are not objecting to designation as a hub; concern about points given in hub status for library, playground, green space and outdoor sports facility
A0600B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Community consultations in Ford have shown that the general population do not support high growth in housing in the village. Greater consideration of community wishes should be reflected in the designation of Ford as a Hub
A0637B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I am local to Longden and have lived in the Parish all of my life. I wish to write and tell you that I strongly agree with the objections that have been sent to you by the Longden Village Action Group. I feel certain my views are shared with many in our Rural community.
A0639B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Ford being a Hub. Quail Ridge Amenity Green Space wrongly includes the play area and Advanti LPG gas tanks: the correct area is 0.19ha therefore 3 points should be deducted. The bus service arrives at 6.08pm and a service not in the parameters of the village arrives at 4.52pm; deduct 5 points. The outdoor sports facility is not publicly accessible and is subject to a planning application for storage: deduct 1 point. The library service is restricted and not accessible - 1 visit every 2 weeks for 20 minutes: deduct 1 point. Ford lies within a conservation area. Points have been wrongly allocated to "Make" the criteria suit. The criteria has been implemented to suit the Council not the residents. Soils within Ford as classed as good to very good and should remain as agricultural land. Ford is designated as a mineral safeguard area this conflicts with SP13. Field FRD011 is an ancient Ridge & Furrow field and this loss would conflict with Policy DP24. The loss of FRD011 would have detrimental impact of the local biodiversity especially the loss of hedgehogs and other hedgerow wildlife. The local Housing Survey reported a low demand for new housing with a lack of rental take up on existing properties. Field FRD011 lacks the infrastructure connections to facilitate a high density development. Access to the main road at peak times is difficult especially making a right turn towards Welshpool. Trinity School has no room for expansion for the development of Cross Gates Meadow. The 75 proposed dwellings would produce many more than 1 child Existing residents' children would be forced out of local education. Existing residents' mental health will be impacted as a result from building noise, builders working weekends, Builders working past 5pm, loss of privacy to rear gardens, loss of privacy to windows facing field FRD011. Loss of public footpath/common land as this has been used for many years as a green space. 75 houses is not low density this should not be allowed a figure of below 50 should be considered if at all. Access at peak times along Butt Lane does not support development, building or construction traffic. Loss of community.
A0641B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about infrastructure, lack of open space and play facilities, lack of bus routes, school and medical facility and community room to serve the additional population. Developments should be built in parallel with essential infrastructure. Green networks are essential (DP13 & DP15) so existing boundaries around site 060 should be retained. Full public consultation should be carried out on the master plan before finalising proposals.
A0642B50	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The case for the NWRR is weak. It should be omitted from the Local Plan unless a revised business case and carbon assessment shows that it still makes economic and environmental sense. The Shrewsbury Place Plan Appears to allow commercial development but not residential in the area west of Ellesmere Rd but this is not clear. 10a: The reinforcement and enhancement of the local and strategic highway network: Investment in roads is not consistent with the Climate Emergency or Net Zero CO2 target. Shrewsbury Integrated Transport Strategy, the Big Town Plan Movement Strategy and the Shropshire Local Transport Plan: None of these documents are available for the consultation and it is not clear how they support or are supported by the NWRR
A0642B51	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	This seems to get the green light assuming NW road built – but traffic won't be included in NWR assessment. This needs to be included as understanding cumulative impacts of developments is essential.
A0642B53	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Para 5.224 The traffic implications of SHR173 need to be included in the NWRR traffic modelling to assess cumulative impacts.

Page 312

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0651B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Petition objecting to the identification of Ford as a proposed Community Hub and the proposed allocation of FRD011.</p> <p>258 (84.9%) of dwellings responded and 46 (15.1%) were not at home/unoccupied. Of those available:</p> <p>2 (0.8%) were in favour of Ford being designated as a Community Hub and the subsequent housing development.</p> <p>15 (5.8%) refused to sign for other reasons.</p> <p>241 (93.4%) were in support of this petition.</p> <p>The results of the petition clearly show overwhelming support for its aims and objectives.</p> <p>Consider that the criteria for identification of Ford as a Community Hub are incorrect as:</p> <ul style="list-style-type: none"> -Amenity Greenspace at Quail Ridge: If the gas tank and play area (already allocated points) are excluded, then the amenity area is below the size threshold of 0.2ha. Meaning a reduction of 3 points. -Bus Service: There is no return service arriving between 3 and 6pm, it arrives at 6:08pm. There is one bus that arrives in Ford parish at 4:52pm but it only stops opposite the Smoke Stop, now within the parameters of the village/development boundary and not within a reasonable walking distance of the village. Meaning a reduction of 5 points. -Outdoor sports facility: The redundant bowling green is overgrown and not accessible to the public. Planning Application for storage units pending consideration. Meaning a reduction of 1 point. -Library: Mobile library for 20 minutes once a fortnight should not be allocated 1 point less than a permanent library open 6 days a week, as it is a far more limited service. <p>Object to identification of Ford as a proposed Community Hub and proposed development for the following additional reasons:</p> <ul style="list-style-type: none"> -The village lies within a Conservation Area (limiting potential for infill and potential harm to the character of the Conservation Area). -Soil types within and surrounding the area are good/very good (Grade 2 and 3) for agricultural use. -Ford is designated a Mineral Safeguarding Area and proposed development conflicts with draft Policy SP13. -FRD011 is an ancient Ridge and Furrow field that should be protected. Its proposed development conflict with draft Policy DP24. -The required Environmental Impact Assessment will highlight biodiversity present in and adjacent to FRD011 that should be protected. -A Local Housing Survey undertaken in 2019/20 showed scale of demand for new housing was low. This highlighted that it has been particularly difficult to find tenants for the recently completed affordable housing at Cross Gates Meadow (32 dwellings). Officer observed the results of this survey did not provide much evidence for a big increase in development. -Ford is a rural village that lacks infrastructure to support the level of extensive development resulting from Community Hub status. Concerned that if identified as a Community Hub, this status will be permanent and lead to development beyond the development boundary in the medium to long term.
A0652B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	agree in principal with some considerations - ensure that the wildlife pond is protected - consider green corridor. increased traffic along squinter Pip Way and Red Deer Road. consider parking and increased road traffic
A0674B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Object to Longden being a Community Hub.</p> <p>The settlement is half the size of the next smallest proposed Community Hub with only 135 dwellings.</p> <p>The Longden Village Development Statement, endorsed by the Parish Council, reflects the view that half the residents want to stay as a Community Cluster.</p> <p>The Hierarchy of Settlements is flawed as there is no weighting to reflect the size of services and its capacity to cater for additional residents.</p> <p>Feel less points should have been given to Longden by the Hierarchy of Settlements because they only have a mobile library, very small village shop which doubles as Post Office (but both get points), the pub is very small and only opens part time, the primary school and nursery are very small, superfast broadband is only available by satellite link, outdoor sports facility should be grouped with childrens playground, the 546 bus service does not allow for connections to other public transport in Shrewsbury and Longden does not have sustainable transport links to other nearby settlements.</p> <p>A lack of employment opportunities means residents have to drive to work so, development in Longden would generate significant carbon emissions - this is against government and Shropshire Council policy. Having Longden as a Hub will have a negative impact on the climate whilst staying as a Community Cluster means growth would be by infill and minimise carbon emissions.</p> <p>New development would result in loss of mature hedgerows and replacement ones will take time to mature, thus reducing carbon capture and storage.</p> <p>The Right Home Right Place survey indicated 18 houses were needed so residents feel the guideline of 50 (27 after consideration of completions since 2016 and existing commitments) is a betrayal of trust in the Council.</p> <p>Future Local Plan reviews are likely to add more houses: this engenders mistrust from those residents who have engaged with the Council so far.</p> <p>Residents fear that exception sites will be identified on an ad hoc basis and valuable agricultural land will be lost.</p> <p>If agricultural land around the village were developed, flooding from tributaries of the Reabrook will occur.</p> <p>Wish to remain a Community Cluster and not be a Community Hub.</p>
A0682B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I am concerned yet again regarding the possibility of Longden village becoming a "hub" for housing development. Longden is on a B road and the already difficult traffic flow will only get worse and more dangerous. The road network in and around Longden does not support Longden becoming a "hub". Longden is surrounded by public footpaths, some of which will disappear if village be one a hub. Not only will recreational enjoyment be curtailed, the visual, and noise impact will be substantial to the village. The government is actively encouraging people to get fit and walk locally, but this development will significantly limit this.
A0684B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Opposes the designation of Longden as a hub settlement, and questions the scoring process of the hierarchy of settlements document - including why Longden is allocated 3 points for a library when its only a mobile, the same as Pontesbury which has a permanent new library
A0686B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Oppose allocation of BAY039. The site was turned down only three years ago. Shropshire Councils own criteria suggests BAY040, BAY042, and BAY048 are available and score as well or better in the Sustainability Appraisal and Site Assessment Environmental reports. Access to the site is poor and there are already issues with speeding on the road. Access from the A49 to the road to the site is also poor, and when accidents occur on the A49 this road is used as a cut through. Flooding on the site is a concern and drainage in the area could not cope with further increase in water. Bayston Hill Parish Council does not support the allocation of this site. Designation of Bayston Hill as a "preferred development area" and changing the boundary seems underhand and has not given people without social media information an issue. Consulting during a pandemic means people haven't been able to meet to discuss the process
A0686B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Other sites in Bayston Hill are more appropriate and better meet the Sustainability Appraisal and Site Assessment Environmental criteria; disputes that the site is within easy walking distance of the GP and shops services school and other facilities. The sites proximity to the Lyth Hill Country Park is also an issue that seems to have been overlooked. Concern that the site won't provide enough off street parking and excess cars will block up Lyth Hill Road affecting access to Lyth Hill for walkers, cyclists and horse riders
A0694B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Support objections to the identification of Longden as a Community Hub by community groups. Longden is only served by one relatively small road from Shrewsbury to Bishops Castle, going North to South and two small single track roads going East to West. Traffic on the North to South road is already restricted by having to pass through the village of Anncroft where many Properties have no off-street parking, resultant on-street parking at times causes vehicles to be held-up waiting to pass. Further development at Longden, one mile away would only exacerbate the problem.
A0716B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Longden should not be a Hub - roads a poor/narrow, limited pub access, limited library access, shop & post office are one building, broadband only available via satellite link.
A0717B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Roads are narrow and dangerous with school children - more houses will exacerbate this problem, the Shrewsbury-Longden road does not merit even a 'B' road status,
A0838B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	My comments relate to two issues connected with sites SHR 161, 158 and 060.1) Whilst I disagree with the scale of development proposed in the Local Plan in general, and these sites in particular, some development will inevitably take place in this part of Shrewsbury. Shropshire Council needs to ensure that it does not make the same mistakes that it made in the current DanlvsWalk/Bowbrook housing areas where it has allowed extensive housing to be built without ensuring that the necessary infrastructure was built at the same time. I refer in particular to proper footpath access to reasonable amounts of open space; to the lack of any play facilities for children; to the lack of a bus route; and to the lack of a school, medical facilities or community building to serve a population that is considerably greater than many of Shropshire's larger villages. It is within the control of the planning system to place conditions on planning consents to ensure that large scale developments are built in parallel with essential infrastructure. The draft Local Plan has a raft of policies dealing with these issues. but the policies are of no value if they are not used and enforced. Be bold, and don't let it be just another housing estate! 2) My second comment is more specific. It will need to be realised through the eventual Master Plan but is still relevant to this consultation. There is a need to ensure that extensive green networks and corridors are created for wildlife and to maintain open views, and this is reinforced in Local Plan policies DP 13 and DP 15 in particular. There are several swales and water features that run through the existing Darwins Walk/Bowbrook housing areas, and these, together with hedgerow continuity, offer the opportunity to make continuous habitat links which allow wildlife to flourish. In one area in particular there is the opportunity to create a network from the existing open space of the Community Woodland and ancient wells at Nobold Lane, across the A488 Hanwood Road, and along the line of the current water feature north of Violet Grove and Red Deer Road. Site 060 is adjacent to this area, and to fulfil the corridor concept it would be essential to keep the boundary of any building on this site well to the north of the current water area and nearby hedgerows. It would be very helpful if the Council could ensure that a full public consultation is carried out on the Master Plan before any of its proposals are finalised.
A0857B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Opposes inclusion of Valeswood, Great Ness, Little Ness and Hopton as a community cluster. Area has already had extensive development in the last 5 years, and significant development is planned in nearby Nesscliffe and Baschurch, and two large poultry farms have also been developed in the area. The road network is not suitable for increased levels of traffic and is also heavily used by large farm vehicles and HGV's. Public transport in the area is also poor, and few job opportunities. Nesscliffe Country Park is likely to be designated as a nature reserve and new housing will be detrimental to this designation
A0858B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Opposes inclusion of Valeswood, Great Ness, Little Ness and Hopton as a community cluster. Area has already had extensive development in the last 5 years, and significant development is planned in nearby Nesscliffe and Baschurch, and two large poultry farms have also been developed in the area. The road network is not suitable for increased levels of traffic and is also heavily used by large farm vehicles and HGV's. Public transport in the area is also poor, and few job opportunities. Nesscliffe Country Park is likely to be designated as a nature reserve and new housing will be detrimental to this designation
A0858B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Opposes inclusion of Valeswood, Great Ness, Little Ness and Hopton as a community cluster. Area has already had extensive development in the last 5 years, and significant development is planned in nearby Nesscliffe and Baschurch, and two large poultry farms have also been developed in the area. The road network is not suitable for increased levels of traffic and is also heavily used by large farm vehicles and HGV's. Public transport in the area is also poor, and few job opportunities. Nesscliffe Country Park is likely to be designated as a nature reserve and new housing will be detrimental to this designation
A0859B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Form B1 completed but no comments attached

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0862B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Support draft Policy S16.1 and the settlement development boundary as now shown on the Policies Map. As the county's strategic centre, Shrewsbury is an appropriate location to accommodate growth. Land within the town's bypass offers some of the most sustainable locations for development anywhere in the county. Draft Policy S16.1 sets a housing requirement of 8,625 dwellings for Shrewsbury over the 22 year plan period 2016-2038. This equates to a growth rate of 1.17% per annum of Shrewsbury's estimated 33,597 dwellings. The compares positively to the overall growth of 1.13% per annum in the number of households in Shropshire over the plan period. However it is only marginally above the projected increase in households in Shropshire, so the town's growth is barely more than the county's as a whole. In light of this, the policy should seek 8,625 dwellings as a minimum figure. Expressing the housing guideline figure as a minimum figure will support the Plan's strategy to focus development in urban areas. Strongly support allocation of SHR054a as: <ul style="list-style-type: none"> • It provides better balance of residential development across the town, being one of only two sites north of the river and the only new allocation on east side of Shrewsbury; • It enhances Shrewsbury's ability to deliver its housing requirement of 8,625 dwellings; • It reduces the Plan's reliance on unidentified windfall sites (currently 505 dwellings); • It is sustainably located close to a range of existing services and facilities including schools, doctors, shops, public transport and a very good range of sports and health facilities; • It makes better use of currently under-utilised agricultural land separated from wider land by the bypass in accordance with paragraph 118d of the NPPF; • Allocation of the site is consistent with the allocation of site SHR166, which is also within the Shrewsbury bypass; • The Landscape Report provided to the Council in September 2019 confirms that the site will have an acceptable impact on wider landscape; • Development of the site will provide a pedestrian route from the Shropshire Way footpath along the river to Sundorne Road as part of the site's green infrastructure contribution, enhancing the town's network. Residential development will have to comply with draft Policy DP1 (Residential Mix) which requires sites of over 5 dwellings to include 25% of dwellings to be 2 bed or less and a further 25% 3 bed or less; and sites of over 50 dwellings to include a range of specialist housing to meet the needs of older people. These requirements will reduce the average size of dwellings significantly. The indicative layout plan for the site that was submitted with the 'Call for Sites' assumed an average floorspace of around 115sqm per dwelling. The emerging policies will bring the average floorspace down to around 85sqm. Smaller units require an increase in the number of dwellings by approximately 35% in order to achieve the same floorspace coverage. Therefore, in order to achieve the same floorspace as shown in the indicative layout plan at these smaller sizes, there would need to be at least 81 dwellings on the site. Draft Policy SP1 (The Shropshire Test) requires development which, "makes efficient use of land" and draft Policy SP5 (High-Quality Design) includes a requirement to make, "efficient and effective use of land and topography". Support these sections of Policies SP1 and SP5. SHR054a is 3.86 hectares in size, the proposed guideline figure of only 60 dwellings is equivalent to a density of only 15.5 dwellings per hectare. This is inconsistent with draft Policies SP1 and SP5 as the site is capable of accommodating 116 dwellings at a density of 30 dwellings per hectare. Acknowledge that some of the site will be needed for compensatory car parking for the Shrewsbury Club, however this does not justify a reduction from 116 dwellings to only 60 dwellings. 85 dwellings (net density of 22 dwelling/ha) would be more appropriate. Assuming the above guideline of around 85 dwellings, we can confirm that the site will be highly deliverable and viable. SHR054a is likely to be delivered earlier than the current timescale of 2025-2030 shown in Local Plan Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations. This should be changed to the 2021-2025 period.
A0871B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Longden should remain a cluster not become Hub. Any new housing should be in keeping with the size and village rural character. Less points should have been given to Longden by the Hierarchy of Settlements because: they only have infrequent, little used, mobile library; very small pub which only opens part time & not well patronised; nursery affiliated with the school not a separate entity; no superfast broadband; Housing would result in increased carbon emissions contrary to legislation and Councils climate change policy. Hub proposal result in additional built development & suburbanisation in the Countryside eroding open and rural character of the area.
A0873B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	BIT023 promoted for allocation. It is identified as a site with long term potential which has no significant constraints identified by the SLAA. However considered site is has short term potential. Site is accessible and well located relative to village, school and facilities, the development boundary and has a favourable Fair sustainability rating. It is immediately available, fully deliverable with interest from developers. Identified site BIT022 has more significant identified highway issues, implications and requirements than proposed site BIT023 where SC Highways have accepted proposed access arrangements and identified no significant highway concerns relative to previous applications. BIT023 also well placed for safe access to school. Site can be fully self-contained to provide a phased housing if required, with a new access that will not have a negative impact on the existing infrastructure. Additional information can be provided as required to support bringing the site forward. Site location plan provided .
A0878B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	New Promotion / amended site part SHR110/SHR055 site is has short term potential because site; has no significant constraints; is immediately available, fully deliverable; well located, adjoining land has been developed for residential use and proposed development, including schools. There has been interest from developers in the site. Bringing site forward would help to deliver stated dwelling requirement
A0879B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Site WEY015 has short term potential for development for 30 dwellings because site; has no significant constraints; has existing access; is immediately available, fully deliverable; well positioned for village expansion located in the centre of Westbury, adjoining previously developed land and the development boundary; good access to village hall, church & pub. Site can be fully self-contained to provide a phased development if required, with an access that will not have a negative impact on the existing infrastructure. There has been interest from developers in the site. Site location plan provided. Additional information can be provided as required to support bringing the site forward.
A0879B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Site in Westbury promoted for development (see summary B1)
A0882B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I am writing in response to the consultation for the Shropshire Strategic Land Availability Assessment, with regards to land to the west of Hanwood belonging to our clients. This site is currently an agricultural field. We are pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation. This finds the site to have no significant constraints. I am writing as we believe this land can be considered for short term potential due to the following: Availability Mr. & Mrs. Sandells have the benefit of full title to the land and are willing to make it immediately available for development. The land is adjoining the highway with good access via the existing residential estate and developed land and this site has received interest from developers. Deliverability and Sustainability We can confirm this is a well located and fully deliverable site. We believe this site is suitably placed to provide the development of 22 dwellings by 2038, being situated with an access off B488 and adjoining previously developed land and the development boundary, plus walking distance to the school, local amenities and playing fields. The land is well positioned with access to the highway on the western adjoining land that has already been developed. The land is well placed for the expansion of Hanwood in terms of its location to the school and facilities. There will be no requirement for children and parents to walk on a footpath on the very busy main road (A488), as the school would be accessed via the much safer route. The land is also well placed for access to the village hall, playing fields and school.
A0883B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Puts forward land in Dorrington for consideration as a suitable development site. Land on the Limes Paddock, currently an agricultural field located to the north of Dorrington, Shrewsbury ref. DGN018. We are pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation. This finds the site to have no significant constraints but has future potential. I am writing as we believe this land can be considered for short term potential due to the following = land is available and owner has full title to the land; it is a deliverable site within Dorrington which has excellent access to the A49; and the site is within walking distance of the centre of Dorrington and its shops and services.
A0895B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Fletcher Homes object to the Cross Houses settlement guideline figure which has reduced from 130 dwellings in the previous consultation to only 90 dwellings in the current draft Plan. The Council's Schedule A5(ii) on page 330 of the Plan shows 18 dwellings delivered in Cross Houses in the first 3 years of the plan period (2016-2019), equivalent to 6 dwellings per annum. If this rate of delivery were extrapolated for the whole plan period, ie. 6 dwellings per annum x 22 years, the village would deliver 132 dwellings. Fletcher Homes supports the designation of Cross Houses as a Community Hub. The village is a sustainable settlement with a good range of services and significant local employment, scoring 53 points on the Council's 'Hierarchy of Settlements' paper (August 2020), several points above the cut-off level of 48 points. Fletcher Homes' ongoing development in Cross Houses has proved very popular, with very strong demand the new houses largely from existing village residents keen to move to more suitable housing in the village. It has brought significant investment into Cross Houses and is prepared to continue to do so, helping secure a more sustainable future for the village. Shropshire will be required to have higher housing delivery, as a result of the latest household projections and the new standard methodology. Cross Houses is located on the Strategic Corridor off the A58 between Shrewsbury and Bridgnorth benefitting from access to the employment and service opportunities in these settlements. Cross Houses has benefitted from the successful delivery of Phases 1 and 2 of the large Fletcher Homes scheme in the village. Fletcher Homes suggest that site CSH006 is allocated in Cross Houses because the Sustainability Appraisal in the Site Assessments report shows that site CSH006 has the best sustainability score of all of the options in Cross Houses. It was only not selected by the Council because it was considered too large, however the field can easily be subdivided, with suitable landscaping to soften the south eastern boundary. The proposed line of a 2.5ha site that rounds off the Cross Houses development boundary could accommodate 30 - 60 dwellings, depending on density. Site CSH006 forms a natural extension of Fletcher Homes' existing development, from which access is available and fully achievable. It would be accessed through the existing Fletcher Homes Phase 1 development. Site CSH006 should have the following development guidelines: appropriate pedestrian, cycle and vehicular access will be provided to the site via Ridout Road; site to be developed at a low-density and to include significant open space to reflect the character of its 'edge of village' location; mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network.
A0896B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Galliers Homes supports the designation of Bomere Heath as a Community Hub as a sustainable settlement with a good range of services and significant local employment. Additional housing is needed to retain the next generation, provide for resident workers and maintain a balanced community, to enhance the sustainability of the village. The natural direction for growth is to the south, towards Leaton Industrial Estate with employment opportunities on 22 let industrial units. The proposed allocations extend the village edge to meet Bomere Heath's cricket and football pitches, connected with a new pedestrian footway provided by the existing development. This direction of growth links the village with its leisure and employment opportunities and is strongly supported by Galliers Homes. Galliers Homes strongly supports the preferred housing allocation BOM019 as forming natural extension of Galliers Homes recent development of 34 dwellings on the adjoining site to the north. There are no technical difficulties and Galliers Homes will be able to deliver housing relatively quickly. We can confirm that the site is viable and that it is deliverable, with an option agreement in place with Galliers Homes that ensure that a planning application will be forthcoming shortly after allocation. It is likely to be delivered earlier than the Local Plan's current forecast of 2025-2030, with the 2021-2025 period more appropriate in the Local Plan Appendix 7: Forecast of delivery timescales for local plan allocations. The existing Galliers Homes development to the north was designed to provide access to a future extension on site BOM019. The new roundabout on Shrewsbury Road was oversized to cater for the planned later phases on the basis that it would cater for later phases of development. The proposed policy guidelines should be revised to reflect this, removing references to a new access off Shrewsbury Road and instead referring to the provision already made to access the next phase of development via Trinity View. Similarly a new footpath has recently been constructed along Shrewsbury Road as part of the previous development (17/00768/REM). It is unnecessary for the new allocations to duplicate this path. We therefore suggest the proposed changes to the policy guidelines shown below: "This site represents Phase 1 of the development. An appropriate highway access will be provided via the recently completed phase of development at the Wickets and Trinity View and any other necessary highway improvements undertaken including the extension of the 30mph zone and other relevant traffic calming measures. New pedestrian footpath links will be provided where necessary to link the site to the services in the village. Existing trees, hedgerows, public rights of way and priority habitats will be retained and enhanced. Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from Shrewsbury Road. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere." It should be noted that the existing development (17/00768/REM) included a surface outfall and pond under the high voltage electricity lines, close to the railway, that was oversized and designed to cater for these later phases of development. A sustainable surface water drainage strategy is therefore in place and the agreed outfall rate with Severn Trent Water will not need changing when allocations BOM019 and BOM020 are developed.
A0896B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Galliers Homes supports the designation of Bomere Heath as a Community Hub as a sustainable settlement with a good range of services and significant local employment. Additional housing is needed to retain the next generation, provide for resident workers and maintain a balanced community, to enhance the sustainability of the village. The natural direction for growth is to the south, towards Leaton Industrial Estate with employment opportunities on 22 let industrial units. The proposed allocations extend the village edge to meet Bomere Heath's cricket and football pitches, connected with a new pedestrian footway provided by the existing development. This direction of growth links the village with its leisure and employment opportunities and is strongly supported by Galliers Homes. Galliers Homes strongly support the preferred housing allocation BOM020 as forming a natural extension to BOM019 and providing certainty for the direction of growth for the village over the longer term, joining up with recreational facilities and linking to local employment. We can confirm that the site is viable and that it is deliverable, with an option agreement in place with Galliers Homes that ensure that a planning application will be forthcoming shortly after allocation. Galliers Homes have a strong local reputation for high quality housing and are committed to ensuring that preferred allocation BOM019 comes forward quickly, with BOM020 following behind to meet the needs of the village across the plan period. As phase 2, the timescale of 2025-2030 is appropriate in the Local Plan Appendix 7: Forecast of delivery timescales for local plan allocations. The policy guidelines appear to reflect the footway that has recently been constructed by Galliers Homes as part of the previous development (17/00768/REM). We therefore support the proposed development guidelines.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0896B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to preferred housing guideline of 200 dwellings over 2016-2038 as far too low. Bayston Hill has 2,024 dwellings and the level of growth over the 22 year plan period 2016-2038 represents annual growth of 0.45% well below the proposed rate of 1.01% per annum for Shropshire. Support the designation of Bayston Hill as a Community Hub, as a sustainable settlement with a good range of services and significant local employment attracting 80 points for its services and facilities as one of the top three scoring Community Hubs. Bayston Hill is on the A49 corridor with excellent access to nearby Shrewsbury. The A49 is a strategic corridor in paragraph 4.91e of the Plan and Policy SP2: Strategic Approach and explanatory paragraph 3.26. Despite the A49 being one of these strategic corridors, the Plan unjustifiably diminishes Bayston Hill's potential for growth. Bayston Hill's proposed growth rate is far lower than other Community Hubs with similar sustainability scores at Pontesbury with 80 points with 1.03% per annum growth; St Martins with 77 points with 1.66% per annum growth; Clun with 72 points with 1.1% per annum growth; Gobowen with 71 points with 1.2% per annum growth. This would call into question the basis by which the settlement growth figures have been determined. Galliers Homes made comments under Policy SP2 to increase Shropshire's overall housing needs and Bayston Hill can contribute more to meeting Shropshire's housing needs with an upward adjustment to the housing guideline figure to at least 1% per annum equal to 445 dwellings. Paragraph 5.228 of the Plan states, "Bayston Hill is a large urban village located to the south of Shrewsbury. Due to the proximity between these settlements, consistent with Community Hub Policy SP7, the retention of the Green Gap to the north of Bayston Hill is a key priority." There is however no evidence that supports the retention of a 'Green Gap'. It does not feature in either the Shropshire Open Space and Recreation Needs Assessment (September 2018) or in the Green Infrastructure Strategy for Shrewsbury (July 2020). The Council's Landscape & Visual Sensitivity Assessment (2018) identifies the southern side of Bayston Hill (on the opposite side to the Green Gap) as more visually sensitive than the northern side of the village. In addition to looking out towards the South Shropshire Hills Area of Outstanding Natural Beauty some 5 km to the east, south and south west, the southern end of the village is associated with the local beauty spot of Lyth Hill and is crossed by many well-walked Public Rights of Way. In contrast, the north side of Bayston Hill has lower landscape and visual sensitivity. In relation to parcel 20BYH-E to the north west of the village, the study states, "Views within this rural landscape are of variable quality taking in a farmed landscape of diverse scale and condition, major road infrastructure..... To the north, views are contained by hedgerows, A5 embankment and planting. This reduces its susceptibility as new development would be better screened by the existing landform and vegetation than in a more open landscape." It notes the potential benefits of development: "There is also potential to improve the settlement edge which is partially integrated. There is a low sense of tranquility due to frequent road noise and quarry traffic, however this could be buffered by screen mounding and planting which would be appropriate within the parcel." It is perfectly possible to improve the gap by utilising private investment to this end. The settlement strategy for Bayston Hill should actively promote sites that will provide additional planting and new areas of public open space that will benefit residents and improve the landscape and recreational potential of the gap. Galliers Homes have repeatedly suggested the allocation of site BAY005 to deliver an attractive area of public open space along the northern edge of Bayston Hill (fig 9 overleaf). The site is very well located for access to Bayston Hill's shops and facilities as well as being close to the Pulley Lane route into Shrewsbury. The Council already recognises the sustainability credentials of site BAY005, scoring it 'fair' (-4) in its Site Assessments (August 2020). The development of site BAY005 provides an opportunity for generous new landscaping along the ridgeline and public open space providing views north, similar in style to the popular Lyth Hill park that provides views south. The site can deliver an enhanced village edge with landscaped public open space on its northern edge. Galliers Homes commend site BAY005 to the Council for allocation in its Final Plan and propose the following development guidelines: "Development to provide public open space along the ridgeline with appropriate landscaping and viewpoints. Existing trees and hedges will be retained wherever possible. Appropriate highway improvements will be made to the junction of Gorse Lane and Pulley Lane". Paragraph 5.228 should be amended to read: "Bayston Hill is a large urban village located to the south of Shrewsbury. Due to the proximity between these settlements, consistent with Community Hub Policy SP7, the improvement of the Green Gap to the north of Bayston Hill is a key priority. Three Local Plan residential allocations have been identified in Bayston Hill, one of which represents the redevelopment of a former school, the other is located to the south of the existing bus form overlooking the South Shropshire Hills Area of Outstanding Natural Beauty, and the third provides infill development with new public open space and landscaping to improve the northern edge of the village."
A0901B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	development is allocated under the assumption that the North West Relief Road is built, regardless of the previous unsuitability rating at stage two. The induced traffic demand in building a ring road to the north of Ellesmere Road will in the medium to long term increase traffic congestion along this road. The NWRR is not the solution to this problem. Will have negative effects on the wildlife.
A0909B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Consideration should be given to allowing housing development at the northern end of the proposed NWRR in the vicinity of the Ellesmere Road/Baschurch Road junction (i.e. site SHR181). Access would be available in a short time-frame. Development of one or other or both of the areas of that to the east of the route of the NWRR, off Ellesmere Road or to the west of the route, off Baschurch Road could take place in the immediate future or phased to take place along with the construction of the NWRR. Development of this land would help alleviate journeys, thus helping to achieve the aims of DP12 and DP19.2. 16.1.4 indicates the "focus" of directing residential growth to the west of the town, particularly N & S of Mytton Oak Road. This will perpetuate the long-known issue of residential development being situated to the west of the town with the major employment areas being to the east and north of the town. More housing should be located north. It is considered short-sited that the land between the route of the road and the development boundary shown on the Proposals Map for Shrewsbury will remain regarded as "Countryside," as this area could assist with meeting the apparent shortfall in housing land supply. It appears that the housing requirement for the County has increased, but, in spite of the stated aim of the Plan to foster an "urban focus" the requirement for housing in Shrewsbury has not been increased, and now falls below the 30% target which was the Council's earlier objective. S16.1 confirms the requirement for Shrewsbury for 8,625 dwellings which appears to be 615 dwellings short of meeting the 30% target for housing in Shrewsbury. It is suggested that this shortfall should be rectified by further allocation(s) in Shrewsbury. SAMDev sites are not included in Appendix 7. SUEs are difficult to maintain – there may be a shortfall and so more sites should be allocated, as is the case with SHR173 being completed in the Plan period.
A0910B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Policy S16.2: Shrewsbury Place Plan – Community Hubs, is not supported because it does not include Cockshutt in the list of Community Hubs, even though Cockshutt has a larger population than 6 of the 10 villages listed.
A0920B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Ford as a Hub settlement accords with the Local Plan's vision in this regard, given Ford's strategic location on the A458 corridor with excellent connections to a wide range of employment opportunities both in the rural area and Shrewsbury. However part 2 of Policy SP2 undermines these aims as it only proposes 1,400 dwellings per annum, which is below the figure set out in the Core Strategy and the 2018 household projection forecast. There is also a danger the plan will fail to be consistent with the NNPF. The Government's current consultation proposes changes to the standard method that would apply the 2018-based household projections and apply an affordability adjustment that would increase this figure to 2,124 households per annum. There is a strong case for the Council to re-consider its housing requirements in light of the Government's recent consultations on changes to the Framework and its direction of travel to increase housing delivery across the country. Policy SP2 will be more resilient if the housing requirement figure is increased to reflect the latest household projections and affordability data, replacing the current housing target of "around 30,800 dwellings" to "at least 46,700 new dwellings" over 22 years 2016-2038. The above change to policy SP2 should be reflected in the Community Hub policies, including policy S16.2 in relation to Ford, which can accommodate a much higher residential guideline figure.
A0920B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The statement in Policy SP7 that "Community Hubs are considered significant rural service centres and the focus for development within the rural area" is supported. It is therefore very disappointing that Policy SP7 seeks to limit development in Community Hubs, only permitting development where it, "would not result in the settlement's residential guideline being exceeded" (section 1f of the policy). This section of the policy makes the guideline a ceiling figure, running counter to the National Planning Policy Framework's consistent use of housing numbers as minimums rather than maximums. It is contrary to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It makes the Local Plan's job of delivering the housing and employment development that Shropshire needs much more difficult than it needs to be. In our view, Community Hubs should be allowed the flexibility to respond to changing needs and not have artificial constraints such as a ceiling on numbers imposed on them. We therefore suggest that all residential guideline figures are expressed as minimums and that section 1f should be deleted from policy SP7 in its entirety.
A0920B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The designation of Ford as a Community Hub settlement in Policy S16.2 is strongly supported as this is seen as vital to ensuring the village's long-term future. The settlement of Ford lies in close proximity to, and has a strong relationship with, Shrewsbury. It is also located on the A458, part of the strategic road network through the County. Ford is therefore one of relatively few villages in Shropshire that has significant potential for rural growth both socially and economically and development in the settlement will complement growth in urban areas, in accordance with Policy SP2: Strategic Approach. However we are disappointed that the services and facilities provided in the cluster of development at the west of Ford are not recognised, and that the policy relies on 60% of dwellings to be delivered on just one site. This is a missed opportunity to provide additional windfall opportunities in a highly sustainable location within the settlement. It also fails to recognise where the Council has previously considered development to be sustainable in the settlement of Ford, including the brownfield land surrounding the Smoke Stop that previously benefited from consent for travel lodge style accommodation and the new residential development being constructed on land to the north of the A458 (subject of planning consents 14/01819/OUT and 17/03865/FUL). The current consultation provides an opportunity for Shropshire Council to amend policy S16.2 and Inset Map S16 to acknowledge that the cluster of development around the junction of Back Lane with the A458 forms an important part of the settlement and is a sustainable location for future development and to include brownfield sites previously found by the Authority to be sustainable locations for new development and residential sites currently under construction
A0928B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The overall analysis of Shrewsbury and its settlement strategy appears to be fair. It is welcomed that as Strategic Centre, Shrewsbury is the largest settlement in Shropshire. It contains the main commercial, cultural and administrative centre for Shropshire, offering most of its employment and a large range of services and facilities to the residents of the town and its large rural catchment. It is appropriately seen as a highly sustainable location to accommodate the largest proportion of Shropshire growth. Taylor Wimpey and Persimmon support its main focus to growth which would see the majority of growth directed towards Shrewsbury and the main Towns with more limited growth (albeit not to the total exception of growth) in the rural areas. This is important to support sustainable patterns of growth, but also support delivery. The approach has the real potential to be deliverable, but still allows for all parts of Shropshire to gain from the benefits of new housing and employment development. The approach for Shrewsbury in the Plan reflects the town's focus within the heart of the County and the excellent range of services and facilities the town already provides. It also reflects the opportunity to deliver on emerging growth aspirations, such as those expressed through the emerging Big Town Plan, as well as responding to specific development opportunities presented by a range of factors. Land is available in sustainable locations to support delivery at Shrewsbury. Our specific comments are as follows; • Shrewsbury is and should be the primary focus for development in the County. • Additional housing and employment development beyond the 8,625 development guideline is justified in Shrewsbury and deliverable. • The residual requirement to allocate additional sites, given our concerns highlighted in our representations elsewhere including an undue reliance on windfall will mean that further sites in Shrewsbury will be needed even to meet the currently proposed housing requirement of the plan. • More housing will be needed is the housing requirement is appropriately increased as we suggest. Equally Shrewsbury should be the first priority for any additional allocations should deficiencies be identified in any of the current Regulation 18 consultation sites to date. • Past rates of delivery in the town show that it is a strong market that could support a high level of provision reducing the extent of more dispersed growth around Shropshire • Whilst there are some significant historical and ecological constraints around the town, such as the setting of the Registered Battlefield to the north and areas of flood risk around the town there are equally relatively unconstrained sites which can accommodate the scale of development envisaged • Identified critical infrastructure priorities for Shrewsbury are identified but none represent an impediment to its future growth and can be addressed. • A greater range of medium sized sites upto 400 dwellings would better support delivery – the trajectory for the large Shrewsbury (and other large main centre sites) unrealistically expects some delivery for the period 2021 to 2026 (Phase 1). Given the timescales for adoption of the Local Plan Review, the needs for significant infrastructure to be put in place to support the large sites, the outline and Reserved Matters application process, means that such large scale sites are most unlike to deliver in the Phase 1 of the Plan, but more likely the latter part of Phase 2. Sites around 400 dwellings can be more easily delivered and maintain delivery in the early phases of the Plan period. In this context, whilst the allocation of strategic sites to help deliver the required level of growth within Shrewsbury, the proposed allocation of SHR158/SHR060/SHR161 concentrate a very large part of the total dwellings within the plan period. This represents a significant overreliance on a small number of large sites to achieve the required level of housing delivery, with some considerable risk particularly in the early years of the plan.

Page 315

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0928B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Taylor Wimpey and Persimmon have submitted proposals suggesting the allocation of land for housing at Weir Hill Phase 3. The site represents a suitable, sustainable and deliverable site for residential development and a logical extension to the settlement, adjoining the existing residential areas of the town to the north, west and south. Allocation of the site would create a strong and well-defined settlement edge, without extending out into the wider open countryside. The site is now further enclosed by the proposed employment allocation SHR166 to the north east of the site, across the River Severn, which is shown as a “standalone” development boundary. A previous Vision Statement for the site has been updated with the latest proposals which Taylor Wimpey and Persimmon propose for the site. It addresses comments and feedback about the proposals which have been raised through discussions with officers to date as well as issues and opportunities which have emerged through phases 1 and 2 of the development. The Vision Document confirms that the development can deliver a high quality scheme providing new homes as well as a new local centre with a range of uses which will support the sustainability of this phase and earlier phases of the development. The vision for the site is landscape led with much of the site being dedicated to open space and mixed recreation space with areas close to the river protecting existing ecology interests but also promoting new opportunities for enhanced biodiversity. Community use opportunities are presented in the development with new dedicated parking for local walkers and those enjoying the enhanced country park, as well as community space for local groups including potentially for the Scouts (who need a new facility), wildlife trust or other community groups. As a whole the development completes the final phase of the Weir Hill development with new and enhanced proposals for the existing and new community. It is our submission here that the site is suitable for allocation for around 400 dwellings. Evidential material in support of the allocation in respect of landscape, transport and traffic, ecology, drainage etc have been made available to the council in the past and are fully available on request to ensure that site is duly considered to its full merit. The site has not been allocated in the plan to date. It is our strong submission that the Council’s assessment of the site within the sustainability appraisal and site selection process to date has been misconceived and flawed. The Council have not judged the proposals fairly, have misunderstood the delivery of associated infrastructure including the delivery timeframe for the new London Road link which will be in place to serve this phase as well as earlier phases. They have not had appropriate empirical evidence to judge highway implications and traffic. They have also failed to appropriately and fairly consider localised, site specific landscape implications. The following is particularly highlighted with reference to attached supporting information comprising Vision Document (Septemeb 2020), Landscape and Visual Appraisal (PGLA, September 2020) and Transport Technical Note (Croft, September 2020); Landscape Sensitivity – the landscape review undertaken by Gillespies for the Council as part of the Local Plan evidence base, identified the development on this site as an area of landscape medium / high sensitivity. The assessment is not appropriate for the evaluation of small component parts of the wider landscape around the Town. Indeed the study itself highlights that it is “a strategic assessment which provides the context for more detailed studies of individual sites. It does not make judgements on the appropriateness of specific developments on individual sites (and does not consider specific development proposals where these might exist). More detailed studies relating to specific site allocations and development proposals will be undertaken at a local authority level as part of the Development Plan and development management process”. The character area classification of landscape sensitivity is therefore not a definitive factor in assessing site proposals, which have to be done in the context of the specific proposals themselves. Indeed, the Gillespies Report suggests as much in stating “In this study visual aspects are considered in relation to landscape character and quality and not in relation to specific views (although these will be noted where they are a key characteristic of a particular area). This is because views and visibility change over short distance and can only be assessed in relation to a particular development type as part of landscape and visual impact assessment.” Our own assessment previously submitted to the Council and now further updated as attached in a September 2020 update by PGLA here highlights that the lack of granularity within the parcels of the SLVSA combined with the methodology is providing an assessment with inaccurate and distorted broad brush gradings regarding landscape and visual sensitivity. Further in this context the sensitivity grading is therefore not reflective of the more fine granular nature of the wider character area which means it usefulness and effectiveness as a tool to inform or strongly influence an assessment for a specific site such as this site SHR176 is obviously flawed and will not provide the local authority with an accurate and helpful evidence base for making decisions on site allocations. A more appropriate and focused landscape assessment confirms significant less sensitivity, less than other sites around the Town which have been selected for allocation. The landscape sensitivity here is not medium high. It is self-evidence that by comparison to the Gillespies work (and no criticism of its approach and brief), the landscape assessment work we have submitted as part of our evidence in support of this site does appropriately assess the site and its sensitivity, which is in fact Medium Low and landscape impacts moderate to negligible.. This is noting particular proposal including the approach which safeguards as open space and landscape planting, those areas which may be more visually sensitive adjacent to the river. If the Officers assessment has been influenced by the Gillespies broad brush character assessment which it seemingly has and not the circumstances of this particular site and proposed development, then it is undoubtedly unfair and flawed. Masterplan/Uses – Some concern has been expressed about the proposals for Phase 3 (and indeed combined with Phases 1 and 2) not allowing for any additional supporting local social infrastructure, whether that be a local shop, community uses, or other social infrastructure. The development of Phases 1 and 2 will see the completion of 600 dwellings and with this further Phase 3, could see a total of 1000 dwellings coming forward as part of this overall development at Weir Hill. Reflecting this discussion, the updated masterplan and proposals for the site (see Vision Document, Septemeb 2020) provides for a logical location for such community and social infrastructure in the heart of the development, yet not necessarily compete with the facilities which are already at Column, or on Abbey Foregate. The site proposed could provide a valuable addition to the development, providing the opportunity for some small shop units, health use, community space or similar in combination – we have been in discussion with local groups such as the Scouts who also need new provision for community use and have the potential to accommodate their needs within the development either as a standalone facility or with joint provision. This is part of the updated vision for the site which builds on elements within phases 1 and 2, particularly expanding upon and completing the vision for the riverside park with an extensive array of wider mixed components for the park aligning with the Council’s own green infrastructure aspirations in the recent study as well as the Big Town Plan. Comments and feedback on matters of ecology have also focused particular proposals for the mixed community uses within the park, with considerable emphasis on biodiversity gains and complementarity with the river and its designation as a local wildlife site. None of the development proposals have ever proposed any development in such proximity to the river to impact on ecology interests, moreover the vision has always seen opportunity for gains. Likewise, that part of the site which adjoins the river and is located within Flood Zones 2 and 3 have never been proposed for development and all built development is within Flood Zone 1. London Road Access – a significant concern in the Council’s assessment of this site was a mis-understanding that the delivery of the London Road link (through Phases 1 and 2) would be provided much later in the Plan period such that the accessibility and traffic benefits of this link wouldn’t be available to Phase 3 in the short term. This is not the case. The delivery of the London Road link is conditioned in the current planning permission issued by the Council for Phases 1 and 2, such that no more than 175 homes within Phases 1 and 2 can be commenced construction and no more than 150 dwellings occupied before the London Road link is fully open to public use. In this regard, development is well underway in Phase 1 of the development. Reserved Matters have been approved for Phase 2. The London Road link has full planning permission as part of the hybrid planning permission and Phase 2 reserved matters and is under construction with a currently expected opening this year to tie in with wider construction and occupations. The road will easily be available to provide access to Phase 3 of the development in the short term and previous concerns this regard are misplaced. Equally no construction access whatsoever would be required to construct Phase 3 using Preston Street, which was a principal concern of the council in establishing the limits to occupations on Phase 1. Phase 3 is available for very early delivery in the Plan period and will support the plan housing delivery trajectory as other larger schemes will take some time to come forward. Further transport analysis has been undertaken on potential traffic implications for Phase 3 in the Attached Transport Technical Note (Croft September 2020). It highlights that the site is highly accessible including by non car means; vehicle access is available and safe; an assessment of traffic from the development (including a considered assessment of traffic distribution with the London Road link in place) shows that it would have a minimal impact on Preston Street, or the wider highway network; there will be no requirement whatsoever for construction traffic to use Preston Street as the London Road link will be in place and there is no highway or safety concerns that should prevent the site from being allocated. Overall, the Vision for Phase 3 of the Weir Hill development presents a high quality sustainable development which is supportable by clear evidence and should be allocated in the Local Plan Review.</p>
Page 316	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>1. Cerda Planning Ltd is instructed to make representations to the Shropshire Local Plan Review – Consultation Regulation 18: Pre-submission Draft Local Plan on behalf of Gleeson Strategic Land Ltd. Relevant supporting evidence and assessments have been taken into account when forming the views below</p> <p>2. Gleeson Strategic Land Ltd has an interest in a significant parcel of land on the south-eastern edge of Bayston Hill. It is our client’s intention to bring this site forward for residential development through the plan led process as part of the Local Plan Review, and as such our responses will be primarily focussed on the settlement of Bayston Hill and the Shrewsbury Place Plan area in which it is located.</p> <p>See also representation on policy SP2 which concludes that the site should be allocated.</p> <p>SITE AND ITS LOCATION</p> <p>4. The site is 17.53 hectares in size and situated immediately adjacent to the settlement edge to the south-east as illustrated by the insert below. The site is bounded to the east by the Hereford Road the A49 distributor road and is accessed directly from the Hereford Road. The subject site is currently in use for agricultural purposes. It is generally free from trees and other vegetation save for the field boundary hedgerows. Land falls away across the site from the north east to the south west where it joins the A49 at grade.</p> <p>SITE HISTORY</p> <p>5. Outline proposals for residential development (access only) were refused in September 2015 under planning application 14/05556/OUT. Two reasons for refusal were cited as follows:</p> <ul style="list-style-type: none"> The proposed development is located within an area defined as open countryside where new dwellings are only permitted where required to accommodate key agricultural, forestry or other essential countryside workers or to meet a local need for affordable housing/accommodation. No such need has been demonstrated in this case and the proposal would lead to sporadic and unsustainable development, promoting rather than reducing the need for vehicular travel to access local services. Accordingly, the proposal fails to comply with adopted policies MD1 and MD7a of SAMDev, policies CS4, CS5, CS6 and CS17 of the Core Strategy; and Central Government Guidance advice contained in the National Planning Policy Framework. Insufficient detailing has been included within the application to provide the local Planning Authority or the Highways Agency to assess the impacts that an access at the proposed location would have upon the adjacent A49. As such the proposal cannot be adequately assessed in order to ascertain the likely impacts upon highways safety, and as there are concerns in regard to this issue the proposal in its current form is not considered to comply with policies CS6 and CS7 of the Core Strategy or the guidance contained within the NPPF. <p>6. The first reason for refusal could be overcome through the Local Plan process. If the Council came to a position whereby the development of the site could be supported, the settlement boundary could be re-drawn around the edges of the site. This would take the site out of its current countryside designation.</p> <p>7. In relation to the second reason – the officer report sets out that the Highways Agency had raised concerns in relation to the proposals and that requests were made to the applicant to provide a Stage 1 Safety Audit. This was never received. As neither the Local Planning Authority or the Highways Agency were confident that safe access or egress could be achieved without these details, the refusal on highway grounds was issued.</p> <p>8. Safe access would be possible into the site and any new proposals on the site would be accompanied by relevant audits and assessments.</p> <p>9. The planning officer concluded in all other matters that the proposals were acceptable: “the proposals would be closely related to the surrounding urban context and could provide a softer edge to the main village via a carefully considered reserved matters application. The impact on the landscape was not considered to be harmful and it was considered that a layout could be provided within the curtilage on the site without undue harm to the landscape character whilst also providing a more attractive settlement boundary via the provision of outward facing dwellings and a resultant soft edge to the village.” and</p> <p>“It is recognised that the views of neighbouring dwellings tight on the boundary would be restricted from what are currently open vistas of the surrounding countryside, however a sensitive design would ease the sense of enclosure that could be felt by neighbours to the site. It must also be considered that subject to suitable interface distances, a development of this nature could be accommodated on site without undue harm to residential amenity.”</p> <p>SLAA 2018</p> <p>10. The site was included in the Strategic Land Availability Assessment (SLAA) 2018, site reference BAY040 for residential use (with an indicative yield of 525). Through this process the Council considered the suitability of the site for residential purposes. The Residential Suitability Summary states:</p> <p>“The site is located adjacent to but outside of the settlement development boundary. Consequently, open market residential development on the site would be contrary to policy. However, the site may have long term potential subject to relevant changes to policy and management of any physical, heritage and environmental constraints.”</p> <p>11. The residential overall summary states:</p> <p>“The site is considered available; achievable; and viable (subject to any further necessary viability assessment). Furthermore, the associated settlement offers a range of services and facilities suitable to meet the needs of potential occupiers of the site. However, the site is not currently suitable for development as it is located in the countryside where open market residential development is currently contrary to policy. Additionally, the site is subject to a physical; environmental; or heritage constraint and the sites suitability is subject to appropriate assessment and management of any impact. Specifically, its proximity to a Ramsar site which means that an assessment under the Habitat Regulations will be needed. If the assessment is passed and/or suitable mitigation of this identified constraint were possible, the sites development potential would also depend on appropriate changes to policies affecting this location; and suitable management of any other physical, heritage and environmental constraints present (informed by input from relevant service areas and infrastructure providers) and the outcome of a visual impact and landscape sensitivity assessment. Such constraints include its proximity to one or more Listed Buildings and a Scheduled Monument.”</p> <p>12. It concludes that the site is not currently suitable but does have future potential subject to further detailed assessment. It is therefore right and proper that the site is considered in the plan making process.</p> <p>13. Gillespie’s have produced a Landscape and Sensitivity Assessment of Bayston Hill for the Council in order to inform the site selection process. The subject site falls within Area B. This document advises that the landscape is defined by the small upstanding hill (Bayston Hill) to the west and Lyth Hill to the south west.</p> <p>14. In terms of landscape value, the document concludes:</p> <p>“this landscape is of moderate scenic quality derived from the wider setting of the Shropshire Hills AONB however the rural character of the landscape has been weakened as result of agricultural intensification and extensive loss of hedgerows and tree cover. Landscape value is low with no distinctive features, sparse natural habitats and poor connectivity despite the presence of Lyth Hill and Country Park to the western boundary. Although the Shropshire Hills AONB lies some 5 kms to the east, south and south west, the low-lying landscape displays very few of the AONB’s special qualities and could not be considered to fall within its setting.”</p> <p>15. In terms of landscape sensitivity, the assessment concludes that overall, the sensitivity of the landscape to change arising from new housing is medium- low.</p> <p>16. In terms of visual susceptibility, the document states:</p> <p>“Agricultural intensification and loss of hedgerows and tree cover, has created an open often vast landscape with far reaching views that are particularly susceptible to new development. There is no relationship with the settlement edge and there are few sensitive receptors within the parcel. This reduction in susceptibility has however to be balanced against the highly scenic panoramic views that extend towards the Shropshire Hills AONB from Lyth Hill that could be vulnerable to change. Development would also be visible from higher elevated viewpoints including Lyth Hill and intervisibility with the AONB. The relative number of people likely to experience the view is high due to Paragraph 5.228 Policy SP7 and link to SP16.4 - explanation I welcome the statement that the green gap between Bayston Hill and Meole Village is seen as an important buffer Zone between the two areas. Securing this green gap has been a long standing policy of Shropshire Council and is very much supported by the residents of Meole village and Meole Village Residents Association. The area around the Rea brook south of Meole Village is seen as a green lung for the area and is used extensively by local people for recreational purposes. As the Rea brook south of Meole Village is an important tributary for the river severn and leads into the Rea valley conservation areas I believe permanent protection should be afforded to its length all the way to Hook-a-gate and would urge Shropshire Council to recognise its importance within its Strategic policy documents. It is also an important flood plain area reducing volume flows into the river Severn at Longden Coleham and is a valuable green corridor for wildlife movement and habitat protection which fits in with many policies identified in the partial plan review</p>
A0955B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Paragraph 5.228 Policy SP7 and link to SP16.4 - explanation I welcome the statement that the green gap between Bayston Hill and Meole Village is seen as an important buffer Zone between the two areas. Securing this green gap has been a long standing policy of Shropshire Council and is very much supported by the residents of Meole village and Meole Village Residents Association. The area around the Rea brook south of Meole Village is seen as a green lung for the area and is used extensively by local people for recreational purposes. As the Rea brook south of Meole Village is an important tributary for the river severn and leads into the Rea valley conservation areas I believe permanent protection should be afforded to its length all the way to Hook-a-gate and would urge Shropshire Council to recognise its importance within its Strategic policy documents. It is also an important flood plain area reducing volume flows into the river Severn at Longden Coleham and is a valuable green corridor for wildlife movement and habitat protection which fits in with many policies identified in the partial plan review</p>
A0955B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	<p>Paragraph 5.228 Policy SP7 and link to SP16.4 - explanation Meole Village Residents Association welcome the statement that the green gap between Bayston Hill and Meole Village is seen as an important buffer Zone between the two areas. Securing this green gap has been a long standing policy of Shropshire Council and is very much supported by the residents of Meole village and Meole Village Residents Association. The area around the Rea brook south of Meole Village is seen as a green lung for the area and is used extensively by local people for recreational purposes. As the Rea brook south of Meole Village is an important tributary for the river severn and leads into the Rea valley conservation areas M.V.R.A. believe permanent protection should be afforded to its length all the way to Hook-a-gate and would urge Shropshire Council to recognise its importance within its Strategic policy documents. It is also an important flood plain area reducing volume flows into the river Severn at Longden Coleham and is a valuable green corridor for wildlife movement and habitat protection which fits in with many policies identified in the partial plan review</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0956B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Provide further evidence on housing delivery trajectory, including key assumptions for larger site allocations and lapse rates. Support for recognition of sustainable location of south-west area of Shrewsbury town. Direct further growth to the town of Shrewsbury, alongside sustainable growth of the Community Hubs and Clusters. Noting the constraints to housing growth around Shrewsbury town, further recognise the sustainable location of the south-west area of the town to which additional development could be directed. Our Client's Site represents a sustainable site option in this location which should be considered further(Alternative site promotion Bloor Homes in relation to land at Nobold) Delivery trajectories need to be provided for the Saved SAMDev allocations to reflect the most up to date position for these Saved allocations which are a key part of the housing delivery strategy. The delivery trajectory for the draft SLP housing allocation at Land between Mytton Oak Road and Hanwood Road is anticipated to medium-long term and potentially extend beyond the plan period. The Council should be clear on the assumptions that have been made to inform the delivery trajectories for these sites (no detailed commentary provided) & include further flexibility to ensure the housing requirements of Shrewsbury are met within the plan period at this sustainable location within the town. The Council should also consider the potential to provide a more sustainable strategy focused upon the town of Shrewsbury, alongside sustainable growth of the Community Hubs and Clusters. The risks to the delivery of smaller scale sites should also be factored into the Council's housing trajectory e.g. lapse rates, which can generally be higher for smaller scale schemes. It is not clear what lapse (or non-implementation rate) has been assumed in the housing trajectory overall for the plan period. This should be clearly identified and evidenced as per the NPPG (Paragraph 024 ID: 3-024-20190722) There is no justification provided for the 10% lapse rate assumed in the Five Year Supply Statement i.e. local evidence of implementation rates in recent years. Shrewsbury Alternative site promotion. Bloor Homes in relation to land at Nobold. Land at Nobold (the Site) has been assessed within the Strategic Housing Land Availability Assessment (SHLAA, 2018) under a number of separate parcels and site references. Whilst rejected for policy reasons, in light of accompanying commentary and the Site's proximity to existing draft SLP allocations, it is clear that there is potential for further consideration of strategic land release within the south west area of the town as a sustainable location. It is apparent that significant flood risk to east, centre and north west of town constraints further opportunities in those locations. Combined with existing allocations that have already been proposed around the town edges, the area to the south west represents the next logical area to examine further. Bloor homes have excellent track record of bringing forward strategic land including major urban extensions with significant infrastructure packages. Land at Nobold, Shrewsbury lies to the south west of the town of Shrewsbury in close proximity to the existing suburban neighbourhoods of Radbrook and Meole Brace, representing a sustainable location for residential development with access to a range of existing services and facilities. It provides the opportunity for a sustainable urban extension of approximately 138 hectares with residential development to the north of the A5 and employment development to the south (indicated on the accompanying Concept Plan). The development is capable of catering for a range of infrastructure needs including a primary school, local centre, green infrastructure and highways infrastructure. Land adjacent to the Site in separate ownership (to the west fronting Hanwood Road) is also considered as part of a comprehensive masterplan. In close proximity to the north lies the proposed draft SLP mixed use allocation (SHR060, SHR158 & SHR161) for 1,500 dwellings, 5ha of employment land (minimum) and a local centre, including potential education and medical facilities. There are also a number of Saved SAMDev Plan sites in close proximity, including SHREW212 for 175 dwellings and SHREW019, 094, 030/R and 210/09 for a total of 550 dwellings. These existing SAMDev allocations and the proposed draft SLP allocations demonstrate the overall sustainable nature of this location. Development of Land at Nobold would serve to complement these proposed developments, maximising the opportunity provided by the existing sustainable location with conceptplan/masterplan provided. Concept Plan retain existing and incorporate further green infrastructure provision, make use of and enhance existing connections within the area & help deliver on the objectives of the Shrewsbury Big Town Plan.
A0957B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Planned housing growth is too fast for Shrewsbury. It is very unpopular and infrastructure is lagging well behind the need, already reducing the quality of residents' lives. Furthermore, high growth will not help emissions targets, which are insufficiently well guarded (SP3) in the Plan The Big Town Plan is not now offering meaningful consultation. Shrewsbury residents have too little say and the draft Local Plan does not advance the importance of early public collaboration. While there are references to the Big Town Plan's Spacial Principle of the Green Network, that of "Balancing Growth" is missing, despite the early suggestions of some 1400 "windfall" homes, allocation. For Shrewsbury there may be other criteria that need to be tested since the Town has several unique features needing conservation and enhancement. Big Town Plan leaders wish to enable this rigour in some way more specific than a County wide set of broad principles. Specific comments on policy wording: Para 2. This paragraph suggests that "the Shropshire Test" is agreed in principle by the Big Town Plan although this has not been agreed. It seems to undermine any further attempt to detail features of acceptable developments within Shrewsbury town. Para 3 ignores the Big Town Plan principle of 'Balanced Growth'. Para 6 It seems right that there is an emphasis on employment opportunities and that some of this is in terms of allocated land. However, employment (post Covid) may be better provided by enhancing electronic 'highways' and the provision of free or wide band-width broadband in terms of employment opportunities is missing from the Local Plan. Para 7 accepts the so-called North West Relief Road as a factor in extending the pre-set "Development Boundary" for both ELR 67 and SHR 173. However, the new road is not necessary to extend these boundaries. In the case of SHR 173, the limitations concern the access from Ellesmere Road. Personal experience suggests that the NWRR traffic predictions for Ellesmere road are now inaccurate and that the NWRR will not reduce accessibility along that road. Para 11 lacks the definition that would ENSURE that desired outcomes are met. Para 12 is welcome and needs a degree of extrapolation. In terms of particular sites for development, the allocations are accepted but (previous experience suggests) a lack of degree of specification that might avoid the considerable public opposition to particular developments. Each of these sites needs a closer detailed specification of the local needs, how the local voice will be heard, the infrastructure implications and contributions, in addition to the Shropshire test and any Big Town Plan test requirements. The specifications for these sites have insufficient detail to avoid considerable local disquiet and long term sub-standard living
A0962B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Error in Consultation Inset Plan for Baschurch which should be corrected. Extract from Plan Review Extract Shropshire Local Plan Review extract approved for consultation at Cabinet 20th July 2020 contrasted with the Plan that formed part of the 3rd August to 30th September consultation. Developer request that the settlement boundary be amended to accommodate the extent of planning permissions for mixed use including residential development was reflected on Baschurch inset plan considered by the Cabinet Committee on the 20th July 2020 but not included in the consultation version plan. Understand that this is a cartographical error which will be rectified and if this is the case objection will not be relevant. Also object to the exclusion of additional area fully wrapped around & contained by the development boundary line from the settlement. Baschurch is identified as a Community Hub and focus for development within the rural area etc as set out in Policy SP7. SP9 references supporting rural communities by enabling some controlled development to maintain local sustainability & defines appropriate development. It is considered that the 2.3 ha land excluded is not open countryside, is effectively part of the settlement and serves no open countryside function. The Inset Plan development boundary lines should therefore be amended to clearly include the 2.3 ha site (BNP034a) as shown on the submitted Plan. This would allow developers with an option on the land to develop a phase 2 scheme linked to the phase optioned land with planning permission. The site assessment identifies that the site is available, sustainable & suitable. The site has also been established as viable by the prospective developer, available now, is a suitable location for development and should be considered deliverable as a windfall site within development boundary which will assist in meeting housing target.
A0974B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Support for inclusion of site Land between A5 and Holyhead Road, Montford Bridge SY4 1EG
A0975B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Supporting information for inclusion of Land at Underdale off Woodcote Way SY2 5TB in Shrewsbury
A0975B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Supporting information for inclusion of Land at Underdale off Woodcote Way SY2 5TB in Shrewsbury
A0975B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Supporting information for inclusion of Land at Underdale off Woodcote Way SY2 5TB in Shrewsbury
A0975B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Supporting information for inclusion of Land at Underdale off Woodcote Way SY2 5TB in Shrewsbury
A0976B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	It is considered that Site BAY048 should be allocated for housing in the Local Plan Review for the following reasons i. It meets the aspirations of the local community as it is a sustainable site on the edge of the settlement ii. The hatched area submitted on the attached plan extends to circa 0.7ha which would allow for 8-10 residential dwellings and this would meet the aspirations of the local community through the delivery of smaller sites on the edge of the settlement. The following sites have been graded as 'Future Potential', and in association with BAY048 could collectively achieve the residential housing need requirement of 100 dwellings (BAY008/BAY013/BAY019/BAY042). This approach would be more in line with the community's aspirations than the over reliance on one large site, namely BAY039. iii. Site BAY048 extends in total to 2.43ha which would facilitate circa 72 houses at 30dph. Should Shropshire Council disagree with the local community's aspirations for smaller sites, it is considered that the entire site would be suitable, achievable and deliverable for residential development. iv. In the round, the site provides for a contained continuation of ribbon development along Lyth Hill Road whilst not leading to an incursion into open countryside as the development will have the benefit of infilling the gap between Bayston Hill and The White House. v. The site is extremely well serviced in terms of access to the vast array of services and facilities in Bayston Hill. vi. The site is presently used for agricultural purposes and is not constrained by any statutory, historic or environmental designations or ownership issues. The site offers a relatively flat, un-prominent, neutral, well bounded sustainable site for housing development. vii. The site is sustainable, achievable and deliverable within the plan period
A0976B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	It is considered that the allocation of the 'Preferred Site' BAY039 is inappropriate for the settlement of Bayston Hill due to the following reasons: i. An outline planning application (17/02561/OUT) for residential development for 103 dwellings was refused on this site on 10/10/2017. The proposal met with a high level of objection from local residents, including the Parish Council. The following key reasons for objection remain relevant in contesting the allocation of the site: a. Prominent visual position. b. The application was accompanied by a flood risk assessment which concludes that extensive mitigation measures will be required to prevent the risk of flooding affecting properties outside the site. c. Furthermore, the south-east end of the site is at high risk of surface water flooding. ii. Bayston Hill are currently preparing a Community Led Plan (2028). The initial aspirations of the community can be summarised as follows: a. Desire for small housing sites geographically spread around the village. b. Smaller developments to provide opportunities for local builders and developers. c. Smaller sites will enable a greater level of individuality to come forward through design and materials. d. Mixed development size to meet the varying needs of the community and provide support for local services. e. The survey has found an identified need for all house types, including those suitable for downsizing and 4-5 bed executive homes. f. Local support to retain a gap between Bayston Hill and Shrewsbury to protect its unique character. iii. Further to the above points, Site BAY039 does not accord with the aspirations of the local community.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0977B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Promotion of site HWD005 in Hanwood. Whilst agreeing with the principle of the upgrade of Hanwood to a community Hub from a community Cluster in the draft Local Plan, the owner of land west of Orchard Lane, Hanwood disagrees with the content of Policy SP7 as, in the case of Hanwood, the housing guideline for the settlement can not be delivered within the current, out of date, development boundary. In the light of the impossibility of the 15 required "windfall" dwellings being built within the Hanwood development boundary, our client suggests that Policy S16.2 is amended to propose an extension to the development boundary for Hanwood to include his land west of Orchard Lane (HWD005) as an allocated site. The HWD005 site has already been identified as a "Long Term Potential" residential site in the SLAA. (See attached Feb 2019 Supporting Statement). The attached Illustrative Site Plan demonstrates how this can be achieved on the lower part of the HWD005 site by the provision of twelve small to medium sized dwellings served by an upgrade to Orchard Lane and the unmade track to Highfield. This proposed enhancement of the Orchard Lane connection to the A488 represents a significant benefit (confirmed by the Council's Highways Officer) to the community by the provision of highway safety and drainage improvements to the Weir Road/Orchard Lane/A488 junction. The types and sizes of the dwellings can be agreed at the planning application stage in accordance with proposed Policies DP1 – DP7, but an early assessment of the capacity of the site indicates that a cross-subsidy/lower cost market/entry level/older persons' housing scheme may be the most appropriate.
A0981B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The proposed development of 400 dwellings is of sufficient size to generate demand for playing fields, and whilst it would not be expected by Sport England that such provision should be delivered on-site for this proposed allocation, the policy should require that developers would be expected to make off-site developer contributions towards the delivery of playing field provision, in line with investment priorities identified the Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) and that contributions will be calculated using Sport England's Playing Pitch Calculator. In the Central sub area (of which Shrewsbury forms part) there are currently shortfalls of capacity for cricket and rugby union, and there are predicted to be shortfalls for football, rugby union and cricket in the future taking into account participation and population growth. There is also an identified need for investment in additional 3G artificial grass pitches to meet existing and future needs. The demand from this proposed housing allocation using Sport England's Playing Pitch Calculator is set out on the separate sheet that accompanies this form. In summary, the development would generate demand for 1.01 playing pitches and 1.34 changing rooms. Within the Shrewsbury area, the PPS identifies a need for new full size 3G pitch and additional cricket provision. There is also a need to improve rugby provision. The ECB advise that several Shrewsbury based clubs including Shrewsbury CC, Pontebury CC and Beacon CC would most likely pick up the additional demand for cricket and have links to secondary schools on the west side of Shrewsbury. Growth in teams would generate the need for investment both in additional cricket pitches but also improved ancillary provision. The Football Foundation also comment regarding the need for additional 3G pitch provision on the west side of Shrewsbury as there are limited alternative opportunities to secure a suitable site to serve this demand. The RFU comment that the main priorities would be to secure contributions towards off-site improvements at Shrewsbury RFC, however there is also a need for a World Rugby compliant 3G pitch for training. Given the need for new provision, it is recommended that the wording of the proposed allocation is expanded to expressly reference the need to secure contributions towards off-site investment in playing pitch provision in Shrewsbury, which could be pooled with other contributions from other developments in Shrewsbury to deliver identified priorities for sports pitches. The policy should reference that developer(s) will be expected to work with NGB's to identify the most appropriate mix of sports facilities to address these identified needs and to secure their future management and maintenance where necessary. The additional sheet also sets out the demand for sports halls and swimming pools using Sport England's Sports Facilities Calculator. Whilst the development, of itself, would not generate sufficient demand to justify provision of additional sports halls and swimming pools, a contribution towards improving the quality of facilities would be justified. The Council's Built Sports Facilities Strategy identifies that whilst there is sufficient quantitative provision of swimming pools and sports halls to meet the existing and future needs of the population, the stock of facilities are aging and in need of investment. The focus for any developer contributions should therefore be on contributing towards qualitative improvements to existing built sports facilities including the Quarry Leisure Centre facility. The proposed allocation should therefore also make provision for a suitable developer contribution towards built sports facility investment in line with the priorities identified in the Built Sports Facilities Strategy. It is recommended that this is set out in the wording of the proposed allocation so that developer(s) are clear what is required to be provided to address the infrastructure needs generated by this development.
A0981B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The proposed development of 450 dwellings is of sufficient size to generate demand for playing fields, and whilst it would not be expected by Sport England that such provision should be delivered on-site for this proposed allocation, the policy should require that developers would be expected to make off-site developer contributions towards the delivery of playing field provision, in line with investment priorities identified the Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) and that contributions will be calculated using Sport England's Playing Pitch Calculator. In the Central sub area (of which Shrewsbury forms part) there are currently shortfalls of capacity for cricket and rugby union, and there are predicted to be shortfalls for football, rugby union and cricket in the future taking into account participation and population growth. There is also an identified need for investment in additional 3G artificial grass pitches to meet existing and future needs. The demand from this proposed housing allocation using Sport England's Playing Pitch Calculator is set out on the separate sheet that accompanies this form. In summary, the development would generate demand for 1.13 playing pitches and 1.51 changing rooms. Within the Shrewsbury area, the PPS identifies a need for new full size 3G pitch and additional cricket provision. There is also a need to improve rugby provision. The ECB advise that several Shrewsbury based clubs including Shrewsbury CC, Pontebury CC and Beacon CC would most likely pick up the additional demand for cricket and have links to secondary schools on the west side of Shrewsbury. Growth in teams would generate the need for investment both in additional cricket pitches but also improved ancillary provision. The Football Foundation also comment regarding the need for additional 3G pitch provision on the west side of Shrewsbury as there are limited alternative opportunities to secure a suitable site to serve this demand. The RFU comment that the main priorities would be to secure contributions towards off-site improvements at Shrewsbury RFC, however there is also a need for a World Rugby compliant 3G pitch for training. Given the need for new provision, it is recommended that the wording of the proposed allocation is expanded to expressly reference the need to secure contributions towards off-site investment in playing pitch provision in Shrewsbury, which could be pooled with other contributions from other developments in Shrewsbury to deliver identified priorities for sports pitches. The policy should reference that developer(s) will be expected to work with NGB's to identify the most appropriate mix of sports facilities to address these identified needs and to secure their future management and maintenance where necessary. The additional sheet also sets out the demand for sports halls and swimming pools using Sport England's Sports Facilities Calculator. Whilst the development, of itself, would not generate sufficient demand to justify provision of additional sports halls and swimming pools, a contribution towards improving the quality of facilities would be justified. The Council's Built Sports Facilities Strategy identifies that whilst there is sufficient quantitative provision of swimming pools and sports halls to meet the existing and future needs of the population, the stock of facilities are aging and in need of investment. The focus for any developer contributions should therefore be on contributing towards qualitative improvements to existing built sports facilities including the Quarry Leisure Centre facility. The proposed allocation should therefore also make provision for a suitable developer contribution towards built sports facility investment in line with the priorities identified in the Built Sports Facilities Strategy. It is recommended that this is set out in the wording of the proposed allocation so that developer(s) are clear what is required to be provided to address the infrastructure needs generated by this development.
A1011B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1012B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1013B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1014B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1015B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1016B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1017B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1018B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1019B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1020B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1021B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1022B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1023B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.

Page 318

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1092B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wishes to see Cross Houses designated as Open Countryside following a period of significant housing development in Cross Houses, and the village needs time to assimilate this development. Increased volume and speed of traffic on the A458 is a concern for residents. Expresses concern that the Parish Council have not challenged the designation of Cross House as a community hub, and also questions scoring criteria in hierarchy of settlements assessment, particularly Mobile library score; Children's play area; Amenity green space and Outdoor sports facility
A1093B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wishes to see Cross Houses designated as Open Countryside following a period of significant housing development in Cross Houses, and the village needs time to assimilate this development. Increased volume and speed of traffic on the A458 is a concern for residents. Expresses concern that the Parish Council have not challenged the designation of Cross House as a community hub, and also questions scoring criteria in hierarchy of settlements assessment, particularly Mobile library score; Children's play area; Amenity green space and Outdoor sports facility
A1094B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wishes to see Cross Houses designated as Open Countryside following a period of significant housing development in Cross Houses, and the village needs time to assimilate this development. Increased volume and speed of traffic on the A458 is a concern for residents. Expresses concern that the Parish Council have not challenged the designation of Cross House as a community hub, and also questions scoring criteria in hierarchy of settlements assessment, particularly Mobile library score; Children's play area; Amenity green space and Outdoor sports facility
A1095B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wishes to see Cross Houses designated as Open Countryside following a period of significant housing development in Cross Houses, and the village needs time to assimilate this development. Increased volume and speed of traffic on the A458 is a concern for residents. Expresses concern that the Parish Council have not challenged the designation of Cross House as a community hub, and also questions scoring criteria in hierarchy of settlements assessment, particularly Mobile library score; Children's play area; Amenity green space and Outdoor sports facility
A1096B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wishes to see Cross Houses designated as Open Countryside following a period of significant housing development in Cross Houses, and the village needs time to assimilate this development. Increased volume and speed of traffic on the A458 is a concern for residents. Expresses concern that the Parish Council have not challenged the designation of Cross House as a community hub, and also questions scoring criteria in hierarchy of settlements assessment, particularly Mobile library score; Children's play area; Amenity green space and Outdoor sports facility
A1097B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Wishes to see Cross Houses designated as Open Countryside following a period of significant housing development in Cross Houses, and the village needs time to assimilate this development. Increased volume and speed of traffic on the A458 is a concern for residents. Expresses concern that the Parish Council have not challenged the designation of Cross House as a community hub, and also questions scoring criteria in hierarchy of settlements assessment, particularly Mobile library score; Children's play area; Amenity green space and Outdoor sports facility
A1106B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Shrewsbury West Urban Extension (SUE), which contains our site, is included as a saved policy in the local plan. However, it has not been designated its own policy within the plan. We advise that as part of policy S16. Shrewsbury Place Plan Area the SUE is discussed and its benefits (namely a minimum of 750 homes which will be delivered over the coming decades) are highlighted. This will ensure that there is a coordinated approach for the Shrewsbury area as suggested in paragraph 5.222. The potential increased capacity of the site should also be examined. This site has been allocated and it is BDW's intention to deliver homes in a timely manner, in line with Shropshire's housing trajectory, once this is decided upon. The full application also demonstrates that it may be possible for the SUE to accommodate more houses than previously allocated, and we believe this should be explored by Shropshire Council. The SUE can be seen in the attached Local Plan map. However, we believe that the map's graphics and its specifications could be improved. We suggest that further detail be provided on this map and that the drawn lines used to represent certain areas (relief road, allocation, development boundary etc) are made clearer and more precise. The plan should also make reference to the SUE Masterplan which Shrewsbury was adopted in 2013 (https://www.shropshire.gov.uk/media/7262/shrewsbury-west-sue-masterplan-february-2014-appendix-a.pdf) Rather than multiple sub-divided maps the DLP could provide a single map showing the whole of the Shrewsbury area and the spatial strategy for future development. This would be helpful for the purposes of understanding and coordination. Paragraph 4.261. of the plan states that "the subregional role of Shrewsbury is to be enhanced by the delivery of the North West Relief Road to extend the A53 around the north and west of Shrewsbury." Paragraph 5.224 also discusses the relief road and the implications of its development. Although it is not mentioned, the delivery of the relief road is integral to the SUE. We support this approach, but recommend it makes a detailed reference to the Shrewsbury West Urban Extension as they are directly linked. We also request the relief road is framed as part of a wider spatial approach for the Shrewsbury area, highlighting its importance.
A1110B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I would like to make additional statements to clarify the statements made by the Longden Village Action Group. 1) The roads connecting Longden to the rest of Shropshire are very poor. I understand that the best road, which is the main Shrewsbury road, was downgraded by the council in the 1960s to no longer be a B road. There are many blind corners on this Shrewsbury Road. Around 15 years ago I was just North of Hook A Gate headed towards Longden and my car's wing mirror was ripped off by a large delivery van travelling North at great speed around a blind corner. Unlike this van, I was being careful not to cross over the lines at the middle of the road. This is a dangerous road. A little North of Hook A Gate is a weak railway bridge that it is not recommended to drive large lorries over. I understand that this Shrewsbury Road cannot be improved by for example building bypasses because it runs within a narrow valley. Longden is a gateway to the Shropshire Hills and so road building here is much more difficult and expensive than it would be in the North Shropshire Plain. Many people in Longden do not work in Shrewsbury because of the limited job opportunities there. Instead they work in Telford or Wolverhampton or beyond. The most important road out of Longden for me is the single track road to the A49. With increased traffic in recent Years I have met far more oncoming cars on this road than I used to. This bottleneck would become much worse if a significant number of new houses was built in Longden parish. This road emerges onto a hill on the A49 with poor visibility of cars travelling North on the A49. It is not a good spot for a new improved road to emerge onto the A49. I do not believe that it would be viable to build more than a the number of houses proposed in the Longden Village Development Statement without a dramatic and expensive improvement to the roads around Longden. 2) The last bus from Shrewsbury to Longden is at 18:05 and the first bus from Longden in the morning is at 08:10. I believe that even for someone working in central Shrewsbury it would not be possible to commute to and from Longden using the bus service. Leaving work early each day at 17:30, especially if you had not got in until 09:30 that morning, would be unacceptable to most employers. For a commuting bus to be viable, the last bus would need to be at 19:00 or later. Commuting to a more likely centre of employment such as Telford would of course be impossible using the Longden bus service. 3) A number of "facilities" around Longden have been awarded a points score similar to that of Pontesbury to justify Longden also being defined as a hub for house building. Pontesbury Library is open for 4 days a week, including Saturday. The library bus that turns up infrequently in Longden offers a much poorer service. Similarly the opening hours for Longden shop are much shorter than those for the Coop in Pontesbury which unlike the shop in Longden has a good range of reasonably priced products. The Tankerville Arms in Longden seems to only be open erratically due to a lack of customers. I suspect that it will shut. Similarly the Church (when it was open) did not have weekly services. Annscroft Church is the only well attended Church in this group of parishes.
A1111B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I am a resident of Longden. I agree with the letter representing the residents of Longden village in its entirety. I strongly object to Longden village becoming a hub for new housing developments as proposed by a new system of allocating points for existing services in the village such as a library van, a bus service or a pub. Somehow the point system has unequally given us the same planning status as a much more developed village such as Pontesbury, which is almost a small town in comparison having a purpose built library a Secondary school and even a small supermarket. Longden has only one very small shop/post office, a small school, and a pub that has partly been sold for building. This can not be right or fair. I am shocked by the ever increasing pressure for more and more housing in this small village in rural Shropshire, with limited local job opportunities. The only current options are for people to commute elsewhere, generally by car to places like Shrewsbury and Telford, along narrow country lanes where residents are finding it more and more difficult to pull in to their own drives because of the speed of continuous streams of traffic. Much of the housing in the village is actually on the Shrewsbury to Longden road, or for example Plealey Lane, and along with most of the County we are concerned about vans and cars using the back- lanes as commuter runs or school runs etc. brought here by their sat navs. I have just discovered a very good survey that was produced by Shropshire County Council in 2006 'The Shropshire-landscape-typology.PDF' the gist of it is that the landscape in and around Longden developed gradually over centuries, and has been looked after and farmed with care and attention emerging as I understand it from open moorland on the high ground of the Stiperstones not far away with common land that gradually became enclosed by field boundaries i.e. hedges many centuries ago. The hedges have a mix of all sorts of old trees and hawthorn which are great for wildlife. The large estates had an effect on the landscape, with a history of looking after the land and helping to create our valued landscapes, each and every field is part of that landscape and would disappear with the first removal of our wonderful hedges to make room for a new access road. We are not far from an area of outstanding natural beauty, and already the U.K gov.t is thinking of protecting more land from development to help our environment and biodiversity. The public are becoming more concerned about the loss of the natural world. During coronavirus lock-down, it was remarkable to see how many people took to cycling and walking in the area with the lack of traffic. The air felt cleaner. As Shrewsbury becomes more densely built up particularly in and around the Radbrook area and places like Sweet Lake at Nobold not too far away, it seems that people are looking to the Shrewsbury - Longden route as a way out of the town to enjoy the country-side for exercise etc. and for rural escapes. The popularity of the Shropshire Hills is an asset to everybody and appears to be more popular than ever. Cardingmill Valley attracts around a million visitors a year, and camp sites such as the one at Ratlinghope near Bridges are pretty busy with those looking to hike and bird watch. Any increase in the size of Longden will have an impact on Tourism and leisure activities, in fact the new development of 13 houses on the old 'Arrow 'site in Longden can be clearly seen from the top of the Lawley hill, one of our iconic Shropshire landmarks. We understand that there is a demand for housing but would argue that there are better places for it, and in the mean-time will be supporting U.K. farming to reduce air miles and help to alleviate climate change wherever possible.
A1111B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I am a resident of Longden. I agree with the letter representing the residents of Longden village in its entirety. I strongly object to Longden village becoming a hub for new housing developments as proposed by a new system of allocating points for existing services in the village such as a library van, a bus service or a pub. Somehow the point system has unequally given us the same planning status as a much more developed village such as Pontesbury, which is almost a small town in comparison having a purpose built library a Secondary school and even a small supermarket. Longden has only one very small shop/post office, a small school, and a pub that has partly been sold for building. This can not be right or fair. I am shocked by the ever increasing pressure for more and more housing in this small village in rural Shropshire, with limited local job opportunities. The only current options are for people to commute elsewhere, generally by car to places like Shrewsbury and Telford, along narrow country lanes where residents are finding it more and more difficult to pull in to their own drives because of the speed of continuous streams of traffic. Much of the housing in the village is actually on the Shrewsbury to Longden road, or for example Plealey Lane, and along with most of the County we are concerned about vans and cars using the back- lanes as commuter runs or school runs etc. brought here by their sat navs. I have just discovered a very good survey that was produced by Shropshire County Council in 2006 'The Shropshire-landscape-typology.PDF' the gist of it is that the landscape in and around Longden developed gradually over centuries, and has been looked after and farmed with care and attention emerging as I understand it from open moorland on the high ground of the Stiperstones not far away with common land that gradually became enclosed by field boundaries i.e. hedges many centuries ago. The hedges have a mix of all sorts of old trees and hawthorn which are great for wildlife. The large estates had an effect on the landscape, with a history of looking after the land and helping to create our valued landscapes, each and every field is part of that landscape and would disappear with the first removal of our wonderful hedges to make room for a new access road. We are not far from an area of outstanding natural beauty, and already the U.K gov.t is thinking of protecting more land from development to help our environment and biodiversity. The public are becoming more concerned about the loss of the natural world. During coronavirus lock-down, it was remarkable to see how many people took to cycling and walking in the area with the lack of traffic. The air felt cleaner. As Shrewsbury becomes more densely built up particularly in and around the Radbrook area and places like Sweet Lake at Nobold not too far away, it seems that people are looking to the Shrewsbury - Longden route as a way out of the town to enjoy the country-side for exercise etc. and for rural escapes. The popularity of the Shropshire Hills is an asset to everybody and appears to be more popular than ever. Cardingmill Valley attracts around a million visitors a year, and camp sites such as the one at Ratlinghope near Bridges are pretty busy with those looking to hike and bird watch. Any increase in the size of Longden will have an impact on Tourism and leisure activities, in fact the new development of 13 houses on the old 'Arrow 'site in Longden can be clearly seen from the top of the Lawley hill, one of our iconic Shropshire landmarks. We understand that there is a demand for housing but would argue that there are better places for it, and in the mean-time will be supporting U.K. farming to reduce air miles and help to alleviate climate change wherever possible.
A1126B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Given the mix of facilities and infrastructure it is recognised that Bayston Hill is a Community Hub. However, given that facilities and infrastructure are already over-structed, a range of smaller sites rather than rapid development of larger sites is considered more sustainable. The recently completed Community Led Plan revealed a clear preference within the community for smaller developments. The guideline for Bayston Hill is too high and difficult to achieve without extending the development boundary. Standard density assumptions for sites (30dph) are too high, as reflected in the proposed capacity of allocations. BAY039 should be removed from the draft Local Plan as: There is strong local opposition to the site from residents and the Parish Council. An Outline Planning Application was previously refused on the site. The decision notice indicated a reason for refusal was the site being outside the development boundary - don't simply change the boundary to permit development. The site has a poor access off Lyth Hill Road and additional traffic will probably cause the junction with Hereford Road to become overwhelmed. Particularly in combination with other development proposals. It is remote from most of the existing facilities in the village Its development will have a negative impact upon Lyth Hill Country Park (a potential Local Nature Reserve) and existing residents. It may impact on the viability of other sites. There is significant concern that if BAY039 is allocated and the development boundary expanded to reflect this, it will not be long before more than 20ha of greenfield land is developed. Disagree with development boundary being amended to include BAY039. Alternative sites which do not involve the expansion of the villages development boundary should be considered, including BAY050, BAY013, BAY026 and BAY019. Some of these perform more favourably within the S/

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1126B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	SHR145 should be removed from the draft Local Plan as: Local residents and Bayston Hill Parish Council are opposed to the site. An Outline Planning Application was previously refused on the site. This decision should hold for a significant period and the site will never prove to be a suitable environment for good quality housing - keeping windows closed because of noise pollution. Creating a new access onto Hereford Road is likely to increase the numbers of vehicles/congestion on the A5/A49 Dobbie's roundabout and the entrance to Meole Brace Retail Park. The central reservation on Hereford Road means access is likely to be left turn only, increasing pressure on these roundabouts further. If the site is developed a second entrance to Meole Brace Retail Park may be required. The site should be retained as countryside. Disagree with development boundary being amended to include SHR145.
A1126B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Fully endorse para 5.228 of the Explanation to Policy S16.4 which recognises the important of retaining the Green Gap to the north of Bayston Hill between Shrewsbury and the village.
A1126B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Given the mix of facilities and infrastructure it is recognised that Bayston Hill is a Community Hub. However, given that facilities and infrastructure are already over-stretched, a range of smaller sites rather than rapid development of larger sites is considered more sustainable. The recently completed Community Led Plan revealed a clear preference within the community for smaller developments. The guideline for Bayston Hill is too high and difficult to achieve without extending the development boundary. Standard density assumptions for sites (30dph) are too high, as reflected in the proposed capacity of allocations. The Parish Council recognises this site as the most appropriate location for a larger scheme as it has good links with existing infrastructure and offers the opportunity to enhance the village facilities through the provision of a Community Hub. The open space of the Glebeland is much valued by the local community and it is important that a significant area of green space is allocated on the site. Object to the possible infringement on Green Space provision on the site. Do not support any trade-off of green space in relation to this site. The open space that is provided is for all the community and allows good access to pathways. There is a need for retirement bungalows and low cost 2 and 3 bedroom homes, as evidenced within the recently completed Community Led Plan Survey (2018)
A1127B1	Viability and Deliverability of Proposed Site	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Agree with site allocation, but guideline is too low. It should be around 30, not 15. Likely to be short to medium term.
A1129B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The Pre-Submission Draft Plan proposes the allocation of Land West of Ellesmere Road, Shrewsbury (SHR173) for the development of 450 dwellings. Our client does not object to the principle of development of land to the west of Ellesmere Road for new housing and is indeed supportive of this location as a sustainable part of Shrewsbury within which new homes can be provided, particularly in the context of progress towards the implementation of the Northern West Relief Road (NWRR). Our client is however concerned that the proposed allocation of SHR173 is not effectively justified. Put simply it is not clear why SHR173 is the preferred location in the west of Shrewsbury area for new development when there are other available, suitable and achievable development sites including our client's land interests at Crosshill Farm (SHR163) and more widely as defined in site no. SHR174. Our client has reviewed the evidence base for the Plan's proposed allocation of SHR173 including both the strategic housing land availability assessment and the various stages of the Plan's Sustainability Appraisal (SA) of the potential sites. On its own evidence there is very little difference in the suitability for residential development of SHR173 above or in preference to other adjacent/nearby sites including SHR174. A side-by-side comparison of the SA analysis and findings for both SHR173 and SH174 has been undertaken for our client and is appended to this representation. It is plainly evident from this comparison that both site areas perform well as sustainable locations for new residential development but there is not objective differentiation for the proposed allocation of SHR173 only given the obvious merits of SHR174. It is also evident that the SA analysis for both sites (and indeed others) has been undertaken on an inconsistent basis with very different weight and emphasis applied to the ability to develop the sites; their possible highways/traffic effects and ecological and air quality/noise implications. In short the assessment of SHR173 appears to be biased in favour of the site's allocation above SHR174 or other sites in these regards against a baseline position which is very similar in terms of inter alia: overall location, access, landscape, ecology and future development of the NWRR. The SA analysis also makes some very sweeping and general assumptions as to the capacity of the sites and the possible effects of development arising from each (this is subject to further comment in a separate representation concerning the omission of SHR174 from the Pre-Submission Draft Plan). Overall our client concludes that while SHR173 is a sustainable development site that there is no objective evidence upon which this allocation should be favoured now above other sites including SHR163 and SHR174 which is equally or indeed better placed to support the sustainable development of new housing for Shrewsbury.
A1129B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The identification of Shrewsbury as the Strategic Centre of Shropshire and the primary focus for development in policy S16.1 is supported. An increased focus on Shrewsbury is appropriate given the town's role and function as the primary, highest order centre in Shropshire and given that there are available opportunities for new housing development within the town and through new sustainable urban extensions. It is essential that the Local Plan Review maximises opportunities for housing development in sustainable locations such as Shrewsbury and its immediate surroundings. It is our client's view however that Shrewsbury should accommodate additional housing development above the level identified in policy S16.1 (8,625 dwellings). The town and its immediate hinterland benefits from the highest levels of access to jobs, services and facilities and is well positioned with respect to existing and proposed/emerging infrastructure, including the new North West Relief Road. Our client's land to the west of Ellesmere Road is not physically or environmentally encumbered and should form a focus for future housing development allocation in this Plan. The land is capable of sustainable development along with contributions towards critical infrastructure identified in the Settlement Strategy. The focus of growth to the west of the town is supported in principle as set out in S16.1 at bullet 4. Our client considers that there are other sites, including their land interests to the West of Ellesmere Road that are suitable and sustainable locations for residential development that would help further support the focus of growth for Shrewsbury. In this respect, the delivery of the Northern West Relief Road (NWRR) set out in bullet 7 of policy S16.1 is supported in principle with the proposed road line identified on the Policies Map. Our client does not however support the proposed retention of the Countryside designation for land between the proposed NWRR road and the existing area of Shrewsbury along the line of Ellesmere Road. The implementation of the NWRR in this location is a fundamental change to the landscape character and visual relationship of the countryside to the town in this location. There is little logical reason to exclude the area contained between the NWRR and the town from being used for appropriate additional residential and commercial development and it is noted that the Plan supports commercial (but not residential development) within this area (as bullet 7 sets out). There is no justification or rationale for restricting this area from providing for residential development and it is noted in the Plan's Sustainability Appraisal and in the previous SHLAA sites assessment evidence that our client's site (Refs: SHR163 and SHR174) performs as well as the proposed allocation of site SHR173 and it is unclear why this site has been selected in preference. Overall, our client's site (and surrounding land as a part of SHR174) can and should make a positive residential development contribution to the future growth of Shrewsbury particularly in light of the changing character and levels of accessibility to the area provided by the implementation of the NWRR. The Draft Plan misses an opportunity to allow new land for development to come forward before the NWRR is completed and which can assist in helping meet the immediate housing land supply requirements of the Plan period, or in the circumstances that other allocated sites fail to be delivered.
A1129B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Our client has land interests that are encompassed by site reference no. SHR163 (Land at Crosshill Farm, west of Ellesmere Road, Shrewsbury). Our client objects to the omission of their land interest SHR163 from the Pre-Submission Draft Plan including at policy Schedule S16.1 (i) and the relevant Policies Map Inset S16 (Shrewsbury Town). Our client has previously provided Shropshire Council with substantial details setting out the availability, suitability and achievability of significant, sustainable residential-led development of the site on its own terms and as part of the wider SHR174 site area. The principle of residential development in the area to the west of Shrewsbury is supported in the Pre-Submission Draft Plan and is welcomed by our client. However the failure to identify and allocate our client's land represents a significant omission from the Plan given the level and nature of new housing required in Shrewsbury and in Shropshire overall. The characteristics of the area to the west of Ellesmere Road are anticipated to fundamentally change during the lifetime of the Plan with the confirmed funding and development proposals for the new North West Relief Road (NWRR) infrastructure that will cut through, bisecting our client's land and encompassing a substantial area to the east of the NWRR within a more urbanised character setting at the edge of Shrewsbury. Put simply, there will be a new hard urban edge to Shrewsbury created by the NWRR and which should be used positively in the Plan to form a new, sustainable, residential development area for Shrewsbury. The presence of the new road will, as designed in the emerging planning application, effectively transform the landscape and visual character of the surrounding area as well as change the ecological and biodiversity relationship of Hencott Pool Ramsar/SSSI with the surrounding land to the east. The road will also bring new opportunities for improved strategic and local area highway access for land to the west of Ellesmere Road. Set against this substantial change in underlying characteristics, it is not clear why SHR163 has been omitted from allocation in the Pre-Submission Draft Plan when the nearby neighbouring site SHR173 has now been proposed for allocation. This is particularly concerning given our client's concern that the Sustainability Assessment (SA) and strategic housing land availability assessment evidence that purports to underpin SHR173 does not demonstrate any fundamental, objective differences between SHR173 and SHR163. Our client has conducted a side-by-side comparison of the SA and site assessments undertaken for SHR173 and SHR163 and is concerned that the assessments (a) do not appear to have been undertaken on a consistent or comprehensive basis; (b) fail to reflect the actual physical characteristics of SHR163 or the ability of that site to resolve, mitigate or compensate any potential ecological, noise, access or air quality effects (which the SA downplays substantially in relation to SHR173). Overall, there is no clear evidence why SHR163 was not proposed for allocation as it performs equally or better than SHR173 and has the added benefit of being able to positively address the NWRR as part of any future development of the land. Our client therefore objects to the omission of SHR163 due to the lack of objective evidence or rational planning arguments for its exclusion from the Draft Plan and the inconsistent approach taken to its assessment alongside other sites, including SHR173, in the SA. SHR163 is available, acceptable and can be delivered as a sustainable residential development site (on its own or as part of SHR174 and with SHR109 in part) within the early part of the Shropshire Plan period. The site's allocation would provide a positive and proactive response to the changing character and nature of the surrounding area as well as offering a scale of site opportunity that can effectively address landscape and open space infrastructure requirements and deliver ecological and biodiversity benefits above those offered by the new NWRR road.
A1129B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Comparison Document of sites on Ellesmere Road to support information submitted in response A1129
A1130B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The Pre-Submission Draft Plan proposes the allocation of Land West of Ellesmere Road, Shrewsbury (SHR173) for the development of 450 dwellings. Our client does not object to the principle of development of land to the west of Ellesmere Road for new housing and is indeed supportive of this location as a sustainable part of Shrewsbury within which new homes can be provided, particularly in the context of progress towards the implementation of the Northern West Relief Road (NWRR). Our client is however concerned that the proposed allocation of SHR173 is not effectively justified. Put simply it is not clear why SHR173 is the preferred location in the west of Shrewsbury area for new development when there are other available, suitable and achievable development sites including our client's land interests at Crosshill Farm (SHR163) and more widely as defined in site no. SHR174. Our client has reviewed the evidence base for the Plan's proposed allocation of SHR173 including both the strategic housing land availability assessment and the various stages of the Plan's Sustainability Appraisal (SA) of the potential sites. On its own evidence there is very little difference in the suitability for residential development of SHR173 above or in preference to other adjacent/nearby sites including SHR174. A side-by-side comparison of the SA analysis and findings for both SHR173 and SH174 has been undertaken for our client and is appended to this representation. It is plainly evident from this comparison that both site areas perform well as sustainable locations for new residential development but there is not objective differentiation for the proposed allocation of SHR173 only given the obvious merits of SHR174. It is also evident that the SA analysis for both sites (and indeed others) has been undertaken on an inconsistent basis with very different weight and emphasis applied to the ability to develop the sites; their possible highways/traffic effects and ecological and air quality/noise implications. In short the assessment of SHR173 appears to be biased in favour of the site's allocation above SHR174 or other sites in these regards against a baseline position which is very similar in terms of inter alia: overall location, access, landscape, ecology and future development of the NWRR. The SA analysis also makes some very sweeping and general assumptions as to the capacity of the sites and the possible effects of development arising from each (this is subject to further comment in a separate representation concerning the omission of SHR174 from the Pre-Submission Draft Plan). Overall our client concludes that while SHR173 is a sustainable development site that there is no objective evidence upon which this allocation should be favoured now above other sites including SHR163 and SHR174 which is equally or indeed better placed to support the sustainable development of new housing for Shrewsbury.
A1130B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The identification of Shrewsbury as the Strategic Centre of Shropshire and the primary focus for development in policy S16.1 is supported. An increased focus on Shrewsbury is appropriate given the town's role and function as the primary, highest order centre in Shropshire and given that there are available opportunities for new housing development within the town and through new sustainable urban extensions. It is essential that the Local Plan Review maximises opportunities for housing development in sustainable locations such as Shrewsbury and its immediate surroundings. It is our client's view however that Shrewsbury should accommodate additional housing development above the level identified in policy S16.1 (8,625 dwellings). The town and its immediate hinterland benefits from the highest levels of access to jobs, services and facilities and is well positioned with respect to existing and proposed/emerging infrastructure, including the new North West Relief Road. Our client's land to the west of Ellesmere Road is not physically or environmentally encumbered and should form a focus for future housing development allocation in this Plan. The land is capable of sustainable development along with contributions towards critical infrastructure identified in the Settlement Strategy. The focus of growth to the west of the town is supported in principle as set out in S16.1 at bullet 4. Our client considers that there are other sites, including their land interests to the West of Ellesmere Road that are suitable and sustainable locations for residential development that would help further support the focus of growth for Shrewsbury. In this respect, the delivery of the Northern West Relief Road (NWRR) set out in bullet 7 of policy S16.1 is supported in principle with the proposed road line identified on the Policies Map. Our client does not however support the proposed retention of the Countryside designation for land between the proposed NWRR road and the existing area of Shrewsbury along the line of Ellesmere Road. The implementation of the NWRR in this location is a fundamental change to the landscape character and visual relationship of the countryside to the town in this location. There is little logical reason to exclude the area contained between the NWRR and the town from being used for appropriate additional residential and commercial development and it is noted that the Plan supports commercial (but not residential development) within this area (as bullet 7 sets out). There is no justification or rationale for restricting this area from providing for residential development and it is noted in the Plan's Sustainability Appraisal and in the previous SHLAA sites assessment evidence that our client's site (Refs: SHR163 and SHR174) performs as well as the proposed allocation of site SHR173 and it is unclear why this site has been selected in preference. Overall, our client's site (and surrounding land as a part of SHR174) can and should make a positive residential development contribution to the future growth of Shrewsbury particularly in light of the changing character and levels of accessibility to the area provided by the implementation of the NWRR. The Draft Plan misses an opportunity to allow new land for development to come forward before the NWRR is completed and which can assist in helping meet the immediate housing land supply requirements of the Plan period, or in the circumstances that other allocated sites fail to be delivered.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1130B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Our client has land interests that are encompassed by site reference no. SHR163 (Land at Crosshill Farm, west of Ellesmere Road, Shrewsbury). Our client objects to the omission of their land interest SHR163 from the Pre-Submission Draft Plan including at policy Schedule S16.1 (i) and the relevant Policies Map Inset S16 (Shrewsbury Town). Our client has previously provided Shropshire Council with substantial details setting out the availability, suitability and achievability of significant, sustainable residential-led development of the site on its own terms and as part of the wider SHR174 site area. The principle of residential development in the area to the west of Shrewsbury is supported in the Pre-Submission Draft Plan and is welcomed by our client. However the failure to identify and allocate our client's land represents a significant omission from the Plan given the level and nature of new housing required in Shrewsbury and in Shropshire overall. The characteristics of the area to the west of Ellesmere Road are anticipated to fundamentally change during the lifetime of the Plan with the confirmed funding and development proposals for the new North West Relief Road (NWRR) infrastructure that will cut through, bisecting our client's land and encompassing a substantial area to the east of the NWRR within a more urbanised character setting at the edge of Shrewsbury. Put simply, there will be a new hard urban edge to Shrewsbury created by the NWRR and which should be used positively in the Plan to form a new, sustainable, residential development area for Shrewsbury. The presence of the new road will, as designed in the emerging planning application, effectively transform the landscape and visual character of the surrounding area as well as change the ecological and biodiversity relationship of Hencott Pool Ramsar/SSSI with the surrounding land to the east. The road will also bring new opportunities for improved strategic and local area highway access for land to the west of Ellesmere Road. Set against this substantial change in underlying characteristics, it is not clear why SHR163 has been omitted from allocation in the Pre-Submission Draft Plan when the nearby neighbouring site SHR173 has now been proposed for allocation. This is particularly concerning given our client's concern that the Sustainability Assessment (SA) and strategic housing land availability assessment evidence that purports to underpin SHR173 does not demonstrate any fundamental, objective differences between SHR173 and SHR163. Our client has conducted a side-by-side comparison of the SA and site assessments undertaken for SHR173 and SHR163 and is concerned that the assessments (a) do not appear to have been undertaken on a consistent or comprehensive basis; (b) fail to reflect the actual physical characteristics of SHR163 or the ability of that site to resolve, mitigate or compensate any potential ecological, noise, access or air quality effects (which the SA downplays substantially in relation to SHR173). Overall, there is no clear evidence why SHR163 was not proposed for allocation as it performs equally or better than SHR173 and has the added benefit of being able to positively address the NWRR as part of any future development of the land. Our client therefore objects to the omission of SHR163 due to the lack of objective evidence or rational planning arguments for its exclusion from the Draft Plan and the inconsistent approach taken to its assessment alongside other sites, including SHR173, in the SA. SHR163 is available, acceptable and can be delivered as a sustainable residential development site (on its own or as part of SHR174 and with SHR109 in part) within the early part of the Shropshire Plan period. The site's allocation would provide a positive and proactive response to the changing character and nature of the surrounding area as well as offering a scale of site opportunity that can effectively address landscape and open space infrastructure requirements and deliver ecological and biodiversity benefits above those offered by the new NWRR road.
A1130B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Comparison Document of sites on Ellesmere Road to support information submitted in response A1130
A1139B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I have concerns about this site due to its proximity to my home in Carmen Avenue, Shrewsbury. The noise from the A49 and A5 are intrusive currently and I do not look forward to this site creating more noise and light pollution. What does 'appropriate' links from the site into town mean? Will these links meet the aim to reduce travel by car? Where is the proposed Parkway Station in relation to this site?
A1152B46	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	During the Preferred Scale and Distribution of Development consultation 8,625 dwellings and 91ha of employment land was proposed (based on the proposed balanced growth). This remained the same during the preferred sites consultation. In the draft Local Plan despite the plan period having been increased by 10%, and there being an increasing urban focus, the housing guideline figure for Shrewsbury remain unchanged, although allocations for 410 more houses are proposed. However, the employment land guideline has now been increased by 9 Ha to 100 Ha, although 6 Ha less employment land is proposed for allocation. Consider the overall housing guideline of 30,800 is exaggerated and should be considerably lower, which would have a knock-on effect on Shrewsbury. However, note the relative proportion of the overall guideline that is earmarked for the main towns has been reduced slightly. The same maths applies to the guideline for Shrewsbury.
A1160B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Longden Parish Council.</p> <p>Response to Shropshire Council's Local Plan Consultation. September 2020</p> <p>The Parish Plan, Longden Village Development Statement and the recent Public Meetings have been instrumental in formulating this response to the proposed Local Plan scheme for Longden Parish. The feelings and views of the residents have been incorporated into this considered response and the Parish Council fully endorse and support the views expressed in the objection from Longden Village Action Group.</p> <p>Longden has endeavoured to satisfy the recent SAMDev scheme that asked for a relatively large number of homes to be built within the Parish from 2016 to 2026. Longden expected 50 new properties and in fact nearly 90 have been built throughout the Parish and many more are planned and agreed. This has increased the development in Longden Parish by nearly double that which was expected!</p> <p>This recent planning history has meant that Parish residents are now firmly of the opinion that there has been enough development within the Parish. The infrastructure, road links and amenities are such that the present level of housing is close to the upper limit of capacity for the existing facilities. The road network is inadequate and has not been improved for decades. Visits to primary care services involve residents travelling by car through single track lanes to Pontesbury or Bayston Hill as there is no bus service. Housing developments nearer to Shrewsbury town have increased the traffic using the only direct route from the Parish into the town and there is always significant traffic queuing at morning and evening peak times impacting on Parish residents accessing facilities there. Residents of villages to the South also use the Longden road into Shrewsbury and the accruing vehicles are contributing to the excessive traffic numbers and speeding through the Parish.</p> <p>We are delighted to see that our arguments and requests that the villages and settlements within Longden Parish are to be given open countryside status and confirm that this is the wish of residents.</p> <p>We were dismayed however, to see that Longden village is still included in the list of proposed Hubs and this has meant the dissemination of information explaining this position particularly at residents' meetings, during COVID limitations to be rather rushed and we are concerned that despite our best efforts, some residents might still be unaware of the implications of the proposed plan. The detailed scoring for designating Longden as a HUB is badly flawed, blunt, and wrong. The allocation of points does not reflect the lack of size and capacity issues in our village so that the points awarded do not satisfactorily reflect the value of the facility being scored. We have repeatedly explained this to SC Planners and also drawn this to the attention of SC Cabinet, with little effect, as no changes to our points score have been made. Longden itself has little employment available and this factor seems to be totally ignored in promoting the village to HUB status. Access to areas of employment such as Shrewsbury or Telford etc is again often via single track lanes connecting to some main or trunk roads. With climate change and carbon emissions high on the agenda for everyone, it seems foolhardy to promote development in areas where there is poor public transport and no cycle lanes due to the narrowness of the roads. Surely it would make more sense to expect development nearer the towns, so saving the need for car journeys and avoiding the increase in carbon emissions. The infrastructure requirement for the proposed new housing has not been projected or anticipated and this will lead to further loading of existing facilities or of the poor road links to those further afield.</p> <p>The number of new houses proposed for Longden, equates to over a 35% increase in the number of dwellings in the village. This goes against the SC core strategy objective 3 that seeks to support rural communities by the delivery of local housing...appropriate to the role, size and function of each settlement. The section on Longden (para 19.75) refers to a 'modest amount of additional housing'. Little weight has been given to the character and quality of the local environment and the impact further development would have on the village character as required by objective 11 of the SC. core strategy.</p> <p>Aligning Longden Village with much larger settlements each having extensive facilities and.</p> <p>With good road links does not seem credible. Village residents do not want Longden to be a HUB. They feel that this will inevitably lead to pressure from developers to build significant numbers of new homes which goes against the recent Parish Plan and Longden Development statement to which they contributed. They feel that remaining a cluster should preserve the character of the Parish and safeguard our open countryside and traditional customs and landscape.</p> <p>The proposed development boundary for Longden provokes discussion regarding where and how the expected new housing is going to take place. The planners state that the expected new housing will come from exception sites around the development boundary. The recent Right Home Right Place survey highlighted particular housing needs and how this is expected to be met by exception sites, is anyone's guess. What we do not want is an unplanned and ad hoc approach leading to the highly valued agricultural fields around the village becoming housing estates in the coming years.</p> <p>The points the Parish Council put forward for review and action are:</p> <p>1. The Hierarchy of settlements methodology formulae is too blunt and is flawed. Longden should not have reached HUB status because there is no employment in the village which could be counted in the hierarchy of settlement assessment and should therefore have a negative score for this section.</p> <p>The points given for a 10-minute visit of a library bus, once a fortnight in the middle of the day when few are able to use it, is fundamentally wrong. Receiving three points for this fleeting visit, the same number of points as Pontesbury which has a large fully equipped and staffed library, seems particularly ridiculous!</p> <p>Longden shop is also the post office, but it is so small that only two people can use it at any one time, particularly under COVID regulations. Allocating so many points for a tiny shop and post office is completely unfair compared again with Pontesbury that has several shops, a mini-supermarket, post office, butchers, hardware store and yet gets the same points allocation as Longden!</p> <p>The Public transport link is regular, but, is so infrequent that it has little effect on sustainability. The timetable does not allow office/shop workers to arrive in time for opening/starting and outgoing or returning connections timings prohibit Public Transport links as a feasible method of gaining onward transportation to other towns. To gain 10 points for this awful service seems particularly wrong.</p> <p>Reducing points in the Settlement Hierarchy Assessment to a more realistic and rational number in these areas would lower the village points to below the HUB status threshold.</p> <p>2. Changing Longden Village from Hub as proposed and confirming its status as a cluster.</p> <p>In summation, Longden Parish Council have consulted the residents on several occasions recently and the overwhelming consensus is that Longden Village should be designated a cluster and the other settlements within the Parish be designated open countryside.</p>
A1263B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1264B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1264B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1287B1	Viability and Deliverability of Proposed Site	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Agents letter confirming interest from health care provider to develop medical and care facilities in Ford in association with a health centre and care home, with reference to site FRD011.
A1301B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1307B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.
A1308B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Concerned about level of development in Cross Houses and strongly suggest that should remain as Open Countryside and not a Community Hub. Housing needs assessment should be undertaken. Recent Parish Council Community Led Plan questionnaire was not sufficient in asking whether further development was required and the difference between Open Countryside and Community Hub. Believe Inspector should request PC to explain why this was not made clear and why they assumed Community Hub was a given. The proposed Hub status is based on a points system with several areas of contention in the scoring of services, facilities and employment for Cross Houses. Such as lack of library (mobile library does not constitute a library, single provision children's playground and amenity green space and outdoor sports facility, assumed to a playing field owned by PC which is just a field.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1646B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	SHR109 should be a housing with the adjoining land (SHR174 and SHR023). This land is capable of sustainable development along with contributions towards critical infrastructure identified in the Settlement Strategy. There is little logical reason to exclude the area contained between the NWRR and the town from being used for appropriate additional residential and commercial development. Site SHR109 as part of a comprehensive development of this area can and should therefore make a positive residential development contribution to the future growth of Shrewsbury particularly in light of the changing character and levels of accessibility to the area provided by the implementation of the NWRR. The failure to identify and allocate this land represents a significant omission from the Plan given the level and nature of new housing required in Shrewsbury and in Shropshire overall. Set against this substantial change in underlying characteristics, it is not clear why this land has been omitted from allocation in the Pre-Submission Draft Plan when the neighbouring site SHR173, equally dependent upon the NWRR, has now been proposed for allocation. It should be noted that the landowners of these parcels of land (SHR023, SHR109 and SHR174) have now agreed to jointly promote their land in order to achieve a deliverable and comprehensive sustainable development of this area.
A1700B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Cross Houses should remain a Hub. Cross Houses has had enough house building in recent years. Cross Houses' residents should have had the option to remain as Open Countryside. The points scoring is flawed – only have mobile library, only 1 children's playground, 1 amenity green space, the outdoor play facility is just a field. The Inspector should inspect all the facilities to determine whether SC is correct.
A1814B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The Village Plan should be given consideration. The site is not supported by Core Strategy, SAMDev or the revised NPPF. It is Countryside. Visibility is poor on Lyth Hill Road with on-street parking. The road is already busy due to it being a popular commuter route. The road near the site [south] is single track. Traffic would back up. The overall forecast demand should be compared to the ability of the existing network to accommodate traffic over a period up to ten years. I raise concerns over the validity of the findings of the previous applicants Transport Assessment undertaken – there is an underestimation of the vehicles numbers here. Drainage is over-capacity. Village has been over-developed. Popular footpaths will be lost. Construction traffic will last 3 years. More affordable houses needed. Dangerous walking route for any children in these houses to the schools. Doctors/dentist are over-capacity. Shops/amenities far from site. Residents do not want this site developed. There is ecological and biodiversity interest in the site.
A1834B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Consider that proposed site allocation SHR057 & SHR177; SHR145; SHR173; SHR166; SHR197VAR; and SHR060, SHR158 & SHR161 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: SHR057 & SHR177: traffic and boundary; A5 Churncote and Woodcote roundabouts. SHR145: traffic; A5/ A49 Dobbies/ Bayston Hill roundabout. SHR173: traffic; A5 Churncote and A5/ A49 Dobbies/ Bayston Hill roundabouts. SHR166: traffic; A5 Preston Island roundabout. SHR197VAR: traffic; A5 Preston Island roundabout. SHR060, SHR158 & SHR161: traffic, boundary; A5 Edgebold, A5/ A49 Dobbies/ Bayston Hill and A5 Churncote roundabouts. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development. The Circular sets out, "Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage...[and] should not normally be considered as fresh proposals at the planning application stage". This requires an assessment of the transport impacts of the above proposed allocations to be made that is appropriate in detail to the scale of the proposals such that the board requirements for any enhancements to the SRN can be identified and included in the Infrastructure Delivery Plan (IDP). A significant number of the proposed allocations (not just those in Shrewsbury itself) have a cumulative impact to the SRN around Shrewsbury (A5 and A458 routes) and would welcome separate discussions about requirements of this assessment. This will need to be extended, in a proportional way, to consider whether any of the other above allocations will also give rise to such needs. Note delivery of the proposed North West Relief Road (NWRR) is supported in principle within the draft Local Plan. The Council is currently seeking to finalise the traffic modelling and scheme design details in relation to the NWRR (including proposals at A5 Churncote roundabout), informed by discussions with Highways England. Recommend consider further the opportunity to use these strategic models to assess the likely cumulative traffic impacts from the draft Local Plan proposed site allocations on the A5 roundabouts at Shrewsbury. The final form of this scheme would also benefit from a cumulative assessment of the draft Local Plan, to confirm whether additional needs arise and whether these could be accommodated for by changes to the planned scheme.
A1834B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Consider that proposed site allocation BAY039 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: BAY039: traffic; A5/ A49 Dobbies/ Bayston Hill roundabout. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A1834B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		Consider that proposed site allocation FRD011 would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: FRD011: traffic, boundary; A5 Churncote roundabout. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A1852B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	strong objections to the proposed change of Longden village from cluster to hub status This would completely change the character of the village and the surrounding countryside as well as having a detrimental effect on the quality of life for those currently living there. The school is, I understand, full to capacity - can the Education Dept afford to provide additional accommodation, and even if it could, is there sufficient land without destroying the children's play areas? There is considerable parking congestion outside the school already. The narrow roads and lanes in the area will not cope with a lot of additional traffic, there is no pavement in many places and this will be even more dangerous for both drivers and pedestrians. The bus service is already very limited and the times are not convenient for commuters, they are also often unreliable meaning that those who have to be at work on time could be disadvantaged. Also more children would need to be bussed or driven to secondary schools in Shrewsbury. Hope will the infrastructure - electricity, gas, water and sewerage cope with a lot of additional housing? Finally, one of the reasons for the change is cited is that there is a shop. There is however it is very small, privately owned (ie not part of a chain) and is not intended for large numbers of people to do a big shop. We own and rent out the building in which it is housed - there is nowhere to extend it and we would have no intention of doing so anyway. I do hope that you will listen to the concerns of the people of Longden, who are being very reasonable in accepting that some new build is inevitable, and may even be beneficial, but this should be within the guidelines of CLUSTER and not hub status
A1892B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Object to Longden being a Community Hub. The settlement is half the size of the next smallest proposed Community Hub with only 135 dwellings. The Longden Village Development Statement, endorsed by the Parish Council, reflects the view that half the residents want to stay as a Community Cluster. The Hierarchy of Settlements is flawed as there is no weighting to reflect the size of services and its capacity to cater for additional residents. Feel less points should have been given to Longden by the Hierarchy of Settlements because they only have a mobile library, very small village shop which doubles as Post Office (but both get points), the pub is very small and only opens part time, the primary school and nursery are very small, superfast broadband is only available by satellite link, outdoor sports facility should be grouped with childrens playground, the 546 bus service does not allow for connections to other public transport in Shrewsbury and Longden does not have sustainable transport links to other nearby settlements. A lack of employment opportunities means residents have to drive to work so, development in Longden would generate significant carbon emissions - this is against government and Shropshire Council policy. Having Longden as a Hub will have a negative impact on the climate whilst staying as a Community Cluster means growth would be by infill and minimise carbon emissions. New development would result in loss of mature hedgerows and replacement ones will take time to mature, thus reducing carbon capture and storage. The Right Home Right Place survey indicated 18 houses were needed so residents feel the guideline of 50 (27 after consideration of completions since 2016 and existing commitments) is a betrayal of trust in the Council. Future Local Plan reviews are likely to add more houses: this engenders mistrust from those residents who have engaged with the Council so far. Residents fear that exception sites will be identified on an ad hoc basis and valuable agricultural land will be lost. If agricultural land around the village were developed, flooding from tributaries of the Reabrook will occur. Wish to remain a Community Cluster and not be a Community Hub.
A1898B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Amenity green space at Quail Ridge - if the gas tank area and the play area (already allocated points) are discounted then the resulting amenity area drops below the size threshold of 0.2ha to 0.19ha. The allocation of 3 points should be removed. Bus service – there is not a return service arriving in the village between 3pm and 6pm - it gets in at 6.08pm. There is one bus that arrives in Ford parish at 4.52pm but it only stops opposite The Cross Gates Hotel (now called 'The Smoke Stop'). This is not within the parameters of the village or the development boundary and it is not within reasonable walking distance of the village. The allocation of 5 points should be removed. Outdoor sports facility – the redundant and overgrown bowling green is not accessible to the public and is now in private ownership with planning application for storage units pending consideration. The allocation of 1 point should be removed. Library - the provision of a mobile library service that visits for 20 minutes once a fortnight should not be allocated 1 point less than a permanent library open 6 days a week, as it is a far more limited and restricted service. The village lies within a Conservation Area (limiting potential for infill and potential harm to the character of the Conservation Area). Soil types within the village and surrounding area are classed as good or very good (Grade 2 or 3) for agricultural use. Ford is in a designated Mineral Safeguarding Area and any proposed development conflicts with Shropshire Council's Strategic Policy SP13, Strategic Planning for Minerals. Field FRD011 is an ancient Ridge and Furrow field that should be protected. Its proposed development conflicts with Shropshire Council's Development Management Policy DP24, Conserving and Enhancing the Historic Environment. The required Environmental Impact Assessment will highlight the biodiversity present in, and adjacent to, the proposed development site that should be protected. A Local Housing Survey carried out in 2019/20 showed that the scale of demand for new housing development in Ford is low. This is highlighted by the fact that it has been particularly difficult to find tenants for a recently completed affordable housing project of 32 homes at Cross Gates Meadow. Mathew Mead, Shropshire Council officer, commented: "This survey shows the scale of demand (for housing) is low and this should be met by the planned new development (Cross Gates Meadow). There doesn't seem to be much evidence for a big increase in development."Ford is a rural village that lacks the infrastructure to support the level of extensive development resulting from being a Community Hub.
A1899B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Amenity green space at Quail Ridge - if the gas tank area and the play area (already allocated points) are discounted then the resulting amenity area drops below the size threshold of 0.2ha to 0.19ha. The allocation of 3 points should be removed. Bus service – there is not a return service arriving in the village between 3pm and 6pm - it gets in at 6.08pm. There is one bus that arrives in Ford parish at 4.52pm but it only stops opposite The Cross Gates Hotel (now called 'The Smoke Stop'). This is not within the parameters of the village or the development boundary and it is not within reasonable walking distance of the village. The allocation of 5 points should be removed. Outdoor sports facility – the redundant and overgrown bowling green is not accessible to the public and is now in private ownership with planning application for storage units pending consideration. The allocation of 1 point should be removed. Library - the provision of a mobile library service that visits for 20 minutes once a fortnight should not be allocated 1 point less than a permanent library open 6 days a week, as it is a far more limited and restricted service. The village lies within a Conservation Area (limiting potential for infill and potential harm to the character of the Conservation Area). Soil types within the village and surrounding area are classed as good or very good (Grade 2 or 3) for agricultural use. Ford is in a designated Mineral Safeguarding Area and any proposed development conflicts with Shropshire Council's Strategic Policy SP13, Strategic Planning for Minerals. Field FRD011 is an ancient Ridge and Furrow field that should be protected. Its proposed development conflicts with Shropshire Council's Development Management Policy DP24, Conserving and Enhancing the Historic Environment. The required Environmental Impact Assessment will highlight the biodiversity present in, and adjacent to, the proposed development site that should be protected. A Local Housing Survey carried out in 2019/20 showed that the scale of demand for new housing development in Ford is low. This is highlighted by the fact that it has been particularly difficult to find tenants for a recently completed affordable housing project of 32 homes at Cross Gates Meadow. Mathew Mead, Shropshire Council officer, commented: "This survey shows the scale of demand (for housing) is low and this should be met by the planned new development (Cross Gates Meadow). There doesn't seem to be much evidence for a big increase in development."Ford is a rural village that lacks the infrastructure to support the level of extensive development resulting from being a Community Hub.
A1928B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Agree with objections made by Longden Village Action Group
A2104B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	objection to the proposed plan to change Longden Village from a cluster into a hub. I would like to state that I am in complete agreement with the letter written by the Longden Village Action Group regarding the Shropshire Local Plan review. Each and every point is valid, and the points system used to decide the future of the village is flawed and grossly unfair. A very large concern I have is the road running through Longden and the onward route to Shrewsbury through the neighbouring villages, already struggles with the amount of traffic using it. The volume of cars, large lorries and farm vehicles using a road which substantial bends and the fact that the road is also a well-used cycle route has safety implications.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2108B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Consideration should be given to moving the Harlescott P&R to this site which is much better than its current location, where we have the absurd situation of a P&R located well within the town boundary rather than on its edge. This leads to traffic and congestion along Battlefield Road in order to reach the P&R. Relocating the P&R to SHR16 would remove much traffic from Battlefield Road, which is currently heavily congested. The current P&R site could then be developed for employment or housing use. All P&R sites should be on the edge of town as a matter of principle. Consideration should also be given to opening a station on the rail line at this location. This would remove even more traffic from the town centre. Combined with a relocated P&R and new and improved segregated cycle paths and a cycle park, this site would make a very substantial contribution to reducing traffic and hence carbon emissions. The car park associated with the P&R could also be covered by solar panels, thus allowing buses and cars to be recharged whilst parked without taking electricity from the National Grid. There may even be times when excess electricity could be contributed to the grid. It would also provide shade and some weather protection for parked cars.
A2108B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	SHR197VAR should be deleted from the Plan as it lies outside the natural boundary of the town formed by the A49 link road. Development outside this boundary sets a dangerous precedent as further urban sprawl would be difficult to stop. Battlefield is at the very limit of walkability within Shrewsbury. It takes approx. 1 hour to walk from Battlefield to the town centre. The northward sprawl of the town needs to be halted at this natural boundary because development beyond it would be effectively unwalkable as well as unstopable. It should also be noted that SHR197VAR lies within 500m of an ancient woodland (Lion Coppice) which has not been noted in the scoring. This site is known to be a hunting ground for the Tawny Owls that nest in Lion Coppice and would further isolate the coppice from what used to be surrounding open fields. It would further degrade the coppice which is a priority habitat under Section 41 of the NERC Act 2016. I believe this would change its score from -6 to -8 meaning that it would rated as Fair rather than Good
A2108B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	SHR197VAR has been incorrectly scored as it lies within 500m of an ancient woodland (Lion Coppice). I believe this would change its score from -6 to -8 meaning that it would rated as Fair rather than Good.
A2108B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	"The provision of a Shrewsbury Parkway Station will promote rail travel and reduce traffic on the strategic highway network". The proposed location of this station is not mentioned. I am hopeful that this is SHR166, but I think it is important for the location to be given in this document. "Shropshire will welcome investment to improve highway safety especially on the A49, or by duelling or partially duelling the A5/A483 north of Shrewsbury and with junction capacity improvements to the A5 Shrewsbury and Oswestry bypasses." There is no evidence that duelling or partially duelling a road will lead to improved safety. Usually it results in faster speeds which result in more casualties (and more severe injuries). Furthermore, duelling increases road capacity which encourages car use at a time when we urgently need to be reducing it and moving "positively towards a zero-carbon economy" as stated in para 2.28. Duelling is also very expensive and the money would be better spent on improving active travel infrastructure. Duelling of roads and other capacity "improvements" fails para 1c of The Shropshire Test. In general we should be decreasing the capacity for motor vehicles whilst increasing the capacity for walking and cycling. Indeed, this is stated explicitly in para. 4.254: "Key objectives are to reduce our dependency on private motor vehicles and fossil fuels by using "active" travel opportunities...".
A2126B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Strongly object to designation of Ford as a community hub and subsequent development of field FRD011 for residential purposes. I object because - the additional housing will put a strain on the facilities already available in the village, which is already affected by holiday traffic during busy times of the year; impact on residents of Ford through building work noise and general disruption; the school during drop off and collection times is extremely dangerous with people parking on yellow lines and residents have a great deal of trouble leaving the village at this time and new housing will compound this. FRD011 is an ancient ridge and furrow field that should be protected. Its proposed development conflicts with policy DP24 conserving and enhancing the historic environment. Ford lacks the infrastructure to support the level of development resulting from being a community hub. The school is at full capacity and no longer has room to expand. The traffic emerging onto the A458 is already at a concerning rate and additional vehicles would take this to an alarming rate
A2131B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	A further 300 houses have been added to the original total of 1200, so now totaling 1500 for this area. A concern here is all the traffic inc public transport both moving around the development and in and out onto a very narrow Hanwood Road. There is also a concern about carbon emissions during the building of all these houses and after.
A2132B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	As wildlife has now returned to the area (since the last development) it is extremely important to maintain enough sufficient green space between existing ponds and new green corridors so that the swans, geese, ducks, moorhen etc are able to graze and rest.
A2135B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	As long term Longden residents we are writing to oppose the proposition to develop the village as a hub. Without wishing to repeat the many reasons that this would be inappropriate we would like to state that we fully support the objections raised by the Longden Village Action Group all of which we see as valid and pragmatic
A2144B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I have seen and read the letter of objection that has been sent to you from the Longden Village Action Group about the Shropshire Local Plan Review. I fully support their arguments.
A2161B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with designation of Ford as a community hub. Feels that points have been incorrectly awarded in the areas of Amenity Green space; bus services; outdoor sports facility and mobile library service. In addition the scale of development proposed would place a strain on infrastructure and the natural environment. Level of demand in Ford for housing doesn't require the scale of development listed in the plan.
A2162B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with designation of Ford as a community hub. Feels that points have been incorrectly awarded in the areas of Amenity Green space; bus services; outdoor sports facility and mobile library service. In addition the scale of development proposed would place a strain on infrastructure and the natural environment. Level of demand in Ford for housing doesn't require the scale of development listed in the plan.
A2163B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Support proposed allocation SHR173. The site has been promoted throughout the Local Plan Review as a suitable, available and achievable site suitable for delivering a sustainable residential development. A vision document for the site has been appended as an annex to this representation. The Vision Document has been underpinned by technical analysis and assessments including minerals assessment, highways, landscape, heritage and ecology. It demonstrates that the site is suitable, available and achievable for sustainable residential development. SHR173 is proposed for 450 dwellings. However, consider has the capacity to accommodate up to 500 dwellings over the developable area of 14.35ha. This could be delivered at: Phase 1: 5.72ha (200 dwellings at 35dph) and Phase 2: 8.63ha (300 dwellings at 35dph) (illustrated on an Illustrative Framework Plan which represents an Appendix to this representation). Notwithstanding the new requirement to allow for a local centre, SHR173 can accommodate up to 500 dwellings without needing to alter the wider development parameters. these dwellings can be provided whilst also providing the requisite infrastructure such as play areas, greenery and wildlife ponds. The draft policy should be amended accordingly and these extra dwelling can contribute towards housing need. The broad principles of the Development Guidelines for SHR173 are supported, including the provision of a local centre. Would welcome the flexibility within the policy wording to provide single retail outlet in place of local centre, if retail demand favours this. It is noted that draft site guidelines state development of SHR173 will not commence until such time as the North West Relief Road (NWRR) is operational. This is also included in the explanatory text of the policy at para 5.224. It is understood that construction of the NWRR is still intended to commence in Spring 2022, with the road opening in Autumn 2023. A Highway Assessment demonstrates that up to 200 dwellings (phase 1) could come forward prior to the NWRR being operational, without having a significant adverse impact on the current highway network. If planning permission for SHR173 was granted in 2021 and reserved matters approval secured later in 2021, construction could start on site in 2022 with the expected delivery of 50 dwellings per year. Phase 1 could then be completed by 2025. Therefore, the draft policy and draft policy explanation should be amended to allow for up to 200 dwellings with the remainder dependent on approval/construction/completion of the NWRR. Draft Development Guidelines also request preparation of a Masterplan in consultation with the public and adopted by Shropshire Council, with a decision not to be made on a planning application until such a time a Masterplan for the Site has been approved by the Council. Consider adoption and approval of a masterplan prior to a Planning Application being submitted is not necessary for the effective delivery of a sustainable residential development. Instead, the draft policy should be amended to read that a comprehensive masterplan should be submitted as part of a planning application that has been demonstrably informed by public consultation and engagement. This way, delays in bringing an application forward would be avoided and it would not materially change or influence the Council's decision-making process. SHR173 is viable, available and achievable, and is expected to deliver housing in accordance with the policy requirements identified within the 'Regulation 18: Pre-Submission Draft Shropshire Local Plan'. Consider the timescales identified for SHR173 in Appendix 7 of the draft Local Plan are too protracted. The delivery of the SHR173 is anticipated to be between the Short-Term and Medium-Term in the Local Plan, even with the residential guideline increasing to 500 dwellings. In the short-term 200 dwellings are deliverable, with 300 dwellings in the medium-term.
A2175B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with SC Highways assessment that the highway is suitable for development on land off Lyth Hill Road BAY039. The proposed development would lead to an extra 250 cars using the road, and so the full impact will be significant, not only on the road itself but the impact on neighbouring roads of Cross Roads, Lyth Wood Road and the Lyth Hill Countryside Site itself, as well as issues with parking on these narrow roads. The impact of additional traffic onto the A49 also doesn't seem to have been sufficiently considered
A2180B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Agree with urban focus and High Growth. Concerned that expansion of Shrewsbury into other parishes will lead to CIL and council tax given to other parishes, where really the houses are situated in Shrewsbury (a boundary review has been pressed for, although it is acknowledged that this is not a LPR concern). Disappointed Shrewsbury Test and Big Town Plan not fully grasped in this Plan. However agree with Shrewsbury's position within the Plan. A reinforcement of the highways network is needed (due to the increasing houses to the S and W), a rail halt should be at Preston Boats as well as a Park & Ride and Green Open.
A2180B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	We are generally supportive of this development site but would request that great stock is placed on the layout along the Shrewsbury Canal and the Shropshire Way Routes. We would also expect improvements to the Highway Network and particularly the Roundabout from which we presume this development will access the network.
A2180B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	We are generally accepting that the direction of development will head west towards the A5, but we believe that this parcel of land needs to have an appropriate Masterplan to ensure the correct design, quality and linkages not only to the proposed development site across the road but also to the Mytton Oak Road/Hanwood Road development site. Improvements to the highway network particularly in terms of footpath improvements is critical.
A2180B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Reference needs to be taken from the experience of the Barratt/Bovis development in terms of how the site develops, engagement with the community and the layout of the network to avoid these residential areas becoming rat-runs should a congested A5 occur. It is essential that there is a Masterplan developed and also extensive provision for recreation. The Barratt/Bovis site had significant land allocated for education/recreation but this has been allocated by the Education Authority for Education. The imbalance needs to be addressed on this site. Careful consideration needs to be made so that open space across this development site and the one above links up to existing open space to create that western green lung that the Big Town Plan aspires to achieve.
A2180B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	We are generally supportive of this site but have some concern about the strain on the network and we made our comments known during the consideration of this site as the development was presented for planning permission. Hereford Road already suffers from overtrading of the retail park and both carriageways can be gridlocked by vehicles at this point. Consideration also needs to be given to that fact that Pulley Lane opposite this junction is a major route for Bayston Hill residents accessing the town.
A2180B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Whilst we understand that this site will only ever be presented in the event the North West Relief Road is constructed, we are still aware of the traffic congestion along Ellesmere Road which has been cumulatively impacted by additional developments. Members question the sustainability of this site and would request clarification on the level of projected traffic reductions that a NWRR would create to justify inclusion. Adding also to our point above about Walking & Cycling, we would wish to understand how this is likely to be generated to link up to existing active travel networks particularly in view of the fact that the development sits on the opposite side of such networks.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2180B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	The Town Council does acknowledge that any plan needs to continue to allocate land for employment, but careful consideration needs to be given to design and layout so that buildings sit within what is a green corridor along the A49. Understandably this employment site sits alongside the main network, but we need to appreciate that this site will be an employment site for residents of Shrewsbury and its surrounding areas. Therefore active travel routes need to be created to ensure that this doesn't become a car-led development
A2180B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	The Town Council is generally supportive of this scheme.
A2258B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Insufficient infrastructure to support an additional 200 houses. Roads, medical facilities, schools, water,sewage as evidence by the overflow of untreated sewage down Farlwy Brook into the River Severn. Housing sites elsewhere will increase traffic through this small historic town. Roads all around are becoming increasingly busy.
A2276B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Errors in your document. Green space at Quail Ridge is below 0.2 Ha. No bus stop within ford village. Bowling Green no longer exists, land now for sale as a development site. Site FRD011 is an ancient ridge and furrow field and is protected under DP24. The service station serves A458 not Ford Village. There is no public house, just a restaurant. No high speed broadband.
A2297B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with the proposal and agree with the objections raised by Longden Parish Council and the Longden Village Action Group.
A2298B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with the proposal and agree with the objections raised by the Longden Village Action Group.
A2299B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with the proposal and agree with the objections raised by the Longden Village Action Group.
A2300B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with the proposal and agree with the objections raised by Longden Parish Council and the Longden Village Action Group.
A2301B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with the proposal and agree with the objections raised by Longden Parish Council and the Longden Village Action Group.
A2302B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with the proposal and agree with the objections raised by Longden Parish Council and the Longden Village Action Group.
A2303B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagree with the proposal and agree with the objections raised by Longden Parish Council and the Longden Village Action Group.
A2308B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	FRD011 is approximately 2km south east of Nesscliffe Training area. Flying activity within this location, undertaken in support of training for the front-line, produces a significant amount of low frequency noise which can be disturbing. Therefore, the proposed allocation would represent a cumulative increase in sensitive receptors to noise within this location and as a result has the potential to lead to an increase in noise complaints. For FRD011 to be in accordance with Para 95 of the NPPF (ensuring operational sites are not affected adversely by the impact of other development proposed in the area) and para 182 of the NPPF (existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established, with a requirement for the applicant to provide suitable mitigation before the development has been completed), it should make reference to a requirement for planning applications to be submitted with an appropriate noise assessment which takes into account noise arising from defence activities and provides appropriate mitigation solutions such as soundproofing. Applicants should engage with MOD in the production of such assessments. Furthermore, the site promoters of FRD011 should provide measures to enable future occupants to be made aware that military aircraft may be seen and heard operating in the area and that aircraft may overfly the site. The mitigation of noise in external areas may not be possible. Future occupants should also be made aware that aircraft types, flight paths and ground based activity can vary over time and this may cause disturbance. Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: FRD011: RAF Shawbury Plan AT 91.4m - East part of site.
A2308B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: SHR054a: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B. SHR057 and SHR177: Safeguard Zone - RAF Shawbury Plan AT 91.4m. SHR060, SHR158 and SHR161: Safeguard Zone - RAF Shawbury Plan AT 91.4m. SHR145: Safeguard Zone - RAF Shawbury Plan AT 91.4m. SHR166: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B. SHR173: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B. SHR197VAR: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B
A2308B21	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: BNP024: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B. BNP035: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B.
A2308B22	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: BAY039: Safeguard Zone - RAF Shawbury Plan AT 91.4m. BAY050: Safeguard Zone - RAF Shawbury Plan AT 91.4m.
A2308B23	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: BIT022: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B.
A2308B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: BOM019: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B. BOM020: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B.
A2311B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Paragraph 5.228 in Regulation 18: Pre-Submission Draft of the Shropshire Local Plan identifies Policy SP7, and states as a key priority the importance of retaining the Green Gap with Shrewsbury to the north of Bayston Hill. This is very welcome and I fully support this objective. This area, north of Bayston Hill and south of Meole Village incorporates the Rea brook, farm land and flood plain for the Rea, it leads into the Rea valley conservation areas and is important for wildlife and its habitat, and for exercise and recreational for local people. The Rea has flooded extensively over the area in recent times, and such flooding is likely to increase with climate change. The action of the flood plain in storing water is important in reducing the flow to the Severn at Coleham and the English Bridge. The Green Gap is a crucial buffer zone between the communities in Bayston Hill and Meole Village, and because of its environmental importance it would be highly desirable to afford permanent protection to all of the land south of Meole Village and extending to Hook-a-gate. I strongly request Shropshire Council to provide this protection in its strategic policy documents.
A2316B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Whilst a point system (for HoS) seems logical, it does mean that it can skew results and does not take into account the views from residents and does not allow a common sense appraisal of an area, which has all incorrectly lead to Longden being classified as a Hub. The roads in and around Longden are poor and extra housing would exacerbate this issue. It is unjustified to give 3 points as the library is only a mobile library. If a hub, it would open the floodgates to planning proposals from aggressive developers and inevitably more than the need/guideline would be built. The planned growth is around 20%, which is too high. Longden should remain a Cluster to resist aggressive developers. Small pockets of housing is acceptable, which a Cluster classification would allow for. A large number of housing would threaten the integrity of the village/community.
A2322B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Shropshire Wildlife Trust - Shrewsbury Branch - The plan falls short in the following ways: There is a lack of reference to the 25 Year Plan for the Environment, the Environment Bill, and Nature Recovery Networks Supportive of the North West Relief Road an environmentally damaging scheme that does not have planning permission. Any development areas associated with the road should be excluded from the plan. Unambitious with its target of increasing land for biodiversity by 10% - the Wildlife Trusts' believe that 30% of the land should be under recovery for biodiversity by 2030 and this should be reflected as reasonably as possible at the local, regional and national level. It is biased towards the social and economic benefits of development and downplays the environmental disbenefits against the backdrop of climate and ecological crises It is inconsiderate of accessible local natural green space for people Overall it demonstrates an set of underwhelming solutions to the climate and ecological crises We note the plan does not reference the proposed planning process changes or changes to the standard method of calculating house number:

Page 328

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2330B1	Viability and Deliverability of Proposed Site	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	We envisage SHR060 commencing delivery in the short term and potentially being fully delivered in the medium term. Strong support for this site. Masterplan attached to rep
A2340B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I would like it noted that I am fully supportive of the Longden Parish Council and the Longden Village Action Group's position of OBJECTION to the proposed changes in status for Longden Parish. I hope you will give due weight to both their submissions regarding this appeal.
A2353B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		SHR057 etc. It is important that employment areas are balanced across the town to reduce traffic movements and provide an even distribution of social and economic uses. We are supportive of this allocation as part of the much larger development; there may be scope for this to be a medical/educational employment cluster. SH145. Remain concerned that this enclave of housing in a broadly commercial area will cause a conflict of uses both with the retail area and the allocated employment land to the east of the railway line, and that the access onto the Hereford Road leading to the A5/A 49 is inadequate. SH166. Support this allocation as a longer term follow on site to the established Shrewsbury Business Park to the south and the Otley Road land which is expected to be released (at last) for development in 2021. Bearing in mind the proximity of SH166 to the main Shrewsbury - Birmingham railway we suggest that there is reservation for a rail halt in this area. SHR197VAR. Support this zoning as a long-term expansion of Battlefield Enterprise Park Shrewsbury Town Centre. Support the realism that demand for town centre retail space has diminished and as such redevelopment of the Riverside Centre should consider other uses. Linking with the Shopping Centres and the surrounding historic streets it should be developed as a key 'anchor' for town centre investment.
A2370B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Settlement Policy S16.1 'Development Strategy: Shrewsbury Strategic Centre': This policy is supported as it recognises the strategic role of Shrewsbury in the County and directs a significant proportion of the County's housing and employment land growth to Shrewsbury during the Plan period. In addition, the identification of land to the west of the town (north and south of Mytton Oak Road) as a focus for growth during the plan period is also supported as this land is unconstrained and lies in a highly sustainable location. The land will therefore make a significant and unique contribution towards meeting the growth needs of both the Town and the County.
A2370B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Strategic Policy S16.1(i) 'Residential and Mixed-Use Allocations: Shrewsbury Strategic Centre', Policy Map Inset S16 'Shrewsbury Town' and Mixed Allocation 'Land between Mytton Oak Road and Hanwood Road, Shrewsbury SHR060, SHR158 & SHR161' are supported. This site is a strategic allocation and would make a significant contribution towards the overall housing and employment requirements for Shrewsbury up to 2038 and beyond, into the next Plan period. The majority of the site allocation (SHR158) is promoted for development by CEG who are a strategic development and investment company operating across the UK. They have extensive experience of delivering a huge range of development projects, from office and residential, to retail, industrial and mixed-use. In delivering on projects CEG works closely, and builds lasting relationships, with local authorities, landowners, stakeholders and communities. CEG therefore has a proven track record in delivering development projects and this is exemplified in Shrewsbury with CEG's involvement in the development at Bowbrook to the north-east of, and adjoining, proposed mixed use allocation SHR158/SHR060/SHR161. Examples of recent projects are included at Appendix 1. Development Guidelines: In respect of the development guidelines we have the following comments: Housing Numbers – The overall housing number in the plan is supported. Employment Land – The quantum of employment land is supported. Local Centre – The provision of a local centre is supported. Education Facilities – The Council acting as Education Authority have confirmed that the required area of land is significantly less than the 4ha identified and is closer to 2ha. We would support this approach and the area of land identified on the parameters plan has been reduced to 2.10 hectares accordingly. Site Design & Layout – We recognise that a masterplan will need to be approved for the site and the quality, design, mix and layout of the development will be informed by site constraints and opportunities. Highways and Access – We support the approach taken to vehicular access points, pedestrian, and cycle links within and through the site. Further detail will emerge through the Development Brief process. We would express some concern that "all necessary improvements to the Local and Strategic Road Networks will be funded through the development". This is imprecise an open ended and would request the Council consider an alternative form of words which ensures that the improvements needed are directly attributable to the development site rather than other improvements to the Strategic Road Network. Green and Blue Infrastructure – We support the approach taken to green and blue infrastructure. A sustainable drainage strategy and Green Infrastructure network will be key components of the Development Brief. In summary, the allocation of this site is supported as it represents a significant, and unique, opportunity to meet the social, environmental, and economic needs of Shrewsbury during the current Plan period and beyond. It is considered essential that the Plan enables flexibility on the precise amount and mix of uses to be provided on the site to ensure that the site best meets the development growth requirements of the town. Development Brief: CEG have been leading discussions between the two other landowners forming the draft allocation; Mr Roger Parry (on behalf of Davies Parry (Oakfields) Limited, Site SHR060) and Shropshire Council (via their Estates Team, Site SHR061). Through this dialogue, a draft Development Brief has emerged that aims to provide a strategic approach to the creation of a cohesive and coordinated high quality development, spanning land ownership boundaries and buildings on existing and forthcoming planning policy. The Brief provides for a three-tiered approach, including: 1. Design Principles – which all design decisions must be judged against; 2. Spatial Parameters – the strict parameters that the development must comply with; and 3. A Placemaking Code – a future document to be produced before the submission of a reserved matters planning application. CEG have worked collaboratively on the Parameter Plan and the latest version of this is attached in Appendix II. The plan conforms with all the requirements in the development guidelines except for the school expansion land. This has been reduced to 1.8 hectares following confirmation of the land requirements from Shropshire Council acting as education authority. CEG would take this opportunity to confirm their commitment to working proactively with the Council, landowners, the local community and other stakeholders to develop the Development Brief and subsequently deliver a mixed use scheme that meets the needs of the settlement. Viability and Deliverability: The Council's latest viability study and appraisal of the site currently demonstrates, with the consultants' own assumptions, that the development is currently 'Marginal' in terms of viability, and therefore should not be considered as viable. We would disagree with this assumption however understand that many of the assumptions, particularly with regards to abnormal infrastructure costs and S106/CIL, are not yet 'set in stone' and are therefore open to interpretation and further analysis. At this stage, we would consider that this appraisal is inconclusive given that we need to look into several areas of this in much more detail and to understand how Shropshire are planning to address site wide or off site infrastructure provided by developers of the scheme where this would normally have been paid for via CIL which may help to mitigate the position. In addition, we would expect that developers would be able to build for a lower price per sqft and indeed sell for a higher price per sqft than currently indicated in the appraisal, depending upon the mix and quality of product ultimately delivered. Furthermore, the mix of development of the subject Site within the Study is set at 1,400 dwellings; and does not take account of any land value derived from the areas of employment land or the proposed Local Centre/Community Hub uses. In respect of deliverability CEG are committed to bringing forward an outline application as soon as possible and in advance of the Examination in Public. Some early discussions with housebuilders have taken place and it is expected that a proportion of the site will be available early in the plan period. Naturally, a site of this scale will be phased, and a phasing plan will form part of the outline application. CEG are committed to further engagement with the Council to gain a more in depth understanding of the assumptions put forward in the calculation of the £17,380,000 abnormal development costs for the scheme. This can then be reviewed by our appointed cost consultant in due course to ensure that any costs that the Council assume going forward are robust and support our view that the scheme is viable and deliverable. Conclusion: To conclude we welcome the Council's allocation of this strategic site and ask that these representations are considered in preparing the Final Plan.
A2373B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Disagrees which method for identifying Community Hubs.
A2398B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	Bayston Hill is the tenth largest settlement in Shropshire, with a population of 5,156, with only three of the proposed Key Centres being larger. Bayston Hill is nearly three times the size of Bishops Castle, which is the smallest of the proposed Key Centres. The settlement provides a wide range of services which meet not only the day to day needs of its residents but also those of the surrounding rural and urban catchment. Bayston Hill performs very well in the Council's Hierarchy of Settlements. It has multiple convenience stores, a post office, several pubs, a place of worship, library, areas of public open space with play equipment, a two-form primary school (with a larger than average number of pupils, including from Shrewsbury and the wider rural area), a medical centre (6,228 patients, an asthma clinic, physiotherapy service and undertakes minor surgery), Bayston Hill quarry is a large local employer. Bayston Hill is clearly a well contained settlement, with the majority of services located within a defined centre. Given level of services, surrounding countryside and proximity of additional working opportunities in Shrewsbury, it is clearly an attractive place to live. There is unmet housing need within Bayston Hill which could be fulfilled either through its designation as a Key Centre or the identification of an appropriate development guideline. The SAMDev Guideline identified the importance of the gap between Shrewsbury and Bayston Hill - as such it is apparent that the Council consider development around Bayston Hill is particularly constrained to the north and to the east. This has also been considered through Planning Appeals, within which the strategic importance of this gap was given significant weight. The explanation to this draft Policy also specifically references the importance of this gap, cross referencing draft Policy DP7. Until Part 2 of the SHMA is published, latest information dates back to March 2014 (previous SHMA). For Bayston Hill this identifies that affordable stock comprises 78 dwellings; 30 lettings occurred and an average of 68 bids per affordable property were made between June 2009 and Jan 2014. The 2014 SHMA also indicates that there was an affordable housing need of between 469 and 997 dwellings per annum. An addotable housing statement submitted in support of a Planning Application in Bayston Hill indicated that between 2008/09 and 2014/15, 1,728 affordable dwellings had been delivered in Shropshire, equating to 247 dwellings per annum. Significantly short of the need identified in the 2014 SHMA. In Bayston Hill average affordable housing delivery is 1 per annum over the last 11 years excluding delivery in Meole Brace (which is part of the Parish). There is an obvious need for additional affordable housing within Bayston Hill, which the SAMDev Plan Guideline would not meet. This justifies a guideline of at least 200 dwellings as proposed within this draft Local Plan. Support the identification of a development guideline for Bayston Hill, but maintain that 200 dwellings should be the minimum figure for consideration. This scale of development will enable provision of much needed affordable and market housing in an area which is attractive to developers. It is important to remember these development guidelines are not ceilings or maximums, they are intended to provide guidance. As such the policy should state at least 200 dwellings rather than around 200 dwellings. Any provision over and above these guidelines should be considered on its own merits and whether it comprises sustainable development. It is specifically the use of "around" in regard to the development guidelines for all Community Hubs with which our client disagrees. There are also less sustainable Community Hubs with larger development guidelines than Bayston Hill (see other comments).

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2398B9	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	<p>Agree with the approach to the allocation of sites for Bayston Hill, which confirms that BAY039 is the most suitable for allocation. Support the draft allocation and can demonstrate the site is capable of delivering a minimum of 100 dwellings which will meet the needs and aspirations of the area and the benefits which new development might be able to provide. It will make an important contribution to meeting the needs of Bayston Hill. It can also offer benefits to the area, including affordable homes, opportunities for leisure and recreation, and/or new highways infrastructure. Keen to work collaboratively with Shropshire Council, the local community and other stakeholders to explore, expand and refine the potential development opportunity.</p> <p>BAY039 is approximately 6.1ha, relatively flat and unremarkable agricultural land, immediately to the south of Bayston Hill. The site is to be accessed from Lyth Hill Road from the eastern boundary. The north western and western boundaries of the site are tree lined with countryside extending beyond that. Land to the north of the site comprises residential areas of Bayston Hill. The site consists of two distinct sections to the site that are clearly separated by a hedgerow.</p> <p>Lyth Hill Road is a residential street with pavements on both sides which stop approximately 60m north of the proposed access point, near to the junction with Grove Lane. As part of development proposals, the pavement will be extended on the western side of Lyth Hill Road into the site and this is to be achieved within highway land. At the site's eastern extent is a public footpath and a connection will be made to this path where it emerges between the houses on Yew Tree Drive and Grove Lane. Footpaths will therefore provide access between the site and the services/facilities in the village centre, as well as to local bus stops. Buses provide links to Shrewsbury and Little Lyth. Nearest train station is in Shrewsbury.</p> <p>Highlighted site guidelines for BAY039 are broadly supported. With regard to the draft guidelines proposed for the site:</p> <ol style="list-style-type: none"> 1. Access to the site is proposed off Lyth Hill Road and will be provided in the form of a priority T-junction with 5.5m carriageway width and 6.0m junction radii. 2. An Automatic Traffic Count (ATC) carried out on Lyth Hill Road in the vicinity of the proposed access indicates 85th percentile wet weather speeds of 35.5mph northbound and 36.3mph southbound. In accordance with guidance within Manual for Streets, the required stopping site distances based on these speeds would be 54.3m to the north of the access and 56.0 to the south. The required visibility splays can comfortably be accommodated to/from the proposed access junction. 3. Currently, there are no footways present along the site frontage with Lyth Hill Road. As part of the development proposals, a footway will be provided on the western side of Lyth Hill Road, from the proposed site access junction, connecting to the existing footway further to the north at Grove Lane. 4. A landscape and visual impact assessment has been undertaken for the site. This confirms the site is reasonably visually contained with the existing settlement containing most views from the north, northeast and east. Local undulations limit inter-visibility with the wider landscape to the west and existing boundary hedgerows and trees assist in filtering remaining views of the site. It is recommended that development retains the southern hedgerow boundary and introduces additional native hedgerow and linear groups of broadleaved trees to the south. It is concluded that a sensitive design response, including retention and strengthening of existing vegetation will mitigate against the minimal impact on landscape and visual setting. 5. The emerging Masterplan for the site shows buffering along the site's northern boundary and the introduction of additional planting. The plan also shows that the boundary separating the two fields would be enhanced to create a focussed north-south green link. These features will preserve existing habitats and provide opportunities for ecological gain. 6. The Arboricultural Survey and Report for the site identifies that the majority of the tree population occurs in the field boundaries between hedgerows and that trees are often in associated groups. These trees and hedgerows are to be retained and strengthened where possible. Opportunities to de-culvert the watercourse are being explored. 7. The emerging Masterplan for the site provides for a policy compliant level of greenspace which is to be located optimally within the site. This area will be well overlooked in order to provide natural surveillance and minimise opportunities for crime, increasing the safety of residents. The layout has been designed to allow for circular walks around the northern and western edges of the development, which will also link with existing pedestrian connections. 8. An attenuation pond will be positioned at the northern corner/lowest point of the site. Provided attenuation will be appropriately sized to include the appropriate allowance for climate change (currently 40%). Above ground attenuation will be utilised where possible to enhance aesthetic amenity and provide valuable habitats for the local wildlife, supplemented where necessary by below ground storage. <p>The Environment Agency Flood Map confirms the site is located entirely within Flood Zone 1 (Low Probability of Flooding). There is a smaller ditch ('Ordinary Watercourse' system) along the boundary of the site in the Northwest most site extent. The ditch is culverted from the northern site boundary and this culvert runs diagonally across the neighbouring parcel of land and continues on to Yewtree Drive. A review of historic mapping shows that the majority of the site forms part of the natural catchment to this ordinary watercourse system. The Site Framework sets out development parcels that are outside the 1,000 year surface flood risk zone.</p> <p>BAY039 is available for development, suitable, sustainably located and development here would be achievable with the scheme being completed in full within five years.</p> <p>There are no known viability issues and any scheme would provide a policy compliant suite of planning obligations in respect of affordable housing as well as providing on site open space for the benefit of new and existing residents. Such benefits would have a significant material positive effect on the local community. The land is capable of being delivered in accordance with density and Site Guidelines highlighted in the draft Local Plan.</p>
A2403B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	<p>We support the continued role for Shrewsbury as the strategic centre for Shropshire and the primary focus for growth and new development in the county, and the identification of the need for additional land to be allocated to support this development strategy. The development boundary should include proposed allocated sites, including SHR166 and thereby provide greater support for connectivity between the site and the rest of Shrewsbury. The Sundorne Castle Estate continues to support the development of site SHR166 'Land to the west of the A49' and its identification as the key gateway employment site for Shrewsbury. It is recognised that its location allows it to contribute to the council's strategic aspirations for the A5/M54 'Eastern Belt' Shrewsbury-Telford-Wolverhampton growth corridor. With the potential for sustainable transport options to the site to be improved as acknowledged within the policy, it is considered that the site could also be suitable for a wider mix of uses on the site as part of an holistic master planning exercise which delivered sustainable transport improvements at its heart. This would allow the council flexibility during the plan period, as encouraged by Paragraph 81 d) of the Framework, including in responding to what could be a shift in the structure of the economy and lifestyles generally as a result of the Coronavirus Pandemic. In response to comments made to the 2019 Local Plan consultation by Historic England regarding the allocation of this site for development, a Heritage Assessment has been undertaken to support the proposed allocation. This report is submitted within this representation. This report concludes that the site could be brought forward for development, in some cases with appropriate mitigation, without substantial harm to the heritage significance of the site itself or nearby heritage assets. The development would represent the continuing expansion of Shrewsbury. Furthermore, it notes the heritage benefits that would arise from the development in providing investment opportunities to the estate for the management of other heritage assets, and the sustainable and economic health of its communities. It is therefore considered there are no barriers to the site being allocated for development, and the Estate will continue to work positively with the council to ensure the site can contribute to the strategic ambitions of the council.</p>
A2403B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	<p>Heritage Report for SHR166. Concludes that: The integrity of the Roman marching camp has been compromised by the construction of the A49 that cuts across a part of the site. At that time (1990s) it appears that the value in advancing our understanding of such camps, by excavation, would mitigate the harm caused by the engineering works. Given that there are other better preserved marching camps surviving elsewhere it would be reasonable to conclude that further archaeological investigation, prior to development would mitigate the archaeological impacts. The proposed development of the Manor field would not directly affect the scheduled monuments or affect the extent of the view from the hillside. It would to some degree alter the viewing experience but the development of the site would not undermine our understanding of the significance of the hillfort and castle folly as a defensive location or as a visible object in the landscape. What's in the view and our sensory response to it would depend on a range of variables, not least the size and scale of any new buildings required to meet the employment needs, as well as their materiality and layout on site. Subject to Shropshire Council's enduser requirements the site could be laid out to take advantage of existing landscaping and as may be proposed to soften the edges of buildings and to filter views. This would reflect the way that the existing suburban forms of Shrewsbury are experienced. Why the scale and materiality of any proposed buildings is important can be explained by reference to the visual effects of the light coloured roofs of the buildings on the business park to the north of Shrewsbury. The prominence of these buildings could have been eliminated or minimised by careful design of roof forms and by careful choice of roofing materials, supported by an effective landscaping strategy. The development of this site should not be seen in isolation, the existing backcloth against which this site will be experienced in views will change with other sites on the edges of the town being brought forward for housing and employment purposes. The Sundorne estate is responsible for a variety of heritage assets in the area. It takes its responsibilities seriously. Development of this proposed allocated site, which now has had its physical link and continuity with the wider estate severed by the A49, would facilitate the long term investment the estate is making or planning for the preservation and enhancement and ongoing management of its heritage assets. This would represent a heritage benefit.</p>
A2404B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>I have grave concerns about the quality and type of development planned. It appears to me to overwhelm an already densely populated area, and has little additional amenity for the new community to be created. Even with the new school planned, I cannot see how the existing infrastructure can support the proposed level of development. The creation of this level of development will seriously impinge on the existing wildlife, green space and flora. This change is irreversible and damaging to the local environment and the future of our planet. I question if a more suitable site has been sought for this quantity of development? Access to the existing area is already a concern; already I live on Darwins walk, and the existing road layout already creates problems. Roads are too narrow, and there are many parking issues and near misses in traffic. I question the safety for children with additional traffic and likely lack of buses, especially post COVID. Park and Ride towards Mytton Oak Road would be good but access from it and then through to Hanwood Road is also a concern. Where will the link road be, to access the site? Roads are already busy when A5 has congestion, often already I do not use the A5 to go to work, as at 7.30 it has long queues and it is quicker for me to travel to Telford via town! Surely this will get worse, with more traffic on existing roads especially with the proposed schools' site it is great to see more green space and corridors, but surely we need to retain this, not just squeeze it in? Please maintain the link between existing ponds and buffer development as much as possible from away from these. Lots of wildlife has now returned and we have resident ducks of various varieties, swans and migrating geese annually use fields for grazing. I have seen a person doing a survey of these - they would not tell me where they were from/representing whom - but I am aware that a small mammal survey would be likely to reveal a large number of small mammals and these are pivotal in the food chain. Waters edge / marginal plants are an essential part of our eco system and would be lost. Meanwhile we need to support a sustainable drainage plan as water levels are already an issue with them rising annually. Flood concerns for some existing properties, will only get worse when there is less natural surface run off and pools with more built up areas cannot state more firmly my multiple concerns that this development will impede the environment that has so far enticed us to live in this area. Infrastructure will fail and the proposed development will take away a natural amenity for all of our futures, which would be a tragic loss for future generations.</p>
A2417B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Site SHR173 is currently a high quality area of countryside adjoining the busy Ellesmere Road, directly opposite Winney Hill and Hencote and a section of the Old River Bed, immediately adjacent and of a similar character to the SSSI on the east side of Ellesmere Road. It is a site of high amenity and agricultural value and only scores -4 or 'Fair' in the Council's own sustainability criteria. I oppose allocating this site for housing development for the following reasons:</p> <ol style="list-style-type: none"> 1. There is extensive evidence that building new road links such as the NWRR increases journey demands. Any reduction on Ellesmere Road would only be temporary, indeed Shropshire Council's own traffic forecasts show that traffic would increase on the northern part of the road up to the roundabout and on Berwick Road. 2. The bus service along Ellesmere Road is not regular enough to be relied on (every hour or two hours). 3. There are no continuous cycle routes from the site to the town centre. The cycle route from Herongate via Greenfields Recreation Ground has been blocked by the car park works at the Flaxmill - the path left is only 1.5 meters wide, which is not enough for cycles and pedestrians. 4. The site is of enormous amenity value, opposite the rare wetland habitat in the old river bed and the protected heritage landscape of Winney Hill, where the council has made at least some efforts to control unsuitable development by Hencote Winery with glamping and holiday lodges etc. 5. The site is close to the Old River Bed SSSI and would affect this site adversely. 6. 450 houses is far too high a density for this site given the constraints of the road and cycle network. <p>Additionally I would like to endorse the position taken by Shropshire CPRE. All the housing targets in the plan, especially for Shrewsbury, are too high (higher than the government requires). The target for affordable houses within this figure is far too low. The NWRR is being simultaneously proclaimed as a means to reduce traffic while opening up land for development. It cannot be both. The sustainability strategy is vague and the effects of the proposals on carbon reduction to meet statutory requirements to combat climate change are inadequate.</p>
A2425B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>The site BNP034A has been promoted throughout the consultation process and has generated assessment forms as a result, but at no point has it been acknowledged that this site will be surrounded on all four sides by the built environment, once relevant planning permissions are built out. As such, this should have been an allocated site.</p>
A2441B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Building the NWRR might be seen by some to be solving one of Shrewsbury's problems but in all likelihood the proposed road will actually increase local traffic overall. There is evidence supporting this view - many bypasses, for example Newbury, significantly increased traffic in the area. By encouraging people into their cars onto the new road does this really tie in with SC's goal of reducing reliance on private vehicles? Please reconsider the NWRR. If a project has been in the books for 50 years and still hasn't been built it is either not required or the chosen place isn't the right place.</p>
A2441B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	<p>Far too many houses for the area to cope with. These two sites together will add some 1500 dwellings. This could mean around 4,500 extra vehicles using Mytton Oak Road. What provision is being made so that access to the hospital ie ambulances, will not be impacted. Additional infrastructure will be needed to cope with the influx of people - where will these people shop / go to school / see a doctor or dentist / etc. The area is already under pressure. Are the people expected to get in their cars for these services and drive across the town - that will not help with climate change, it will add to the CO2 emissions. All development plans should consider and address upfront the infrastructure needs of the area</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2441B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Very supportive of the choice of BIT022 by Shropshire Council to be included in the development boundary for Bicton and to make the main part of Bicton Parish, the community hub element of Bicton, to be the development boundary for this area and that it has been recognised by Shropshire Council that no additional small boundary necessary. I am also very pleased that Shelton Rough has been removed from any development. Well done to Shropshire Council on the above points
A2441B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	There has been very little to no green belt left when planning for the 750+ houses. Given Shropshire Council's commitment to the environment and the government's pledge to protect the English countryside to support the recovery of nature, could more consideration to including wildlife corridors and green space be incorporated in to the SUE. What we are actually seeing from the developers of this area is squash as many houses in as possible without any thought to the occupants well-being or supporting the recovery of nature. The original application for land off Welshpool Road was 297 which was dropped to 296 - and that was considered overcrowded - and now that application has been withdrawn with a request to build 345. There is insufficient infrastructure to cope with the original proposed number of houses. Furthermore, the land off Churncote Roundabout - in 2014 the developers withdrew the application for a petrol station because of public opposition and the Environment Agency but in 2020 the application is back in with the petrol station being the prominent feature. The petrol station should be withdrawn especially as there is a similar set up of petrol station and cafe/hotel only 4 miles away.
A2441B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Agree	Very, very pleased that the main part of Bicton Parish, the community hub element of Bicton, is the development boundary and the site BIT022 has been chosen for this area and that it has been recognised by Shropshire Council that no additional small boundary is necessary. I am also very pleased that Shelton Rough has been removed from any development. Well done to Shropshire Council on the above points.
A2452B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	As a resident of Longden I would like to raise my objections to above proposal. Longden is a country village & to maintain it's character I believe that any future development needs to be on a small scale as any large development would ruin the present balance. The point system appears to be an inflexible blanket assessment whatever the size or merit of the business. How was such a steadfast inflexible means of attributing the points formulated and how was the qualifying criteria determined? The Longden shop & post office are very valuable but very small & to attribute the same number of qualifying points to this business as to Pontesbury shop is illogical. The mobile library is little used & in my opinion does not qualify for 4 points. The pub trading is also very limited. I consider that any development of Longden should be gradual and confined to small clusters of 2 or 3 houses sensitively placed rather than extensive housing developments. The school, shop, play area and the roads are not suitable to cope with or serve many more people. I believe that planning permission has been given to too many very large houses. Longden is historically a country village & any development needs to have that concept in mind i.e. smaller houses that local people can afford to buy rather than mansions or 'local needs houses' taken over by housing associations not respecting that concept. I strongly believe that it is not in the best interests of Longden to be developed as a Hub but instead have the status of a Cluster & developed aesthetically without taking out the small lanes characteristic of this area.
A2458B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The NWRR should not be supported in principal. It will not ease congestion as suggested instead will only make the problems worse. It is now known through various published studies that it is not possible to build your way out of congestion. It is the roads themselves that cause traffic. The concept of 'induced demand' - when you increase the supply of something - including roads - it makes people want it more. The NWRR will not only increase congestion further but also cuts through a swathe of important countryside and will have severe detrimental impact on designated sites such as the Hencote SSSI. Their combination impacts of the new road have not been properly considered and the ecological impacts will not be outweighed by the benefits of the road. Furthermore, in the current climate the Council should be aiding economic recovery post Covid 19 not spending money on a new road. The existing roads in the county are in a terrible state of repair and these should be repaired before a new road is built.
A2458B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The policy should not rely on the NWRR taking place. The NWRR should not be constructed as this significant harm it will cause to the countryside and ecological sites does not outweigh the potential benefits. The pollution impacts have not been fully considered. Sites should not be allocated assuming the road will be constructed.
A2458B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	The Council should not be allocating sites that is directly dependant on a new road being built - which may not ever happen. The site is unsuitable for development particularly as the Ellesmere Road is already very congested and unsafe. Local residents are becoming increasingly concerned about the safety of the Ellesmere Road and any new development will only make it worse - with or without the NWRR. The development will have negative impact on the Hencote Pools SSSI. The in combination impact of the NWRR and any new development needs to be assessed.
A2476B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Don't know / no opinion	Parts of the Estate are assessed in the Council's housing evidence base under SHELAA references SHR096, SHR162, SHR169 and GVH001X however these representations refer to a wider area of land. A Site Location Plan is attached to Appendix 1. Site Description 2.1 The Berwick Estate consists of approximately 2000 acres (c. 810 Ha) of land that is predominantly held within two ownerships. The Estate mainly comprises agricultural land along with 38 houses and cottages and several areas of woodland. 2.2 Notable assets and opportunities within the Estate include the following: Agriculture – around 1500 acres (c. 607 Ha) of tenanted farmland, some of which has inherent development potential given its location between the proposed NWRR and the edge of Shrewsbury. ● Berwick House – the Estate is centred on this large grade II* Listed mansion house that dates back to 1731. The house is no longer a main residence and requires a new viable use to ensure its ongoing conservation and retention. ● Berwick Stable Block – an attractive and historic grade II Listed stable block that adjoins Berwick House. Now largely redundant, these buildings require a new viable use. ● The Walled Garden – located to the south of the main house are a number of cottages and greenhouses within a spacious walled garden. There are ambitions to use this area as a wedding and event space. ● Berwick Chapel – a grade II* listed dedicated estate chapel which could also tie in with the proposed wedding and events uses. ● Gravel Hill farm buildings – an attractive courtyard of dis-used farm buildings centred on a grade II listed C17th farm house. The buildings require a new viable use to ensure their ongoing conservation. ● The West Midlands Showground – the 58 acre site is let to the Shropshire & West Midlands Agricultural Society and hosts the annual agricultural show along with other entertainment, cultural and fundraising events. 2.3 The Estate abuts the north western edge of Shrewsbury at its southernmost point, separated by the River Severn, and it stretches towards Bomere Heath at its northernmost point. The majority of the land lies between the River Severn and the Shrewsbury to Chester Railway line, although there are additional holdings west of the river and east of the railway. 2.4 The Berwick Road (B5067) is the primary vehicular route and crosses the Estate from the north to the south east where it connects to the A258, which itself leads to the centre of Shrewsbury. Shrewsbury railway station is around 0.7km away from the nearest point of the Estate and provides regular services to key destinations including Manchester, Birmingham and Cardiff. With the NWRR in place, access to the National Cycleway and strategic road network will be greatly enhanced. 2.5 In terms of designations, the Estate includes Berwick Park which is a grade II listed Registered Park & Garden. This area of land surrounds Berwick House and is a representative example of a C18 park, improved in the late C19. An area of the Estate to the north of the river is vulnerable to fluvial flooding lying within Flood Zones 2 and 3.4.1 These representations have demonstrated the substantial opportunities that can be brought about by the allocation of a first combined phase of 350 dwellings at the Berwick Estate. This will assist in and safeguard the delivery of the NWRR, which is a fundamental policy objective, and in doing so, will facilitate the draft local plan in meeting the tests of soundness. 4.2 The 350 dwellings being promoted is the first phase of a Berwick Whole Estate Plan that can provide substantial development opportunities in years to come. The vision is in accordance with Garden Village principles and driven by the opportunity for stewardship to ensure the living with Beauty initiative is carried through. That will ensure the Estate takes a long-term custodianship approach to delivery, lasting beyond the current plan period. 4.3 In doing so there will be a clear enhancement in connectivity and accessibility between Shrewsbury Town centre, the new garden neighbourhood and the extended historic Parkland, which will be opened up for the benefit of all existing and future residents of the area. 4.4 The Vision for the Estate is a new healthy, thriving and balanced community that adopts 21st Century Garden Village principles that respects the uniqueness of the landscape and wellbeing heritage of the Berwick Estate and the historic character and nature of Shrewsbury. The first phase of this vision can come forward within the Shropshire Local Plan and will provide an exemplar development in terms of its sustainability and placemaking principles. 4.5 The opportunity to take this forward only exists with the unique location of the Berwick Estate. The first phase development should therefore become an allocation and serve to support the advancement of the local plan. Representation includes appendices (not summarised here) as follows: Appendix 1 Site layout Appendix 2.2 Context analysis Appendix 2.3 Flood risk Appendix 2.4 Heritage and Ecology Appendix 2.5 Strategy and Design Appendix 2.6 Access map Appendix 2.7 Initial phases of the master plan Appendix 3 Environmental Constraints and Opportunities Appendix 4 Transport Report
A2476B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area		3.17 This policy sets the key aims and principles for development within Shrewsbury, which is incorrectly acknowledged as the primary focus for development within the County with around 8,625 dwellings and 100Ha employment land to be delivered within the Plan period. These representations are broadly supportive of the approach to the Shrewsbury Strategic Centre, however a number of improvements to soundness are identified and could be assisted by the inclusion of land at the Berwick Estate. S.16.1(2) 3.18 Policy S.16.1(2) sets out that a comprehensive and co-ordinated approach to the development of Shrewsbury will be taken in a manner that is consistent with the 'Big Town Plan' for Shrewsbury along with Policy SP1 – The Shropshire Test. 3.19 The Vision Document submitted alongside these representations makes clear the rationale for a phased mixed-used sustainable neighbourhood at the Berwick Estate. This Vision is supported by the Berwick Estate Whole Estate Plan, which in turn was created in accordance with the Shrewsbury Big Town Plan. The Vision for the Berwick Estate is integral to the success of this policy and should be acknowledged accordingly. 3.20 Phase One is promoted to be delivered during this plan period, opening up the opportunity for a framework to support the success of the Shrewsbury Town Plan, to help exceed its well-being targets, facilitate the North West Relief Road and deliver high quality investment and public access to the outstanding Parkland and natural environment Shrewsbury has to offer. 3.21 The Vision for the Estate also explains how the Whole Estate Plan looks beyond the plan period and sets out a comprehensive and co-ordinated long-term strategy for development at the Estate that can assist meeting housing and other development needs for decades to come, in a manner entirely consistent with the aims of this policy and to support local aspirations in addition to the aims set out in the Building Better Building Beautiful Commissions report Living with Beauty (2020). Policy S.16.1(7) 3.22 Policy S.16.1(7) supports the delivery of the NWRR in principle. It states that land between the proposed NWRR and the development Boundary will remain as Countryside guided by policy SP9, but that potential windfall proposals for commercial purposes may be supported wherever suitable access can be provided. In accordance with policy SP9, open market residential development will continue to be strictly controlled in this area. 3.23 The North West Relief Road has been committed by Shropshire Council. The location of the NWRR is yet to be fixed via a planning application and consequently its location and the associated land required for delivery is not yet fully understood. Berwick Estate is supportive of the principle of a NWRR and recognises the strategic importance of this to Shrewsbury Town. 3.24 These representations and the submitted material alongside them put forward a clear case for the additional benefits that can be delivered by allocating land for development at the Berwick Estate. There are clear synergies that could arise whereby additional development at the Estate is made even more accessible by the NWRR, which in turn could safeguard and assist the delivery of key sections of the road itself, including the proposed Berwick Road and Shelton roundabouts. 3.25 In this respect, the NPPF at paragraph 72 and 72(a) make clear that authorities should consider the opportunities presented by existing or planned investment in infrastructure when looking to identify suitable locations to meet needs for development in a sustainable way. It goes on to set out that it is important to set clear expectations for the quality of development, such as through the use of garden city principles, when planning for larger scale development. 3.26 It is therefore suggested that policy S.16.1(7) is amended to acknowledge that land at the Berwick Estate can facilitate and contribute towards the delivery of the NWRR and that additional land on the Estate is identified for residential-led development based on a garden village principle. In doing so, this will ensure the policy is justified and consistent with national policy. S.16.1(i) Residential and Mixed Use Allocations: Shrewsbury Strategic Centre 3.27 This draft policy proposes to allocate the site ref. SHR173 for around 350 dwellings. In doing so it recognises that the site is directly dependant on the construction of the NWRR and that development cannot commence until the road is fully operational. 3.28 The lead-in times for development that relies on substantial infrastructure improvements are well documented and it is unclear at this stage whether the full 350 dwellings identified could be realistically delivered within the plan period, given that it is reliant on the entirety of the NWRR being delivered. 3.29 There is no in principle objection to the allocation of the land west of Ellesmere Road for future development, however it cannot be considered that it will be capable of being achieved when the location of the NWRR has not been fully committed. The plan should recognise that development of at least 350 units at the Berwick Estate can come forward independent of the NWRR delivery, and also an earlier stage in the plan period if required. 3.30 When referring to the 'Phasing' section of the submitted Vision Document it can be seen that Parcel A/Phase 1 (200 homes) and Parcel B/Phase 2 (150 homes) can come forward within 5-10 and 10-15 years respectively, and can therefore comfortably be delivered entirely within the plan period, when due regard is had to local build out rates of housing delivery. 3.31 Given these points, the allocation of land parcels A and B as outlined in the Berwick Estate Vision Document will ensure the effectiveness of the local plan by commencing earlier and by delivering in full within the plan period. As such, Policy S.16.1(i) should be modified to allocate land at the Berwick Estate for at least 350 residential dwellings. 3.32 In addition, the local plan should recognise the significant long-term development potential for an excess of 1,000 new homes along with improved connectivity, a country park, employment and community facilities at the Berwick Estate. Parcels C, D and E within the Vision Document should be safeguarded for future development within and beyond the current plan period. An alternative alignment of the NWRR is also put forward and could enhance further the placemaking and development opportunities arising in this location. 3.33 The alternative alignment of the NWRR has its genesis in the work undertaken between the Estate and Severn Trent Water. There is no objection from Severn Trent Water to the location of the Bridge across the River Severn being north of the abstraction point and it appears that the Environment Agency objection to that point has been the driving force behind the location of the Bridge. There is limited information within the public domain that suggests this alternative location for the Bridge has been explored and the Estate would like to raise an objection that the full optioneering exercise has been undertaken to suitably justify the current location of the NWRR within the proposed local plan. 3.34 It is clear that the Estate supports the delivery of the NWRR and the rationale for the benefits it will bring to the whole of Shrewsbury, however it is also clear that it objects to the current location until it is satisfied that other locations have been more fully explored. 3.35 If the Berwick Estate land is not allocated our view is the plan will not be capable of demonstrating that the allocations can be delivered. The Estate wants to ensure the Local Plan is found to be effective and therefore it is required to identify the Phase 1 area as a broad location for future growth. 3.36 The delivery of land associated with the NWRR will be safeguarded by the Estate and alongside further detailed masterplanning and technical work to be brought forward through the Whole Estate Plan the delivery or contribution to the Berwick Road and Shelton roundabouts will be set out. 3.37 Proposals should come forward through the endorsement of a Whole Estate Plan and/or under Policy SP6. In doing so, this would provide greater flexibility for the plan and any subsequent local plan review(s).
A2481B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	This will confirm that we do not agree with Shropshire Council proposal to amend Longden village to "Hub" status following review of the local plan. Longden is small village in rural setting, we do not object to "in-fill" development for (appropriate) housing, but the village should retain its "Cluster" status.
A2488B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	I would like to comment on paragraph 4.261, page 139. My comment also relates to the application of policy SP3 To deter heavy traffic flow and to encourage pedestrians and cyclists into the centre of Shrewsbury, the temporary calming measures introduced during the pandemic to make provision for social distancing should be made permanent. There has been obvious economic benefit to hard-pressed shop and café owners as a result of the colonisation of pavements by diners and coffee drinkers throughout July, August and most of this month. However, this is a minor aspect in relation to the issue of greatest significance ever faced by humankind which is the almost unprecedented changes to the bio-sphere on which we depend that are now occurring as a result of the radical and uncontrolled experiment we are conducting with our planet's atmosphere. If the Thwaites glacier in Antarctica were to collapse, sea level rise would be so great as to inundate all our port cities, including London. The New Scientist and The Washington Post have reported very recently that this massive volume of ice is now unstable because of infiltration by sea-water from beneath. We need urgently to implement massive reductions in greenhouse gas emissions now, not in the next two decades. Steel manufacture emits 1.85 tonnes CO2 per tonne of steel made. Cement production causes 0.82 t CO2 per tonne to be released to air. Projects dependent on huge consumption of these materials must be halted until their carbon impact can be reliably off-set. Regrettably, the draft plan not only fails to reflect this urgent need, it runs counter to it by having the proposed North Relief Road as a centre piece. In addition to the great CO2 emission impact caused by its construction, the extra traffic such a project would inevitably generate would contribute its part, as a consequence of the CO2 emissions from the increased traffic volume, in the destruction of our native islands by encroachment of the rapidly rising seas surrounding them.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2493B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S16 Shrewsbury Place Plan Area	Disagree	To the North East of saved site BAS 035 Lies the old station yard site. The site has full planning permission which can be seen on the Shropshire Council Portal ref 17/02174/REM. However, whilst the village boundary line was shown correctly surrounding the site when the plan went to cabinet, on this consultation it is shown, incorrectly, not including the site. When I queried this with the planning department, they informed me that this was a mistake and would be rectified, at the regulation 19 stage of the plan However, this means that locals, parish councils and indeed bodies such as the CPRE are not commenting on a true picture in the village as this site covers over six acres and has planning permission for 48 houses. I have included in the email, both the correct map as presented to councillors at cabinet and the incorrect map as presented to the public at the consultation
A0005B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area		Reject CLV012 & CLV018 as an unbalanced aesthetic. Support CLV010 which offers proximity to train station and offers the chance for Clive to grow and support to local school
A0021B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	I am writing in support of CLV012/018. I have attended many Parish Council Meetings and listened to the arguments from both sides and I believe that this proposal offers the best approach for Clive village for the following reasons: 1. It helps to address the parking issues which are a major safety concern for those of us who live here. 2. It provides easy access to the A49 which I believe will lessen the impact of the new traffic on the village as a whole. 3. It provides land for other community activities which can be discussed and decided by the population as a whole. CLV010 does not address any of these issues. I am concerned that supporters of CLV010 have been spreading inaccurate reports.
A0033B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Respondent indicates support for CLV12/18 but raises concerns that the School of Governors at Clive school are inappropriately trying to influence parents to support a specific site by mis-representing the facts.
A0035B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Advocate CLV10 as the better site. There are benefits for the school, through opportunity to create new hall and reduce education time lost moving pupils to other sites and rearranging furniture to allow lunches to be eaten in classrooms.
A0036B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Advocate CLV10 as the better site. There are benefits for the school, through opportunity to create new hall and reduce education time lost moving pupils to other sites and rearranging furniture to allow lunches to be eaten in classrooms.
A0038B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	The whole of our site, CLV018 was put forward and in by letter to you on 25/02/20 we suggested that part of this land could find a solution to the car parking problem for the school, and also include a bowling green. The current proposals does not include the whole field, but leave around an acre which is land-locked. Why not include all of that field for development and move the proposed boundary to the end of our field to link up with our boundary.
A0040B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area		Shawbury site promotion
A0043B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	The two sites allocated for 20 dwellings in Clive (CLV012 and CLV018) are not supported by the Governors of Clive CofE Primary School. For the reasons outlined in the representations made by the school that CLV010 is a site with greater advantages, I am in support of this position.
A0048B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	The two sites allocated for 20 dwellings in Clive (CLV012 and CLV018) are not supported by the Governors of Clive CofE Primary School. For the reasons outlined in the representations made by the school that CLV010 is a site with greater advantages, I am in support of this position.
A0077B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Survey carried out by the PC showed 56% were in favour of the preferred sites (at 27 Aug 2020). Any U-turn from this position would need explaining
A0078B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Survey carried out by the PC showed 56% were in favour of the preferred sites (at 27 Aug 2020). The inclusion of more parking and safe access to the School by CLV012+CLV018 proposals helps to address the long-standing issue of traffic /parking. CLV010 would be more hazardous as vehicles drive at speed with reduced visibility
A0093B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Site will not provide suitable additional parking nor enhance pedestrian linkages between the site and existing facilities. The Choice of CLV012/018 is likely to increase the flow of traffic through the village (enclosures detail & compare shortest distance & quickest /preferred routes between popular destinations from Clive village from CLV010 and proposed site CLV012). Anecdotal evidence suggests that more people from the village will travel in the Shrewsbury direction than towards Shawbury/Whitchurch CLV010 is a more suitable site because: 1) It is closer to the centre of the village and amenities and virtually the same distance from the school as CLV012/018 (details of distances/walk times provided) 2) Any Car park envisaged on CLV012/018 is likely to be of little use because of the distances & walking times to/from the School & such a car park(details of walk times from different locations provided) 3) There is a public footpath on CLV010 which provides safe and direct access to the centre of the village and the school.(map provided showing new footpath link from CLV010) 4) CLV010 is likely to enhance the use of Train services from Yorton as there is a direct and safe footpath from CLV010 to the Station. Shropshire Council should seriously consider offer of land next to the Clive Primary school linked with the choice of site CLV010 as the School Governors have already made clear the benefits to the school and the education that it would be able to provide(as previously set out in letters to the council from the School Governors). Additionally the 'well being' and standards of Clive Primary school are also an important consideration in the present and future character of the village
A0094B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Site will not provide suitable additional parking nor enhance pedestrian linkages between the site and existing facilities. The Choice of CLV012/018 is likely to increase the flow of traffic through the village (enclosures detail & compare shortest distance & quickest /preferred routes between popular destinations from Clive village from CLV010 and proposed site CLV012). Anecdotal evidence suggests that more people from the village will travel in the Shrewsbury direction than towards Shawbury/Whitchurch CLV010 is a more suitable site because: 1) It is closer to the centre of the village and amenities and virtually the same distance from the school as CLV012/018 (details of distances/walk times provided) 2) Any Car park envisaged on CLV012/018 is likely to be of little use because of the distances & walking times to/from the School & such a car park(details of walk times from different locations provided) 3) There is a public footpath on CLV010 which provides safe and direct access to the centre of the village and the school.(map provided showing new footpath link from CLV010) 4) CLV010 is likely to enhance the use of Train services from Yorton as there is a direct and safe footpath from CLV010 to the Station. Shropshire Council should seriously consider offer of land next to the Clive Primary school linked with the choice of site CLV010 as the School Governors have already made clear the benefits to the school and the education that it would be able to provide(as previously set out in letters to the council from the School Governors). Additionally the 'well being' and standards of Clive Primary school are also an important consideration in the present and future character of the village
A0097B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Accept that the site falls within Wem Town its position but comments unchanged from those submitted in January 2019 .Wem Town Council continuing opinion that there should be no more development in the town until necessary previously identified infrastructure improvements are addressed.
A0097B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Accept that the site falls within Wem Town its position but comments unchanged from those submitted in January 2019 .Wem Town Council continuing opinion that there should be no more development in the town until necessary previously identified infrastructure improvements are addressed.
A0097B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Accept that the site falls within Wem Town its position but comments unchanged from those submitted in January 2019 .Wem Town Council continuing opinion that there should be no more development in the town until necessary previously identified infrastructure improvements are addressed.
A0097B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Amend Development boundary .To reflect planning & appeal history including dismissal of development on land opposite the Mill on Mill Street, the development boundary should be amended to run parallel north with the road from Roden Weir alongside the western edge of the pavement on Mill Street to the watercourse known as Back Brook behind Mill House and then west along the southern boundary of Roden Lodge.
A0180B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area		LETTER Support for CLV012 & CLV018 but oppose CLV010. Clive PC survey 56% support CLV012 & 018. only 24% support for CLV010, 19% no preference. Support for Lydia Bardsley letter 27 March benefits of sites 012 & 018 PC support development on east side, bridge the gap between main village and Quarry View, close to amenities so let driving, provision for dedicated parking for school & overflow for medical centre, pedestrian access to school avoiding public roads, improved pedestrian safety, provision for additional recreation space for school & community. Clive CofE Primary School governors have been lobbied by Sansaw Estates promoting CLV010 and have gifted the school a derelict building adj to the school. Parents have been asked to write to you with a template letter. As Clive residents we object to parents who do not live in Clive determining outcomes in Clive. 45% of pupils do not live in Clive 9/2019 Exec Director Children's Services SC. It has been promulgated that all CL monies from CLV010 should be used for the school, against the wishes of residents who want wider community to benefit. 40% of pupils from Clive travel to primary schools away from Clive. PETITION states unsafe nature of gifted building, land not gifted, cost of demolition who will pay, support for CLV012 & CLV018, notes single track roads into Clive but agrees with growth & Clive taking it's share. signed by 61 people
A0208B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Concerned that there is insufficient land allocated for housing. There is a considerable number of dwellings to be met by windfall sites (at least 109 units). Where there are suitable sites for allocation it is therefore more appropriate to allocate sites rather than to seek to meet a shortfall through reliance on windfalls. Site WEM038 is suitable to assist in meeting this requirement and would provide around 50 dwellings. It was only ruled out by its "remote location...[and] highway and traffic issues associated with the rail crossing." Application 14/03428/OUT was granted in 2014 with the appeal docs confirming it was suitable and would not constrain any highway/traffic issues. The only reason for non-inclusion has already been addressed by the Planning Inspector
A0239B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Object to inclusion of WEM010 as a preferred option. WEM045 should be allocated in preference to WEM010 which is undeliverable. WEM045 is readily available, clearly in a sustainable location and is contiguous to both existing and proposed employment sites with safe access onto the main road and is confirmed deliverable. The site sustainability and accessibility is supported by the Inspectors comments on an appeal relating to planning application 14/00797/OUT for site development which was primarily dismissed due to the site being undeveloped agricultural land outside the development boundary. Whilst comments are made by the Inspector regarding impact on character and appearance of the area WEM045 is little different to that identified on Pymms Road, in that both would involve development on open land outside the recognised built form of Wem. WEM045 has also been acknowledged by the Council as being in a sustainable location adjacent to the identified proposed employment site for Wem and close to Robinson and Young garage and shop, during consideration of recent nearby planning application 19/00006/FUL. Additionally the site should be included for allocation to address the shortfall in delivery since the SAMDev was adopted; to meet the growing need for different types of housing and to address likely significant shortfall (as identified by Lichfields) due to revised housing methodology

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0239B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Object to continued inclusion of WEM003 as an Allocated site. Support site WEM045 in preference to allocated site WEM003. WEM003 allocated over 5 years ago but little interest in the site and it still has no planning permission so it would not appear to be deliverable. An outline application (20/01054) for up to 100 dwellings was refused in June 2020. The application included additional land to the west of the identified site required to compensate for land within the site that cannot be developed due to the presence of a high-pressure gas main. Presence of this constraint & likely need for additional land throws considerable doubt on the deliverability for the preferred option site WEM010 for a further 120 dwellings, as a linked second phase to the adopted allocation. Whilst site guidelines include an option for second access in case WEM003 not developed it will result in 2 accesses in close proximity if both sites are brought forward. There are significant traffic issues within Wem and no shops local to the site or direct routes to Ellesmere and Whitchurch, whilst the Eastern side of Wem provides direct access to the A49. Additionally, there are known flooding problems which require investigation. WEM045 is a more sustainable location with sustainability having been established in an appeal decision. Whilst this site is on open agricultural land this is no different to the allocated and preferred sites objected to.
A0247B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Site HDL009 should be allocated within the Local Plan. The site is adjacent to several recent developments and access can be gained through Hall Drive (off the A49), which has served other recent development - the road does narrow but this can be addressed. The site adjoins the proposed development boundary and represents a natural continuation of development. Hadnall offers the infrastructure necessary to support development of the site. The site would provide a range and choice of housing in the village and has the potential to represent an attractive development. This site would contribute to addressing the shortfall of deliver since the adoption of SAMDev and meeting the need for different types of housing identified in the NPPF and draft policies DP1-DP7. Housing delivery will become increasingly important if the revised housing methodology for Shropshire becomes national policy (increasing need from 1,400 to 2,129)
A0251B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	These sites would minimise the impact on pedestrian safety - The High Street through Clive has no footpath for much of its length. CLV0012 & CLV0018 benefits over alternatives considered is children living in the proposed developments would be able to access the village school without walking or travelling along the High Street. Adults who drive would be able to begin and end many journeys away from the village using the road at the eastern end of the village as access to one of the nearby A roads, thereby not increasing traffic towards the centre of the village (Drawwell, High Street, Jubilee etc).
A0271B1	Viability and Deliverability of Proposed Site Allocations	Draft Policy Area S17 Wem Place Plan Area		The landowner is working in partnership with the landowner of CLV018, where the involvement of a developer has been discussed. It remains the landowners preference to have a single site allocation, across the two land parcels – instead of the current CLV012 and CLV018. The proposed sites are allocated as a single site, with a single guideline and will be delivered together – i.e. any application will be submitted across both sites and to provide both the proposed housing provision and policy requirements across the both sites. One site is not responsible for certain requirements, and the other site others. It therefore makes sense to have a single allocation, with a single housing provision and a single delivery timescale.
A0278B1	Viability and Deliverability of Proposed Site	Draft Policy Area S17 Wem Place Plan Area		Confirmed subject to the matters raised in our main representation. The assumption made is too late (c.) as we now have a contract with a housebuilder who is keen to move forward to submit a planning application. We anticipate delivery commencing in the short term.
A0306B062	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	We are concerned about firstly, the proximity of this site to a SSSI and secondly, the lack of mitigation measures mentioned in the plan:
A0370B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Agree
A0371B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Accept the need for development, including in Clive - although 3 of the 4 roads into the village are narrow Support identification of CLV012 and CLV018 as site allocation. Strongly oppose site CLV010. Recent surveys by the Parish Council indicate local support for development of CLV012 and CLV018 (56% of respondents, with 24% supporting CLV010 and 19% expressing no preference). Benefits of CLV012 and CLV018 include: -Reflects community and Parish Council preference for development to the east of the village. -Bridges the gap between the main village and Quarry View. -Closer to amenities, reducing the need to drive. -Provision of dedicated car parking for the school and overflow parking for the GP. -Provision of a dedicated pedestrian access to the school, avoiding public roads. -Contribution to improved pedestrian safety. -Provision of additional recreational space. It is understood the school and parents of children at the school may prefer CLV010 as a result of potential provision of a derelict building for school purposes. This is contrary to the views of residents of the Parish. It is also understood that some have suggested CIL funding from development should be ring fenced for the school, this is also contrary to views of residents. There is also concern about the potential for further expansion of CLV010
A0372B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Any development should not change the 'feel' of the village. CLV012 and CLV018 will enhance the 'feel' of the village by linking parts of the village, provide car parking facilities near the doctors surgery and school and though this provision increase road safety by reducing on street parking close to a difficult bend. The alternative site to the west would represent urban sprawl.
A0420B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	The site allocations do not include sufficient land to meet the housing need. HDL013 should also be included.
A0440B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Support identification of Clive as a Community Hub and the proposed residential guideline. Support the joint allocation of CLV012 and CLV018. The site is largely flat site, which is open and with minimal field boundaries - there is slight tree cover along the boundary between the two components of the site. The site has good access to the A49 which will reduce construction vehicles travelling through the village. It represents a natural expansion of the settlement. Development of CLV012 and CLV018 will be undertaken comprehensively, provide attractive low-density residential development and much needed infrastructure. Specifically it will deliver appropriate low-density housing, bridge the gap and increase community cohesion between the main form of the village and Quarry View, incorporate open space and much needed additional car parking facilities (to the west of Flemley Park Farm in the centre of the village) to reduce the level of on-street parking with enhanced pedestrian linkages between the site and the existing facilities on the High Street and Clive Primary School (via Holly Close Public Footpath). It can also deliver a policy compliant scheme. Parish Council have indicated support for improved car parking and accessibility to the school. A recent community survey resulted in support for CLV012 and CLV018 rather than CLV010 (an alternative site promotion), which would not deliver off-street parking for the school, but is understood to be offering land/building to the school. Another recent community survey related to loss of services and Community Hub status, with suggestions the shop may now close. There is a need for a rounded and holistic assessment when considering the future status of Clive. As a result of the Covid 19 pandemic; 2020 is an unprecedented year with most businesses, facilities, venues across the county negatively impacted. Therefore it is felt unfair to make a valid 'points' assessment at this moment in time, plus on a more specific level if the shop closes it affords an opportunity for another business to be set up to fulfil that need. It is noted that Community Cluster status would mean loss of development boundary and guideline, with all development delivered as windfall. The required housing growth is unlikely to alter, so new development is likely to be delivered through sporadic, small scale sites, which will not be able to deliver the wide-reaching community infrastructure improvements that the Proposed Site Allocation can bring. Hence it would be detrimental for the community if Clive were to lose its Community Hub status. The 'open countryside' status of Clive in the current Local Plan is a glaring omission by the Council and ignored the facilities afforded this settlement and the need for sustained growth to allow the existing facilities to flourish. Oppose downgrading of Clive to a Community Cluster and failure to plan positively would impact on the soundness of the plan and represent a missed opportunity for the village to deliver much needed community infrastructure.
A0533B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	If the adjoining site of 1 The Hill was available to the School, the Governors intend to build a school hall, Early Years classroom, kitchen and ancillary facilities on the site, and use the rest of the site for recreation and outdoor education purposes. This would enable the School to enhance permanently the quality of education for all children at the School for many years to come, and allow additional children to be admitted.
A0599B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Feels that the site is unsuitable because: The land is very wet and has 3 natural springs on it, and stream running to the side. If developed these issues and water run off roads could increase local flooding; the site will add to existing issues with waste water and sewerage in the Shawbury area, as the system needs increased capacity already; there are not sufficient places at Shawbury Primary school and 80 new homes will see a need for significant expansion of the school. Issues of bus collection and drop off of pupils also needs to be addressed; supply of fresh water to properties by Severn Trent is already barely sufficient. Insufficient supply could also impact on RAF Shawbury and any major fire at the base; Shawbury Medical Practice on Poynton Road is at full capacity and will need to be expanded considerably with this new development; the impact on traffic in Shawbury. The A53 is already busy and 80 extra homes will cause congestion and risk to pedestrians walking along Poynton Road to the School
A0635B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Site plan included but no other information submitted.
A0671B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Shawbury is still evaluating the impact of the ongoing development of Lioncourt homes plus that of Chantry Close development. For example St Marys primary school has a 42 student reception entry and is dividing classes with 15 students having to join classes with other year groups. Traffic in and through Shawbury has increased despite traffic calming solutions. A thorough and proper evaluation of the drainage and sewage works requires conducting and its outcomes made transparent to the Parish community in association with STW. The sewage and drainage system cannot cope with the existing demands on it. There is regular flooding from manholes into and surrounding properties and waterways. The current new build Lioncourt homes resulted in sewage floods due to blockages as it connected into the Paddocks and destruction of wildlife into the beck. Reference to S010. An infrastructure survey and overhaul should be conducted and upgrades made to bring the system into the 21st century able to cope with new developments as a starting point. Residents from Whitelodge through to the Hazeldines have already been impacted by the Lioncourt development in terms of noise and visual impacts for the last 2 years. Further developments from the Lioncourt site as proposed in Appendix R Wem Place Plan Area Site Assessments will continue this for a further 2 to 3 years on this proposed site SHA019, despite a local parish meeting some 9 months ago agreeing to lobby that this chosen site was not to be given any more credence than any other of the viable sites proposed. It appears that the decision has been made to develop SHA019 despite this site being one of 8 with an overall sustainability conclusion of good. Far from creating a community, the development is isolated from the main community, and fails to address the public transport depression and the councils commitment to a zero carbon future. Environmentally the key points relating to habitat loss, noise and air pollution, and drainage even given small enclaves between the sites involve too much disturbance too quickly in relation to the sustainability appraisal of the Regulation 18. Please reconsider decisions around this site SHA019 and the need to carry out a full sewerage and drainage survey in Shawbury with Severn Trent Water who have not responded to information on the extent of the issues in Shawbury when contacted several weeks ago. Existing residents also have rights to a peaceful life and not 5 years plus of continual developments in a village with a heavy traffic thoroughfare on the A53
A0708B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Object to allocation of HDL006 for development. HDL006 lies outside the development boundary in open countryside contrary to Policy CS5 Countryside. Planning permission has already been refused for the development of this land under appeal decision APP/L3245/W/15/3003781. A letter was provided to the Council in 2019 setting out the following issues: development of HDL006 will affect our quality of life and our neighbours. Permission for development of the land has already been refused on appeal but the Council seem unwilling to accept the decision of the Inspector. Hadnall residents voted at a Parish Meeting in 2019 to remain as a Countryside village.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0855B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	We fully support the identification of Hadnall as a 'Community Hub' settlement Hadnall is a medium-large settlement, serving wide hinterlands, with multiple services and facilities. We are also in full support of the development boundary as found at Inset S17.2 Hadnall. The residential guideline of "around 125" dwellings throughout the plan period - 2016 - 2038 - is supported and considered achievable within the period. The inclusion of a site allocation, to provide 40 new dwellings at Proposed Site Allocation HDL006, allows for an appropriate level of windfall development within the development boundary. Hadnall previously had no identification of a Hub or Cluster settlement, yet still received a large amount of housing - disproportionate to its status as open-countryside. The identification as a Hub and the introduction of a development boundary can only be seen as a positive and will allow for a managed and directed housing growth that is in-line with the Parish Council's and communities aspirations.
A0872B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	WEM037 Promoted as a more sustainable alternative to WEM033. WEM037 is identified as a site with long term potential which has no significant constraints identified by the SLAA. The site is within an area of moderate rural character with medium visual and landscape sensitivity. Site is accessible and well located relative to development boundary with a favourable Fair sustainability rating which is therefore better than identified site. It is immediately available, fully deliverable with interest from developers.would help to deliver stated dwelling requirement Additional information can be provided as required to support bringing the site forward. Site location plan provided.
A0876B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Pleased land is identified as a site with long term potential which has no significant constraints by the SLAA. However considered site is has short term potential because site ; immediately available, fully deliverable ; adjoining land has been developed for residential use and there has been interest from developers in the site; direct access to A53 ; would help to deliver stated dwelling requirement. Additional information can be provided as required to support bringing the site forward. Site location plan provided.
A0880B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Site HDL015 proposed as alternative site. Site has short term potential for development because site; within village proposed as community cluster; has no significant constraints; is immediately available, fully deliverable with significant developer interest ; has main services; close to primary school with no requirement to cross A49; well positioned located with western boundary adjoining the village with agricultural building and yard forming natural infill and screening bund to the south. Site development well placed to provide benefits of additional school carparking providing safe access to school plus land suitable for a multipurpose sports centre through the landowner of land donation. Additionally, site would include area of public open space. Land to north(in same ownership) recently developed incorporating infrastructure to accommodate high volume of surface water. Site however outside area of flood risk. Site has a Good sustainability rating compared to other sites in Hadnall. Site self-contained & Plan provided illustrates how site can fulfil 52 house requirement for Hadnall. Village has good facilities and further development will allow additional investment to local facilities & improve sustainability. Site has direct access within existing 30mph zone and required improvements can be implemented. Proposed scheme provides needed affordable family houses within safe walking distance of the school. Proposal for a attractive development to complement the village and balance housing type. Adjoining farm building will not be used for housing livestock. Scheme reflects community led plan and no objection raised by Parish Councillors. The proposed scheme to be allocated suggests that cars will drive through the Westfield's Housing development as the proposed car park for the school is a long walk away, where our proposal has direct access off Astley Lane. Residents of Westfield's states their houses shudder as HGV's travel on the A49 Proposed site lost an appeal. The area has high water table and existing gardens at Westfields unusable in winter. Site guidelines for proposed allocation suggests that cars will drive through the Westfield's Housing development as the proposed car park for the school is a long walk ,whereas our proposal has direct access off Astley Lane. Residents of Westfield's highlight traffic impact (houses shudder as HGV's travel on the A49).Additional information can be provided as required to support site allocation.
A0884B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Promoting land at Wem Industrial Estate, Soutlon Road, Wem, Shrewsbury on behalf of clients. This site is currently an agricultural field located to the south east of the industrial estate adjoining the B5065. The site has no significant constraints. I am writing as we believe this land can be considered for short term potential due to the following: Available and owner has full title to the land; the site is fully deliverable and suitably placed to provide development in Wem; the site is well positioned to highways access off the B5056 and onto the A49. Our client is very keen to provide this site for commercial/business park development, therefore is happy to provide any information the Council deems as necessary as further evidence of the site being available and sustainable
A0900B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Sansaw Estate supports the designation of Hadnall as a Community Hub settlement in Policy S17.2 as vital to ensure the village's long-term future. Paragraph 5.247 of the explanatory text is supported in noting that, "due to its relatively close proximity, the village (also) has a strong relationship with Shrewsbury." This relationship makes Hadnall one of relatively few villages in Shropshire that has significant potential for rural growth both socially and economically. Amend policy S17.2 to reflect the more visionary approach provided by the Estate and help deliver policy SP2 Strategic Approach. We would strongly support a residential guideline for Hadnall of at least 250 dwellings to 2038 with additional allocations of land for up to 200 dwellings and 2 hectares of employment land together with new community facilities in the centre of the village, to be delivered during the plan period to 2038. Despite being located on a strategic corridor, Policy S17.2 gives Hadnall a residential development guideline of 125 dwellings, of which 73 dwellings (58%) are already committed. The Plan allocates one site for 40 dwellings at land south of Wedgefields Close (HDL006) and assumes windfall development of 12 dwellings over the remainder of the plan period to 2038. This equates to around 3 dwellings per annum over the 17 years 2021-2038, which we consider to be unjustifiably small for such a well located, sustainable village. The Sansaw Estate is disappointed that Shropshire Council has not allocated any of the land promoted in the Strategic Vision Document presented to both Shropshire Council and Hadnall Parish Council in 2018/2019. The Vision balanced residential development with economic development arranged in an arc around the village core. It provides a 30 year vision encompassing both this plan period and the next, to 2050. The Plan in its current format ignores the potential for a more vibrant village core centred on the community facilities of the village hall, car park, church, village shop and central area of public open space around Hadnall moat. There is a missed opportunity to focus development in a ring around the village core to facilitate a renewal of the heart of the village. The Council's Landscape and Visual Sensitivity Assessment for Hadnall notes that in the northern side of the village, "Views are generally contained due to low lying topography and vegetation." The Assessment notes, "The gentle topography is less susceptible to change a result of development, with opportunities to enhance the settlement edge and restore hedgerows and rural pattern as part of new development." This supports the potential of the northern part of the village to accommodate residential and employment-led development. The following sites are promoted by the Sansaw Estate for allocation, having already been assessed by the Council as having no technical difficulties: HDL011 Land south of Ladymas Road (1.656ha); HDL012 Land west of A49 and north of Chapel Rd (5.174ha) and HDL014 Land north of Station Road (1.337ha). Address its pressing need to identify more land for housing and employment development in light of Government pressure; reinforce its strategy of focussing growth in strategic corridors including the A49 north of Shrewsbury; utilise a worked out Whole Estate Plan on which Hadnall Parish Council has already been consulted to help deliver sustainable housing.
A0900B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Sansaw Estate object to the removal of their site CLV010 from the regulation 18 Pre-Submission Local Plan Plan in favour of sites CLV012 and CLV018 which are further from the railway station and the village shop. CLV010 was the preferred allocation in the last consultation in November 2018. Sansaw Estate support Policy S17.2 identifies Clive as a Community Hub settlement that will have growth of around 30 dwellings. The Sansaw Estate supports the designation of Clive as a Community Hud as essential to the long term vitality of the village. In light of policy DP1, we can guarantee that site CLV010 will deliver a suitable mix to reflect local housing need as well as help enhance local infrastructure, with the Sansaw Estate prepared to work closely with the school and the Parish Council. We respectfully request that site CLV010 is restored as an allocation in the Plan. To guarantee delivery of community infrastructure, we suggest the following development guidelines: "Development will contribute to the extension of the school through the provision of the 'Hilltop Cottages' site adjoining the school. An appropriate highway access will be provided onto Station Road with accompanying pedestrian footway. Development will provide a low density scheme and the development mix will reflect identified local housing needs. Development will enhance pedestrian linkages between the site and the existing facilities on the High Street and Clive Primary School. Existing trees, hedgerows and priority habitats will be retained and enhanced". This new allocation will address the issues raised in page 220 of the Wem site assessments report as, "Whilst this site was identified as a Preferred option in 2018, concerns have been raised about the sites proximity to services within the villages, taking into account the slightly uphill gradient from west to east, as well as concern that traffic will need to go through the village to access the A49. To this end, it is considered there are alternative sites on the east of the village that are more appropriate for allocation to meet the village's modest housing requirement." These concerns are misplaced and can be adequately addressed as follows: the gradient of Station Road at this point is very slight indeed and development can create a pedestrian footway along this length of Station Road, to the benefit of existing homes on the opposite side of the road as well as to the new dwellings. Sansaw Estate owns the intervening land between site CLV010 and the existing public right of way connecting the south of the village to the railway station and the school. A new footpath link can be created as part of CLV010 to provide residents with a largely off-road route to the station to the west and the school and village facilities to the east as shown in figure 4. the Sansaw Estate can provide a hard surface to improve the route between site CLV010 and the school. For traffic management along the route from the A49 to the A528, concerns about construction traffic are misplaced and can be addressed as a planning condition to require deliveries to travel to and from the site from the A528 direction entirely avoiding the village. Sansaw Estate has an excellent reputation for delivering housing and public open space, it manages 150 hectares of woodland and extensive areas of grassland, including the Grinshill Local Nature Reserve with unfettered public access. Clive CoE Primary School is physically constrained but the Estate own land and a derelict building adjoining the school and as identified in our letter dated 16th December 2019, the Estate is willing to make this land available to Clive primary school for educational purposes as CLV010's contribution to village infrastructure. Clive school governors support this proposed transfer of the land and building, which represents a significant opportunity for the school. There is an outline agreement between the Estate and the school that this will accompany the development of site CLV010 as part of its contribution to community infrastructure. A mix of smaller houses with at least 25% two-bedroomed and 25% three-bedroomed houses will be required by Policy DP1 in addition to 10% affordable homes. CLV010 will therefore include housing for young families with children who rely on the school. This addresses Parish Council's concerns regarding the mix of housing in December 2018 with the PC minutes showing they favour sites that deliver smaller, lower-cost homes.
A0900B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Sansaw Estate support Policy S17.3 which identifies Grinshill as a Community Cluster that will deliver "appropriate small-scale windfall residential development, where it is consistent with Community Cluster Policy SP8 and other relevant policies of this Local Plan". The Plan thereby provides for a small-scale, limited growth consistent with maintaining the social, economic and environmental vitality of Grinshill. Sansaw Estate has an ongoing dialogue with Grinshill Parish Council and the neighbouring estate regarding a comprehensive plan for Grinshill and would welcome an opportunity to discuss this with Shropshire Council in more detail in a face-to-face meeting.
A0913B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported.The identification of Wem as a Key Centre accords with the Local Plan's vision in this regard, given Wem's strategic location on the A49 corridor with excellent connections to Shrewsbury and other English regions to the north.
A0913B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	The designation of Wem as a Key Centre settlement in Policy S17.1 is strongly supported as this is seen as vital to ensuring the town's long-term future.We agree with the explanatory text to policy S17.1 that due to Wem's strategic transport links (including main Crewe-Shrewsbury rail line) the settlement "contributes towards the strategic growth objectives in the north-east of the County". However, Policy S17.1 places a significant reliance on windfall development to meet the needs of the townover the Plan period, with an additional 89 dwellings as windfall (unplanned development). Given the strategic importance of growth being directed to Wem such a reliance on windfall development is considered inappropriate.It would be a much more sensible option to allocate up to 40 of these windfall dwellings onto our client's land, along the lines of the indicative plan attached to this letter. the current consultation provides anopportunity for Shropshire Council to amend policy S17.1 and Inset Map S17 to allocate ourclient's land. The allocation of this land would result in a greater level of certainty that theaims and objectives of the Plan, including the strategic growth objectives in the north-east ofthe County, will be realised over the Plan period. In addition, the allocation of this land,rather than the reliance on windfall development, will also deliver the important communitybenefits set out in this letter.
A0913B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	The designation of Wem as a Key Centre settlement in Policy S17.1 is strongly supported as this is seen as vital to ensuring the town's long-term future.We agree with the explanatory text to policy S17.1 that due to Wem's strategic transport links (including main Crewe-Shrewsbury rail line) the settlement "contributes towards the strategic growth objectives in the north-east of the County". However, Policy S17.1 places a significant reliance on windfall development to meet the needs of the townover the Plan period, with an additional 89 dwellings as windfall (unplanned development). Given the strategic importance of growth being directed to Wem such a reliance on windfall development is considered inappropriate.It would be a much more sensible option to allocate up to 40 of these windfall dwellings onto our client's land, along the lines of the indicative plan attached to this letter. the current consultation provides anopportunity for Shropshire Council to amend policy S17.1 and Inset Map S17 to allocate ourclient's land. The allocation of this land would result in a greater level of certainty that theaims and objectives of the Plan, including the strategic growth objectives in the north-east ofthe County, will be realised over the Plan period. In addition, the allocation of this land,rather than the reliance on windfall development, will also deliver the important communitybenefits set out in this letter.
A0924B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	The designation of Edstaston as a Community Cluster settlement in Policy S17.3 andits identification on Inset S17, is strongly supported as this is seen as vital toensuring the settlement's long-term future.The settlement of Edstaston lies in close proximity to, and has a strong relationshipwith, the key service centre of Wem. It is also benefits from a limited range ofservices and facilities. Edstaston therefore provides a sustainable location for theprovision of additional residential development in the rural area.
A0924B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Site location plan for EDS005

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0951B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Don't know / no opinion	<p>Proposed Allocation</p> <p>Policy S17 Wem Place Plan Area, highlights the importance of Wem as a Key Centre that contributes to strategic growth in the north-east of the County. As such a development guideline for 600 new dwellings in Wem is identified in Policy S17.</p> <p>The policy identifies new allocations for residential development in the edges of Wem and saves allocation WEM003, which was identified in the adopted SAMDev. An additional residential allocation on the western side of Wem is proposed, as shown in figure 1 (shaded yellow but not included in this summary).</p> <p>The 1.5 hectare site is put forward to deliver approximately 25 dwellings in conjunction with the delivery of the saved WEM003 allocation.</p> <p>The proposed allocation is currently outside of the development boundary and therefore is within the open countryside. However, it is well related to Wem and its development would come forward with WEM003. Both sites would then also have the potential to link to the proposed allocation WEM010, creating a comprehensive development area on the western side of Lowe Hill Road.</p> <p>Landscape Evidence Base</p> <p>As the proposed allocation is currently open countryside, the local plan evidence base has been reviewed in relation to the sensitivity of the landscape surrounding Wem and the potential impacts the proposed allocation would have on the surrounding countryside.</p> <p>The adopted SAMDev evidence base considered the appropriateness of new residential development extending Wem's settlement boundary. The North Shropshire Landscape Sensitivity and Capacity Study (March 2008) considered the landscape constraints around Wem and the sensitivity and capacity of a number of sites (as selected by officers and marked by a red dashed line). The plan extract is included below as figure 2. The study did not identify any specific constraints relating to the proposed allocation site or surrounding land. Moreover, site NSWe9-24, north of the site was considered to have a medium landscape sensitivity and a medium landscape capacity for housing (Figure 2 - North Shropshire Landscape Sensitivity and Capacity Study (March 2008) – Plan Extract and Assessment Text for NSE29-24 (not included in this summary)).</p> <p>The assessment for the NSWe9-24 site also noted that the area has medium visual sensitivity as the area is gently undulating, which limits very wide views.</p> <p>The Site Assessment for allocation WEM003 identified the site as having medium landscape sensitivity, based on the assessment for site NSWe9-24. The site was recommended as a preferred option, as it is a 'good strategic location relative to alternatives, limited environmental constraints, opportunities to masterplan and phase if required'.</p> <p>(Figure 3 - Extract from Adopted Policies Map (S17 Wem) is not included in this summary).</p> <p>The Shropshire Landscape & Visual Sensitivity Assessment (2018) considers land surrounding Wem and forms part of the evidence base for the current Local Plan review. For the western / northern section of Wem, within which the proposed allocation site falls, the assessment concludes that:</p> <p>Landscape Sensitivity – This is a generally intact landscape of pastoral fields with recreational features including The Shropshire Way, Wem Market Town and Cycle Rides and the River Roden, which are locally enjoyed. Overall, the sensitivity of the landscape to change arising from new housing is medium and to employment is medium-high.</p> <p>Visual Sensitivity – This is a landscape with very gently rolling landform with intervisibility to the settlement edge. The medium scenic quality combined with intervisibility with the settlement edge means views experienced are of medium sensitivity to change arising from new housing and medium-high to employment.</p> <p>The overall sensitivity for the proposed allocation site and surrounding area for housing development is assessed as 'medium'. The level of sensitivity was recorded on a six-point scale (low, medium-low, medium, medium-high, high and very high).</p> <p>The three residential allocations proposed in Wem (WEM010, WEM025 and WEM033) are located within this area of 'medium' sensitivity, as is the additional site proposed to the west of WEM003.</p> <p>Based on this assessment, the Design Guidance for Wem, as set out in the report (figure 4 below):</p> <ul style="list-style-type: none"> - Does not identify the proposed allocation site and its surrounding land as having 'higher landscape sensitivity to development' or 'higher visual sensitivity to development' (while several areas to the east of Wem are considered to have higher sensitivity); - Does not identify any designated features or visitor destinations in or near to the proposed allocation site; - Does not include any important landscape features which should be retained are located in or near to the site. - Does not identify any long distance views passing through or close to the site. (Figure 4 - Shropshire Landscape & Visual Sensitivity Assessment (2018) – Extract is not included in this summary). <p>The SAMDev Review Site Assessment (2018) for WEM010, which lies to the north east of the proposed allocation site, noted that 'the site lies outside, but adjacent to the development boundary and adjoins the existing housing SAMDev allocation which is expected to deliver in 2019, and is therefore considered a natural extension to the settlement.' The assessment confirms there are limited environmental constraints relating to the site.</p> <p>In light of this it is not considered that any specific landscape features have been identified to restrict the allocation of land to the west of saved allocation WEM003. The western edge of the proposed allocation is delineated by an established hedgerow and tree lined boundary which would form a clear edge to the open countryside.</p> <p>Site Proposals</p> <p>A masterplan and site specific Landscape and Visual Impact Assessment have been produced for the proposed allocation site and the adjacent WEM003 saved allocation site, copies of which are included as Appendices A and B. The masterplan illustrates an outline layout for a modest density housing scheme, set within a strong axis of landscape buffers which include the retention of valuable fir</p>
A0966B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	<p>Promoters and Landowners support the allocation of site SHA017 as a site in a highly sustainable location close to Shawbury Community Hub centre and its services and facilities. The site lies within 1 ownership which simplifies availability and delivery & is available for immediate development. There is evidenced developer interest. The site is viable and capable of coming forward as part of the Local Plan Review process as evidenced by phase 1 development (SHA004) experience by Lioncourt Homes. Anticipated delivery timescales: Phase 1 site 'Short Term' (2020 to 2025) Phase 2 site will come forward in the 'Medium Term' (2025 to 2030).</p> <p>site will be developed in 2 Phases-approx 40 in each Phase; Access to site would be via the new A53 roundabout via 'Oaklands Park as this has sufficient capacity with pedestrian footway along the site's eastern boundary, connecting to the existing footway on Poynton Road. No vehicular access will be provided from Poynton Road, the Paddocks or Hazeldine Crescent. The development will support delivery of a footpath link, along side appropriate infrastructure including lighting and secure fencing, to enhance connectivity to the School and to ease congestion. Existing trees, hedgerows and priority habitats will be retained and enhanced; enhanced connectivity to St Marys Primary School and to ease congestion on Poynton Road. Existing trees, hedgerows and priority habitats will be retained and enhanced. Development will reflect and respect heritage interest & contributions be provided towards the consolidation, conservation and interpretation of the Grade II listed brick kiln and associated structures west of the site. Appropriate noise management/mitigation measures will be employed. Appropriate sustainable drainage and water management will be put into place & details are attached of drainage improvements which have been discussed with Shropshire Council.</p> <p>Inaccuracies published on social media community site regarding the proposal and feedback prompted some adverse comment, but positive comment also made which is unlikely to be submitted. Positive comments related to benefits of provision of new houses, economic & social benefits and support for local shops & businesses also highlighting timescale and safeguards built into planning processes. It was also noted that Shawbury not unique in receiving development. It is clear that there is support within the community of Shawbury for new houses. Extract from social media postings included in rep.</p> <ul style="list-style-type: none"> •at Preferred Sites Consultation agreed that proposed development boundary provides for the a logical extent of the existing settlement along with a suitable residential allocation in SHA019; •Shawbury Parish Council comments of 22nd January 2019 are reported (agenda and minutes included as an appendix) including acceptance of 80 dwellings to 2036 and identification of the site as the most appropriate. Although the PC request that application for development not considered within the next 5 years this cannot be justified and alternative suitable phasing for the site is suggested. •Public concerns (set out in standard letter provided) were raised to the Parish Council meeting regarding the development of the site & village capacity for development. In respect of these it can be demonstrated that: there is likely to be sufficient gp & school place capacity; access and road infrastructure is suitable; recently upgraded sewer is capable of accommodating the outfall from the proposed site SHA019; no likely flood risk and the development of the site will not result in the loss of flood storage capacity & drainage scheme & culvert upgrade will address localised issues; employment available locally; alternative footpath route to that via The Paddocks & bus turning area can be provided if required.
A0966B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	<p>Support identification of Shawbury as a (higher level) Community Hub - known services & facilities listed which support that role. Follows that within the hierarchy of settlements that Shawbury should be a focus for new development in line with Policy CS1.</p> <ul style="list-style-type: none"> •In view of the sustainability residential requirements, including settlement housing guideline (150) identified at Preferred Sites Consultation should be a minimum level of development
A0969B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	<p>Agree with site allocation and guideline for SHA019</p>
A0995B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	<p>Site promoted - on the West side on Hadnall, immediately adjacent to several recent residential developments. Access has previously been deemed appropriate for the recent small/medium developments that have been approved and built. We have had discussions with Eddie West in August 2019 regarding the alterations to Church Lane and developing the land in general, and he was sympathetic with our scheme and generally positive with the approach we were taking. The proposed land is immediately adjacent to the current proposed development boundary for Hadnall, making our site a natural continuation of the desire for development. It is our view that this site should be included for allocation to address the shortfall in delivery since the SAMDev was adopted and meet the growing need for different types of housing identified in the NPPF and the draft Local Plan (Policies DP1 – DP7).</p>
A1120B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	<p>Fully support the identification of Aston as a Community Cluster' settlement within the Wem Place Plan Area and in connection with: Edstaston, Quina Brook, Northwood, Newtown and Tilley</p> <p>Aston is in close proximity to Wem, a Key Centre, providing easy access to the services and facilities within the town to meet the day-to-day needs of current and future residents. Aston was formerly an open-countryside development and has been largely void of development through the current plan period. However, its size, accessibility and proximity to Wem clearly evidences Aston as a sustainable settlement and able to accommodate new housing growth through the extended plan period.</p> <p>However, with Aston identified as a Cluster settlement, any new housing growth must be in accordance with draft Policy SP8, specifically Point 2.</p> <p>Whilst the introduction of a definition for 'infill' is welcomed, it is felt that there is too much rigidity in directing new housing development, that does not take into account local context and character and will hamper new development on a otherwise sustainable development.</p> <p>Aston is a very much linear and tight-knit settlement, with a clear nucleated cluster of housing in a regimented form, as a result the availability for new development (aside from conversions) is few and far between.</p> <p>It is therefore requested that a degree of flexibility be introduced to the definition of infill, in recognition that no two sites or settlements are the same. For draft Policy SP8 to be applied so rigidly, with no allowance for slight interpretive anomalies would limit new development in Aston so heavily, that it is likely the settlement will not deliver on any windfall new-build. Instead new housing will be delivered through conversions, of which are disproportionately high-value and will exclude Aston from delivering its longer-term sustainability</p>
A1121B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	<p>Support the identification of Clive as a 'Community Hub' settlement within the Wem Place Plan Area as a medium-large settlement serving a surrounding rural hinterland. Clive offers multiple services and facilities to meet the day-to-day needs of the community and future residents including: School, Church, Medical Practice, Shop & Post Office, Village Hall, amongst others. Support the development boundary as found at Inset S17.2 Clive which will facilitate the delivery of the residential guideline of "around 30 dwellings" from 2016 – 2038, whilst retaining a sympathetic built pattern and avoiding unnecessary encroachment into the open countryside. The inclusion of Proposed Site Allocation CLV012 and CLV018 to provide 20 new dwellings is supported as they help meet the needs of Clive and allow an appropriate level of windfall development within the settlement. The Proposed Site Allocations CLV012 and CLV018 should be amalgamated into a single site allocation and together they are available, deliverable and viable. The development of this allocation will provide local infrastructure improvements to satisfy the settlement policy, whilst providing a sympathetic form of low-density housing to be developed in complete accordance with all draft Policy requirements and developer contributions. The Proposed Site Allocation represents the most sustainable site for new development within the settlement, protecting residential amenities and providing improvements to highway safety, local biodiversity and landscaping. It is considered there are no other promoted land parcels which the Council have not previously considered and already rejected. The Site Allocation CLV012 and CLV018 should remain in the Plan to provide the new housing required in Clive. A supporting Further Representations document accompanied this submission.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1123B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Fully support the identification of Tilley as a Community Cluster' settlement within the Wem Place Plan Area and in connection with: Edstaston, Quina Brook, Northwood, Newtown and Aston. Tilley is in close proximity to Wem, a Key Centre, providing easy access to the services and facilities within Wem to meet the day-to-day needs of current and future residents. Tilley was formerly an open-countryside development and has been largely void of development through the current plan period. However, its size, accessibility and proximity to Wem clearly evidences Tilley as a sustainable settlement and able to accommodate new housing growth through the extended plan period. However, with Tilley identified as a Cluster settlement, any new housing growth must be in accordance with draft Policy SP8, specifically Point 2. Whilst the introduction of a definition for 'infill' is welcomed, it is felt that there is too much rigidity in directing new housing development, that does not take into account local context and character and will hamper new development on a otherwise sustainable development. Tilley is a very much a tight-knit linear settlement and a largely historic settlement, hence the recent designation of a Conservation Area. As a result, the availability for new development (aside from conversions) is few and far between. It is therefore requested that a degree of flexibility be introduced to the definition of infill, in recognition that no two sites or settlements are the same. For example, land adjoining the north-western edge of the settlement, on a parcel of land that is physically and functionally well connected to the existing settlement, yet would fail to comply with draft Policy SP8 owing to a lack of development on two sides. For draft Policy SP8 to be applied so rigidly, with no allowance for slight interpretive anomalies would limit new development in Tilley so heavily, that it is likely the settlement will not deliver on any windfall new-build. Instead new housing will be delivered through historic conversions, of which are disproportionately high-value and will exclude Tilley from delivering its longer-term sustainability. Additionally, Tilley is characterised by large detached farmhouses and former barn conversions. The designation of a Conservation Area will add further pressures on any new housing scheme providing a sympathetic form and layout, whereby the requirement that no infill site be bigger than 0.1 hectare and provide no more than 3 units, will result in any new housing development unable to meet the requirements of draft Policy SP8 and draft Policy DP24 concurrently.
A1142B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Don't know / no opinion	From previous Council meetings and discussions, Clive Parish Council's standpoint was as follows: given that the points score for the parish (51 points) put Clive just over the threshold for Community Hub status (48 points), the only course of action was therefore to accept Community Hub status and to try our best to mitigate the negative impacts of large scale development in the community so that it did not put too much pressure on existing infrastructure, or feel too out of character with existing development. The Parish Council had previously asked for the housing guideline figure for Clive to be reduced from 40 to 25 maximum, with the dwellings being split between a single development of 10-15 dwellings and the remaining as in-fill within the development boundary. In this latest draft of the Local Plan, the current housing guideline figure being proposed for Clive parish is "around 30 dwellings", however it is noted that policy SP6 does allow for these housing guideline figures to be exceeded in certain circumstances. In anticipation of this current stage of consultation on the Local Plan, Clive Parish Council delivered a survey to all local electors asking for their preferences on preferred development sites, on the assumption that Clive would be a Community Hub. The return rate was over 80% and results showed that: • 56% of respondents were in favour of development on sites CLV012 and CLV018 • 24% of respondents were in favour of development on site CLV010 • 3% of respondents were in favour of development on both sites CLV010 AND CLV012 & CLV018 • 16% of respondents had no preference on development sites • 5% of surveys had no options ticked As a result of this, the Parish Council had agreed at the Parish Council meeting held on 17.09.2020, that it would respond in support of the current proposals for Clive, in terms of development boundary, site allocation and housing figure, although we do note that a large number of comments in the surveys asked that there be sufficient affordable housing provision. This is so that those who have grown up in Clive are given an opportunity to rent/buy in their home village. A number of survey comments also repeated concerns about the pressure that an additional 30 houses will have on current infrastructure e.g. sewage, and services such as the medical centre. There were also concerns about the impact of increased traffic (potentially 60 extra cars) on the narrow access roads in and out of Clive, and how this will impact road safety. These comments echo concerns that have been raised by the Parish Council in previous consultations. Following the Parish Council's survey of the community, a separate, unofficial survey was conducted by a group of independent residents. This survey asked the community whether they would support losing an amenity or service in order to drop below the 48-point threshold, and take Clive out of Community Hub status. At an Extra Ordinary Parish Council meeting held on 24.09.2020, the independent group presented their findings. Whilst the results of this survey still need to be independently verified, it was stated that: • 23% of respondents wished to retain current services/amenities and become a Community Hub • 43% of respondents were willing to lose an amenity/service to become a Community Cluster • 25% of respondents were willing to lose an amenity/service to remain as Open Countryside • 7% of respondents had no preference • 1% of surveys were spoilt At the same meeting, it was also revealed that the tenants and landlord of the Clive Village Stores had decided to close the shop, and it has since been confirmed that the shop will close on 16th October 2020. The landlord has given assurances that the timing of this decision is coincidental, that this will be a permanent closure, and that the building (7a High Street) will not re-open as a shop in the future. On this basis, when the shop closes Clive would then lose 4 points for the shop, and drop to 47 points, which is below the 48-point threshold for Community Hub status. Clive would therefore default to Open Countryside. As this news about the forthcoming closure of the shop has come just before the end of the consultation period, the Parish Council does not have time to re-consult the community again at this point, however we plan to look further into what is entailed in the different options of Open Countryside and Community Cluster (potentially with Grinshill parish), and engage the local community fully to establish whether the preference would be to remain as Open Countryside or to become a Community Cluster.
A1168B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	From previous Council meetings and discussions, Clive Parish Council's standpoint was as follows: given that the points score for the parish (51 points) put Clive just over the threshold for Community Hub status (48 points), the only course of action was therefore to accept Community Hub status and to try our best to mitigate the negative impacts of large scale development in the community so that it did not put too much pressure on existing infrastructure, or feel too out of character with existing development. The Parish Council had previously asked for the housing guideline figure for Clive to be reduced from 40 to 25 maximum, with the dwellings being split between a single development of 10-15 dwellings and the remaining as in-fill within the development boundary. In this latest draft of the Local Plan, the current housing guideline figure being proposed for Clive parish is "around 30 dwellings", however it is noted that policy SP6 does allow for these housing guideline figures to be exceeded in certain circumstances. In anticipation of this current stage of consultation on the Local Plan, Clive Parish Council delivered a survey to all local electors asking for their preferences on preferred development sites, on the assumption that Clive would be a Community Hub. The return rate was over 80% and results showed that: • 56% of respondents were in favour of development on sites CLV012 and CLV018 • 24% of respondents were in favour of development on site CLV010 • 3% of respondents were in favour of development on both sites CLV010 AND CLV012 & CLV018 • 16% of respondents had no preference on development sites • 5% of surveys had no options ticked As a result of this, the Parish Council had agreed at the Parish Council meeting held on 17.09.2020, that it would respond in support of the current proposals for Clive, in terms of development boundary, site allocation and housing figure, although we do note that a large number of comments in the surveys asked that there be sufficient affordable housing provision. This is so that those who have grown up in Clive are given an opportunity to rent/buy in their home village. A number of survey comments also repeated concerns about the pressure that an additional 30 houses will have on current infrastructure e.g. sewage, and services such as the medical centre. There were also concerns about the impact of increased traffic (potentially 60 extra cars) on the narrow access roads in and out of Clive, and how this will impact road safety. These comments echo concerns that have been raised by the Parish Council in previous consultations. Following the Parish Council's survey of the community, a separate, unofficial survey was conducted by a group of independent residents. This survey asked the community whether they would support losing an amenity or service in order to drop below the 48-point threshold, and take Clive out of Community Hub status. At an Extra Ordinary Parish Council meeting held on 24.09.2020, the independent group presented their findings. Whilst the results of this survey still need to be independently verified, it was stated that: • 23% of respondents wished to retain current services/amenities and become a Community Hub • 43% of respondents were willing to lose an amenity/service to become a Community Cluster • 25% of respondents were willing to lose an amenity/service to remain as Open Countryside • 7% of respondents had no preference • 1% of surveys were spoilt At the same meeting, it was also revealed that the tenants and landlord of the Clive Village Stores had decided to close the shop, and it has since been confirmed that the shop will close on 16th October 2020. The landlord has given assurances that the timing of this decision is coincidental, that this will be a permanent closure, and that the building (7a High Street) will not re-open as a shop in the future. On this basis, when the shop closes Clive would then lose 4 points for the shop, and drop to 47 points, which is below the 48-point threshold for Community Hub status. Clive would therefore default to Open Countryside. As this news about the forthcoming closure of the shop has come just before the end of the consultation period, the Parish Council does not have time to re-consult the community again at this point, however we plan to look further into what is entailed in the different options of Open Countryside and Community Cluster (potentially with Grinshill parish), and engage the local community fully to establish whether the preference would be to remain as Open Countryside or to become a Community Cluster.
A1197B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Response to sites CLV010 and CLV012/18 Governors Clive Church of England Primary School the Governors continue to support the development of site CLV010 on the ground that it provides the following benefit: <ul style="list-style-type: none"> • A substantial planning gain by the provision of the only possible adjacent site for the construction of much needed facilities at the School which will secure the provision of first-rate education for the children of Clive and the surrounding area for many years to come. • Alleviates the concentration of traffic on High Street, thus promoting road safety particularly by creating on site car parking for School staff. • Provides easy pedestrian access to the greatest number of village facilities and the railway station. • Has the least detrimental effect on the built form of the village. Range of supporting documents submitted with the response
A1198B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Suport for allocation of site CLV010 within the plan over sites CLV012/018. Benefits of CLV010 include - Close to the railway station which will help encourage use of the train for journeys; major advantage of this site is that the owners have offered as part of their site development to provide an off road path from the site to the public footpath from Back Lane to Yorton Station and, most significantly, to give the Clive Primary School a 99 year lease of the site of 1, The Hill (known locally as Rowland's Cottage). This site is immediately adjacent to the school and provides the only site opportunity for the School to build a school hall and a new EYFS classroom. both of these developments are essential for the future existence of the school. It also provides the opportunity to provide 9-10 on site parking spaces for staff which will remove the need for staff to park on the highway between the Wem Road junction and the doctors surgery removing the only serious conflict of parking in the village related to the school. Site CLV012/018 is less attractive as it has access issues onto the A49, planning gains from these sites of a car park is too far from the school to be attractive to use
A1266B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	This site is not suitable due to drainage and flood risk issues. Recent development off Poynton Road has seen significant flooding in recent years, with one property flooded upto the front door. Developing next to this already flood prone area would be a disaster. The site SHA019 has streams running through it and part of the site has been impossible to cultivate as a result. Even if this area is left for green infrastructure its not a suitable for housing. Developers assurances the sites flooding can be mitigated are not reassuring - and may displace flooding to other neighbouring sites. Sewerage is also an issue, a small development of 4 houses was built nearby 20 years ago and the sewerage system has been over capacity ever since, and this summer sewerage spilled into the river. Please on't build on this site its not suitable
A1635B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Wem's target is too low. Site at Mill Street should be included. Windfall numbers are no realistic. It is a logical extension and a good location. The chosen draft allocations are very rigid and provide no real flexibility if any land becomes undeliverable. The allocations rely on factors outside the Council's control in terms of their deliverability and there is no thought given to providing a suitable buffer. The site at Mill Street is fully deliverable as a residential or mixed-us allocation and the land can be available immediately.
A1638B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	There is a need to address the issue of traffic crossing the railway rather than to extend the development of the town further into open countryside on its northern and western extremes. A new road which would link Aston Road with the Shawbury Road would seem to be a good way to reduce the traffic impact of the level crossing and eliminate the need for cross-town traffic movements by commercial vehicles. Promoted Sites WEM018 and WEM034 coupled with the proposed Employment site ELR031 could enable the new road.
A1827B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	CLV010 is better than the preferred allocations. There is an opportunity to extend the school and this should be taken.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1886B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area		I am a parent and resident of Clive. I understand that the Parish Council have lobbied to change the draft proposal from CLV010 to CLV012/018, Shropshire Council are about to launch an 8-week consultation and the Parish Council will leaflet villagers to explain the reasoning behind the change. I have reviewed the documentation uploaded on 2 July by Lydia Bardsley and the minutes from the past year and I am seriously concerned that the Parish Council have used both inaccurate and misleading information, overlooked key information and relied upon unsupported assumptions, which I strongly feel have invalidated any conclusions drawn. I ask that the Parish Council corrects these errors and omissions and also fully acknowledges them in the actual consultation document issued to villagers. This is because many will have attended the public meeting last year and many will have also read copies of the documentation in the past week, since the school governors wrote to parents and the links were then subsequently posted on the village Facebook page. Full analysis attached, but in summary the Parish Council documentation includes: 1) Inaccurate measurement to the school from CLV012/182) Misleading measurements to the school from CLV12/18 (measured from near corner of a plot which is over 300m long) 3) Misleading timed walk by councillor from far corner of CLV010 to school, because walked the longest route possible via surgery 4) Inaccurate conclusion that CLV012/18 is "considerably closer to the school and other village facilities". I have included full walking times and distances to all amenities, recorded with Strava. 5) Inaccurate statement from CLV018 landowner that the land offered to the school is 'adjacent' (not queried by PC). The nearest point of land owned by CLV018/CLV012 owners is over 200m or a 3-minute walk from the school. 6) Omission regarding the footpath link Sansaw would cut between CLV010 and the existing footpath to Back Lane, (providing off-road access to the centre of the village, and the school via the Glat.) 7) Omission of possible locations, footpath routes and walking distances from proposed car parks at CLV012/18. Having looked at the distances from these plots, they are too distant compared to the existing access points to be used by many parents and will be of no use in solving traffic or parking issues for any of the other amenities. E.g. school drop off time of approx. 17 minutes vs approx. 8 minutes from Drawwell/Glat. 8) PC has not asked about or quantified the size of the reduction in CIL available to the community, from offsetting the large number of farm buildings currently on CLV012. 9) Illogical thinking regarding assertion that CLV010 would increase potential traffic in the village more than CLV012/18. There is no evidence to back up the assertion that villagers leave the village via Preston Brockhurst/A49 more than via Yorton/B5476/A528. Since the Battlefield link road gives access to Battlefield Roundabout, it is logical to leave away from the village from either plot for most destinations. I have included quickest routes using Google maps from each plot to various destinations, which shows the quickest routes are typically to leave West via Yorton/A528 from CLV010 and East via Preston Brockhurst/A49 from CLV012. I appreciate the Parish Council's enthusiasm for wanting to alleviate parking and traffic issues, but in this matter, they have seized upon an ill-thought-out suggestion from landowners and immediately "RESOLVED" to support it in the March meeting, without consulting governors or parents or scrutinising the proposal properly. Dismissing a concrete and extremely valuable opportunity for the school on this basis is outrageous. Unfortunately, throughout the Local Plan Review process I feel the Parish Council have failed to act objectively. I understand the majority of feedback from the village so far has been against development at CLV010. I would expect this to be the case, as it was the plot actually consulted on last year. Since then, there has been no visibility to parents or villagers of the Sansaw offer to the school beyond the Parish Council meeting minutes, until last week when the school governors wrote to parents themselves to tell them of the opportunity to comment in the upcoming consultation. Representation then includes a data summary (46 pages) showing: 1. Maps: Showing: i) On-road and off-road walking routes for residents from both plots to amenities ii) Proposed footpath link from CLV010 to existing footpath running from Yorton Station to Back Lane. iii) Potential footpaths from car parks somewhere at CLV012 or CLV018 to brideway along top of hill. iv) Walking routes from proposed car parks vs existing walking routes from on-street parking. 2. Walking Times (Strava) Proposed car parks vs existing access for parents driving 3. Car Traffic quickest routes - From Google Maps and an analysis of documents as follows: Parish Council Response to Berry's proposals for site CLV010 30th January 2020 "Letter From Halls to SC re site CLV012 March 2020" and "Letter from Landowner to SC re. site CLV018 (Feb 2020)" and "Clive Parish Council response to proposals re. CLV012 and CLV018 27.03.2020" Letter from landowner CLV018: Letter from Landowner CLV018 and the response from the Parish Council. Strava Traces within Clive and screen shots of Google Map driving routes from Clive are then included. The "Site Assessment stage 3" allocates CLV012/018 over CLV010 for housing based on the ability to access the A49 without driving through the village and proximity to the village services. 1) CLV012/018 does have the ability to access the A49 at Preston Brockhurst without driving through the village, but it does not follow that this is a benefit for reducing traffic through the village, in fact there is a benefit for reducing traffic by allocating CLV010 for housing as follows: CLV010 has the ability to access the B5476/A528 at Alderton Crossroad without driving through the village. As the Battlefield link road connects the A528 at the Ellesmere roundabout and the A49 at the Battlefield roundabout, it is logical to leave away from the village from either plot for most destinations. From CLV010, destinations cross-country East to Shawbury or North/ North West West on A49 to Whitchurch/Market Drayton and beyond cross through the village. From CLV012 destinations cross-country West to villages or to the A5, North West to Ellesmere, South to Shrewsbury centre or South West to the Royal Shrewsbury Hospital, cross through the village. As more destinations, in particular central Shrewsbury are best accessed by driving to the West of the village, there is a benefit to situate new housing at CLV010. See next section for full evidence. Looking to the longer term, once the North West Relief Road is built, destinations South West beyond Shrewsbury (and likely South as well given the traffic pinch point between Battlefield and Sundorne Roundabouts) would also cross through the village, further increasing the number of journeys that will leave the village to the West. 2) While CLV010 does have a slightly uphill gradient West to East towards the village, it is overall proximity to services is arguably closer than CLV012/CLV018 as it's closer to the village hall/Renshaw's field area and with the proposed footpath link up to the existing footpath (Back Lane - Yorton Station) improves the off-road connectivity of Station Road with the centre of the village. There are contradictory statements in the sustainability assessment commentary, which make no sense: CLV018 (page 236) is noted as 'close walking distance to the village facilities' However, CLV017 (page 235), which is closer to the village is noted as 'being more remote from the focus of the village'. CLV013 (page 226), which is diagonally opposite CLV018 (no more than 50m further along High Street) is noted as 'Site is far from the village centre and its service'. CLV012 and CLV018 combined stretch 330m along High Street, that's over a quarter of the distance from walking from CLV018 through the village to CLV010. The originally proposed development boundary (terminating near CLV012) reflected correctly that the housing is most situated to the South West and that there are relatively few houses East of the Wem Road. As a narrow and very long plot, quite a lot of the new houses would be 'remote from the focus of the village' as noted in the commentary for CLV017 opposite. CLV010 in contrast is a more compact plot, with the housing stretching back further South and South East from the road frontage, with those houses being actually closer to the centre of the village via the proposed new footpath. 3) There are a number of typographical errors in the document, which would appear to potentially show a lack of attention when considering CLV012/018. CLV012 includes 'carparking' and the CLV018 commentary appears to have been copied and pasted from CLV012 narrative, without being properly adjusted, so doesn't read correctly. 4) Community Hub: Clive Scoring page 17 and 18 The mobile library stops have not been included and should score a + for both CLV010 and CLV012 (and many other plots, although not CLV018). This doesn't affect the decision making though, as the plots would still be carried through to stage 2b assessment. Details and Evidence: Representation includes a detailed description of the benefit in reducing traffic by allocating CLV010 and not CLV012/018 (61 pages including methodology and screenshots of Google Mapping for different travel routes). 1) "additional car parking" will not "reduce the level of on-street parking" because the car park allocation is too distant to be of use for the amenities and potentially dangerous 2) The "enhancement of pedestrian links to Clive Primary" will more than double the distance currently walked from the on-street parking, to approximately 700m (from the additional carparking or directly from the housing), including approx. 240m of the existing muddy brideway. No maps or distances have been provided by the Parish Council for the public to understand the walking route and they have deliberately chosen not to inform or consult parents (over 2/3 of whom live outside of the village). 3) There are no proposed "pedestrian linkages between the site and the existing facilities on High Street", which will remain as being a walk along High Street without pavements. (The proposal adds only the limited benefit of a pedestrian route along the site's frontage, behind the maintained hedgerows and having to detour around 'Flemley Park'). 4) S106 agreements have been proposed by the landowners for CLV010 and CLV012/18: The offer of car parking and amenity land, attached to CLV012/18 has no detail and confers little benefit, as the car park is too distant to be useful for the amenities. No consultation has taken place with parents at the school, or users of the doctor's surgery who are the intended users of the car park. With no size of land, or number of spaces stipulated at this stage, it is impossible to evaluate objectively. In contrast the offer of the site adjacent to the school, attached to CLV010, is clearly defined, meets the school's pressing need for additional space and is a major benefit to improve the sustainability of such a vital service for the long term. 5) The 'majority of existing housing is located to the south-west of the village', noted in Paragraph 5.246 reflects the volume of feedback against CLV010 from villagers, as it is situated where the current housing is densest. However, a wish to retain a view or situate new housing as far away as possible from your house, is not a valid planning concern. I feel Clive Parish Council have acted improperly in choosing to conduct a vote on preferred plot, rather than working to provide factual information to residents and reflect valid planning points, backed up by evidence. I wrote a letter to Clive Parish Council and Eddie West on 3 August about factual inaccuracies and omissions in the information that Clive Parish Council were using. I subsequently spoke to Eddie West and agreed that my letter could be considered official 'consultation response' and have therefore also attached it alongside the part A and part B consultation responses. I have had no response from Clive Parish Council, who are clearly unconcerned by any of the issues raised. 6) Clive has 'hub' status under the hierarchy of settlements methodology, but this has encouraged some members of the village to try to game the system by asking that a service be pressurised to close. While I feel this is selfish and utterly ridiculous behaviour, it has unfortunately garnered a lot of support. The Parish Council has legitimised this plan by holding an extraordinary council meeting to discuss it and stated that their job is to represent the majority view of the village. This further means that any future service developments would be opposed, such as a plan to put a children's playground in the village, or replace the footballing green. Details & Evidence: Representation includes evidence to support the view that "Additional car parking" will not "reduce the level of on-street parking" due to the location of the car park being too distant. Suggested uses for the car park are for the school and the doctor's surgery and even for other amenities in the village. The village of Clive has been categorised as a Community Hub. The Parish Council has not made this request voluntarily and a recent poll found that 68% of respondents (79% turnout) did not favour Community Hub and would rather be categorised as Open Countryside or Community Cluster. This compared against 23% who did prefer Hub status. Also, Appendix 3, schedule A3 lists the evidence used in shaping SP2 and contains the results of the Shropshire Hierarchy of Settlements Assessment (2020). Since this assessment, there has been a permanent and material change to the points that should be awarded to Clive. The local convenience store will not be renewing its lease and represents the second time this shop has been forced to close in less than 2 years. This has 2 implications: 1. Clive now lies below the threshold for automatic Hub status and should be re-examined (including seeking the opinion of the Parish Council to determine the village's preferred status), and, 2. The fact that the shop is about to close its doors for the second time demonstrates it is not commercially viable. This should be taken to mean the closure is permanent and not a transient effect of the current pandemic.
A2105B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Within Appendix 3, the Shropshire Hierarchy of Settlements Assessment (2020) is used to inform SP2 and SP7. However, the methodology of any assessment that is incapable of differentiating between the public transport provision of Shrewsbury centre and Clive village must be called into question. Specifically: 1. It is incapable of drawing a distinction between bus service provision and simply sees any route with a peak time service as being the same as Shrewsbury centre. 2. It makes no allowance for transitory amenities, such as libraries. This leads to a mobile service in an outlying village (currently twice a month for 2 hours) accruing the same points as a permanent facility in a town centre. 3. It allocates maximum points for 'high-speed broadband' without defining what that is. It makes no distinction between 'fibre to the cabinet' connections typical of Openreach and 'fibre to the home' systems which are available within the county and represent true high-speed internet. 4. It makes no allowance for part-time services, such as shops or post offices with limited opening hours. For example, Clive scores 4 for a convenience store, the same as a large store servicing a town, yet the store is only open during the morning (typically 0900 to 1200). The points allocation should be capable of being awarded on a pro-rata basis depending on the proportion of time open. In all, lack of flexibility within the methodology means lack of distinction between rural settings and larger towns; this leads to some rural areas being awarded more points than the true value of the contribution from an amenity and compromises the objectiveness of the assessment.
A2105B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	We fully support the identification of Hadnall as a 'Community Hub' settlement within the Wem Place Plan Area. We are also in full support of the development boundary as found at Inset S17.2 Hadnall. The boundary has been drawn appropriately to meet the residential guideline, whilst retaining a sympathetic build pattern and avoiding unnecessary encroachment into the open countryside. The residential guideline of "around 125" dwellings throughout the plan period - 2016 - 2038 - is supported and considered achievable within the period. The inclusion of a site allocation, to provide 40 new dwellings at Proposed Site Allocation HDL006, allows for an appropriate level of windfall development within the development boundary and in recognition of those committed new dwellings. Hadnall previously had no identification of a Hub or Cluster settlement, yet still received a large amount of housing - disproportionate to its status as open-countryside. The identification as a Hub and the introduction of a development boundary can only be seen as a positive and will allow for a managed and directed housing growth that is in line with the Parish Council's and communities aspirations, whilst providing considerable local infrastructure improvements through developer contributions and improving the rural housing stock through compliance with the draft policy requirements.
A2125B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	I fully support the identification of Hadnall as a 'Community Hub' settlement within the Wem Place Plan Area. I am in full support of the development boundary as found at Inset S17.2 Hadnall. I am in support of the inclusion of site HDL006 and the number of houses proposed throughout the plan period.
A2170B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Fully supportive of the designation of Clive as a Community Hub in the draft Local Plan to encourage development which will sustain the level of village's facilities into the future. Within the Hierarchy of Settlements it is noted that Clive scored '0' under 'public house' category. The Clive Hub on Back Lane in Clive village is a free of charge members' club with a bar and full alcohol licence, and it has a full-size snooker/billiards table, pool table, darts and dominoes. It is also available for bookings for events. Like many local businesses, its opening hours have recently been affected by Covid-19, however, it is usually open until 11pm from Wednesdays to Saturdays and during the day on Sundays. Therefore, the score for Clive should be increased from 54 to 57. Site promotion in Clive - land south of High Street and adjacent to Clive Hall. The site is located within the proposed development boundary for Clive and in a sustainable location as such it should be identified for residential development within the draft Local Plan. Within the draft Local Plan, 40 new houses are proposed to be delivered in Clive over the period to 2038. Half of these new dwellings will be facilitated on two site allocations to the far east of the village development boundary. Site allocation CLV012 (Land at Flemley Park Farm, High Street) is proposed to deliver 5 dwellings. Site allocation CLV018 (Land adjacent to The Bungalow) is proposed to deliver 15 dwellings. Taking into consideration existing commitments in Clive, a further 18 dwellings (45%) that need to be delivered through "infill sites" to ensure that Clive can deliver its housing requirements. Land to the east of Clive Hall (the promoted site) is within the defined settlement boundary of Clive and is more centrally located within the village and in closer proximity to existing services and facilities than the two site allocations which are on the same side of the village. The land to the east of Clive Hall is more suitably located for new residential development than the proposed allocations and can contribute to the housing requirements of Clive. The site's allocation will reduce the need for infill sites coming forward and provide more certainty for development.
A2245B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area		Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPP WEM010: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B. WEM025: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B. WEM033: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B and Ternhill Airfield Plan B
A2308B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPP: CLV012 and CLV018: Safeguard Zone - RAF Shawbury Plan AT ANY DEVELOPMENT, Plan B.
A2308B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPP: HDL 006: Safeguard Zone - RAF Shawbury Plan AT 15.2m, Plan B and West WAM Plan T ANY DEVELOPMENT.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2308B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	SHA019 lies approximately 0.5km to the south / south-west of RAF Shawbury. Development would be at risk from increased noise and disturbance from defence flying activities. Therefore, the proposed allocation would represent a cumulative increase in sensitive receptors to noise within this location and as a result has the potential to lead to an increase in noise complaints. For SHA019 to be in accordance with Para 95 of the NPPF (ensuring operational sites are not affected adversely by the impact of other development proposed in the area) and para 182 of the NPPF (existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established, with a requirement for the applicant to provide suitable mitigation before the development has been completed), it should make reference to a requirement for planning applications to be submitted with an appropriate noise assessment which takes into account noise arising from defence activities and provides appropriate mitigation solutions such as soundproofing. Applicants should engage with MOD in the production of such assessments. Furthermore, the site promoters of SHA019 should provide measures to enable future occupants to be made aware that military aircraft may be seen and heard operating in the area and that aircraft may overfly the site. The mitigation of noise in external areas may not be possible. Future occupants should also be made aware that aircraft types, flight paths and ground based activity can vary over time and this may cause disturbance. Para 5.248 of the explanation to the draft Policy makes no reference to RAF Shawbury, which is surprising given that it is a significant, large development immediately adjacent to the village. Concerned that the draft policy/draft Local Plan does not adequately consider the needs of national defence as RAF Shawbury, nor is it included within the settlement boundary for Shawbury village, despite the fact that the edge of the village and the edge of RAF Shawbury are contiguous. As a result RAF Shawbury sits within the countryside in planning terms and is subject to the restrictive policies that apply in such locations. This has the potential to constrain development required at the Station, increase planning risk and could impact adversely on the delivery of national defence requirements. It is considered that by not giving due consideration to RAF Shawbury within the Wem Place Plan, the draft Local Plan is not in accordance with Para 95 of the NPPF, which requires planning policies to recognise and support development required for operational defence and security purposes. Would like to see a defence-specific policy within the draft Local Plan, (as specified in a response to a previous consultation), these concerns could be addressed by making the changes to draft Policy SP9 Managing Development in the Countryside (see comments on this draft Policy). Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: SHA019: Safeguard Zone - RAF Shawbury Plan AT 15.4m, Plan B and West WAM Plan T 45.7m
A2324B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	We fully support the identification of Hadnall as a 'Community Hub' settlement within the Wem Place Plan Area We are also in full support of the development boundary as found at Inset S17.2 Hadnall
A2332B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	Support Hadnall's classification as a Hub, it has the services to support the proposed housing. Support the Development Boundary proposal
A2346B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	We have previously promoted CLV017 and maintain our support for it. It is close to the village facilities which are within walking distance. The site is available, deliverable and achievable as an allocated site or windfall site. It is within the 30mph zone of the village. A safe access with good visibility and a pavement can be created. There is existing development to the west and east so the proposal would fit logically between existing housing. The design and layout will reflect the edge of village location. It remains our view this is the most suitable site in the village for development. We welcome the fact that the council support development at the east end of the village as opposed to the west.
A2350B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Further new residential development in Grinshill would not be suitable because the village is not served by any safe and accessible public transport. There is no village shop or public house to sustain. More development in Grinshill would conflict directly with the stated Climate Change aims of SP3 as - no public transport serves Grinshill or links to other networks. The Neighbourhood Plan process should be used to determine if the residents of Grinshill want this community cluster status. In 2015 when residents were asked their views on future proposals on 3 out of 60 returned their questionnaire wanting to extend the village development boundary
A2351B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Appendix 3, Schedule A3 references policy SP2 as being informed by the Shropshire Hierarchy of Settlements Assessment (2020). In the Hierarchy of Settlements Assessments 2020 Clive village has been classified as a Community Hub. The points allocation that informed this decision is incorrect. Clive has been scored as amassing 54 points. There is however no "Outdoor Sports Facility" and these 3 points were supposed to have been removed from the assessment. Inaccuracies in the points allocation calls into question the validity of the inferences and subsequent decisions made from the Hierarchy of Settlements 2020. There has also now been a material change to the amenities of Clive village in that the local convenience store is due to close this year. This was confirmed at Clive Parish Council extraordinary meeting of the 24th of September 2020. This is now the third time in recent years that this convenience store has closed. It has now closed twice in the last year and is now not seen as a commercially viable business. The proprietor has stated that it will not be reopening. This will bring Clive village to 47 points, below the threshold for Community Hub status. This should be reflected in the Hierarchy of Settlements prior to finalisation of the local plan. This is in alignment with the results of a recent village survey (79% response rate) demonstrated the lack of support for community hub status. 68% of respondents believed that Community Cluster or Open Countryside better represented the nature of Clive village.
A2358B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Shropshire council's original preferred site CLV010 not identified or included within boundary on map. The sites within Clive have not been assessed or treated honestly and fairly by the parish council. I know residents who feel there is blatant bias and vested interests playing a part in the development decision making process. I agree with them.
A2358B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Hub status should no longer apply with Clive as the village shop is closing, bringing the points total to below hub level. Points system does not seem fair at present with part time rural amenities scoring the same as full time urban ones.
A2364B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	SITE ATTACHED The proposal to classify Loppington as open countryside is questioned and it is felt that due to the level of services afforded this settlement it should be identified as a community cluster or even a hub as part of Wem Place Plan. It is acknowledged that there is a Hierarchy of settlements across the county, but the exclusion of the village of Loppington as a (SP2.2) Community Hubs or (SP2.3) Community Clusters seems illogical, particularly in light of the inclusion of other rural villages of similar status and size in the County. The village has an active and prospering community, with well known landmarks such as the church, village hall and the Dickin Arms public house. While it remains rural in nature and the locals undoubtedly wish to retain the integrity, it is a popular village and for it to continue to thrive it will need to move with the times and appeal to a younger audience who work from home or can commute for work. Mr Lay owns several sites in the vicinity of the village which could deliver small scale residential development to address the communities needs. Details of the possible sites are included within the attached document; 'Lay Rep LPR 2020'. It is considered that in order that the plan is considered sound that Loppington needs to be considered more positively and be classified either as a Community Hub or part of a Cluster in the Local Plan, subsequently allow suitable new development to allow modest growth
A2367B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Within Appendix 3, the Shropshire Hierarchy of Settlements Assessment (2020). The scoring methodology does not differentiate between levels of service provided by an amenity. In Clive, the small rural primary school scores double that of the large secondary in Wem, because it contains an (even smaller) pre-school. The village post office, which is run via a temporary contract from the village hall and is open for a few hours a week, scores the same as the permanent and dedicated PO facility in Wem. The shop (which is permanently closing by the end of the year), opens for a few hours on sporadic days, yet scores the same as a major store. The village bus service scores the same as Shrewsbury town centre. A mobile library stops in the village for 2 hours each month; this scores that same as a permanent facility. The scoring assessment should be adjusted so that points are scaled down to reflect the true nature and availability of the amenity.
A2367B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	A survey undertaken in Clive demonstrates that that 68% of residents (turnout of 79%) do not support Hub status, and instead want to be categorised as Open Countryside or Community Cluster. Furthermore, since the HS assessment, the village shop has closed, meaning that the village no longer scores the required points to be considered a hub. There is no prospect of the shop reopening. The village should not be classed as a Hub in the final Local Plan.
A2397B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	I fully support the identification of Hadnall as a 'Community Hub' settlement within the Wem Place Plan Area. Hadnall is a medium-large settlement with multiple services and facilities to meet the day-to-day needs of the community and future residents: I am in full support of the development boundary as found at Inset S17.2 Hadnall and the identification of HDL006 for the building of 40-houses. I trust this will avoid development outside of the proposed boundary for the foreseeable future.
A2401B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	Within Appendix 3, the Shropshire Hierarchy of Settlements Assessment (2020) is used to inform SP2 and SP7. However, the methodology of any assessment that is incapable of differentiating between the public transport provision of Shrewsbury centre and Clive village must be called into question. Specifically: 1. It is incapable of drawing a distinction between bus service provision and simply sees any route with a peak time service as being the same as Shrewsbury centre. 2. It makes no allowance for transitory amenities, such as libraries. This leads to a mobile service in an outlying village (currently twice a month for 2 hours) accruing the same points as a permanent facility in a town centre. 3. It allocates maximum points for 'high-speed broadband' without defining what that is. It makes no distinction between 'fibre to the cabinet' connections typical of Openreach and 'fibre to the home' systems which are available within the county and represent true high-speed internet. 4. It makes no allowance for part-time services, such as shops or post offices with limited opening hours. For example, Clive scores 4 for a convenience store, the same as a large store servicing a town, yet the store is only open during the morning (typically 0900 to 1200). The points allocation should be capable of being awarded on a pro-rata basis depending on the proportion of time open. In all, lack of flexibility within the methodology means lack of distinction between rural settings and larger towns; this leads to some rural areas being awarded more points than the true value of the contribution from an amenity and compromises the objectiveness of the assessment.
A2401B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Disagree	The village of Clive has been categorised as a Community Hub. The Parish Council has not made this request voluntarily and a recent poll found that 68% of respondents (79% turnout) did not favour Community Hub and would rather be categorised as Open Countryside or Community Cluster. This compared against 23% who did prefer Hub status. Also, Appendix 3, schedule A3 lists the evidence used in shaping SP2 and contains the results of the Shropshire Hierarchy of Settlements Assessment (2020). Since this assessment, there has been a permanent and material change to the points that should be awarded to Clive. The local convenience store will not be renewing its lease and represents the second time this shop has been forced to close in less than 2 years. This has 2 implications: 1. Clive now lies below the threshold for automatic Hub status and should be re-examined (including seeking the opinion of the Parish Council to determine the village's preferred status), and, 2. The fact that the shop is about to close its doors for the second time demonstrates it is not commercially viable. This should be taken to mean the closure is permanent and not a transient effect of the current pandemic
A2436B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area		Response form b has no information
A2464B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	We fully support the identification of Hadnall as a 'Community Hub' settlement within the Wem Place Plan Area. We are also in full support of the development boundary as found at Inset S17.2 Hadnall and the identification of HDL006 for the building of 40-houses. We believe the development boundary will avoid the over development (outside of the boundary) that has been seen for the last few years in Hadnall whilst it has been classified as open countryside.
A2465B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S17 Wem Place Plan Area	Agree	I fully support the identification of Hadnall as a 'Community Hub' settlement within the Wem Place Plan Area. Hadnall is a medium-large settlement with multiple services and facilities to meet the day-to-day needs of the community and future residents. I am in full support of the development boundary as found at Inset S17.2 Hadnall and the identification of HDL006 for the building of 40-houses.
A0107B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The town has poor roads, lack of dental & medical facilities, poor broadband. The proposed sites' location is poor as they would create a sprawling mass of houses in an area where the drainage is poor, creating one large estate of housing which would not be in the character of this small market town.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0140B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Sites WHT037 and WHT044, areas of high flood risk, should not be included in the Plan as contrary to paragraph 4.189 of Policy DP20. Known natural springs and the newly developed site at Oakfield Way already suffers from drainage issues. Photographic evidence included of flooding in 2020 Having considered the published criteria, requirements and outcomes of Stage 1 – SLAA for the sites WHT037 and WHT044 should not have progressed to stage 2 of the Assessment. Key concern is risk of surface water flooding not taken into account as a significant environmental/physical constraint at stage 1, an omission which results in the Local Plan Partial Review being potentially unsound. Report submitted provides map of areas of high flood risk within the sites & references known flood issues which have been highlighted in relation to various planning applications, most recently 18/02583/FUL (retrospective application for the construction of storm drainage system). Chester Road has experienced flooding as a direct result of development on sites adjacent to WHT037 and WHT044. Additionally, there are ongoing disputes regarding illegal culverting on the site and the green field run off rates. Additionally, stage 2 & 3 assessments are unsatisfactory. At stage 2 the strategic suitability of the site is justified by the existence of each other and surface water flooding not identified. As Stage 3 assessment identifies need for flood modelling it is premature to designate sites WHT037 and WHT044 as 'preferred sites' before modelling undertaken. Flood risk primary issue but there are also concerns relating to highways, landscape impact, ecology and impact on the amenity of local residents. Accuracy of analysis of responses to previous Preferred Sites Consultation questioned and detail of infrastructure concerns and Welsh Water response requested;
A0162B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The site is low lying, wet and contains a large pond/lake, as such where will the water go - this will mean significant engineering works will be required and lead to increased flood risk on and off-site. Surrounding properties and roads experience run-off during heavy rainfa Past development has caused flooding in the area. The site is of ecological value, ducks and other birds use the pond/lake and yellow bellied newts (protected?) and foxes have been observed, development will destroy this habitat. Chester Road had the reputation as the best part of Whitchurch, over development will stop this. The development will spoil views, reduce property values, the area is too densely developed and there has already been significant development in this part of the town, as such other areas should be the focus. Surrounding roads are very busy and poorly maintained. This site will increase pressure and could create a 'rabbit run'. There is insufficient infrastructure to support the development, particularly sewage infrastructure in this part of the town (some properties have to store sewage on site and then pump it to the nearest main drain at Chester Road). Further development will not provide sufficient support to retain/reopen existing shops and businesses and many will simply shop/commute elsewhere
A0191B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area		The public sewerage network can accept the potential foul flows from the proposed development site WHT014.The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.
A0191B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area		For WHT042- hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended).The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.
A0191B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area		The public sewerage network can accept the potential foul flows from the proposed allocation WHT037 & WHT044. Welsh Water will seek to control the points of communication to the sewerage network via appropriate planning conditions as such there would be a requirement for off-site sewers to be provided to the boundary of the development site. The sewers can be requisitioned through the provisions of the Water Industry Act 1991 (as amended).The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.
A0199B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	No objection to the creation of new housing ,especially affordable homes for young first-time buyers. Objection to encouraging an over-developed urban sprawl that erodes communities and qualities that make Whitchurch an attractive place to live. As stated by Whitchurch councillor, Thomas Biggins, the land to the north of Chester Road would become "saturated" and needs to be "given a break". Cumulative impact of the proposed 200 home development that joins up The Beeches with Oak Tree Way and Haroldgate, to create an un-necessarily dense, concentrated and unpleasant mass development. An undeveloped northern strip of land, parallel to the by-pass, between Tarporley Road and Chester Road roundabouts, would still leave a needed central public amenity triangle of green fields which have nature conversation value including presence of protected species. As the site is a low central triangle of damp land, with a high water table, this would threaten the foundations of any future housing – despite any ambitious drainage proposal. Photo provided of heavy flooding subsequent to heavy rain, earlier this year,which persisted for some considerable time. Proposal irretrievably threatens the rural market town character and community quality of Whitchurch.
A0203B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT014 should be removed as it will badly affected green spaces (and thus mental and physical health), habitats will be affected, increased traffic will affect asthmatics, noise pollution and congestion
A0216B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	This site should not be included as: Alkington and Liverpool Roads are densely populated and this greenfield site should be retained to provide valuable open space. Most traffic from the site will exit to the by-pass via Wrexham Road, which due to on-street parking is limited to single land traffic for much of its length, causing delays, increased air and noise pollution (many houses are located close to with living room level with the highway). There are high numbers of asthma sufferers in Whitchurch. Priority should be reducing traffic on Wrexham Road.
A0220B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT037 and WHT044 should be removed from the plas because They are in an area which has already been heavily developed. They are important open space, well used for recreation, providing health benefits and contributing to the character of the area. They have a diverse ecology including foxes and birds. They are prone to flooding. They would place additional pressure on existing infrastructure - particularly roads (and the additional pollution resulting from the cars)
A0222B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The site is prone to flooding. The land is used for wildlife and is popular with the public for walking. The extra traffic will add to pollution and congestion. The area should remain unchanged.
A0227B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	This is the only green space left and is not appropriate for building. WHT037 floods and there are ongoing drainage and sewer issues. A road connecting Tarporley Road and Chester Road would be a dangerous rat run.The current continual work on Chester Road is disruptive and further development will make this worse. The area is at development capacity now. It would be nice to retain some green land for wildlife.
A0243B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Object to allocations WHT037 and WHT044. There is known flooding in the area. Past development in the area has caused significant problems/flooding, installing inadequate drainage, it is wrong to consider a site for development which has similar problems. There has been significant recent development in the area. The B5395 is extremely busy and residents on Chester Road have problems getting off their driveway. A link fro Chester Road to Tarporley Road would degenerate the situation
A0291B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Current development around Chester Road/Tarporley Road should be sufficient, other areas around the town should be considered WHT037 and WHT044 has significant drainage issues and a road through the sites would create a 'rat-run'. Existing properties have been sold on the premis of open space to their rear, which is now proposed for development. Development boundary in this area should remain unchanged.
A0302B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Concern over timing of development as infrastructure supporting the Chester Road area is already severley overloaded. Upgrading required before further development. Proposed timing is inconsistent with the proposed policy on wastewater treatment works.
A0306B063	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	With regard to PH004, we are concerned about firstly, the proximity of this site to a SSSI and secondly, the lack of mitigation measures mentioned in the plan.
A0309B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Site promotion Land north of Pear Tree Lane. Site considered to be a in a sustainable location, within walking distance of services and facilities. Whitchurch is a Principal Centre and should have more than the current 3 sites allocated. This site should be given serious consideration
A0325B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT 037 & WHT044 I disagree with plans for further housing development. I live on the Mount Farm development and am aware of people having problems with flooding gardens and drainage. I also have concerns for existing wildlife, having recently witnessed Red Kites flying over the fields in question , fox family 'playing', bats fying and many other wildlife making use of this land, it would be a real shame to further disturb this.It is really important to maintain some green spaces , nature and people in harmony.
A0336B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT037/WHT037VAR and WHT044 should be removed from the Local Plan Developers of WHT046 provided inadequate drainage causing flooding to properties. WHT037/WHT036VAR is also likely to cause flooding around Tarporley/Chester Road. There is insufficient infrastructure (highways, phones, medical, education, retail drainage and water water etc), these shortfalls must be addressed before development. A link road between Chester Road and Tarporley Road will create a 'rat-run' with safety implications. WHT046 was supposed to have pedestrian/cycle access to Tarporley Road, however whilst provided these are on narrow roads with on street parking causing safety implications. Proper segregated pedestrian and cycle paths should be the aim of all future development. Development of WHT037/WHT037VAR and WHT044 would result in loss of green space
A0381B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Disappointed to see that site TLK009 not screened as having potential for future housing as Tilstock is a cluster and is a sustainable area near to Whitchurch.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0408B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Object to allocation of WHT037 and WHT044 as Development of the sites could result in the loss of approximately 622m of hedgerows, this is contrary to Policy DP13 (para 8E). It is important to keep a green wedge of land between Chester Road and Tarporley Road. Development of the sites would impact on the views of residents on the Mounts Farm Estate. Development of the sites would result in 87,000m2 of green infrastructure to be lost, affecting wildlife and habitats on the site, contrary to Policy DP15. If the sites are developed, then Para 1b of draft Policy DP15, draft Policy DP16 and draft Policy DP17 relating to enhancement of existing green infrastructure assets/networks, open space provision and landscaping of new development must apply. To maintain green space and the present views from the properties in the Mount Farm development and ensure open space provision on the sites adjoin existing open space on the Mount Farm development in order to create a high-quality open space which meets the needs of all residents. The sites are currently agricultural land and as such contrary to draft Policy DP19. The sites are subject to flooding (as are existing properties in the area). Development of the site will reduce the amount of permeable land and increase flood risk elsewhere, contrary to draft Policy DP22. There is insufficient infrastructure (none was provided as part of the Mount Farm Development), this will need to be provided if the sites are developed, consistent with draft Policy DP28. Mobile signals are a particular issue. Development of the site would cause increased traffic on Haroldgate. As such if the site remains in the Plan, no vehicular access should be possible from the existing estates. Furthermore, the draft guidelines for WHT037 and WHT044 include provision of a cycle and pedestrian route to link the Tarporley Road and Chester Road. However, the proposed allocations do not reach Tarporley road, as such it is unclear where this route would go
A0419B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Enough development on this side of the town now. Storm water issues for most recent development need resolving before more development.
A0441B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	Support identification of Whitchurch as a Principal Centre with a residential guideline of 1,600 dwellings and employment guideline of 20ha Support proposed allocation of WHT042, a deliverable site which can contribute to the future sustainable growth of Whitchurch. WHT042 represents a natural extension to existing SAMDev allocations WHIT051 and ELR033. WHT042 is well located to facilitate pedestrian access to the town's facilities and subject to ecological surveys, the could facilitate opportunities to make improvements to pedestrian access to the east railway platform, which is currently not accessible to wheelchair users. WHT042 affords the opportunity to incorporate green infrastructure corridors with effective native planting forming a buffer to the allocated employment land to the east of the site. Acknowledgement that development of WHT042 will provide further cross-subsidy support, where required, for the delivery of the allocated employment land to the east (saved SAMDev policy ELR033). Development of WHT042 is viable and deliverable, having regard to the policy requirements identified within the Pre-Submission Draft of the Shropshire Local Plan. Acknowledge that WHT042 is targeted to deliver 180 new dwellings during the plan period. Assumptions made within Appendix 7 in respect of timescales for the delivery (Medium Term (2025 – 2030) to Long Term (2030 – 2035)) is considered appropriate
A0442B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Support identification of Whitchurch as a Principal Centre with a residential guideline of 1,600 dwellings and employment guideline of 20ha However the proposed development boundary for the town is drawn too tightly and is overly restrictive, limiting the amount of windfall opportunities. WHT040 is not a preferred allocation, however it would complement the spatial pattern of development proposed for the town, as it is surrounded by existing built development on three sides. The site is unquestionably sustainable with a raft of amenities / facilities within walking distance (shop around 300m, doctors around 0.5miles, bus stop around 550m, school around 0.9miles(7-13)/0.6miles(4-6), sports facilities around 0.4miles). Off-street parking could be offered on-site, to residents on Wrexham Road to reduce on-street parking. Discussed with the Town Council and was received positively. Expansion of the development boundary to include WHT040 would afford efficient use of this parcel of land and represent a logical windfall opportunity. It would afford the opportunity for a modest scale residential development to come forward which would not put undue impact of existing infrastructure and potentially reduce parking on Wrexham Road.
A0444B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Support identification of Whitchurch as a Principal Centre with a residential guideline of 1,600 dwellings and employment guideline of 20ha. However the proposed development boundary for the town is drawn too tightly and is overly restrictive, limiting the amount of windfall opportunities. This boundary could be loosened to increase logical small-scale windfall developments, which would complement the existing spatial pattern and boost housing delivery. According to Appendix 5, Whitchurch has a windfall allowance of 82 dwellings. Due to the tightly drawn development boundary, it is questioned whether this allowance is appropriate. WHT032 has not been identified as a preferred allocation, however it would complement the spatial pattern of development as it is surrounded by existing built development on three sides and would represent a logical windfall opportunity. The site is in low intensity agricultural use and could deliver housing growth consistent with the targets for Whitchurch; form a logical rounding of the settlement, whilst maintaining public access through, thus improving greater spatial cohesion; provide new housing that is physically close to the towns services/facilities which are accessible on foot, reducing the need for private vehicle travel; provide enhanced and improved pedestrian provision through the site; and is able to comply with all draft policy requirements (Open Space, Affordable Housing, biodiversity). Unencumbered access can be achieved onto Chester Avenue. Modest-scale development could comfortably be accommodated on this road without undue impact on existing infrastructure or neighbouring properties. The footpath that crosses WHT032 is well used by the local community. Development could be sympathetically done so as not to hamper this, in fact it could enhance it and afford good connectivity to the surrounding footpath network.
A0446B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Support identification of Prees as a Community Hub and its proposed residential guideline. However it is considered that the proposed development boundary is drawn too tightly. With the 'tight' development boundary, achieving the windfall allowance is uncertain. Consider that land off Brades Road, Prees (PPW018), north of Prees Industrial Estate, should be included within the development boundary as it could provide a logical windfall development whilst providing tangible benefits to the villages sports facilities. It would benefit the vitality of the community. Prees Cricket and Recreation Club (host numerous local sports teams including 18 football teams, both male and female teams of all ages) is in need of additional pitches to sustain the various teams. PPPW018 could be developed for a mixed residential/recreation use, providing land for additional pitches, a modest amount of housing which complements the existing built form, a landscape buffer to the adjacent employment site and allow expansion of the number of sports pitches available to local sports teams. PPW018 has an access off Brades Road. Development could incorporate improvements to Brades Road, which is a narrow country lane with no pedestrian footway. PPW018 lies adjacent to the development boundary and the Prees Cricket and Recreation Club, the social and recreational hub of the community. It scored 'fair' within the SA. Part of PPW018 is in Flood Zone 2/3, however recreational use is considered an appropriate use as it is less vulnerable.
A0476B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Object to WHT037 / WHT044 land north of Chester Road because the development will have the following effects. Ill considered layout increasing building density - existing developments and recent construction on Chester / Tarporley Roads has significantly increased the density of development. Loss of light and overshadowing - WHT037/WHT044 will cause loss of green space and encroachment onto existing properties and loss of privacy for existing residents. Visual obstacle and loss of wildlife /trees - green spaces in this area must be preserved as local amenity land for exercise and walking pets and to enable urban residents to encounter and enjoy wildlife by protecting habitats and food sources in urban areas. Pollution and odours - the loss of green spaces raises concerns about the effects of increasing pollution and other environmental damage. Generation of traffic - a new access road for the development between two major local roads (Chester Road and Tarporley Road?) may attract further through traffic. Noise and disturbance - the impacts of further urban development may be harmful to both the sense of community and to wildlife (and trees) especially as climate change impacts increase. The recognised character of Whitchurch is that of a quiet country town. New building detracts from the restoration and improvement of the existing housing stock and may simply encourage the sub-division of larger garden plots to provide more new housing
A0478B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Chester and Tarporley Roads have already undergone considerable residential development in recent years. Green spaces between the two roads must be maintained and protected not simply infilled by further development. WHT037/WHT044 both flood and major groundwater and sewage capacity infrastructure investments will be required particularly in the Chester Road area.
A0479B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Chester and Tarporley Roads have already undergone considerable residential development in recent years. Green spaces between the two roads must be maintained and protected not simply infilled by further development. WHT037/WHT044 both flood and major groundwater and sewage capacity infrastructure investments will be required particularly in the Chester Road area.
A0508B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	MPG do have concerns about two key sites that are included that have the benefit of planning permission and which were allocations in the SAMDEV Plan. These are sites WHIT009 Land at Tilstock Road and WHIT021 Alport Road. The two sites in question account for 600 units of the supply in Whitchurch and whilst they have been granted planning permission they have yet to commence. If there is a question mark over whether they will come forward, we contend that the Council should look at other sites within Whitchurch that are not constrained and which could deliver either instead of these or, in addition to them. MPG's site at Tarporley Road, Whitchurch is one such site that in our view is suitable for residential development and should be considered for development. A Site Location plan is attached. In order to address our concern, we contend that the land at Tarporley Road should be considered for an allocation either instead of current allocations or sites that have been carried forward from the SAMDEV Plan, in order to meet housing needs in town in the early part of the Plan Period
A0567B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Range of evidence submitted outlining disagreement with site PPW025 being included in the plan, along with supporting evidence for PPW021a to be included in the plan. Submission raises concerns about the flood risk on site PPW021a and amount of affordable properties the site will deliver. Alternatively site PPW025 can address flood issues on the site through development; is closer to recreational facilities and is a more sustainable site. Clarification is also sought on what contamination Shropshire Council considers exists on PPW021a
A0603B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Oppose the planned development of 200 homes on WHT037 and WHT044. Development of WHT037 and WHT044 would further impact on the environment, existing roads and waste water infrastructure. There are existing infrastructure problems in this area resulting from recent developments at Croft Gardens, The Beeches, Oaktree Way, The Orchards and additional homes on Pear Tree Lane, which have not been mitigated or resolved in a systematic manner. Development of WHT037 and WHT044 for 200 dwellings will exacerbate this. Development has continued in the Chester Road area without resolving foul/waste water infrastructure capacity problems and periodic odor issues emanating from waste water covers remain. These long-standing issues need to be resolved before they become health and safety issues. Despite previous commitments, issues with road conditions and cycle/pedestrian facilities remain. Where cycle lanes exist, they are poorly surfaced, contain multiple pot-holes and infrastructure covers. Speed limit signs are also in disrepair or non-existent. Previous development in the Chester Road area has occurred without attention to the repair/maintenance of roads and cycle lanes nor has there been any attempt to enforce speed limits in a now predominantly residential area. Additional vehicular traffic on what is already an unsafe avenue will adversely impact existing homes, drivers and the safety of cyclists and pedestrians.
A0611B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT037 and WHT044 are liable to flooding and should therefore not be built on Whitchurch has had numerous new developments in this area in recent years with little or no increase in infrastructure. Unclear how infrastructure (Schools, Medical Services, Roads, Sewage, Drainage and Recreational Facilities) have been considered in relation to WHT037 and WHT044. Development of WHT037 and WHT044 will increase the population by 400-800 and cars by 200-400 (together with associated pollution). The Local Plan should not be amended to include development of the scale of WHT037 and WHT044 until these matters are addressed to the satisfaction of the local community
A0621B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Against development of these sites as it is good farmland which produces haylage and provides grazing for cattle and sheep. The land should be kept for farming, food production and a home to endangered wildlife
A0622B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	More houses are not needed in this area. They should not be built on areas WHT037 and WHT044. These areas are good greenbelt farmland which at present are being farmed well, producing haylage and food.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0638B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The essence of the market town will be lost. Empty buildings in the town could be used instead. The Prime Minister has pledged to protect 30% of our land. This site could add to the damage already caused by development. We are already affected by the increased level of the water table, the garden areas do not drain after periods of heavy rainfall. Increased light pollution from housing and street lighting will have an impact on the bats and birds. An increase in traffic will have a negative impact on health because of the emissions and the road noise. Mr Tom Biggins, councillor for Whitchurch North has identified that there are also sewer capacity and infrastructure issues that will have a negative impact on the surrounding developments already in situ and that the "Green Wedge of Land" between the Chester and Tarporley Roads should be kept in place.
A0658B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	another 100 unplanned for dwellings on Chester Road add these to the 100 houses on the Mounts estate built off Tarporley road If these are connected to the two proposed sites it forms a 400 house development. - This includes no green space, no play areas, no football and cricket pitches, no provision for a new school as has been stipulated for the 500 house development site off Tilstock Road. This is not sustainable. - There are insufficient GP surgeries for the current population, where is the infrastructure to support the increasing population, given that the Paul's Moss Medical Centre is quite likely not to be built with the current JD in process. - The main sewer on Chester road ends at Pear Tree Lane and its capacity to take effluent from 200 more dwellings is questionable. - There is work taking place now to find the sewer on Chester Rd presumably to connect the Orchards estate of 52 houses, where sewage is being tankered away daily at the moment even though the houses are occupied. There is frequent overflow of sewage into the nearby brook from the Bronington treatment works Until it is upgraded it is unsustainable.
A0658B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT042 should be increased by 200 houses and WHT037 and WHT044 be removed. This site is closer to the schools, train station and the town's services, and would therefore result in less car reliance.
A0659B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The site WHT014 should not be considered Wrexham road has increased traffic since the housing developments at the top of Wrexham road, along with McDonalds, Starbucks and now Aldi the amount of traffic has increased considerably over the past few years. The junction to Liverpool road from Wrexham road at the weekends is very busy. At times the cars are backed up to the highgate bend waiting to turn down Liverpool road. So the increased traffic the 67 houses will bring will make this already busy junction extremely busy and very dangerous. Children who walk to school again this part of the road is very difficult for them to cross safely, increased traffic will only cause more of a problem. Schools and doctors in the Whitchurch area are already at capacity and over subscribed, with the increase in housing in the Whitchurch there is a desperate need for more schools and doctors. Houses at the bottom of Liverpool road will be very overlooked causing loss of privacy if this build goes ahead. Drainage is another issue, as one of the first residents to move into the estate on Liverpool road, We experienced for ourselves the drains could not cope with the houses being built. Which caused raw sewerage to come up through the plug hole in our new home. When we currently have heavy rain fall the gullies on Liverpool road can not cope with the water which in turn floods the road. So if the field is no longer there this flooding will only increase. Habitats for a variety of local wildlife including bats, birds, great crested newt, toads, hedgehogs, rabbits and foxes would be destroyed.
A0665B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	I support the sites allocated for development on the draft Policies Map for Whitchurch, including those saved from the SAMDev - WHT014; WHT037; WHT042; WHT044; WHIT009; WHIT021; WHIT051; ELR035; and ELR033.
A0665B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	These comments relate to the housing number for Whitchurch and the positive use of windfalls. In my comments to SP2, I set out why the housing requirement is too high for Shropshire, including there no longer being a need to take 1,500 dwellings from the Black Country. This reduction in overall numbers would result in a commensurate reduction in the housing requirement for Whitchurch (and other settlements as well). I support the reference to windfall development within the development boundary of Whitchurch. The plan proposes 82 dwellings, which is 5% of the town's total housing requirement. This seems an appropriate figure. Even with a reduction in dwellings based on my point above, the percentage against the Whitchurch total would be only very slightly higher.
A0665B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	This site continues the new housing that has been built in this part of town. Like WHT037 and WHT044 it is very well situated for the town centre. It makes perfect sense to continue to build houses on Liverpool Road. WHT014 is far more sustainable, both in terms of access to services and shops, and has less impact on things like roads and landscape than alternative options. The Council is correct to allocate WHT014 and I support it.
A0665B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	These sites will continue the successful housing development that has already taken place around them. They are very well located and genuinely within walking distance of the town centre, including Sainsbury's which is only a few minutes away. I therefore support their allocation.
A0665B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	This site is very well located by the railway station and to the jobs around Waymills. This combination delivers sustainable development. Both the station and industrial estate are walkable, as is the town centre along Station Road into Green End. Again this site is far superior to other options that the Council has quite correctly rejected for failing to deliver sustainable development. I therefore support its allocation.
A0705B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Object to WHT037/WHT044 north of Chester Road due to risk of flooding from the sites. WHT044 contains a natural spring and WHT037 is a known flood risk on the Environment Agency (EA) Flood map. The sites drain into channels across neighbouring properties including Dr Muir's home. The riparian responsibilities for the channels require work and significant costs to keep clear. The owners of the channels must accept natural increases in discharge but not from land improvements such as developing greenfield into brownfield land with reference to EA report SC030219 'Rainfall runoff management for developments'. Development at Oak Tree Way on the Gratton Oaks estate caused significant flooding into Dr Muir's property recorded by Shropshire Council Building Control. The matter has been referred to the Local Government Ombudsman.
A0705B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Attached is a photograph of a garden in Chester Road that has been flooded - measuring the inflow at 12 litres per minute : that's 3800 gallons a day...over 17 tonnes of water every day. This volume of water has only started to appear since the developments down Chester Road and I am sure you can understand my extreme consternation at the prospect of further development occurring in this floodplain area with our garden being now repeatedly flooded already. I am only too aware of the environment agency report SC030219 which states that "the total volume of run-off after extreme rainfall events from a developed site is typically between two and 10 times the run-off volume from the same site in a Greenfield state, and this is released much more quickly than the greenfield run-off discharging into receiving waters at orders of magnitude faster than an undeveloped site"By law we are aware that as a riparian owner of a culvert I have to accept natural land drainage water from adjacent land at a higher level. HOWEVER BY LAW THIS DOES NOT APPLY WHEN THE OWNER OF THE LAND UPSTREAM has carried out "improvements", so the run-off from the land isn't "natural" - for example if green field sites have been built on or has been paved over. I am paying Richard Chadwick drainage consultant to do all he can to drain my garden for me for the fourth time since we moved here in 2006, but I cannot keep pace with the massive increase in water reaching the Victorian land dries that are passing under our garden, and deluging our property as a result of the extensive building work that has been carried out on Chester Road over the last 2-3 years. I hope you can understand why we are so very distressed to hear that a further 21 acres of greenfield land above our property could be built on unless common sense prevails, and why we are requesting that this project to build houses on a known flood risk area be abandoned before irreparable damage is done to housing in the area and the local residents affected be forced to take legal action.
A0706B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Object to WHT037/WHT044 north of Chester Road because development of 200 new houses will accommodate 400 people and generate 200 vehicles. This will deleteriously affect the quality of life of existing residents. The views of the Local Councillor are endorsed that: Chester Road and Tarporley Road have taken their full share of housing in recent years and need a rest from further development. WHT037 and WHT044 flood and it is important to keep a 'green wedge' of land between Chester Road and Tarporley Road. There are major drainage, sewer capacity and infrastructure issues. The development boundary in this area should remain unchanged.
A0718B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	200 houses in this one area would create one mass housing area and would impact on the wildlife. The area floods
A0719B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	This area of the town has had enough housing in recent years. Traffic and noise created, the area is becoming too densely development
A0832B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Concerned about over development of the area and believe development boundary should remain unchanged. Both WHT037 & WHT044 currently flood and have major drainage and sewer capacity. Strongly object to Harroldgate being used as part of the proposed link road between Tarporley Rd and Chester Rd as will create a rat-run and is unsuitable.e
A0851B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area		Opposes allocation of the site as the area of Whitchurch has already had significant development. Loss of wildlife around the Chester Avenue and Pear Tree area of Whitchurch has occurred and allocation this site would be in detriment to the town and neighbourhood.
A0869B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The proposed development at WHT037 and WHT044 are completely undisable. The Chester Road and Tarporley Road area has already taken its full share of new housing in recent years. The road infrastructure joining the A41 by-pas wukk be problematic and over burdened. Both sites flood and it is important to keep a green space land between the Chester and Tarporley Roads to prevent this problem being exacerbated. Given the flood risk the suitability of the land for building 200 houses is questionable. There are major drainage and sewerage capacity issues for these sites as identified by Welsh Water. Having considered all of this I believe the development boundaries should remain unchanged.
A0919B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The designation of Whitchurch as a Principal Centre settlement in Policy S18.1 is strongly supported as this is seen as vital to ensuring the town's long-term future. However, Policy S18.1 places a significant reliance on windfall development to meet the needs of the town over the Plan period, with an additional 82 dwellings as windfall (unplanned development). Given the strategic importance of growth being directed to Whitchurch such a reliance on windfall development is considered inappropriate. It would be a much more sensible option to allocate up to 50 of these windfall dwellings onto our client's land, which was submitted under the Council's Call for Sites and identified as WHT002: 'Land north of Edgeley Road, Whitchurch'. A planning application for the site (application ref. 19/05311/OUT) addresses the issues about the sites viability during the stage 2a Sustainability Appraisal. This application has addressed the concerns raised over the amount of land that would be required for retention and buffering of the ecological features, as demonstrated by the response of the Shropshire Wildlife Trust to the application who conclude that, subject to the recommendations of the Ecological Assessment submitted with the application being implemented, they have no objections to the proposed development of the site. In summary, the current consultation provides an opportunity for Shropshire Council to amend policy S18.1 and Inset Map S18 to allocate our client's land. The allocation of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.
A0919B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area		Location plan accompanying A0919

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0964B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	SUPPORT the allocation of site WHT037, WHT044 as promoter and landowner. Confirmed available and deliverable (2020 – 2035) (see comment in notes) Development manner will ensure sustainable development. Quality, design, mix and layout of housing will be informed by site constraints and opportunities, identified local needs, need for local employer and key worker housing & relevant Plan policies. site's vehicular access will be from Chester Road. Pedestrian and cycle links will be provided through the site, connecting from Chester Road to Tarporley Road via the existing development to the north & seeking to encourage own centre access. necessary improvements to the highway network will be undertaken. Appropriately planted Green infrastructure corridors will form an intrinsic component. Road noise mitigation & SUDs informed by a sustainable drainage strategy will be included. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site. Considered site is sustainable location close to town centre/ services and facilities. Site is capable of being safely accessed off the B5395 ideally from a joint site roundabout. position of the site access should not prejudice the longer-term development of site WHT043 on the opposite side of the B5395. Sites are available. Land will come forward over short to long term (2020 – 2035) Suggested that long term strategic vision be taken, and a roundabout be provided to access WHT037 and WHT044 and the land opposite site WHT043 to provide for a safe and convenient access and traffic calming when entering the town.
A0968B1	Viability and Deliverability of Proposed Site	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	Site likely to be in the short and medium term, rather than just medium term
A0989B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT035 should be a preferred allocation. It is not divorce from the town and recent developments have occurred near the preferred sites. It is a sustainable location and has a better SA score than the preferred sites. As our site is better, the latest consultation document cannot be considered sound. Our comments will also be submitted at examination. There are issues with the preferred options, mainly concerns over infrastructure and these have not been properly considered.
A0990B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT017VAR should be a preferred allocation. There are incorrect assessments in its SA. Being surrounded by green space should be a positive. The agricultural land grading is incorrect. Its SA score would be better than the preferred sites in the town. It is in proximity to goods and services, markedly better than the preferred options. Limited detail for Landscape and Visual Assessment for this site - its situation is no different to the preferred options. It has a better highways aspect. Site's ecology can be expanded. Highway's assessment of the preferred sites, particularly links between Chester Road and Tarporley Road, are flawed. The various conclusions reached within the Stage 3 assessment are poor and vague, sufficiently so to suit the Council's favoured direction of continuing to support the site allocations favoured identified under earlier consultation, despite representations and evidential factors which clearly demonstrate that other sites, namely the promoted land at Terrick Road, are more favourable.
A1001B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Feels site should not be included in the Local Plan for a variety of reasons, these include: over capacity of development in the immediate area around the site, which caused major drainage and sewerage capacity issues. The site itself floods on a regular basis. Overall the development boundary in this area should remain unchanged
A1002B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	I agree with Tom Biggins suggested amendment and that WHT037 and WHT044 are removed from the plan and the existing development boundary is retained
A1098B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Oppose the allocation of these sites for the following reasons: Whitchurch is a small market town and is becoming over developed; area around Chester Road has already seen vast development and the local infrastructure can't cope with more development; the proposed site has been subject to major flooding; would destroy the northern approach into Whitchurch which is currently open fields; The housing would be high yield for developers and not smaller starter homes for local residents; existing proposals have already increased from 10 to 190 what is to stop it going to 4000
A1163B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	WHT035 site promotion .Additional material on WHT035. Objection to proposed allocation:WHT035 remains a viable and available option to help deliver the future housing needs of Whitchurch and evidenced site suitability has been unduly overlooked ; evidence of better sustainability credentials than allocated sites. Do not agree with Stage 3 assessment stage 3 flawed conclusions . Disagree that the site is divorced from the town as adjacent housing in a sustainable location and suitable for housing. Highlight that a local Councillor has written to local residents raising significant infrastructure concerns in relation to the proposed allocations of WHT037 and WHT044. Given that concerns based on previous issues experienced resulting from the implementation of other large housing sites in the immediate location, it is evident that there are underlying concerns which have not been properly considered in relation to these preferred sites and they should not be supported.
A1168B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	Whitchurch WHT037 and WHT044 additional promotional information. Act for principal landowners of WHT037 but all of the owners of the combined site, WHT037 and WHT044, are working in collaboration to provide a comprehensive and sustainable development in accordance with the "Development Guidelines" in Schedule S18.1 Collective owners are working in partnership with developer David Wilson Homes (DWH) to ensure the site is available, deliverable at the first opportunity. DWH is actively building in Shropshire and has a positive demonstrable delivery track record including completed the SAMDev residential allocation, WHT046 which secured improvements to the existing foul drainage systems. To enable second phase development & planning application , WHT03744 DWH have undertaken undertake the requisite preliminary studies -topographic surveys, ground investigation, arboriculture, ecology and drainage assessments. The site is sustainably located , walking distance of the town centre and station and Sainsbury's food store. provides an opportunity to integrate new housing with established residential areas in the north west area of the town improving connectivity for existing residential neighbourhoods between Tarporley Road and Chester Road. Such development has the potential to promote more sustainable modes of transport and benefits of additional public open space to the wider community. A concept scheme has been designed by DWH to demonstrate how WHT037 and WHT044 could be developed to meet the site guidelines & Council's requirements regarding access, on site open space provision and affordable housing to potentially provide 215 dwellings. Site within Flood Zone 1 – i.e. within the lowest flood risk category & flood risk/drainage considerations taken into account through sustainable drainage solution (detail provided) with attenuation ponds to be provided; foul drainage disposal available The Land is available for development & can come forward for development in a timely fashion.Draft layout provided. Sites will provide a planned and coherent form of development and enhance accessibility by providing a new highway connection between Chester Road and Tarporley Road. It will satisfy the Council's standards regarding on site affordable housing, sustainable drainage, ecological enhancement and on-site open space provision
A1269B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	I would like to please request the 1) the removal of WHT037 and WHT044 (Housing allocation for 200 dwellings) from the proposed new local plan and 2) the development boundary in this area of the town maintained as it exists currently. (Documents attached showing redrawn development boundary) There are a number of reasons for requesting these two sites are removed from the plan and the existing development boundary maintained. a) The Chester Road has been saturated with new housing during the period Shropshire didn't have a 5 year land supply. This part of town needs a rest from more housing b)We want to keep a green wedge between Tarporley Road and Chester Road, to be part of the green lungs of the town c) We do not want Tarporley Road and Chester Road joined together as one urban mass d) WHT037 and WHT044 flood regularly and are shown by Environment Agency records to be medium/high risk to flooding e)There have been serious flood incidents in Chester Road and Chester Avenue since new development took place in the area f) The sewer infrastructure in this area is at capacity
A1377B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	No comment
A1378B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Against allocation of these sites. Area does not have the infrastructure to support more homes. They need to be in keeping with other properties around Chester Road not rabbit warren created by David Wilson. More parkland is desperately needed to accommodate the residents in Whitchurch area. Drainage is also an issue on the site as floods have occurred and flooded gardens. More green land around properties is needed
A1388B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Site should not be developed. Area has already accommodated a lot of housing and services can't cope with anymore, and new housing will impact on the character of the area
A1603B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	This area of the town has taken its fair share of development in recent years. Will cause traffic problems, and the sites flood. Wildlife should be considered. Drainage issues.
A1637B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Development on the other side of town at Tilstock Road makes more sense - it is closer to services. WHT046 will degrade the area.
A1650B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	No comments made
A1835B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	I do not support this on the basis of the excessive development that has already taken place on and along the Chester Road. There are clearly problems with drains as evidenced by the repeated work being undertaken there and that's without all of the new build taken place being fully occupied. Once fully occupied this can only serve to exacerbate the problem. Furthermore, the proposed location is quite some distance from any amenities and has problems with flooding. It therefore would make sense for this proposal to be rejected and an alternative site be found that would address my above concerns.
A1841B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	NO COMMENT MADE
A1876B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	The preparation work that needs to take place would undermine the integrity of the existing buildings on Alkington Road. This site would or could be a beneficial wildlife area, woodland, allotment or a combination. We need to consider the fact that green spaces are as important as the housing needed. With the current on going Covid-19 issues green spaces and places to exercise outside are vitally important.
A1889B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Very concerned about any development on site WHT014, the effects building would have on drainage to the environment and to nearby houses are a worry. Any access from Alkington Road would result in much more traffic on an already busy minor road. The infrastructure in the area is already stretched to the limit with additional housing developments around the outskirts of the town.
A2106B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Object to inclusion of sites WHT037 & WHT044 in the plan because: The area has been over developed in recent years and local infrastructure can't cope; the greenfield sites are valuable for wildlife and needs to be maintained; Whitchurch will become a commuter town and community spirit will be lost; additional services such as schools, medical facilities and leisure are needed; green space between the town and bypass needs to be maintained; derelict brownfield sites should be prioritised ahead of green fields

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2176B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	A decision to build 200 houses on land between Tarporley Road and Chester Road is not realistic because of the congestion that is likely to be caused. The access road onto Tarporley Road would be Haroldgate which is not suited for a heavy volume of traffic as it is a residential area. In addition any access road onto Chester Road (presumably opposite Pear Tree Lane or close by) would create a bottleneck onto Chester Road and substantially increase the traffic volume on Chester road into the town centre. I am not against a proposal for any development on the land but believe it should be restricted to a much smaller development and with more suitable access away from Chester and Tarporley Roads to enable any out of town traffic to avoid Chester or Tarporley Roads My view therefore is that the local plan should not be amended from its current position namely allowing for development of WHT046 only
A2266B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	I oppose the proposed extension to the Chester/Tarporley road sites. The Beeches Chester Rd site floods my property during heavy rain. The roads, sewerage and drainage systems are at capacity already.
A2269B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	With the proposed extension to the site, the traffic will become unmanageable and will become unsafe for children.
A2271B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	My main concern is the continual impact on the environment, loss of hedgerow, green spaces. Residents are fed up of the road been continually dug up and not repaired properly. Traffic is already very busy, this will make it much worse. Why build more houses when there are still some unsold from the last site? The sewage systems are at capacity and have already overflowed.
A2282B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Against allocation of sites WHT037/044 but also concerned about over development in Whitchurch generally. Feels site 044 won't meet open space policies as playground and green space are too far away; site is liable to flood; sewerage system in the area already has problems and won't sustain more development. Site is also a mineral safeguarding areas and a heritage assessment hasn't been undertaken. Wider concern about services in Whitchurch such as schools and doctors being able to accommodate new development. This should be resolved before new housing is allowed. Feels that information in the documents has been manipulated to show the area can be developed, and only people who will benefit from the development are buy to let landlords
A2288B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	A lot of wildlife would lose its habitat, so I think WHT037/044 should be removed from the plan and the existing development boundary should be retained. The sites are vulnerable to flooding. The road junctions off Tarporley Rd/Haroldgate is dangerous as it is.
A2308B26	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF: PPW025: Safeguard Zone - RAF Shawbury Plan AT 91.4m, Plan B and Ternhill Airfield Plan B.
A2315B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	It is my understanding that previous developments have been denied due to problematic drainage issues. The village is already struggling with an overwhelmed drainage system and a further 100 dwellings would cause significant problems for basic sanitation. This would need to be addressed and rectified. Further traffic would be of great concern to current bottlenecking along Station Road. Widening of High street seems unachievable given all the residential properties present. The increased traffic that 60 further dwelling would bring would cause safety issues.
A2331B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	No comment
A2339B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	This area of Whitchurch has had too much development in recent years. Concern over drainage and infrastructure not being able to cope with the housing increases proposed. The needs of the residents should be taken into account first.
A2341B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Don't know / no opinion	General description refers to two refused planning applications for the site. Without details of failed applications and proposed changes to the site it is not possible to agree or disagree with the achievability/viability, although the site assessment indicates that the development is generally considered achievable and viable unless there are any site specific issues evident.
A2341B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	In relation to Highway Comments, Existing Highway Suitable for Traffic Associated with the Development at the Access Point - Yes. The Site Assessment Stage 3 document indicates that the existing highway is not suitable for the traffic associated with the development as design requirements state that the junction between Wrexham Road and Liverpool Road will require improvement. Subsequently, there is no response to the question "If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?"
A2341B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Under the Strategic Considerations there is no reference to vehicle access. I would suggest that vehicular access would be subject to either a development being limited to low traffic generation or to a wider area transport assessment given other potential sites off Alkington Road (WHT051, WHT041, WHT046) and their combined impact (potentially 378 homes) on the narrow sections of Alkington Road, Kingsway and Wrexham Road. WHT046 refers to access to Liverpool Road via WHT014 and poses a risk of significant increase in traffic locally and on the approach roads.
A2341B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Public Protection Comments - Other Constraints makes no reference to noise or emissions. These would be considerations given the potential for increased traffic due to c.140 additional cars at WHT014 (possibly c.700 + with other future developments) although I note that a Habitats Regulation Assessment would be required under the Ecology Comments.
A2341B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Achievability/Viability Information indicates that the development is generally considered achievable and viable, however I am aware that there is a high potential for natural ground instability in the area which could become an issue for existing properties on Liverpool Road and Alkington Road if piling is to take place. I note that a viability assessment will be undertaken.
A2368B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	Proposed Housing Development on areas WHT037 and WHT044 Evidence in support of the amendment submitted by Councillor Biggins Context- It is unlikely this proposal will be stopped, though the proposal submitted by Councillor Biggins is sound and well argued. However, the housing expansion south of Pear Tree Lane, and alongside the Chester road opposite, were delivered despite strong opposition based on strong planning, infra-structure, educational, environmental arguments. This is because the local authority is keen to increase rate income and meet house building targets imposed by national government. The government is keen to stimulate building expansion, particularly post-depression and following the impact of COVID-19. This is why it proposes a presumption in favour of house building proposals. Therefore, the notion of maintaining a Green Belt or protected environment has disappeared from planning, at least in terms of decisions and outcomes. As the two areas (WHT037 and WHT044) are already in the current local, the likelihood of altering this intention is slim. Despite this pessimism there are good reasons for opposing further developments in these areas. Overall development of the area is patchy, appears unplanned and beyond the town's capacity to support the increased numbers. Whitchurch is relatively underdeveloped and poorly resourced. The town urgently needs further planned development to build a population that is capable of sustaining a town in the modern world and an infra-structure to support and provide for both the current population and the inevitable growth that will come. Planned development can enhance and improve our town by providing the services and business opportunities it needs. Currently we have relatively unplanned housing growth with no planned improvement in services, infra-structure or local business. We should ensure further development is conditional upon commitment to resource the town. Investment and improvement required to support further house building -1. Medical Centre A modern fully resourced medical centre for our GP services is urgently needed. We are the only local town in North Shropshire or South Cheshire without this provision. Crisis situation, oversubscribed understaffed and under resourced. 2. Education- The infant school is full and future intake is rising. This will spread into the Junior school. An additional primary school is needed and the existing provision requires substantial investment. A significant proportion of secondary age pupil travel to schools in Cheshire. As building is taking place in Cheshire West too, this will create additional demand on the nearest Cheshire local secondary school (BHHS). This will increase demand for secondary places in Whitchurch. No significant FE provision in Whitchurch, students travel out of area, little planned provision. 3. Developing the town centre - developing ring of supermarkets and convenience stores around the town are servicing the expanding population who access free parking and easy road access. The town centre is handicapped by relatively few parking areas, much of this is not free, not aware of EV charging points. Funds needed to attract people to the old town. The future of local shops and businesses will depend upon footfall and access which at present is hindering development not supporting it. Transport – Road and Rail links Increased traffic on the ring road has led to dangerous situations at junctions. This is particularly so at the ring road junctions with Chester Road and the Wem Road where traffic enters the junction travelling at 60mph but with no visibility for, or of, traffic from the two feeder roads. Whitchurch is now a dormitory town serving surrounding conurbations and larger towns. The majority of this commuter transport is by car. In large part this is because local train and bus services are wholly inadequate. There are no regular fast services to Manchester, Chester, Liverpool, Stoke on Trent, Wolverhampton, Wrexham or Birmingham. Though it is possible we may be moving into a deeply changed work era, there is no evidence, other than the reaction to the current crisis, to support this. If this shift does take place, then the area requires substantial improvements to its tele-communications and broad band provision. Infra-structure – Water and Sewage, Electricity & Telecommunications There are existing problems with flooding and sewage back-up around the Pear Tree Lane developments and the two estates. Though some work is underway, more will be needed if further developments are planned. The existing electricity supply will not be able to sustain a world in which all domestic transport requires charging points and daily usage increases. Summary - In total this evidence reflects a small town that requires further investment and development in order to service its current population. More development is probably inevitable, but this will lead to a further deterioration in local services in all key areas. Therefore, further local provision must be linked to local investment and improvement. In addition the issue of local environment and character is of increasing significance. Green areas close to and within the town are important because they retain the historical and visual nature of this small market town. Building tightly packed estates around the existing centre will destroy this past and in so doing damage the future. It will also lead to a deterioration in the physical and social environment. This is not planning; it is just building without regard to the immediate impact and the long term future.
A2391B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	believe and observe as a resident that Chester Road and Tarporley Road area has indeed taken its fullshare of new housing in the very recent years and has now reached a sustainable state for the next years. There should not be any further and such large scale developments which have been flourishing in the last four years to retain one of the very last green wedges of land between Chester Road and Tarporley Road. I strongly disagree with the viability of this assertion: "Development to be delivered in a comprehensive manner in order to ensure sustainable development" and would also like to highlight that "Green infrastructure corridors with effective native planting will form an intrinsic component of this development" as if operated as for the existing site WHT046 are a phantasmagoria and will not be achieved. If by implementing "green infrastructure corridors", we designate the very few edges of grass that, are instead of sidewalks or car parks which would guarantee the safety of the residents then I suggest its definition and this statement are reviewed. I also notice that the maintenance of these "green infrastructure corridors" are usually incumbent to the Local Authority as it is in the framework of site WHT046 and have not been maintained once by the Local Authority. This lack of furtherance surely isn't reassuring for the residents of the area. This local plan also equates to the loss of one of the very last unbuilt land in North Whitchurch will be imposed upon its residents. As of today, there is no guarantee and actually, past sites in this area have proven that there will be a major infrastructure issue and that "All necessary improvements to the highway network" would need to far exceed the vicinity of the sites WHT037 and WHT044 as they would impact the area extensively. It is to be highlighted that an important number of Whitchurch residents benefit from the open space on The Mounts and enjoy not only the far-reaching views but also the natural state of this space. Ashighlighted, are remaining only a couple of walks and open space between Chester and Tarporley. With the proposed local plan, this green wedge is set to disappear leaving the increasing number of residents who enjoy daily walks to this area with no option for natural and open spaces. Also, parking spaces are seriously lacking with recent sites having four bedrooms houses benefit from only one single outside parking space in this area. This results in residents parking off-road or on pathways. Drastic improvements would also be required in terms of phone reception as residents of the area are foremost of them encountering serious difficulties. I believe that at the moment the current and overall local plan especially regarding sites WHT037 and WHT044 will be detrimental to the stability of the town and its ecosystem and suggest these are halted or strongly altered.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2392B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	believe and observe as a resident that Chester Road and Tarporley Road area has indeed taken its fullshare of new housing in the very recent years and has now reached a sustainable state for the next years. There should not be any further and such large scale developments which have been flourishing in the last four years to retain one of the very last green wedges of land between Chester Road and Tarporley Road. I strongly disagree with the viability of this assertion: "Development to be delivered in a comprehensive manner in order to ensure sustainable development" and would also like to highlight that "Green infrastructure corridors with effective native planting will form an intrinsic component of this development" as if operated as for the existing site WHIT046 are a phantasmagoria and will not be achieved. If by implementing "green infrastructure corridors", we designate the very few edges of grass that, are instead of sidewalks or car parks which would guarantee the safety of the residents then I suggest its definition and this statement are reviewed. I also notice that the maintenance of these "green infrastructure corridors" are usually incumbent to the Local Authority as it is in the framework of site WHIT046 and have not been maintained once by the Local Authority. This lack of furtherance surely isn't reassuring for the residents of the area. This local plan also equates to the loss of one of the very last unbuilt land in North Whitchurch will be imposed upon its residents. As of today, there is no guarantee and actually, past sites in this area have proven that there will be a major infrastructure issue and that "All necessary improvements to the highway network" would need to far exceed the vicinity of the sites WHIT037 and WHIT044 as they would impact the area extensively. It is to be highlighted that an important number of Whitchurch residents benefit from the open space on The Mounts and enjoy not only the far-reaching views but also the natural state of this space. As highlighted, are remaining only a couple of walks and open space between Chester and Tarporley. With the proposed local plan, this green wedge is set to disappear leaving the increasing number of residents who enjoy daily walks to this area with no option for natural and open spaces. Also, parking spaces are seriously lacking with recent sites having four bedrooms houses benefit from only one single outside parking space in this area. This results in residents parking off-road or on pathways. Drastic improvements would also be required in terms of phone reception as residents of the area are foremost of them encountering serious difficulties. I believe that at the moment the current and overall local plan especially regarding sites WHIT037 and WHIT044 will be detrimental to the stability of the town and its ecosystem and suggest these are halted or strongly altered.
A2451B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	1 I strongly object to the following planning application for 200 dwellings as 1 wht037 and wht044 both flood and have major drainage issue 2 This area of Whitchurch is overdeveloped and a area of undeveloped land should remain to maintain Whitchurches character 3 Access through Haroldgate is to the proposed development is not safe over the last 2 years since the development 100 dwellings there has been - 3 car accidents, 2 pet deaths and numerous jams on the road . during peaktime 8.20 to 9am the traffic flow is over 50 cars data taken on Monday 28th September , plus Regular speeding 4 Further development of an additional 200 dwellings would be unsafe on the current access
A2463B1	Viability and Deliverability of Proposed Site	Draft Policy Area S18 Whitchurch Place Plan Area	Agree	Support site – achievable, viable and deliverable. Past refused applications on the land can be amended to ensure consent.
A2463B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	This land immediately west of the preferred allocation (WHT014) can and should come forward as a preferred site as part of the LPR. This would support the 'urban focus' and, given the changing national government policy, the housing requirement put forward in the draft plan is some 40% lower than Shropshire's LHN figure calculated using the emerging standard methodology.
A2466B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	There have been 4 new developments, close to each other, completed or nearing completion in the last year or two. These are at The Beeches, Oak Tree Way, The Orchards and Croft Gardens. 3 of these are within 200m of the 30mph outer limit. As a result I think Chester Road has already carried a fair share of local development. There are now 4 roads feeding on to Chester Road at Peartree Lane, Croft gardens, Oak Tree Way and The Orchards within about 150m of each other (3 within 100m) and shortly after the brow of the hill, just within the 30mph speed limit. A further access for 200 properties will significantly add to that. In addition we have seen a significant increase in traffic on Chester Road in the short time we have lived there. Adding the traffic from another 200 homes, new homes often have more than one car, will significantly add to the traffic on Chester Road. I note the proposal will encourage cycling and pedestrians but the reality is that people commute and shop by car. The proposal acknowledges that some of the land is subject to flooding. In addition the drains on Chester Road do not currently handle surface water. During heavy or longer rain showers water runs down the road surface, often heavily like a river.
A2472B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy Area S18 Whitchurch Place Plan Area	Disagree	I wish to place on record my objection to consider WHT014 as suitable land on which to build 70 new homes. Reasons detailed below SAMDEV Plan The land in question was not included within the plan which was adopted by the council on 17/12/2015 and it was removed from the 2013 plan for the following reasons: 1. "The outstanding on-site concerns over landscape and visual impact, and traffic congestion on Liverpool Road"; 2. "The mixed community reaction to the site, including Town Council's objection"; 3. "The presence of more suitable sites elsewhere in the town to meet the overall housing need" It is clear that the issues which resulted in the location being removed from the SAMDev plan are still valid: 1. The impact on the landscape and the negative impact the development would have from a visual perspective cannot be underestimated. The site is one of the few "green" areas remaining in the town because of the drive to erect more housing in recent years. Liverpool Road and the surrounding area in particular has seen huge construction and the over-development of the area must be considered. Furthermore if traffic congestion was viewed as a valid issue of concern in 2013 and 2015 respectively I fail to see how this is no longer the case. Traffic is notably worse than in 2013 and to build yet more homes in the area would only exacerbate the issue, creating a bottleneck of traffic that is unmanageable and simply increases the risk of an accident. In addition it is vital that emergency services have easy access Greenfields care home located down Liverpool Road and adjacent to Mare Close. The additional traffic caused by 70 new homes would negatively impact on this capability. 2. Having spoken with neighbours it is clear that the community is united in its objection to the proposed development. I would also assume that the Town Council still objects to the development as the 2013 Preferred Options Draft states that objection was based around "traffic generation and how it would contribute to the over-development of the area". These are still pertinent issues. 3. There are still a number of sites within the existing SAMDEV plan and within this Pre-Submission Draft document that are more suitable building locations than the Liverpool Road location in question. 2015 Rejection Planning permission to build on the site was last rejected in 2016. The decision notice issued by the Council identifies 4 main reasons for refusal, all of which are still relevant today. Services and Amenities Additional pressure on schools, doctors and other services within the town would increase substantially should approval be granted. Schools are already struggling with class sizes and an increase in population would impact negatively on the standard of education received by children, something which is ethically and morally wrong. Doctors, likewise, are struggling with the number of patients demanding services. One surgery in town serves 1,400 patients. If we assume an average of 3 people per home then an additional 210 people would require access to the town's surgery. If all were to use Dodington Surgery (the closest surgery location wise) then the number of patients the surgery would need to care for would increase by 15%. Wildlife The 2015 application was rejected because: "Insufficient survey information has been provided in relation to Great Crested Newts to conclude that the proposal will not cause an offence under the Conservation of Habitats and Species Regulations (2010) and as such the development would also be contrary to policy CS17 of the Shropshire Core Strategy." I can see nothing within the documents which details whether or not this still remains an issue. This would need to be clarified before the site is even considered. Habitats for many other species would also be destroyed such as foxes and hedgehogs. The need for green space within the town can also not be underestimated. The field in question is used by many children to enjoy outdoor activities with their friends and building on the site would obviously take this away. The town of Whitchurch is quickly losing many of its rural features, becoming urbanised beyond recognition over the last few years. Studies show that open, green spaces reduce stress and boost mental and physical health as well as improve air quality and greater diversity. Sadly Whitchurch has also been shown to have the joint highest rate of asthma incidences in England, with 9.3 per cent of the population being registered with the condition – compared to a national average of 5.9 per cent. Therefore, it is essential efforts should be made to reduce traffic pollution in areas around Whitchurch, such as Wrexham Road and Alkington Road, rather than increase it.
A0956B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S19 Clive Barracks Strategic Settlement	Disagree	Promotion of land owned by Raby Estate between Shrewsbury and Telford, promoting the "Beslow Estate" based on a Garden Village principles and providing 3,500 homes and 17ha employment land, community uses and infrastructure. This site is put forward as an alternative to three Strategic sites in Shropshire. Comment on S19 Clive Barracks The indicative masterplan illustrates the mixed-use redevelopment of the (72ha) site to provide local services and facilities; around 5.75ha of employment land; around 750 homes; and green infrastructure. The constraints of the site are as follows: The site is expected to deliver 300-50 homes within the plan period, but this means that much of the site will not meet the County's current need; the site is reliant on the private car, with the nearest railway station 11km away; Ecological/ environmental constraints including ancient woodland, local wildlife sites and Flood Zones 2 and 3; and due to the scale of the site (750 dwellings) it is legitimate to question whether the critical mass could be generated to support local services, facilities and infrastructure, which are central to sustainable development. The proposed development at Beslow Farm is free from such constraints and therefore better placed to meet the immediate needs of Shropshire.
A0971B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S19 Clive Barracks Strategic Settlement	Disagree	Promotion of land owned by Raby Estate between Shrewsbury and Telford, promoting the "Beslow Estate" based on a Garden Village principles and providing 3,500 homes and 17ha employment land, community uses and infrastructure. This site is put forward as an alternative to three Strategic sites in Shropshire. Comment on S19 Clive Barracks The indicative masterplan illustrates the mixed-use redevelopment of the (72ha) site to provide local services and facilities; around 5.75ha of employment land; around 750 homes; and green infrastructure. The constraints of the site are as follows: The site is expected to deliver 300-50 homes within the plan period, but this means that much of the site will not meet the County's current need; the site is reliant on the private car, with the nearest railway station 11km away; Ecological/ environmental constraints including ancient woodland, local wildlife sites and Flood Zones 2 and 3; and due to the scale of the site (750 dwellings) it is legitimate to question whether the critical mass could be generated to support local services, facilities and infrastructure, which are central to sustainable development. The proposed development at Beslow Farm is free from such constraints and therefore better placed to meet the immediate needs of Shropshire.
A1152B47	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S19 Clive Barracks Strategic Settlement	Disagree	Disagree with the housing and employment allocations to the extent that Tern Hill is sufficiently close to Market Drayton (particularly the Tern Valley Business Park) that houses and employment land at the Tern Hill site should be taken as satisfying the need in Market Drayton.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1192B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S19 Clive Barracks Strategic Settlement	Agree	<p>Support proposed allocation of Clive Barracks, Tern Hill as a Strategic Site</p> <p>Clive Barracks has been identified for release by the MOD as part of the Better Defence Estate Strategy. As confirmed in 2019, the site will be available from 2025.</p> <p>Fully committed to delivery of housing at Clive Barracks and recognise the role of the site in the delivery of housing during the Local Plan Review period and beyond.</p> <p>The proposed redevelopment of the site provides an opportunity to deliver a new sustainable settlement on a predominantly brownfield site. Delivering new housing, employment and local services and facilities to benefit both new residents and the existing residents nearby. The site is also able to deliver much needed housing in the latter years of the Plan period and beyond, helping the Council demonstrate that its supply of new homes can be maintained throughout the plan period.</p> <p>As recognised within the explanation of draft Policy S19, the proposed redevelopment of the Clive Barracks is in accordance with the Economic Growth Strategy for Shropshire which seeks to prioritise investment in strategic locations along strategic corridors. Clive Barracks lies on the A41, a strategic corridor within the Economic Growth Strategy. Therefore, it is entirely logical that it be identified for re-development for new homes and employment generating uses, which will contribute towards Shropshire's housing need through the effective re-use of a predominantly brownfield site.</p> <p>A suite of technical evidence to confirm the suitability and deliverability of the site for a residential led mixed-use development has been prepared. These documents and workshops with the Clive Barracks Task Force Group have informed an indicative masterplan for the site which illustrates how approximately 750 dwellings and 5.75 hectares of employment land can be accommodated, having regard to the various site-specific constraints and opportunities.</p> <p>Note that the Council have also prepared evidence for the site.</p> <p>Part 3 of draft Policy S19, advises a comprehensive masterplan will be prepared and adopted by the Council. Recognise and support this requirement and remain committed to ongoing engagement with the Council and the Clive Barracks Task Force Group in working up this masterplan. Part 3 also identifies site guidelines for the masterplan and resultant development. Comments on each proposed site guideline are as follows:</p> <p>Criterion A: Constraints and opportunities arising from site specific technical evidence has informed the quantity of development which can be accommodated on the site. The site can deliver approximately 750 dwellings, accommodating a mix of housing types.</p> <p>Criterion B: The Illustrative Masterplan for the site demonstrates how the site can accommodate approx. 5.75 ha of employment generating uses alongside new housing. Committed to working with the Council to ensure the employment generating opportunities at Clive Barracks reflect local need, market demands and the aspirations of the Economic Growth Strategy for Shropshire. Site Guidelines which seek employment generating uses on the site and provide flexibility rather than a prescriptive approach to deliver the best possible employment offer for the site are supported.</p> <p>Criterion C: The proposed local centre will benefit residents of the site and those living nearby. Note that at previous public consultation events residents commented on the benefit to them of the delivery of a local centre in this location. The exact nature of the local centre, and the phasing of it, will be confirmed through a future planning application for the development of the site.</p> <p>Criterion D: To provide certainty consider the "appropriate quantity" of Green Infrastructure needs to be defined. The illustrative masterplan provides for a range of green infrastructure, including new formal and semi-natural open space which delivers approximately 4.4 ha of open green space and seeks to ensure that both the existing Ancient Woodland and other high quality trees within the site are retained with appropriate buffers provided. Areas of woodland within the site (including buffers) extend to approximately 17.8 ha in total.</p> <p>Criterion E: The Illustrative Masterplan confirms how 1ha of land can be provided in a central location on the site, to facilitate the merging of Buntingsdale School and Stoke on Tern Primary School.</p> <p>Criterion F: A Highways Report has been prepared for the site. A Junction Capacity Assessment of the A41/A53 Tern Hill Roundabout confirms the roundabout currently operates over capacity. The Highways Report identifies measures to reduce the impact of the proposed development, comprising junction widening on three of the approach arms to the roundabout to increase the storage capacity/width available in the vicinity of the roundabout which can be undertaken within Highways land. The Highways Report also confirms the existing junction arrangement with the A41 is capable of serving the proposed development.</p> <p>An Air Quality Assessment which assesses the impact of increased vehicular movements from the proposed development on Tern Hill roundabout will be provided at outline planning application stage.</p> <p>Criterion G: Pedestrian and cycle links throughout the site. Welcome the amended wording which makes clear enhancement of the A41 underpass is for pedestrian/cycle connectivity between the north-eastern and south-western portions of the site.</p> <p>Criterion H: A Preliminary Noise Assessment identifies the A41 and Tern Hill Airfield as the main noise sources. It also identifies a number of measures to mitigate noise impact from both sources on both external and internal noise levels. Further extensive noise monitoring of the Airfield has since been undertaken to inform the ongoing development of the site layout and confirmed mitigation methods proposed are appropriate.</p> <p>Criterion I: A Phase 1 Ground Investigation study has been undertaken and identified how on-site sources of contamination will be managed. Additional Ground Investigation will be undertaken to inform the final layout of the site.</p> <p>Criterion J: A Preliminary Ecological Appraisal identifies habitats on-site. Recommendations within this appraisal have informed the Illustrative Masterplan, which ensures appropriate buffers between proposed built development and Ancient Woodland (30m)/Local Wildlife Sites (at least 15m). Further species-specific surveys (identified within the Preliminary Ecological Appraisal) will be undertaken at the Planning Application stage, although potential species groups identified are unlikely to pose an overriding constraint to development.</p> <p>An Arboricultural Survey identifies Root Protection Areas of trees within the site and has informed the Illustrative Masterplan. A Preliminary Arboricultural Impact Assessment has since been prepared which concludes subject to ongoing arboricultural input during the detailed design stage, a sensitive scheme which retains the site's highest quality trees and important arboricultural features is achievable.</p> <p>Criterion K: A Heritage Statement has been prepared to assess potential impacts on designated/non-designated heritage assets and has informed the emerging masterplan. At detailed design stage, an opportunity exists to retain elements of the former Barracks buildings, and verges/roads within the proposed residential areas. Such measures would reduce the degree of harm caused by the proposed development, notably if the final site layout retains an overall sense of the planned 'campus style' layout of the Barracks, as suggested by the indicative masterplan.</p> <p>Criterion L: Indicative Surface Water Drainage Strategy and Flood Risk and Drainage Scoping Study have been undertaken. The proposed development will incorporate SUDs to manage surface water run-off from the proposed development, ensuring the proposed development will not be subject to surface water flood risk. A sustainable drainage strategy which incorporates SuDS will be prepared as the scheme evolves and will be supported by infiltration testing and detailed ground investigation.</p> <p>The Illustrative Masterplan demonstrates how the proposed development can be delivered outside of the area designated as Flood Zone 2 and 3.</p> <p>Clive Barracks lies adjacent to the operational RAF Tern Hill Airfield. To ensure the proposed site and adjacent Airfield can co-exist, the proposed Masterplan has had due consideration to the MOD's statutory safeguarding requirements associated with the Airfield and its transmitter and receiver facilities (as well as the noise impacts, as dealt with under site guideline h). All these factors have been considered and the land uses proposed by the Masterplan are deliverable.</p> <p>However to protect MOD interests and ensure that the future land uses within the development are compatible with the operation of the neighbouring airfield and associated transmitter / receiver facilities would recommend an additional Site Guideline as follows:</p> <p>applicant/developer may need to identify suitable mitigation measures.</p> <p>The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows:</p> <p>Clive Barracks, Tern Hill: traffic; A5 Preston Island roundabout, M54 -J5, J6 and J7.</p> <p>Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.</p>
A1834B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S19 Clive Barracks Strategic Settlement		<p>Consider that proposed site allocation Clive Barracks, Tern Hill would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures.</p> <p>The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows:</p> <p>Clive Barracks, Tern Hill: traffic; A5 Preston Island roundabout, M54 -J5, J6 and J7.</p> <p>Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.</p>
A2308B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S19 Clive Barracks Strategic Settlement	Disagree	<p>The indicative masterplan Clive Barracks considers safeguarding issues. However, looking ahead to future Planning Applications for the site, in order to protect MOD interests and ensure that future development and land use is compatible with the operation of the neighbouring airfield and associated technical sites (transmitter/receiver facilities), MOD would like to see an additional criterion added to the list of criteria as follows:</p> <p>"m. The layout and dimensions of new structures as well as use of materials will need to be appropriately designed to ensure new development does not impede the operation of the airfield and associated transmitter/receiver facilities at the adjoining MOD site."</p> <p>Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF:</p> <p>Clive Barracks: Safeguard Zone - Ternhill Airfield Plan AT ANY DEVELOPMENT, 15.2m, 45.7m, Plan B; RAF Shawbury Plan AT ANY DEVELOPMENT 91.4m, Plan B and West WAM Plan T ANY DEVELOPMENT, 10.7m, 15.2m, 45.7m, also Consultation required for power lines above 2k</p>
A0270B1	Viability and Deliverability of Proposed Site	Draft Policy S20 Former Ironbridge Power Station		<p>Site is deliverable in accordance with NPPF. Outline planning application submitted with detailed phasing plan. First housing plots will be delivered in 2022/3 (within 0-5 years). However, significant viability constraints due to legacy of former use. A series of viability scenarios have been assessed and confirm that a fully policy compliant scheme is not viable, and would generate a significant financial loss. Several other scenarios have been explored and are all presented within the Development Viability Review. Site is not viable with policy compliant affordable housing.</p>
A0114B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Don't know / no opinion	<p>Development site affects National Grid assets or are in close proximity including 400kV Overhead Transmission lines & Electrical Substations. A plan showing details of the site locations and details of National Grid's assets provided</p>
A0193B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Agree	<p>Ironbridge The landowner and developer of this site support the emerging Policy S20 which seeks to allocate the former Ironbridge Power Station as a new strategic settlement. Harworth Group is committed to bringing forward a highly sustainable mixed-use development, on this largely brownfield site.</p> <p>Site purchased in June 2018 and extensive public consultation has been undertaken to inform the emerging proposals for the redevelopment of the site. The demolition of the power generation infrastructure started in April 2019 and is expected to be complete by December 2021. An outline planning application, 19/05560/OUT including an Environmental Statement, was submitted to Shropshire Council (& also to Telford and Wrekin Council) in December 2019.</p> <p>The planning application (uses described in rep) was formulated in to reflect the mix of uses within the emerging policy for the site & carefully considered to ensure that a comprehensive, appropriate, and sustainable development is delivered. The detailed design and layout of the development will follow at a later date through future reserved matters applications; however, the Illustrative Masterplan that accompanies the planning application demonstrates how the layout could be configured to deliver a high quality and attractive mixed-use development, in accordance with the emerging Policy S20.</p> <p>An Environmental Statement Addendum and revised planning application was submitted in August 2020. There has also been additional technical work and some amendments to the Illustrative Masterplan which is subject to re-consultation by Council. The updated Planning Statement (dated August 2020) sets out how the proposed development accords with each of the site guidelines (A – Q) for S20.</p> <p>The planning application and Illustrative Masterplan support & incorporate the Council's Sustainability Appraisal mitigation measures (set out at Table 10.4) and site guidelines at Policy S20 and therefore they are supported. Measures include:</p> <ul style="list-style-type: none"> - appropriate buffers to the SSSI's, Wildlife Sites and Woodland Sites; - the provision of facilities and services within a village centre, including a nursery and primary school and GP surgery (subject to CCG advise); - exclusion of built development from Flood Zones 2 and 3; - submission of a comprehensive Heritage Assessment to address the site's relationship with Ironbridge Gorge World Heritage Site, Buildwas Abbey Scheduled Monument, the Severn Gorge Conservation Area and the two Grade II Listed Buildings to guide the conservation and enhancement of these features; - identification of requirements to safeguard trees; - provision of green infrastructure and sports facilities, pedestrian and cycle links to service facilities onsite and in the wider area. <p>A Viability Appraisal has been undertaken. The package of contributions proposed by the applicant, in accordance with the overall viability of the site, totals £16.5m towards primary and secondary education, health, sport, community and footpath/cycle links, public transport, tourism and heritage improvements, ecological enhancements, and highway improvements, including traffic calming in Ironbridge. 50 affordable dwellings will be provided. A funding review will also be undertaken midway through the development to review the extent and applicability of these contributions.</p> <p>The developers have worked positively with stakeholders, the local community and the local planning authority in bringing forward these development proposals, and this has continued post- planning application submission with the application programmed for consideration by planning committee in November/December 2020. Delivery of development on the site is expected to take place from 2022 – 2032. The redevelopment of this site represents an opportunity for Shropshire Council to meet their housing and employment needs in a sustainable way, supported by necessary infrastructure and supporting services and facilities.</p>
A0355B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Disagree	<p>Impact of the Buildwas development on the highways infrastructure on roads in Much Wenlock, pressure on GP surgery and school</p>
A0486B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Disagree	<p>We are disappointed that none of our suggestions for renewable power generation and storage have been incorporated into the Local Plan. While there are generic Policies in the Plan that may apply, this large site with good connections to the power grid, provides an opportunity to generate solar power which could be stored in batteries and/or exported from the site. It appears symptomatic of the lack of any real intention to ensure that the Local Plan sets out to achieve net zero emissions.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0956B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Disagree	Need to ensure that the Shropshire Local Plan is 'effective' by fully considering the risks to the delivery trajectories of the strategic settlements and the consequent need for further flexibility in the housing land supply, which could be accommodated via the urban focused strategy within the Strategic, Principal and Key Centres. The Strategic Settlements of Clive Barracks (draft Policy S19) for 750 dwellings and Former Ironbridge Power Station (draft Policy S20) for 1,000 dwellings are identified as a part of the housing delivery strategy. Appendix 7 highlights the anticipated delivery trajectory for these sites, with Clive Barracks potentially extending beyond the plan period and the Former Ironbridge Power Station being at least long term too (up to end of the plan period). There does not appear to be any information within the draft SLP or supporting evidence base on how the trajectory has been derived and no updates provided from the previous Shropshire Council 'Strategic Sites Consultation' (2019) or how the necessary assessment work for these strategic settlements has progressed. As per our comments under draft Policy S16, the Council should clearly set out the anticipated delivery trajectories for these sites and be transparent on the assumptions applied in order to ensure any risks to delivery of housing at these site within (and beyond) the plan period are fully accounted. These assumptions should reflect the site-specific existing characteristics affecting the development of these strategic settlement sites and future requirements (such as infrastructure) to enable their effective delivery. If the risk assessment demonstrates that such sites are likely to be longer term and further beyond the plan period than anticipated, the Council should consider the need to identify further flexibility within the housing land supply by directing additional allocations to the urban locations as per the urban focused spatial strategy for development (draft Policy SP2). Clive Barracks may be better suited to a strategic employment allocation given its location adjacent to the A41, which the plan recognises is an important strategic corridor thereby providing greater alignment with Policy SP10. Our Client's Site, Land at Nobold, can provide a sustainable urban extension to Shrewsbury town, in line with the urban focused strategy of the draft SLP. The accompanying Concept Plan demonstrates the opportunity for a comprehensive development that would serve to make use of and further enhance the sustainability of the south-west area of Shrewsbury, delivering on the objectives of the Shrewsbury Big Town Plan and meeting local needs for housing, employment and infrastructure.
A0971B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Disagree	Promotion of land owned by Raby Estate between Shrewsbury and Telford, promoting the "Beslow Estate" based on a Garden Village principles and providing 3,500 homes and 17ha employment land, community uses and infrastructure. This site is put forward as an alternative to three Strategic sites in Shropshire Comment on S20 Former Ironbridge Power Station Questions can be raised about the deliverability of 1,000 dwellings on the site within the plan period and whether it is possible to minimise the landscape and visual impact. Constraints of the site are considered to be: The demolition and decontamination of the site; and the impact on heritage and environmental designations. The impact the site is expected to have on these make it the worst scoring site in the Sustainability Appraisal. The proposed development at Beslow Farm is free from such constraints and therefore better place to meet the immediate needs of Shropshire.
A1152B48	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Disagree	The Former Ironbridge Power Station site is sufficiently close to Telford that its proposed houses and employment could be taken as satisfying need in Telford. It is apparent that the local road network could not currently adequately cope with the volume of traffic likely to be generated. The site scored as 'Poor' within the Sustainability Appraisal, yet has still been allowed to come forward as an allocated site. The pressure for development has over-ruled the objective assessment.
A1834B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement		Consider that proposed site allocation Former Ironbridge Power Station would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows: Former Ironbridge Power Station: traffic; M54 J6. Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.
A2187B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Disagree	I am concerned at the apparent lack of consideration of the effects on Much Wenlock of the large development at the former Ironbridge Power Station. Traffic problems, in particular at the Gaskell Arms junction, are already well-documented, and this substantial increase in housing, and therefore traffic movements, both at Ironbridge and at Bridgnorth will put intense pressure on traffic passing through Much Wenlock, including its historic centre
A2475B24	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S20 Former Ironbridge Power Station Strategic Settlement	Disagree	This site is already the subject of a planning application to which we have made a detailed response, objecting principally on the basis of the scale and proximity of this major development in the immediate setting of the AONB. We are not opposed to the principle of development on the former power station site, but the importance of the AONB was downplayed and the setting of the AONB not adequately taken into account in the masterplan and application. We welcome para 3h referencing the greenfield elements of the site and their sensitivity in relation to the AONB, but reiterate that we expect the proper consideration of the AONB to result in actual change to the proposed development to reduce its impact on the setting of the AONB, mainly by reduction in scale at the western edge. The policy should refer to the scale of development reflecting proximity to the AONB, as well as design and layout.
A0056B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0065B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0069B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0083B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0084B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0095B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0096B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site		No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0099B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0104B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0106B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0133B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0143B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0144B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0212B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	Consider that ALB013 (Albrighton Garden Centre) should be included within Cosford Strategic Site. The site is around 2.5ha, consisting of a garden centre, car park and overspill parking, it is a long establish retail location, adjoins the Strategic site, is well defined - bounded by RAF Cosford, roads and rail lines and in the Green Belt. Para 133 of the NPPF sets out the purposes of Green Belt. ALB013 was assessed (alongside RAF Cosford) within the Shropshire Green Belt Assessment and Review and considered to make no contribution to Purposes 1 and 4, made only a weak contribution to Purposes 2 and 3, and made an equally significant contribution to Purpose 5 as the rest of the land assessed. Overall it was concluded that there would be a low level of harm to the Green Belt if the site was released (the lowest in the assessment). Opportunity Area assessments also concluded that release of this land would not affect the strategic function of the Green Belt. Policy S21 proposes removal of land at RAF Cosford from the Green Belt to enable the growth of the site and local economy and to contribute to the employment needs of Albrighton. We can see no reason why ALB013 is omitted from the Strategic Site and no reason for its continued inclusion within the Green Belt. Inclusion of ALB013 in the RAF Cosford Strategic Site would unlock the economic value of the site enabling it to provide either complementary retail services (either in its present form, or a revised form of retail/commercial) or as additional housing land. Supporting the economic growth of this part of Shropshire without compromising the Green Belt. ALB013 is highly accessible and would reduce pressure for development on Greenfield sites. Its removal from the Green Belt would not lace harm on surrounding Green Belt or affect its strategic function.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0255B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford
A0280B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford
A0280B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford
A0283B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford
A0284B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford
A0285B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford
A0287B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford
A0290B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0310B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	TC objects to removing the site from greenbelt – no exceptional circumstances to justify. Permissions have already been granted here without the need to remove from greenbelt. Cosford developments are already covered by CS5 and MD6. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities, there is no reason based on recent history, to assume that any current Defence Review will be fully implemented. It would appear that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development well before the Strategic Sites Consultation in July 2019. Proposed policies in the Plan permitting future employment development on such Sites would allow for unrestricted additional employment development here if the site was removed from the Green Belt. It is clear that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here. It is premature to remove such large areas of land from the Green Belt due to covid. There are plenty of areas for employment land within the Strategic Corridor in neighbouring authorities. The TC are concerned that different parcel reference numbers appear to be given to the Proposed Midlands Air Ambulance Charity Site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. Concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. There was no mention in the Strategic Sites consultation response summary that any comment had been received from MAAC regarding a new site. Evidence from the MAAC should be required to be made public. At the SALC meeting, when it was pointed out that the proposed site was much larger than required by the Charity, Shropshire Council's planning policy officer apparently agreed that the land proposed for release was far more than MAAC required. Site would narrow gap between Albrighton and Shifnal. SC have no control to ensure that the site is only developed for MAAC. The fact that SC are proposing nearly double the site area that MAAC actually require calls into question the reasoning behind the size of site proposed and putting the site into the wider RAF Cosford Strategic Site. The site should have a separate allocation. If it was exceptional, it could gain consent through the application process without the need for removal from greenbelt.
A0319B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Don't know / no opinion	Donington with Boscobel Parish Council welcomes the Midlands Air Ambulance plans, but questions the plans to remove 36 rather than 20 acres of green belt
A0353B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0360B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0362B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0368B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0369B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0457B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air ambulance sites are 2-3 acres.
A0469B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air ambulance sites are 2-3 acres.
A0507B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	The removal of land from the Green Belt in Policy DP25 is welcomed but it fails to meet the Councils own requirements and those of the NPPF which require the Green Belt review to consider both Shropshire's current Plan development requirements as well as the need to safeguard land to accommodate future development needs beyond 2038. To meet this shortfall the Council should re-examine the site to the west of the A41 bounded to the north by Sydnal Lane and to the west by Shackerley Lane. This would provide an additional 16 hectares of land for future development without significant impact on the aims of the Green Belt and by retaining an element of open Green Belt between Cosford and Albrighton to maintain a strategic gap.
A0532B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?
A0533B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?
A0535B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?
A0536B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?
A0537B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?

Page 347

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0697B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	<p>Albrighton is highly sustainable and enjoys excellent accessibility to the strategic road (A41/M54) and rail network (which provide excellent access to Telford and Wolverhampton). Albrighton is also in proximity of RAF Cosford, which is likely to be subject to MOD investment and housing need during the plan period (RAF Cosford is identified as a strategic opportunity to complement existing/future uses of the base and support investment in the wider West Midlands Engine). Given Albrighton's role as a Key Centre and its high sustainability, it is crucial to consider the role it can play in accommodating additional growth emanating from RAF Cosford. Any such growth would need to be directed away from the north-west given the need to maintain a strategic gap between Albrighton and RAD Cosford (referenced in S21 and based on evidence from the Green Belt Assessment).</p> <p>The proposed development strategy continues to identify Albrighton as a Key Centre and includes a guideline of around 500 dwellings, which remains unchanged from two previous stages of consultation. It is significant that despite an increase in the overall housing requirement for Shropshire, the outstanding guideline for Albrighton has reduced (from 195 dwellings to 180 dwellings) due to completions over the last two years. This further limits potential growth in Albrighton which would support the draft Local Plan growth agenda, tackle local infrastructure priorities and address under-delivery in Albrighton (since 2006, Albrighton has the lowest level of completions of any Principal or Key Centre, with an average of just 5 dwelling per annum and has delivered only 24 dwellings (average of 8 per annum) in the first three years of the draft Local Plan period, perhaps reflecting the Green Belt constraint). In order to deliver a 'step change' in the scale of development, not only should Green Belt land be released (supported in relation to ALB014) but specifically allocated as part of the Local Plan review, over and above the 180 dwellings currently allocated to Albrighton.</p> <p>The draft housing requirement for Shropshire and draft housing guideline for Albrighton should be increased to not only meet local need but also recognise opportunities to support the wider housing and economic agenda of the draft local plan, better reflect latest evidence on household growth trends (2018-based), chronic under-delivery of housing at Albrighton and to recognise Albrighton's strategic location in proximity to the West Midlands conurbation. Increasing the residential guideline for Albrighton is wholly in line with Albrighton's role in the urban focused strategy, consistent with the wider housing and economic agenda in Shropshire (focusing growth on major 'strategic corridors'), provides further flexibility/boosts housing supply and is in line with national policy.</p> <p>Concerned about the approach/reliance on windfall in the draft Local Plan, including Albrighton. Para 70 of the NPPF sets out tests when considering windfall allowances, with a need for compelling evidence that they will provide a source of supply and they should be realistic having regard to the strategic housing land availability assessment (SLAA), historic windfall delivery and expected future trends. The Shropshire SLAA considers windfall across Shropshire but not for specific settlements, despite allowances being made for many. Do not agree with this approach or that there is compelling evidence for windfall allowances, to be credible a windfall allowance for a settlement must be based on an assessment of future supply at a settlement level. Consider windfall allowances have been applied to limit the allocation of additional sites needed to meet the proposed housing requirement/settlement guidelines, do not agree with this approach. In Albrighton the windfall allowance is 48 (21% of the total identified supply) but the housing supply in the built area has been limited (just 66 dwellings since 2006, or 5 dwellings per annum), compared to other non-Green Belt settlements where the development boundary is less tight. Consequently, additional allocations should be made where opportunities exist in sustainable locations that do not undermine Green Belt purposes (notably ALB014) before any allowance is made for windfalls. In this way, windfall allowances would represent a 'buffer' to help ensure required growth at Albrighton is achieved. This would be more consistent with a plan-led approach to meeting housing needs, rather than relying on supply from unknown sources that may or may not come to fruition i.e windfall sites, without sufficient justification.</p> <p>Object to the proposed development boundary, as the boundary around this highly sustainable settlement is too tight, to limit Green Belt alterations, meaning it is less able to flex and respond to rapid change (such as non-delivery of allocations) as required in para 11a of the NPPF. Allocating more sites (ALB014 could deliver now) and providing greater flexibility from the outset would be sensible, rather than restricting the ability to respond to change.</p> <p>Allocation of ALB014 would also support the contribution that Shropshire, and Albrighton specifically, can make to addressing unmet cross-boundary needs, in a location that lies within close proximity to good transport connections (road and rail) to the conurbation. Such provision should be considered in addition to the proposed housing requirement set out in the consultation document.</p> <p>ALB014 is identified as safeguarded land for development beyond the draft Local Plan period. Support recognition that ALB014 is distinct from other areas of Green Belt around Albrighton and be removed from the Green Belt. Also support recognition that development of ALB014 is potentially acceptable in principle without undermining the purpose of the Green Belt (informed by the Council's Green Belt Review).</p> <p>Therefore, do not support the mere designation of ALB014 as safeguarded land and consider an allocation more appropriate.</p> <p>The explanation to this policy does not explain why sites ALB017 and ALB021 are proposed for allocation ahead of other sites (including ALB014). Identification of these sites is therefore influenced greatly by their previous identification in earlier plans (i.e SAMDev) rather than based on a fair and transparent selection of the 'most appropriate' sites informed by the evidence. This is a significant failing.</p> <p>ALB014 is highly sustainable, being accessible to a range of services and community facilities within the village and enjoying excellent accessibility to the strategic road (A41/M54) and rail network.</p> <p>ALB014 is contained by Cross Road to the north, Newhouse Lane to the east and Patshull Road to the west.</p> <p>An initial vision document/conceptual layout for the site has been submitted as an Appendix to this representation. This illustrates that the site could accommodate around 160 dwellings; 1.7ha of open space, including retained trees/hedgerows; and would fully integrate and complement the existing village. Note a community aspiration to deliver enhanced healthcare provision in the village, ALB014 has the potential to accommodate such a community use.</p> <p>ALB014 would therefore deliver significant social, economic and environmental benefits and will be truly "deliverable" as defined in the NPPF: being "suitable", "available" and "achievable".</p> <p>Therefore the draft Local Plan should identify the site as a proposed allocation rather than simply safeguarding it for future development.</p> <p>Site assessment comments addressed under comments on the Sustainability Appraisal.</p> <p>Exceptional Circumstances for the site addressed under comments on draft Policy DP25.</p>
A0697B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site		Note reference to maintaining a strategic gap between Albrighton and Cosford, which appears to reflect evidence from the Green Belt Assessment. This limits growth of Albrighton in the north-west direction.
A0711B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?
A0712B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong or RAF Cosford?
A0834B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	Supportive of conclusion to keep site within Green Belt due to flooding, access to waterway, quality agricultural land, proximity to nature reserve, railway makes a boundary, conservation area around Donington Church and provides a green break between Cosford and Albrighton/Donington
A0845B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0846B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p> <p>Object to the proposed removal of RAF Cosford from the Green Belt. There has been no change in circumstances, and certainly no exceptional circumstances to justify Green Belt release, since the current plan was adopted.</p> <p>Note that there has been significant development at RAF Cosford and Cosford Museum despite it being in the Green Belt - therefore there have been no difficulties getting Planning Permission for necessary activities on the site and therefore no need to change the Green Belt.</p> <p>Current policy (CS5 and MD6) specifically permits development of the site - including economic uses. This would, apply to all the development referred to as being proposed for RAF Cosford (military, museum and aviation academy) in the draft Local Plan.</p> <p>Reference is made to the Defence Review, however there is no certainty that this will be completed (given past reviews and changing national priorities). Furthermore this also applied during preparation of the previous Local Plan and the site remained in the Green Belt as a major developed site with specific policies (CS5 and MD6) allowing developments that would not compromise future uses, this approach would equally apply in the future - retaining Green Belt status provides greater control, particularly if the defence review does stall. There are therefore no exceptional circumstances to justify release of this site from the Green Belt.</p> <p>Despite statements suggesting only the specific development referenced can occur on the site, it is noted that there are several draft policies and comments in the draft Local Plan that support unrelated economic development schemes, through its identification as a proposed Strategic Site. It would appear, therefore that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>For example since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational site for mixed use and as a potential new employment site that is subject to the Local Plan review, but that the Council will consider making the site available for development in response to market demand. It would appear the Council has already pre-determined the site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites. By defining RAF Cosford as a Strategic Site without any restriction tying future development proposals to those specified in the draft Local Plan, proposed policies in the Draft Local Plan permitting future employment development on Strategic Sites would allow for unrestricted additional employment development here if the site was removed from the Green Belt. RAF Cosford is also located on a Strategic Corridor which is again a focus for employment development in draft Local Plan policies and the Economic Growth Strategy.</p> <p>The draft Local Plan policies also specifically state that the employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site.</p> <p>The draft Local Plan states RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from wider Local Plan policies and the Invest in Shropshire brochure and investment opportunities webpage that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>Given the current economic climate, Covid-19 and the fact that the Economic Growth Strategy which underpins many of the draft policies of this Local Plan runs to 2021 (and does not consider the current economic climate or Covid-19) it is premature to release such a large area of land for employment development and no exceptional circumstances exist.</p> <p>Attention is also drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor.</p> <p>In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal of the site from the Green Belt.</p> <p>The proposed Midlands Air Ambulance Charity (MAAC) site appears to have difference references in different documents and no clarification is given as to which references/assessments apply to it.</p> <p>There is also concern that the draft Local Plan does not specify the size of land being proposed for the MAAC or how this relates to the specific needs put forward by MAAC (assume it is 18ha based on the change to the size of the site between this and previous consultations, however the Flood Risk Assessment for RAF Cosford (which includes the MAAC site) refers to a total site of 218ha, meaning the MAAC site is 15ha). It is essential that there is no discrepancy in the precise amount of land proposed to be removed from the Green Belt and the minimum amount of Green Belt is used to meet the stated need.</p> <p>Note that in the summary of the Strategic Sites consultation, no reference is made to a representation from the MAAC and it is unclear when the site promotion occurred.</p> <p>MAAC evidence has not been made available for consideration by the public to assess the detailed case being put forward to justify the sites removal from the Green Belt. Because this is not brownfield (like the rest of RAF Cosford) but greenfield, it is considered essential that the specific needs of the MAAC can be assessed, to justify the allocation of this site. Particularly, important is evidence about the minimum site area required. Without such justification exceptional circumstances for the release of this amount of land cannot be proven.</p> <p>MAAC information provided to the local community suggests they do not need the size of site proposed nor intend all the development stated to occur. This supports concerns that written evidence from the MAAC should be published so there is no ambiguity regarding specific needs for exceptional circumstances to be established.</p> <p>It is also a concern that the site forms part of the RAF Cosford Strategic Site and not a stand alone site, meaning the Council cannot ensure the site is only developed by the MAAC. Once removed from the Green Belt, it can be developed for any purpose, including residential (see earlier comments regarding the wider RAF Cosford Site). This could prejudice the position of the MAAC, as the landowner may consider it more advantageous under proposed policies in the Plan, to develop it for alternative more profitable uses than MAAC.</p> <p>If established that there is an overriding need for MAAC to relocate here, no opportunity for accommodation on the existing RAF Cosford site and there are no alternatives outside the Green Belt, then the site proposed should be the minimum necessary to meet their needs and it should be allocated separately from the wider RAF Cosford site.</p> <p>This would protect the site from alternative development should MAAC not develop, or in the future to retain planning control over the site should MAAC cease to use it.</p> <p>This would be an identical situation to the M54 Service Area just a few miles away at Junction 4 of the M54. The service area was a specific allocation in the Green Belt because of the essential need for it at this particular site. For this reason, to ensure that planning control was retained for any other use of the site should the service area not proceed or cease in the future, it was accepted that it was appropriate to allocate the site for the precise use but keep the site within the Green Belt. Again this would also be identical to the current position with RAF Cosford where policies allow for any developments related to the current uses without having to establish exceptional circumstances, whilst retaining the site in the Green Belt to protect the Green Belt and site from uncontrolled development unrelated to the exceptional reason for allowing the site for its specific use.</p> <p>Alternatively, if this proposal is considered as an exceptional circumstance such that the land would only be approved for MAAC development, then there is no reason why the development could not be approved through the planning application process, rather than being proposed as an extension to a strategic site. This would also enable stronger planning controls to be applied to ensure that the site was solely approved for and developed for the intended purpose, which would not be possible as currently proposed in the Draft Local Plan.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0848B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0888B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	Site promotion (part of site P30) made on land north of the element of the RAF Cosford Strategic site located to the east of the A41. Land promotion document submitted in support of this representation The site is located directly adjacent to RAF Cosford which is identified as a proposed Strategic Site (adjacent to its proposed development boundary) in a small gap between the Base and the M54. As such the Site offers the potential to deliver housing for existing service personnel seeking private or affordable housing, retiring service personnel wishing to remain in the area and civilian staff who will be required to support the Strategic Objectives of the Base and the wider long term centre of excellence. It should be recognised by Shropshire Council that the living accommodation to be provided as part of the RAF Cosford site will only be made available to those in active service or on contract to the MOD. As such, there will be unmet housing demand in this locality that will not be provided by the RAF Cosford site alone. Disappointed that this site has not been assessed in its own right in the Stage 2 and 3 Assessments, despite submissions during the Strategic Sites consultation defining the site and presenting the technical case for its release. Failure to assess this site in the context of the evidence base is, inconsistent with consideration of other promoted sites which have been provided with their own site assessment numbers in the Council's Evidence Base which supports this Regulation 18 Consultation. It is impossible to make any meaningful comments on the Council's consideration of the site in terms of the Stage 2 and 3 Assessments because the site is only considered as part of a much larger parcel (Site ref. P30), within the 'Albrighton Place Plan Area.' The site should be removed from the Green Belt and allocated for housing or 'safeguarding' as it is available, in a suitable location for development, and achievable (i.e. with a realistic prospect that housing will be delivered within the plan period) and in particular that development is viable. Analysis of planning and environmental issues confirm there are no major constraints to the development of this Site and where there are potential constraints, solutions can mitigate them. If the Site is considered by Shropshire Council as a potential development opportunity, further and more detailed work would be undertaken to fully detail the Site's technical deliverability. The site is appropriate for release for residential development to meet future housing requirements in this area particularly given that the site's contribution to the aims of Green Belt mean that its release would have little impact on the operation of Green Belt in this location, especially given the clearly defined Green Belt boundaries that could be established through its release. Key considerations in terms of the positive contribution which this site can make to current and future housing needs include: <ul style="list-style-type: none"> • Accessible land to meet identified and future housing and other requirements, without the need for significant new infrastructure improvement; • Provision of non-military, market housing that will allow civilian staff, services staff, retired and other people working in supporting services to purchase property within walking distance of where they work (RAF Cosford); • Delivery of affordable housing which could be prioritised for serving and ex-services personnel; • Release of Green Belt land which has a more limited contribution to the NPPF's Green Belt purposes than other areas around RAF Cosford, particularly given the defensible boundary provided by the M54, Newport Road and established woodland planting; • Ability to deliver sustainable housing development in co-location with a strategic level employment allocation within the M54 corridor; • Opportunity to identify this Site as safeguarded land, to ensure sufficient land is taken out of the Green Belt and avoid the risk of successive reviews in any subsequent Local Plans, which would run contrary to the NPPF; • Delivery of a site which is located sustainably and can be readily linked into the wider, existing transport network; • Unlocking the opportunity to enhance the Site and its wider setting through improved/diversified landscaping of retained open areas; • Opportunity to improve/enhance the level of accessible publicly available open space, enhancing its quality, general condition and providing opportunities for better, natural surveillance; • Opportunity to enhance biodiversity and implement an ecological mitigation/improvement scheme to develop ecological connectivity within the Site, and beyond the Site's boundary; • Opportunity to create a landscape framework to be implemented which incorporates green infrastructure corridors; • Delivery of development within the M54 corridor to assist in meeting identified cross-boundary housing need; and • Reducing pressure on a constrained Albrighton for further housing to support the growth of Cosford Air Base, thus helping to protect the gap between these two areas. RAF Cosford is a major part of the Defence College of Technical Training (DCTT). It is at the centre of the RAF's mission to deliver flexible, affordable, modern and effective technical training that meets the needs of the UK's Armed Forces now and into the future. In addition, as part of its future strategy, it is understood that the DCTT is reviewing capacity at RAF Cosford, and it is estimated that over the next 10+ years RAF Cosford could see in the region of an additional 1,500 people (staff and student population), which could potentially increase further, dependant on the outcome of the ongoing work. In order to make the site more sustainable the delivery of range of housing options should be considered in the context of the current local plan review as this level of growth will bring with it demand for housing within walking distance of the Base. The Midlands Air Ambulance Charity (MAAC) also require a new headquarters, which will facilitate co-location of MAAC operations in the Midlands. The location within the RAF Strategic Site will therefore help to provide further opportunities to improve the charity's operation; essential public emergency services; key fundraising facilities which will help to transform their potential to host events; and high quality modern training facilities and office accommodation. Proposals for RAF Cosford provide for new, mixed-use facilities, including training facilities; technical accommodation and domestic accommodation. Draft Policy S21 also notes that proposals for new development and the intensification of the use of RAF Cosford are expected to be for military use and non-profit making uses rather than acting as a contribution to meeting Shropshire's future housing growth needs. The Proposals therefore focus on providing education opportunities, access to a skilled workforce, opportunities for the co-location of supply chain and opportunities for complementary employment offer, facilitating economic growth aspirations in the east of the County and therefore helping to complement and facilitate delivery of the Economic Growth Strategy. To deliver on these objectives, particularly in terms of the benefits accrued from retaining local talent within the M54 Growth Corridor, there will be a need to provide non-military, open market housing that will allow civilian staff, military staff, retired and people working in supporting services to purchase property close to where they work. The current development boundary proposed does not include sufficient land to deliver such open market housing in either the short or long term. This site offers the opportunity to deliver this critical component to support wider strategic objectives for the base and enable people working at the site to walk to work and with the chance to put down real roots by investing in local housing. As such, Shropshire should look to safeguard this site to allow consideration for potential allocation within the next Local Plan iteration. Draft Policy S21(c) also states 'any development required to support the expansion of The RAF Museum Cosford will be of a high-quality design and layout which will complement existing iconic museum buildings and the relationship with an operational airfield.' We believe that an adjacent housing offer would help to support the expansion of the Museum, which will adopt a high quality and sustainable design, in line with the Policies' development objectives and site guidelines as defined within a future high-level overarching masterplan. One of the key objectives from reviewing Shropshire Council's Economic Growth Strategy is to retain more highly trained people in the County. To underpin this, appropriately located housing is essential. By providing improved access to housing for both private sale and prioritised affordable provision, staying in the County becomes more likely.
A0888B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	See wider response.
A1102B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1103B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1104B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1105B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1152B49	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	Do not agree that there is any need to remove the RAF Cosford site from the Green Belt. The existing policy for RAF Cosford has enabled development to take place there over the years without too much difficulty. Why is it therefore necessary to remove the base from the Green Belt? This proposed removal carries the risk that if the military use ceases, the whole area could be redeveloped, without the protection of Green Belt status. While this is currently deemed unlikely by the Council, were the site to be removed from the Green Belt it is hard to see how protection against non-military development would be enforced. In addition, we also do not agree that there is any proven need to remove the whole of the additional MAAC Element of the Strategic Site from the Green Belt. The area proposed appears to be considerably greater than is required by the actual needs of the MAAC. There should also be protection in place to prevent the use of the area for anything other than MAAC purposes.
A1189B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1200B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1200B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	A strong-objection is made to the proposal to remove the site from the Green Belt. It is considered that there has been no change in circumstances (and certain) not the exceptional circumstances required to justify removal from the Green Belt) The current local plan policies specifically permit the specific developments proposed for the site. Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt, Military and museum proposals have not materially changed from the previous local plan. The Plan primarily refers to specific military, museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. Concern that the site is mentioned in the Shropshire Council Invest in Shropshire brochure, which it would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development. Current Covid 19 concerns make it premature to remove the land from the Green belt on the basis of increased economic activity, especially as there is plentiful supply of employment land in Telford and the M54 corridor
A1200B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No specific site detail is provided or assessments of the land made which make comment on the site difficult. Also concern the Plan doesn't specify the specific sites or needs of the MAAC on the site. It is noted that there was no mention in the Strategic Sites consultation response summary that any comment had been received from MAAC regarding a new site. No indication or evidence has been published as to when MAAC submitted details that led to Shropshire Council allocating this site subsequent to the Strategic Sites consultation, nor has that MAAC evidence been made available for the public to be able to assess the detailed case being put forward by MAAC to justify the sites removal from the Green Belt. Information received direct from MAAC to representatives from the local community states that they do not require the size of land proposed to be removed from the Green Belt, nor intend all the development stated to be required for the site. A further concern is that the site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. Shropshire Council have no controls to ensure that the site is only developed for MAAC. If it can be established that there is an overriding need for MAAC to relocate here, that the site proposed is the minimum necessary to meet that need, and that no alternative site is available outside the Green Belt or within the existing RAF Cosford, then the site should not be included as part of the RAF Cosford Strategic Site, but given a separate and specific location. This would be an identical situation to the M54 Service Area just a few miles away at Junction 4 of the M54. The service area was a specific allocation in the Green Belt because of the essential need for it at this particular site. For this reason, to ensure that planning control was retained for any other use of the site should the service area not proceed or cease in the future. Alternatively, if this proposal is considered as an exceptional circumstance such that the land would only be approved for MAAC development, then there is no reason why the development could not be approved through the planning application process, rather than being proposed as an extension to a strategic site. This would also enable stronger planning controls to be applied to ensure that the site was solely approved for, and developed for the intended purpose, which would not be possible as currently proposed in the Draft Pre Submission Plan.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1201B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1201B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	A strong-objection is made to the proposal to remove the site from the Green Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt) The current local plan policies specifically permit the specific developments proposed for the site. Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt, Military and museum proposals have not materially changed from the previous local plan. The Plan primarily refers to specific military, museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. Concern that the site is mentioned in the Shropshire Council Invest in Shropshire brochure, which it would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development. Current Covid 19 concerns make it premature to remove the land from the Green belt on the basis of increased economic activity, especially as there is plentiful supply of employment land in Telford and the M54 corridor
A1201B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No specific site detail is provided or assessments of the land made which make comment on the site difficult. Also concern the Plan doesn't specify the specific sites or needs of the MAAC on the site. It is noted that there was no mention in the Strategic Sites consultation response summary that any comment had been received from MAAC regarding a new site. No indication or evidence has been published as to when MAAC submitted details that led to Shropshire Council allocating this site subsequent to the Strategic Sites consultation, nor has that MAAC evidence been made available for the public to be able to assess the detailed case being put forward by MAAC to justify the sites removal from the Green Belt. Information received direct from MAAC to representatives from the local community states that they do not require the size of land proposed to be removed from the Green Belt, nor intend all the development stated to be required for the site. A further concern is that the site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. Shropshire Council have no controls to ensure that the site is only developed for MAAC. If it can be established that there is an overriding need for MAAC to relocate here, that the site proposed is the minimum necessary to meet that need, and that no alternative site is available outside the Green Belt or within the existing RAF Cosford, then the site should not be included as part of the RAF Cosford Strategic Site, but given a separate and specific location. This would be an identical situation to the M54 Service Area just a few miles away at Junction 4 of the M54. The service area was a specific allocation in the Green Belt because of the essential need for it at this particular site. For this reason, to ensure that planning control was retained for any other use of the site should the service area not proceed or cease in the future. Alternatively, if this proposal is considered as an exceptional circumstance such that the land would only be approved for MAAC development, then there is no reason why the development could not be approved through the planning application process, rather than being proposed as an extension to a strategic site. This would also enable stronger planning controls to be applied to ensure that the site was solely approved for, and developed for the intended purpose, which would not be possible as currently proposed in the Draft Pre Submission Plan.
A1202B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1202B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	A strong-objection is made to the proposal to remove the site from the Green Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt) The current local plan policies specifically permit the specific developments proposed for the site. Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt, Military and museum proposals have not materially changed from the previous local plan. The Plan primarily refers to specific military, museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. Concern that the site is mentioned in the Shropshire Council Invest in Shropshire brochure, which it would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development. Current Covid 19 concerns make it premature to remove the land from the Green belt on the basis of increased economic activity, especially as there is plentiful supply of employment land in Telford and the M54 corridor
A1202B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No specific site detail is provided or assessments of the land made which make comment on the site difficult. Also concern the Plan doesn't specify the specific sites or needs of the MAAC on the site. It is noted that there was no mention in the Strategic Sites consultation response summary that any comment had been received from MAAC regarding a new site. No indication or evidence has been published as to when MAAC submitted details that led to Shropshire Council allocating this site subsequent to the Strategic Sites consultation, nor has that MAAC evidence been made available for the public to be able to assess the detailed case being put forward by MAAC to justify the sites removal from the Green Belt. Information received direct from MAAC to representatives from the local community states that they do not require the size of land proposed to be removed from the Green Belt, nor intend all the development stated to be required for the site. A further concern is that the site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. Shropshire Council have no controls to ensure that the site is only developed for MAAC. If it can be established that there is an overriding need for MAAC to relocate here, that the site proposed is the minimum necessary to meet that need, and that no alternative site is available outside the Green Belt or within the existing RAF Cosford, then the site should not be included as part of the RAF Cosford Strategic Site, but given a separate and specific location. This would be an identical situation to the M54 Service Area just a few miles away at Junction 4 of the M54. The service area was a specific allocation in the Green Belt because of the essential need for it at this particular site. For this reason, to ensure that planning control was retained for any other use of the site should the service area not proceed or cease in the future. Alternatively, if this proposal is considered as an exceptional circumstance such that the land would only be approved for MAAC development, then there is no reason why the development could not be approved through the planning application process, rather than being proposed as an extension to a strategic site. This would also enable stronger planning controls to be applied to ensure that the site was solely approved for, and developed for the intended purpose, which would not be possible as currently proposed in the Draft Pre Submission Plan.
A1203B	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1204B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1209B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1210B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1213B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1214B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1215B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1216B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford? if this proposal is considered as an exceptional circumstance such that the land would only be approved for MAAC development, then there is no reason why the development could not be approved through the planning application process, rather than being proposed as an extension to a strategic site.
A1235B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported.
A1235B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	Object to the removal of RAF Cosford from the Green Belt for the following reasons: since the Bridgnorth Local Plan (BLP) reviewed the Green Belt there has been no change in circumstances to justify releasing the RAF base from the Green Belt; BLP applied special policies for development on RAF Cosford and so the Green Belt designation did not prevent development on the base, current policies CS5 and MD6 could be used in a similar way to permit development for the RAF and its Aviation Academy, Museum and other the MoD development as a major contributor to the Shropshire economy; whilst a Defence Review is underway this is not a change in circumstance since the BLP was also prepared during a Defence Review and the Defence proposals are rarely fully implemented but if they were a CS5/MD6 policy approach would enable the necessary development to be delivered. This leads to the conclusion that there are no exceptional circumstances for releasing RAF Cosford from the Green Belt because the development required by the MoD could be permitted under local policies. Statements in the Local Plan indicate the intended purpose for releasing RAF Cosford from the Green Belt. This is to establish RAF Cosford as a Strategic Site inset into the Green Belt to permit future, large scale, windfall employment development in the M54 Corridor without requiring very special circumstances under national Green Belt policy. This purpose is evidenced by: RAF Cosford is identified on the Invest in Shropshire web-site as an opportunity site for future investment; removing the Green Belt designation is a predetermined decision to permit unrestricted employment development on the base under Policies SP2, SP12, SP13, SP14 and S1.1 (which requires employment land to be provided on the base) and this is endorsed by RAF Cosford being named in two of the Strategic Corridors. The Local Plan should identify whether RAF Cosford is being released to facilitate MoD developments to enhance the role of the base or to promote the site for future employment development through Invest in Shropshire. Removing the Green Belt designation will release 203ha of land but this should not happen until the SEGS 2017-2021 is reviewed and until the effects of Covid-19 on our employment land supply are better understood. There is a plentiful supply of employment land in Telford, Wolverhampton and South Staffs without releasing RAF Cosford and attracting an unrealistic range and scale of employment uses to the RAF base.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1235B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>Object to release of Green Belt land for the MAAC without evidence of their exceptional needs and justification for the amount of Green Belt land released for this purpose at Tong.</p> <p>There is no simple summary of the amount of land being released. This has to be calculated by comparing the Local Plan summary of all Green Belt land releases and the Green Belt land releases in the proposals for the RAF Cosford Strategic Site. These do not give a consistent figure because comparing the Preferred Option (203ha of Green Belt land) with the Reg 18 Plan (221ha of Green Belt land) suggests 18ha and comparing with the RAF Cosford Strategic Flood Risk Assessment (218ha of Green Belt land) suggests 15ha. The minimum amount of Green Belt land required by the MAAC must be identified.</p> <p>There is no authoritative summary of the stated purpose and the original date of the MAAC request to release Green Belt land for their use. MAAC must be required to explain: the detailed case for their new operating base and why they require Green Belt land instead of using land within RAF Cosford; the precise, minimum quantity of land required for their new operating base with a justification setting out the different uses and their individual land requirements within the new base. These are essential requirements to evidence any exceptional circumstances for the amount of Green Belt suggested for the new MAAC operating base.</p> <p>It appears the new operational base for the MAAC is being promoted in the RAF Cosford Strategic Site to provide additional land for any employment uses or possibly residential uses should the MAAC proposal not be implemented. The potential for unrestricted development following the removal of the Green Belt designation could possibly persuade the landowner not to sell the land to the MAAC. To prevent this happening, the MAAC must establish: a compelling case to locate their new operating base in the Green Belt; the minimum quantity of land needed for the new base; that there are no suitable, alternative sites within RAF Cosford or in locations outside the Green Belt.</p> <p>If Green Belt land is released for the MAAC it should be a separate allocation to the RAF Cosford Strategic Site. The MAAC allocation should retain the Green Belt designation and local policies should be used to permit development on the allocation. The Green Belt designation can then be used to control the use of the land if the MAAC does not relocate to the allocation or if the MAAC uses ceases in future.</p> <p>This approach to the MAAC development was used in the Bridgnorth Local Plan for the M54 Knowle Bank Services and to control development at RAF Cosford. This retains control over the use of the land where proposed uses are not implemented or existing uses cease to operate. However, if the MAAC proposal can establish exceptional circumstances for development in the Green Belt, why does it not form part of the RAF Cosford Strategic Site rather than being an extension to the proposals for the RAF base. If the MAAC came forward as a planning application within the Strategic Site, there is a strong case to ensure the land is only used for the MAAC base, which is more than the Draft Plan will achieve.</p> <p>Please note: Parcel References for this land are different in various documents which makes it difficult to identify the correct site assessments for the land.</p> <p>Explanations given in the Local Plan and at a public meeting identify some inconsistencies in the proposed land release for MAAC. It has been accepted by officers of the Council that the proposed land release is too large for the new MAAC base. It was then suggested that the additional land might provide further development land for MoD uses. However, the Green Belt Exceptional Circumstances Statement advocates the land only for use by the MAAC. The Draft Plan states that military uses will only be located within the RAF Cosford land being released from the Green Belt.</p> <p>The Council have also failed to identify: the employment land needs in the wider area; how additional employment development on unused land within the MAAC proposal might satisfy national and local policies on sustainability and how residential uses in this locality would be prevented especially given the degree of flexibility apparent in some of the Draft Plan policies.</p>
A1261B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1390B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1392B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1395B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1395B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1395B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1396B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1397B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1398B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1399B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1401B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1402B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1403B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1406B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported. The decision to reject the proposals by Bradford Estate to release 500 acres of prime Green Belt land at Junc. 3 of the M54 is sound. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford? Proposal to release 36 acres of prime Green Belt land for development at the bottom of Neachley Lane is not supported as this land area exceeds the needs of MAAC even though their service is much needed. This release of Green Belt land will cause moderate to high harm to the Green Belt.</p>
A1407B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p>
A1407B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>Object to the removal of RAF Cosford from the Green Belt for the following reasons: since the Bridgnorth Local Plan (BLP) reviewed the Green Belt there has been no change in circumstances to justify releasing the RAF base from the Green Belt; BLP applied special policies for development on RAF Cosford and so the Green Belt designation did not prevent development on the base, current policies CS5 and MD6 could be used in a similar way to permit development for the RAF and its Aviation Academy, Museum and other the MoD development as a major contributor to the Shropshire economy; whilst a Defence Review is underway this is not a change in circumstance since the BLP was also prepared during a Defence Review and the Defence proposals are rarely fully implemented but if they were a CS5/MD6 policy approach would enable the necessary development to be delivered. This leads to the conclusion that there are no exceptional circumstances for releasing RAF Cosford from the Green Belt because the development required by the MoD could be permitted under local policies.</p> <p>Statements in the Local Plan indicate the intended purpose for releasing RAF Cosford from the Green Belt. This is to establish RAF Cosford as a Strategic Site inset into the Green Belt to permit future, large scale, windfall employment development in the M54 Corridor without requiring very special circumstances under national Green Belt policy.</p> <p>This purpose is evidence by: RAF Cosford is identified on the Invest in Shropshire web-site as an opportunity site for future investment; removing the Green Belt designation is a predetermined decision to permit unrestricted employment development on the base under Policies SP2, SP12, SP13, SP14 and S1.1 (which requires employment land to be provided on the base) and this is endorsed by RAF Cosford being named in two of the Strategic Corridors.</p> <p>The Local Plan should identify whether RAF Cosford is being released to facilitate MoD developments to enhance the role of the base or to promote the site for future employment development through Invest in Shropshire. Removing the Green Belt designation will release 203ha of land but this should not happen until the SEG5 2017-2021 is reviewed and until the effects of Covid-19 on our employment land supply are better understood. There is a plentiful supply of employment land in Telford, Wolverhampton and South Staffs without releasing RAF Cosford and attracting an unrealistic range and scale of employment uses to the RAF base.</p>

Page 352

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1407B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>Object to release of Green Belt land for the MAAC without evidence of their exceptional needs and justification for the amount of Green Belt land released for this purpose at Tong.</p> <p>There is no simple summary of the amount of land being released. This has to be calculated by comparing the Local Plan summary of all Green Belt land releases and the Green Belt land releases in the proposals for the RAF Cosford Strategic Site. These do not give a consistent figure because comparing the Preferred Option (203ha of Green Belt land) with the Reg 18 Plan (221ha of Green Belt land) suggests 18ha and comparing with the RAF Cosford Strategic Flood Risk Assessment (218ha of Green Belt land) suggests 15ha. The minimum amount of Green Belt land required by the MAAC must be identified.</p> <p>There is no authoritative summary of the stated purpose and the original date of the MAAC request to release Green Belt land for their use. MAAC must be required to explain: the detailed case for their new operating base and why they require Green Belt land instead of using land within RAF Cosford; the precise, minimum quantity of land required for their new operating base with a justification setting out the different uses and their individual land requirements within the new base. These are essential requirements to evidence any exceptional circumstances for the amount of Green Belt suggested for the new MAAC operating base.</p> <p>It appears the new operational base for the MAAC is being promoted in the RAF Cosford Strategic Site to provide additional land for any employment uses or possibly residential uses should the MAAC proposal not be implemented. The potential for unrestricted development following the removal of the Green Belt designation could possibly persuade the landowner not to sell the land to the MAAC. To prevent this happening, the MAAC must establish: a compelling case to locate their new operating base in the Green Belt; the minimum quantity of land needed for the new base; that there are no suitable, alternative sites within RAF Cosford or in locations outside the Green Belt.</p> <p>If Green Belt land is released for the MAAC it should be a separate allocation to the RAF Cosford Strategic Site. The MAAC allocation should retain the Green Belt designation and local policies should be used to permit development on the allocation. The Green Belt designation can then be used to control the use of the land if the MAAC does not relocate to the allocation or if the MAAC uses ceases in future.</p> <p>This approach to the MAAC development was used in the Bridgnorth Local Plan for the M54 Knowle Bank Services and to control development at RAF Cosford. This retains control over the use of the land where proposed uses are not implemented or existing uses cease to operate. However, if the MAAC proposal can establish exceptional circumstances for development in the Green Belt, why does it not form part of the RAF Cosford Strategic Site rather than being an extension to the proposals for the RAF base. If the MAAC came forward as a planning application within the Strategic Site, there is a strong case to ensure the land is only used for the MAAC base, which is more than the Draft Plan will achieve.</p> <p>Please note: Parcel References for this land are different in various documents which makes it difficult to identify the correct site assessments for the land.</p> <p>Explanations given in the Local Plan and at a public meeting identify some inconsistencies in the proposed land release for MAAC. It has been accepted by officers of the Council that the proposed land release is too large for the new MAAC base. It was then suggested that the additional land might provide further development land for MoD uses. However, the Green Belt Exceptional Circumstances Statement advocates the land only for use by the MAAC. The Draft Plan states that military uses will only be located within the RAF Cosford land being released from the Green Belt.</p> <p>The Council have also failed to identify: the employment land needs in the wider area; how additional employment development on unused land within the MAAC proposal might satisfy national and local policies on sustainability and how residential uses in this locality would be prevented especially given the degree of flexibility apparent in some of the Draft Plan policies.</p>
A1408B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported.
A1408B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>Object to the removal of RAF Cosford from the Green Belt for the following reasons: since the Bridgnorth Local Plan (BLP) reviewed the Green Belt there has been no change in circumstances to justify releasing the RAF base from the Green Belt; BLP applied special policies for development on RAF Cosford and so the Green Belt designation did not prevent development on the base, current policies CS5 and MD6 could be used in a similar way to permit development for the RAF and its Aviation Academy, Museum and other the MoD development as a major contributor to the Shropshire economy; whilst a Defence Review is underway this is not a change in circumstance since the BLP was also prepared during a Defence Review and the Defence proposals are rarely fully implemented but if they were a CS5/MD6 policy approach would enable the necessary development to be delivered. This leads to the conclusion that there are no exceptional circumstances for releasing RAF Cosford from the Green Belt because the development required by the MoD could be permitted under local policies.</p> <p>Statements in the Local Plan indicate the intended purpose for releasing RAF Cosford from the Green Belt. This is to establish RAF Cosford as a Strategic Site inset into the Green Belt to permit future, large scale, windfall employment development in the M54 Corridor without requiring very special circumstances under national Green Belt policy. This purpose is evidence by: RAF Cosford is identified on the Invest in Shropshire web-site as an opportunity site for future investment; removing the Green Belt designation is a predetermined decision to permit unrestricted employment development on the base under Policies SP2, SP12, SP13, SP14 and S1.1 (which requires employment land to be provided on the base) and this is endorsed by RAF Cosford being named in two of the Strategic Corridors.</p> <p>The Local Plan should identify whether RAF Cosford is being released to facilitate MoD developments to enhance the role of the base or to promote the site for future employment development through Invest in Shropshire. Removing the Green Belt designation will release 203ha of land but this should not happen until the SEGS 2017-2021 is reviewed and until the effects of Covid-19 on our employment land supply are better understood. There is a plentiful supply of employment land in Telford, Wolverhampton and South Staffs without releasing RAF Cosford and attracting an unrealistic range and scale of employment uses to the RAF base.</p>
A1408B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>Object to release of Green Belt land for the MAAC without evidence of their exceptional needs and justification for the amount of Green Belt land released for this purpose at Tong.</p> <p>There is no simple summary of the amount of land being released. This has to be calculated by comparing the Local Plan summary of all Green Belt land releases and the Green Belt land releases in the proposals for the RAF Cosford Strategic Site. These do not give a consistent figure because comparing the Preferred Option (203ha of Green Belt land) with the Reg 18 Plan (221ha of Green Belt land) suggests 18ha and comparing with the RAF Cosford Strategic Flood Risk Assessment (218ha of Green Belt land) suggests 15ha. The minimum amount of Green Belt land required by the MAAC must be identified.</p> <p>There is no authoritative summary of the stated purpose and the original date of the MAAC request to release Green Belt land for their use. MAAC must be required to explain: the detailed case for their new operating base and why they require Green Belt land instead of using land within RAF Cosford; the precise, minimum quantity of land required for their new operating base with a justification setting out the different uses and their individual land requirements within the new base. These are essential requirements to evidence any exceptional circumstances for the amount of Green Belt suggested for the new MAAC operating base.</p> <p>It appears the new operational base for the MAAC is being promoted in the RAF Cosford Strategic Site to provide additional land for any employment uses or possibly residential uses should the MAAC proposal not be implemented. The potential for unrestricted development following the removal of the Green Belt designation could possibly persuade the landowner not to sell the land to the MAAC. To prevent this happening, the MAAC must establish: a compelling case to locate their new operating base in the Green Belt; the minimum quantity of land needed for the new base; that there are no suitable, alternative sites within RAF Cosford or in locations outside the Green Belt.</p> <p>If Green Belt land is released for the MAAC it should be a separate allocation to the RAF Cosford Strategic Site. The MAAC allocation should retain the Green Belt designation and local policies should be used to permit development on the allocation. The Green Belt designation can then be used to control the use of the land if the MAAC does not relocate to the allocation or if the MAAC uses ceases in future.</p> <p>This approach to the MAAC development was used in the Bridgnorth Local Plan for the M54 Knowle Bank Services and to control development at RAF Cosford. This retains control over the use of the land where proposed uses are not implemented or existing uses cease to operate. However, if the MAAC proposal can establish exceptional circumstances for development in the Green Belt, why does it not form part of the RAF Cosford Strategic Site rather than being an extension to the proposals for the RAF base. If the MAAC came forward as a planning application within the Strategic Site, there is a strong case to ensure the land is only used for the MAAC base, which is more than the Draft Plan will achieve.</p> <p>Please note: Parcel References for this land are different in various documents which makes it difficult to identify the correct site assessments for the land.</p> <p>Explanations given in the Local Plan and at a public meeting identify some inconsistencies in the proposed land release for MAAC. It has been accepted by officers of the Council that the proposed land release is too large for the new MAAC base. It was then suggested that the additional land might provide further development land for MoD uses. However, the Green Belt Exceptional Circumstances Statement advocates the land only for use by the MAAC. The Draft Plan states that military uses will only be located within the RAF Cosford land being released from the Green Belt.</p> <p>The Council have also failed to identify: the employment land needs in the wider area; how additional employment development on unused land within the MAAC proposal might satisfy national and local policies on sustainability and how residential uses in this locality would be prevented especially given the degree of flexibility apparent in some of the Draft Plan policies.</p>
A1409B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1410B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1411B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1412B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1413B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1414B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1415B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1416B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1417B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1418B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1419B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1420B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1448B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	Strong objection to remove the site from the Green Belt. RAF and museum have been able to develop already under the current designation so there is no need to make a major change here. The current local plan policies specifically permit specific developments proposed for the site through policy CS5 and MD6; The document mentions the Defence Review, but this occurred during the last Local Plan and didn't require a change to the green belt policy so there is no clear conclusion this review will require a change in policy; So no exceptional circumstances have been demonstrated to require a change to Green Belt policy; While the plan refers to development of military, museum and a complementary Aviation Academy being developed these will not be compromised by the site being in the Green Belt; it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specified developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained. It would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development through its Invest in Shropshire brochure. In view of the current economic climate and effects of COVID-19 on the , economy. it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non-site related developments as proposed in the Plan. Additionally does not believe there is sufficient evidence for the Proposed Midlands Air Ambulance Charity site to be relocated, and if a move is required this could be accommodated through existing policies for the green belt as was the case with the M54 Service station at Shifnal. In conclusion the development proposals for the Costford site can be accommodated through existing policy and there is no need to remove the site through a change to Green Belt policy
A1449B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1450B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1451B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1452B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1453B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1454B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1455B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1456B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1457B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1458B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1459B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1460B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1461B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1462B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1463B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1464B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1465B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1466B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1500B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1506B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
A1507B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1508B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 357 A1509B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1510B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 358 A1518B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1519B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford ."</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
A1609B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>The MAAC have put forward compelling justifications for their proposal but what is not as clear is the amount of land they require. While Shropshire Council has neglected to specify how large the portion of land allocated for the MAAC development is, it has been estimated at 36 acres. Most air ambulance bases in other parts of the country a between 3 and 5 acres apart from Wiltshire AA which is between 11 and 12 acres. It was not mentioned by SC during the previous consultation and the area in question is located outside the perimeter of RAF Cosford. Contrary to what is stated by Shropshire, in the RAF Cosford Strategic Site Plan, there are not any immediate plans to merge with Tatenhill AA base in Staffordshire. They cannot afford to wait for the outcome of the Shropshire Local Plan Consultation otherwise additional funding will be lost. In order to benefit from a government grant, development of the new base needs to commence by February/March 2021 at the latest. This development does need not to be part of the RAF Cosford Strategic Site Plan, as planning permission could be sought through the normal planning application process as they are now doing, and treated as permitted development within the greenbelt. Moreover, it raises questions regarding Shropshire Council's reasons for its inclusion, particularly as there will be at least 16 acres of the allocation not accounted for and available for other development if it is removed from greenbelt protection.</p>
A1656B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1669B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford ."</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1670B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that 'it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 360 A1671B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that 'it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
A1673B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1674B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1675B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 361 A1676B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1778B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford "</p> <p>1.10 The Plan states that 'it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 362 A1779B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford "</p> <p>1.10 The Plan states that 'it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
A1792B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A1834B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site		<p>Consider that proposed site allocation RAF Cosford would result in a likely impact on the SRN, as such it should be subject to consultation with Highways England, and appropriately assessed in line with the Circular, to determine the extent of its potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures.</p> <p>The type of potential impact on the SRN and immediate SRN junctions likely to be impacted by each site is summarised as follows:</p> <p>RAF Cosford: traffic; M54 J3.</p> <p>Whilst we have identified the immediate SRN junctions in close proximity to the site allocations identified in the pre-submission version of the Local Plan, where a likely impact is anticipated, it should be noted that the assessments should not be limited to these junctions only and a wider extent needs to be considered based on the scale of the proposed development.</p>
A1872B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1879B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1885B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1888B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A1969B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A1970B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	The level of growth is too high for Shifnal – services would not be able to cope. Proposals do not account for existing and proposed employment areas within 10miles of the settlement. Shifnal housing growth is concealed by using low housing density and is in addition to existing consents not yet built out. Proposed safeguarded land exceeds Shifnal's future housing needs and will destroy the village atmosphere. Employment proposals will exacerbate traffic problems/ gridlocks in the town centre. Additional commuters will inevitably use travel by car and use this route. Green Belt must be retained, particularly to the west. Site assessments have been inadequate, there are contradictions and missing evidence. The plan is contradictory and difficult to navigate. Support the decision not to proceed with development at Tong. 36 acre site for Air Ambulance appears excessive in comparison with other site:
A2037B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	1. RAF Cosford excluding Air Ambulance Proposed Site 1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here. 1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy. 1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future 1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt. 1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt. 1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained. 1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites. 1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors. 1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford ". 1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site". 1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here. 1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan 1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt. 2. Proposed Midlands Air Ambulance Charity Site 2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site. 2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2038B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 364 A2039B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2040B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 365 A2041B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2042B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 366 A2043B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2044B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 367 A2045B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2046B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 368 A2047B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2048B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 369 A2049B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2050B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 370 A2051B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2052B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 371 A2053B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt ib respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2054B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
Page 372 A2055B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green, Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited ' defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at..RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2056B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy C85 states that limited 'defence related development will be permitted, SAMDev policy MDS not only permits additional development for military uses but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MOD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities. there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current . policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the Future</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MDG in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.</p> <p>1.5 The Plan primarily refers to specific military museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational Site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.</p> <p>1.8 By defining the site as a Strategic Site without any restriction tying future - development proposals to those specifically stated in the Plan. proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that economic growth and investment will be . supported in...strategic sites; windfall class B employment development... will be supported... if located on a Strategic Site"; the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a significant location in the Shropshire Green Belt in respect of two of these corridors.</p> <p>1.9 The Plan also states that Shropshire Economic Growth Strategy seeks to promote a step change in the capacity and productivity of the local economy. The strategic corridors the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified Strategic Sites at RAF Cosford .</p> <p>1.10 The Plan states that 'it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at...RAF . Cosford...and future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt 'new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site".</p> <p>1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.</p> <p>1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non site-related developments as proposed in the Plan</p> <p>1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21 ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site,- refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p>
A2061B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	The 36a provision looks excessive.
A2091B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2097B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2201B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. The plan for Shifnal demands a level of growth that will swamp available roads, health services, schools and rail services. .</p> <p>2. The plan for Shifnal takes no account of huge employment zones already planned within 10 mile radius. (duty to cooperate).</p> <p>3.The size of Shifnal housing growth is concealed by using low housing density and it comes on top of houses already approved and not built. This will give Shifnal growth of 54% compared with 23% for the Shropshire area.</p> <p>4.The proposed safeguarded land area (equivalent to 130 football pitches) far exceeds Shifnals future local housing needs and will destroy Shifnal village atmosphere for ever.</p> <p>5.The suggested scale of the industrial development will exacerbate'the traf]40g1rcidlock already experienced in the town centre at peak periods as the resulting additional commuters will inevitably travel by car using this route</p> <p>6.The green belt must be retained, especially to the west side, and protected to prevent Shifnal becoming another suburb of Telford.</p> <p>7.Most of the Shifnal land earmarked for housing and industrial is being removed from the green belt with inadequate assessment of }402oodinCg,02 generation, climate change, air quality, loss of prime farmland and other environmental considerations.</p> <p>8. The presentation of this plan is riddled with contradictions, missing evidence and an effective denial of public access.</p> <p>9. We support the decision not to proceed with the Bradford Estates proposals at Tong.</p> <p>10. The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air amulance sites are 2-3 acre:</p>
A2205B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. The plan for Shifnal demands a level of growth that will swamp available roads, health services, schools and rail services. .</p> <p>2. The plan for Shifnal takes no account of huge employment zones already planned within 10 mile radius. (duty to cooperate).</p> <p>3.The size of Shifnal housing growth is concealed by using low housing density and it comes on top of houses already approved and not built. This will give Shifnal growth of 54% compared with 23% for the Shropshire area.</p> <p>4.The proposed safeguarded land area (equivalent to 130 football pitches) far exceeds Shifnals future local housing needs and will destroy Shifnal village atmosphere for ever.</p> <p>5.The suggested scale of the industrial development will exacerbate'the traf]40g1rcidlock already experienced in the town centre at peak periods as the resulting additional commuters will inevitably travel by car using this route</p> <p>6.The green belt must be retained, especially to the west side, and protected to prevent Shifnal becoming another suburb of Telford.</p> <p>7.Most of the Shifnal land earmarked for housing and industrial is being removed from the green belt with inadequate assessment of }402oodinCg,02 generation, climate change, air quality, loss of prime farmland and other environmental considerations.</p> <p>8. The presentation of this plan is riddled with contradictions, missing evidence and an effective denial of public access.</p> <p>9. We support the decision not to proceed with the Bradford Estates proposals at Tong.</p> <p>10. The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air amulance sites are 2-3 acre:</p>
A2206B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. The plan for Shifnal demands a level of growth that will swamp available roads, health services, schools and rail services. .</p> <p>2. The plan for Shifnal takes no account of huge employment zones already planned within 10 mile radius. (duty to cooperate).</p> <p>3.The size of Shifnal housing growth is concealed by using low housing density and it comes on top of houses already approved and not built. This will give Shifnal growth of 54% compared with 23% for the Shropshire area.</p> <p>4.The proposed safeguarded land area (equivalent to 130 football pitches) far exceeds Shifnals future local housing needs and will destroy Shifnal village atmosphere for ever.</p> <p>5.The suggested scale of the industrial development will exacerbate'the traf]40g1rcidlock already experienced in the town centre at peak periods as the resulting additional commuters will inevitably travel by car using this route</p> <p>6.The green belt must be retained, especially to the west side, and protected to prevent Shifnal becoming another suburb of Telford.</p> <p>7.Most of the Shifnal land earmarked for housing and industrial is being removed from the green belt with inadequate assessment of }402oodinCg,02 generation, climate change, air quality, loss of prime farmland and other environmental considerations.</p> <p>8. The presentation of this plan is riddled with contradictions, missing evidence and an effective denial of public access.</p> <p>9. We support the decision not to proceed with the Bradford Estates proposals at Tong.</p> <p>10. The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air amulance sites are 2-3 acre:</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2207B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. The plan for Shifnal demands a level of growth that will swamp available roads, health services, schools and rail services. .</p> <p>2. The plan for Shifnal takes no account of huge employment zones already planned within 10 mile radius. (duty to cooperate).</p> <p>3.The size of Shifnal housing growth is concealed by using low housing density and it comes on top of houses already approved and not built. This will give Shifnal growth of 54% compared with 23% for the Shropshire area.</p> <p>4.The proposed safeguarded land area (equivalent to 130 football pitches) far exceeds Shifnals future local housing needs and will destroy Shifnal village atmosphere for ever.</p> <p>5.The suggested scale of the industrial development will exacerbate'the trafj40g1rcidlock already experienced in the town centre at peak periods as the resulting additional commuters will inevitably travel by car using this route</p> <p>6.The green belt must be retained, especially to the west side, and protected to prevent Shifnal becoming another suburb of Telford.</p> <p>7.Most of the Shifnal land earmarked for housing and industrial is being removed from the green belt with inadequate assessment of j402oodinCg.02 generation, climate change, air quality, loss of prime farmland and other environmental considerations.</p> <p>8. The presentation of this plan is riddled with contradictions, missing evidence and an effective denial of public access.</p> <p>9. We support the decision not to proceed with the Bradford Estates proposals at Tong.</p> <p>10. The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air amulance sites are 2-3 acre</p>
A2208B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2210B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2211B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2212B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2213B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2214B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2215B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2216B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2218B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2219B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2222B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2223B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2224B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2225B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2225B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2227B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2228B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2229B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2230B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2231B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2232B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?

Page 374

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2235B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2236B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2237B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2238B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2239B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2240B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2241B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2242B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2243B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2244B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2305B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
Page 375 A2308B28	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>Support inclusion of RAF Cosford as a strategic site.</p> <p>Removal of the majority of RAF Cosford from the Green Belt and the support for defence related development provided via this draft policy will assist in reducing planning risk for MOD and will ultimately support delivery of national defence requirements at the station.</p> <p>Additional information should be added to settlement policies where a proposed allocation falls within a designated safeguarding zone. This will provide clarity for applicants and ensure potential impacts on defence interests are considered, in line with para 95 of the NPPF:</p> <p>RAF Cosford: Safeguard Zone - RAF Cosford Plan AT ANY DEVELOPMENT, 15.2m.</p> <p>Part 4 of the draft Policy: Proposes a requirement for a high-level overarching masterplan which will "be prepared and then adopted by Shropshire Council". This should be clarified to make it clear such a masterplan will be developed with involvement from landowners of the site. Suggest the sentence is amended to include "... working closely with landowners / site operators".</p> <p>Draft Criterion B: Support recognition that any development on the area of the site identified for the Midlands Air Ambulance Charity (MAAC) must not adversely impact on Ministry of Defence (MOD) operations at RAF Cosford.</p> <p>Criterion F: Recognise the need for appropriate pedestrian and cycle links within the site and support recognition that part of the site is restricted in terms of public access, given that it is "within the wire". There is also the issue of considering sustainable travel options into Albrighton, ensuring site users can safely access schools, shops, work and facilities in the village. Suggest the following is included at the end of this criterion: "Consideration should also be given to opportunities for improvements to pedestrian and cycle links into Albrighton."</p> <p>Draft Criterion G: There are a number of undeveloped areas within the boundary of the proposed RAF Cosford Strategic Site, concerned that this criterion could reduce opportunities for expansion if all "open space" (which is not defined) needs to be maintained or compensatory provision made. Furthermore, it is not clear whether sports pitches are included within the definition of open space for the purposes of this criterion. Should there be a change in operational requirement which led to a reduction in the requirement for sports provision at the Station, it would be inappropriate for the draft Local Plan to require any loss of such provision to be re-provided if there was no longer a defence related requirement for it. Consider this criterion lacks clarity and has the potential to be overly restrictive and should be removed.</p> <p>Criterion H: Recognise need for appropriate green infrastructure provision and support recognition that part of the site is restricted in terms of public access given that it is "within the wire".</p> <p>Criterion L: Concerned this is the same criterion as that for the two strategic settlements, therefore it does not acknowledge the key difference: this is an existing development which will remain in use by three separate key users (MOD, RAF Museum and the MAAC), not a site for wholesale redevelopment like Clive Barracks and the former Ironbridge Power Station. Reference to "the site" incorporating sustainable drainage could be read as requiring retrospective application of sustainable drainage features to the existing built form, which would be unreasonable and onerous. Suggest the first part of the criterion is amended to read: "Development proposals will look to incorporate appropriate sustainable drainage..."</p> <p>Criterion M: Para 138 of the NPPF sets out a requirement for compensatory improvements to environmental quality and accessibility of remaining Green Belt land to offset the impact of removing land from the Green Belt. Understand the purpose of this criterion is to address this requirement. However there is a need for clarity because it has the potential to be overly onerous, confusing and creates uncertainty given it refers to the requirements of Policy DP25: Green Belt and Safeguarded Land, however RAF Cosford Strategic Site is proposed for removal from the Green Belt. Furthermore, this criterion applies to "any development proposals", which fails to take into account that RAF Cosford is an existing, developed and operational site rather than a site which will be subject to wholesale redevelopment. Whilst major development could come forward on the site in the future as set out within the draft policy, there will also be more minor development associated with maintaining or extending the existing buildings on the site, or for meeting new requirements. The criterion as currently written could require minor applications for small-scale development to provide improvements to Green Belt boundaries, which appears overly onerous.</p> <p>The RAF Cosford Strategic Site differs from other sites allocated within the draft Local Plan as apart from the area to be utilised by the MAAC, the site is already significantly developed and will continue in its current use, rather than being a site for wholesale redevelopment. RAF Cosford is an existing, operational defence site and therefore it is already a viable site.</p> <p>Turning to future development, RAF Cosford is key operational site for the MOD and has an enduring role to play in national defence. Future proposals will be assessed as they come forward to ensure that they are affordable and represent value for money. Highlighted some concerns with the detail of draft Policy S21, should those issues be addressed there appears to be no significant issue with the viability or deliverability of the site from the MOD perspective, taking into account the policy requirements of the plan.</p> <p>Appendix 7 of the Draft Local Plan indicates that the RAF Cosford Strategic Site will be delivered over all time periods within the plan period and also post 2038. This assumption is considered to be correct. RAF Cosford is an existing, operational defence site and as such is likely to see development brought forward across the plan period and beyond, whether this is required to expand / intensify the defence use of the site or help to maintain / support existing site uses and activities.</p>
				A2309B2
A2314B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2320B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2321B15	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>Policy S21: Strategic Site: RAF Cosford</p> <p>6.1 Vistry welcome the identification of RAF Cosford as a strategic site which as set out throughout these representation and within the report enclosed at Appendix 2, its allocation aligns with significant national and local support with a realistic opportunity that the site could build upon the wider success along the M54 growth Corridor such as that at i54.</p> <p>6.2 As identified in Policy S21 the strategic allocation of RAF Cosford: "will facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton"</p> <p>6.3 A key element of the strategic allocation of RAF Cosford is the incorporation of the MOD plans to relocate the No.4 School of Technical Training from MOD St Athan to RAF Cosford as set out within the 'Better Defence Estate Strategy'. This is a considerable move which the Draft Plan identifies could see in the region of an additional 1,500 people (staff and student population) on site (subject to ongoing work).</p> <p>6.4 This increase in working population within RAF Cosford on top of the existing population and wider growth of the site through other new business activities resulting from the strategic allocation could be significant. This is particularly critical given a 'St Athan Development Brief' document prepared by the Welsh Government and MOD to inform the Vale of Glamorgan Local Plan process (July 2006), identified a site population of just over 10,000 personnel made up of trainers and trainees. While we appreciate that this data reflects operations at a given time, Vistry consider, that the identification of RAF Cosford as an 'internationally renowned facility' incorporating the relocation of the No.4 School of Technical Training, amongst a wide range of related industries, in a key location on the M54 growth corridor could lead to additional population on site far in excess of the rudimentary indicated 1,500 people.</p> <p>6.5 Vistry therefore consider that the full potential of the Strategic Allocation of RAF Cosford has not been realised making it impossible to fully appreciate the associated requirements for supporting infrastructure provision and specifically, the impact upon local housing need. There is clearly a correlation here between an increase in the working population at RAF Cosford, and:</p> <p>"Recognising the relationship between Albrighton and the nearby Strategic Site at RAF Cosford, with many employees and personnel based at RAF Cosford choosing to live in Albrighton" (Paragraph 5.15, Draft Local Plan)</p> <p>6.6 Alongside wider comments set out within these representations, Vistry consider that the draft plan should identify more sites for development in sustainable locations which will be able to assist in sustainably meeting the housing needs associated with the strategic allocation of RAF Cosford, such as land to the east of Newport Road, Albrighton.</p> <p>6.7 Even in the event that the Council do not agree with the wider comments around the suppression of housing delivery within Albrighton, Vistry consider that in the context of a relatively unquantified level of growth at RAF Cosford, the draft plan should as a very minimum identify additional sites for safeguarding in sustainable locations around Albrighton, which should RAF Cosford grow exponentially, sustainable and accessible sites are able to come forward and meet the associated identified housing need.</p>
A2328B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A2382B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A2383B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	<p>No development at Tong is supported.</p> <p>There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?</p>
A2405B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site		<p>Agree with draft Policy S21, subject to suggested amendments.</p> <p>Strongly support proposed inclusion of Midlands Air Ambulance Charity (MAAC) site as part of the RAF Cosford Strategic Site addressed within draft Policy S21.</p> <p>Proposed release of RAF Cosford (including the MAAC site) from the Green Belt as a Strategic Site is supported. The evident and robust nature of the exceptional circumstances cited by the Council in its evidence base is supported.</p> <p>Suggest the following amendments to draft Policy S21 to ensure it is positively prepared, fully justified and facilitates/ensures the viability and deliverability of planned investment at the site:</p> <ul style="list-style-type: none"> -Remove the requirement for a high level overarching masterplan to coordinate delivery of the RAF Cosford Strategic Site. Rather each component of the strategic site should simply develop a masterplan. Consider this requirement conflicts with para 16 of the NPPF which requires plan making to be deliverable and positively prepared, as it negatively impact on deliverability of the proposed allocation (particularly given the varying timescales for progressing developments and the need to engage multiple landowners in this process). Requiring masterplans for each component of the site and in compliance with overarching site guidelines would ensure deliverability and allow each component to come forward in accordance with individual operational timescales. Through compliance with overarching site guidelines and engagement between key stakeholders it can be ensured no conflict will arise and sustainable development is achieved. -Support wording of para 4b of the draft policy, which is clear and unambiguous. It also allows design flexibility for proposals. It is also consistent with para 16 of the NPPF. -Make it clear that any improvements to the railway station should be commensurate and viable (rather than appropriate). Remove reference to station car parking and instead reference facilities such as cycle parking. Consider that the day to day operations of the MAAC development will not have a material impact on Cosford Railway Station. Suggested amendments will ensure future development proposals are viable and the draft policy is deliverable (in accordance with para 16 of the NPPF); that any improvements are commensurate to arising impacts of each specific development; and include the potential for facility improvements including cycle parking. -Amend references to pedestrian and cycle links through the strategic site to through each component and individual masterplan across the strategic site. -Improvements to pedestrian and cycle links should be determined by available evidence at the Planning Application stage, rather than required within the draft Policy. -With regard to consideration/mitigation of noise, odour and contaminated land, this should be where required on the basis of survey evidence and reflect the nature of the development proposal. To ensure this draft policy requirement is clear, additional clarification is necessary (in accordance with para 16 of the NPPF). The MAAC element of the proposed Strategic Site is greenfield land where there is no known contamination. Need to ensure there is no onerous requirement for technical evidence where this is not necessary to ensure the achievement of sustainable development. -The explanation to the draft policy should be updated to more accurately reflect the purpose of the new MAAC headquarters. -Consider the extent of the proposed allocation (specifically the area proposed for the MAAC) should be amended to reflect the extent of the site required to provide the proposed headquarters/airbase. The size, amount and nature of development required to meet MAAC essential operational requirements have been very carefully considered and this process has identified a requirement for an area of approximately 8.3ha (smaller than the area identified within the proposed allocation). The extent of this area is identified within an Appendix to this representation. No further land is required to meet the essential operational requirements of the Charity. <p>The Local Plan Review must be positively prepared, justified, effective and consistent with national policy.</p>
A2413B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	<p>1. RAF Cosford excluding Air Ambulance Proposed Site</p> <p>1.1 A strong objection is made to the proposal to remove the site from the Green Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.</p> <p>1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy CS5 states that limited defence related development will be permitted, SAMDev policy MD6 not only permits additional development for military uses, but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MoD and RAF, but also that required for the Museum and the proposed Aviation Academy.</p> <p>1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities, there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the future.</p> <p>1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MD6 in SAMDev, will continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt. 1.5 The Plan primarily refers to specific military, museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.</p> <p>1.6 However, despite the statements suggesting specific developments only for the site, it is noted that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.</p> <p>1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites. 1.8 By defining the site as a Strategic Site without any restriction tying future development proposals to those specifically stated in the Plan, proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that "economic growth and investment will be supported in...strategic sites"; "windfall Class B employment development... will be supported... if located on a Strategic Site"; "the Council's objective is to prioritise significant new development into ...identified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a "significant location in the Shropshire Green Belt" in respect of two of these corridors. 1.9 The Plan also states that "Shropshire Economic Growth Strategy seeks to promote a 'step change' in the capacity and productivity of the local economy. The 'strategic corridors' have the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified 'Strategic Sites' at RAF Cosford ...".</p> <p>1.10 The Plan states that "it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at...RAF Cosford...". And "future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt"; "new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site". 1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council's Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here. 1.12 In view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non-site related developments as proposed in the Plan. 1.13 Attention is drawn to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include 21ha at Hortonwood, Telford, 24ha at Featherstone, 24ha on the second phase of i54 adjacent to Junction 2 of the M54, 10ha at Newport Shropshire and the West Midlands Interchange which is said would create 8500 jobs. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its specific local needs, and so would not constitute exceptional circumstances for the removal of the site from the Green Belt.</p> <p>2. Proposed Midlands Air Ambulance Charity Site</p> <p>2.1 Different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.</p> <p>2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site, refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.</p> <p>2.3 It is noted that there was no mention in the Strategic Sites consultation response summary that any comment had been received from MAAC regarding a new site. No indication or evidence has been published as to when MAAC submitted details that led to Shropshire Council allocating this site subsequent to the Strategic Sites consultation, nor has that MAAC evidence been made available for the public to be able to assess the detailed case being put forward by MAAC to justify the site's removal from the Green Belt. Because this is not brownfield RAF Cosford land but greenfield Green Belt, it is considered essential that the specific needs of the MAAC can be assessed, to justify the allocation of this site. Particularly, there is no evidence given from the MAAC saying the minimum area of land they require and how this is justified amongst the different elements of their requirements for the site. Without such justification, exceptional circumstances for the release of this amount of land cannot be proven. 2.4 Information received direct from MAAC to representatives from the local community states that they do not require the size of land proposed to be removed from the Green Belt, nor intend all the development stated to be required for the site. This supports the concerns that written evidence from the MAAC should be required to be made public so that there is no ambiguity in their specific needs for exceptional circumstances to be established. 2.5 A further concern is that the site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. Shropshire</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2478B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site		No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A2487B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Agree	I support the decision not to proceed with the Bradford Estates proposals at Tong. The 36 acre provision for the Midlands Air Ambulance at Tong appears excessive. No current plans are available to justify the size of the development and both the existing site in Cosford and other air ambulance sites are 2-3 acres.
A2506B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Draft Policy S21 RAF Cosford Strategic Site	Disagree	No development at Tong is supported. There is no justification for the scale of the MAAC site at Tong? or RAF Cosford?
A0004B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Concerned about availability of evidence base and impact this has on 'proper' consultation.
A0008B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Supports growth. This form of positive planning has supported our own long term investment in North Shropshire where we are investing in a new 132kV circuit from Oswestry substation to an upgraded Wem substation. The injection of additional capacity into North Shropshire will support the levels of growth proposed. Furthermore, the improvements will facilitate other changes needed in the network to meet new demands on the network in transitioning to net zero and therefore contribute to meeting those objectives in the Local Plan for creating a more sustainable environment.
A0015B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	I would like Shropshire Council to commit in the Local Plan that all cycling infrastructure in Shropshire (whether funded by the council, a private organisation or others) will be built to the standards presented in LTN 1/20 (this document has only just been released by the Department for Transport).
A0031B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Asks whether Boraton Bank is in the Plan.
A0037B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Shropshire Council have not published any Statements of Common Ground (SOCG) on the progress of their Duty to Cooperate on the single cross-border issue of supporting unmet housing in the emerging Black Country Plan. Paragraph 2.24 of the Draft Shropshire Local Plan (DSLPL) states that "Positive conversations with relevant bodies have been ongoing over the course of the preparation of the Plan, and ahead of the submission of the Plan for Examination a full set of Statements of Common Ground will be made available". This position is contrary to para 27 of the NPPF and current NPPG which require SOCGs to be made public throughout the plan-making process and before publication of the draft plan. Only 5 letters covering correspondence between Shropshire Council and the Association of Black Country Authorities (ABCA) have been specifically made available to the public in the index of the main evidence base documents. However, a more significant letter dated 27 February 2020 has been included under Appendix 1 of the Green Belt Release: Exceptional Circumstances Statement. This detailed and more up to date letter should have been included with the other correspondence in the the index of the main evidence base documents as it is unlikely that the public will have had the time to read through and consider all of the supporting Local Plan documents. This letter calls for responses by 20 March 2020 and copies of these should also have been published. It appears a very generous offer by Shropshire Council to include a provision of 1,500 dwellings to support the housing needs of the emerging Black Country Plan. The information included in the consultation document is not sufficient to form an opinion without the publication of the Statements of Common Ground and these should have been placed in the public domain over the course of the preparation of the Local Plan. The published consultation documents are silent regarding any reciprocal arrangements which have been proposed/agreed with adjacent Local Authorities and which will benefit Shropshire Council. It appears to be a very generous offer by Shropshire Council to include a provision of 1,500 dwellings to support the housing needs of the emerging Black Country Plan. The information included in the consultation document is not sufficient to form an opinion without the publication of the Statements of Common Ground and these should have been placed in the public domain over the course of the preparation of the Local Plan. The published consultation documents are silent regarding any reciprocal arrangements which have been proposed/agreed with adjacent Local Authorities and which will benefit Shropshire Council. In order for the public to understand the positive conversations and negotiations that have taken place over the past 3/4 years it is essential that all SOCGs are published before the end of this consultation period.
A0045B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Pre-submission Plan does not meet the Shropshire Test SP1. We need affordable housing that is zero carbon emission and enhances local areas. The Council should not be promoting housing schemes that just lead to more road pollution and the detriment of the environment.
A0045B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Consultation process is not accessible to everyday residents. Instructions are unfriendly and unhelpful. Process seems to be designed to put people off. Process is flawed and planned developments should not go ahead.
A0068B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Not clear how feedback is to be submitted. Wealth of technical and opaque documents not accessible to non-experts.
A0068B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Questions how environmental issues are considered in allocation of land for housing; traffic, services and facilities, public transport. Development leads to more traffic which causes pollution. Council's zero carbon aspirations are just words. The needs of young adults and poorer people are not considered - we desperately need more affordable homes. The Plan does not include the North West Relief Road which would only generate more traffic and is unnecessary because decent retail provision should have been made on the west side of town. The same applies to commercial traffic.
A0101B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Support the Strategic Policies, particularly SP2 and SP5. 30,800 dwellings is appropriate and that the strategic proposals for the distribution of development is sound.
A0101B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	From our knowledge of many of the sites concerned we believe that the allocations proposed are generally sound and well-reasoned.
A0114B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	National Grid should be consulted on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets (gas or electricity transmission). National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets and guidance is available during your policy development.
A0120B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	The Council should ensure that its policies are appropriately updated before enabling any future development in order to provide more exacting road specification requirements and deal with residential light pollution issues caused by streetlighting policy

Page 377

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0123B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	I write to express grave concern about a lack of clarity in the process of consultation on the Draft Local Plan for Shropshire and to express equal concern about the inaccessibility of the evidence and the format for responding. I express this concern after having been personally involved in organising procedures for consultation over many decades. I also do so on the basis of comments from numerous members of the public some of whom, including graduates, have sought my help to navigate this confusing consultation process. I recognise the unhelpful staff to which your department has been subjected and the pressure that colleagues must experience. However, I would suggest that this simply makes it even more important to give careful attention to the clarity of the questions asked and the nature of the responses required in the consultation. For ease of comprehension I will briefly outline my main concerns. 1. The consultation took place amid the Covid-19 emergency which limited contacts 2. The time schedule was limited and fell across a holiday season 3. The online nature of consultation made it inaccessible to many 4. Those able to access the system had to trawl through a large complex document 5. Many wishing to respond on local issues found its broad nature intimidating 6. The language used in the documents made it inaccessible to many 7. The pages on the document did not match those in the index 8. Comment realistically demanded the ability to print relevant sections for reference 9. The response forms were themselves complex and off-putting 10. Reference to a guidance document added further complexity 11. The tick boxes on Form B Q1 were liable to misinterpretation 12. On Form B Q2 it was not clear how many boxes should be filled 13. On Form B Q3 the questions are potentially ambiguous 14. The request for evidence and information was off-putting to many 15. The 034Wvoerdrisio0n3d5id not always provide for paragraphs to aid clarity 16. There were some problems in successfully submitting the forms 17. There was no fail-safe formal acknowledgement of submissions Sadly, the potential problems with this Consultation process do not end there. The lack of clarity in the questions means that the public is denied any opportunity to assess the way in which the responses are tabulated and judgments made on their validity. This is a particular concern where purely local issues are concerned where respondents have been denied the opportunity to provide simple feedback. It is perhaps not surprising, therefore, that some have begun to believe that the consultation process was deliberately made obscure, and non-specific in terms of local issues, in order to ensure that the plans in relation to particular localities are not subject to any major change. I trust that you will receive feedback on the nature of these criticisms and will ensure that your processes are designed to be more inclusive and comprehensible in future. It is also vital in the interests of local democracy and accountability that respondents to any consultation can have their voice heard.
A0140B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Key concern is risk of surface water flooding not taken into account as a significant environmental/physical constraint at stage 1 of SLAA, an omission which results in the Local Plan Partial Review being potentially unsound
A0159B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	All DPs should contain an explicit link to the ways they will assist in achieving net zero carbon. This is unacceptable and DPs 1-11 inclusive should be re-written to align them with the urgent need to get to net zero carbon
A0167B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Paragraphs 2.18 and 2.20 Support the Council's aspirations to create a supportive environment for economic growth and the need to carefully balance protection of the local environment and historic assets. Disagree that identification of sites have had regard to a full balance of considerations, with the aim of achieving sustainable development. The extent and nature of development/site allocations in and around Oxon Hall Caravan Park are not deemed to represent sustainable development, and will in fact have detrimental impacts on existing businesses and the wider local environment. Need to carefully consider protection of the local environment as the Local Plan progresses and ensure policies are prepared to ensure development proposals do not have detrimental impacts on adjacent land uses and the long term viability of Oxon Hall Caravan Park.
A0167B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Support the principle of the vision which alongside Plan aspirations should form a material planning consideration. Specifically the aspirations of the vision to resist development which negatively impacts on public safety, health and economic productivity. The extent and form of development proposed at SUE West and within the NWRR will result in detrimental noise and light pollution to Oxon Hall Caravan Park - destroying the tranquil and relaxing visitor experience. Concerned these proposals will undermine the future of this existing business in the longer term.
A0175B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		The line is not 'former' but in use and under re-construction. The Ordinance Survey are already in the process of correcting their maps as they regard the line as 'preserved'. Retrieving data. Wait for a few seconds, then try cutting or copying again. Since 2016 and the transfer of the Transport Works Act Order to the Cambrian Heritage Railway, the entire line should be considered operational. Any matter involving planning adjacent to the railway must take that fact into consideration and the references changed to 'Railway' so that nobody is under the illusion that trains no longer run, because they do, and this may impact on consideration of use, access and therefore viability of adjacent development
A0176B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		The map wisely shows the line of the Shrewsbury and Newport Canal. I believe that the Montgomery Canal and the Llangollen Canal should be shown similarly. The later canal should include the Whitchurch Branch of the Canal which is subject to detailed restoration proposals. In all cases the canal network is an essential & vital part of the canal network providing employment & environmental benefits to the area.
A0187B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Plan is not fit for purpose. It does not provide a positive framework necessary to guide the county towards a net zero carbon economy. There is a lack of detail, there are no targets for how much and by when and no baseline data on the county's current carbon footprint. It does not contain strategies in the 4 key areas of reducing energy demand, developing and supporting more renewable energy, promoting more plant based diets and increasing forested land, using land for carbon capture, increasing biodiversity and reducing livestock use. The need to retrofit buildings should be included. A strategy for moving people's diets to more plant based and low carbon foods should be included as part of DP30.
A0187B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate change.
A0187B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake.
A0187B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The requirement to minimise carbon emissions should be included in SP5, SP6 and SP9 in the same way as it is in SP7 and SP8
A0187B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The local plan must include details, targets and timescales for reducing car use in the county – and it doesn't. Much more support must be given to promoting and signing cycling and walking to reduce carbon emissions. A major shift is needed in transport planning to achieve active travel.
A0187B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Converting to an electric public bus service should be included in this plan.
A0187B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed.
A0188B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Plan is not fit for purpose. It does not provide a positive framework necessary to guide the county towards a net zero carbon economy. There is a lack of detail, there are no targets for how much and by when and no baseline data on the county's current carbon footprint. It does not contain strategies in the 4 key areas of reducing energy demand, developing and supporting more renewable energy, promoting more plant based diets and increasing forested land, using land for carbon capture, increasing biodiversity and reducing livestock use (respondent ref form 2). The need to retrofit buildings should be included (respondent ref form 6). A strategy for moving people's diets to more plant based and low carbon foods should be included as part of DP30.
A0188B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	All the local plan housing development strategies (not just SP5) require details of the standards of design that the council requires of developers in response to climate change (respondent ref form 3).
A0188B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake (respondent ref form 4)
A0188B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. Re-use of existing resources reduces carbon emissions (respondent ref form 5)
A0188B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The requirement to minimise carbon emissions should be included in SP5, SP6 and SP9 in the same way as it is in SP7 and SP8 (respondent ref form 7)

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0188B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref form 8)
A0189B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	CO2 emissions from transport are rising. The local plan does not set out a clear framework on how this will be tackled. Consequently the local plan must include details, targets and timescales for reducing car use in the county – and it doesn't (respondent ref form 9). A major shift in transport planning to achieve active travel is required to give equal and higher priority to walking and cycling compared to car use. The plan includes an excellent graphic depicting this, but nothing concrete or tangible in the plan to make it happen (respondent ref form 10). As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county (respondent ref form 11). Converting to an electric public bus service should be included in this plan (respondent ref form 12).
A0189B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed (respondent ref form 13).
A0231B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Since the Plan very clearly recognises the canal network crosses many threads & is extremely important and worth protecting and enhancing with reference under many different sections/ policies, this importance would be better reflected by a canal specific section The plan could very usefully define these canal corridors (Llangollen Canal, Montgomery Canal, Shrewsbury & Newport Canal and Whitchurch Branch Canal) so that the relevant lines can be easily identified. The plan should include a policy which would explicitly oppose any developments which would detract from the restoration proposals and any proposals which would harm the natural or historic environment of the corridors. This would provide clarity & avoid the danger that protection of the canals undermined by conflicting interpretations of the different policy areas.
A0238B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Document Reference BTC7: Para 2.25 states "The availability of sufficient infrastructure underpins good plan making". However, not aware of any 'Infrastructure Plan' to support the draft Local Plan or that the infrastructure required to implement the plan has been identified and costed
A0238B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Document Reference BTC10: Ref Para 5.63 implementation Plan to support the regulation 18 draft pre-submission needed. The Place Plan is inadequate for strategic policy making. Allocates funding after development has occurred, rather than planning infrastructure in advance and ensuring required funding is/will be available.
A0238B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Document Reference BTC18: Reasoning behind the growth proposed for each market town in Shropshire is not explained in the Plan or supporting documents
A0238B33	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	Document Reference BTC7: Para 2.25 states "The availability of sufficient infrastructure underpins good plan making". However, not aware of any 'Infrastructure Plan' to support the draft Local Plan or that the infrastructure required to implement the plan has been identified and costed
A0238B49	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Cover letter: Democratic & response process for the Town Council challenged by Covid 19 circumstances in particular need to consider significant late change to proposals for Bridgnorth & lengthy document via Zoom & preference would have been for in person meeting. Additionally consultation/engagement opportunity with and by the developer limited by late submission & circumstances.
A0254B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Rep refers to Housing Strategy. Have forwarded the response to the correct inbox.
A0269B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Page 6 Shropshire's Character Support objective of meeting housing needs having regard to strong sub regional ties to Herefordshire
A0269B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Page 7 Shropshire's Character Support policy approach based on Place Plan Areas
A0306B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	We would like to see more regard for the Shropshire Environment Network (SEN), both in terms of limiting impacts on priority habitat areas (core areas of SEN), in addition to identifying areas for biodiversity enhancement and net gain (restoration areas of SEN). As well as mitigation for impacts on SACs, we would like to see impacts on local wildlife sites, SWT reserves, and national and local nature reserves be accounted for. Strengthen wording wherever 'where possible' is used. Settlement policies only make up a small proportion of housing allocations; we are concerned by the areas of windfall sites and the impact these may have.
A0306B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The draft plan lacks ambition and policy wording is weak, a combination that is unlikely to deliver the biodiversity gains and carbon reductions that are needed. There is not a balanced approach to sustainability as economic growth is given priority. This is reflected in the pursuit of higher levels of growth than are actually needed. In turn this places significant pressures on towns and villages in the county that cannot sustainably accommodate the housing and employment allocations forced upon them. Main concerns: There is a lack of reference to the 25 Year Plan for the Environment, the Environment Bill, and Nature Recovery Networks; Support in the plan for the North West Relief Road and HS2 - both environmentally damaging schemes that we have major concerns with; The plan is unambitious with its target of increasing land for biodiversity by 10% - we believe that 30% of the land should be under recovery for biodiversity by 2030: Inconsiderate of accessible local natural green space for people: Underwhelming solutions to the Ecological and Climate Change Crisis: Development where a release of greenbelt would cause moderate or above risk of harm is unacceptable: Reliance on significant levels of housing being accommodated on windfall sites.
A0306B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.19 There is reference to strategies, some still in draft format, but no reference to Local Nature Recovery Strategy. Given the contribution of transport to Climate Change we have particular concerns relating to the absence of an up to date and adopted Local Transport Plan.
A0306B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	Para 2.20 We welcome the recognition of the need to respond to the Climate Emergency, and the aim to achieve sustainable development. There is an Ecological and Climate Emergency; this weighting should be duly considered in the 'full balance of considerations'.
A0306B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.28 There is an Ecological and Climate Emergency; moving towards a zero carbon economy should be occurring now to be ideally be achieved by 2038. We would suggest rewording along the following lines: 'as Shropshire moves towards completing it's progress to a zero carbon economy'.
A0310B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP10, SP11 and DP9: These policies would allow for unplanned development outside settlements. These policies specifically allow for new economic development and windfall development in the countryside and particularly adjacent to settlements in a strategic corridor and in a strategic site, undermining the stated purpose for removing the Green Belt protection. The TC supports the decision not to allocate land at J3 of the M54 as a garden village in this Plan, but notes that the wording of this policy would still allow such a development to be approved subsequently in the future. DP9 also states that Cosford (not RAF Cosford) is a key centre in the East/M54 Strategic Corridor. There is no need to in effect allow for any employment development outside settlements. These policies undermine the status of Green Belt and Safeguarded Land protection
A0310B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The Town Council question the adequacy of consultation and whether it has been supported by proportionate and appropriate evidence as required by several legal and procedural requirements. Allocation of sites have not been properly assessed. There has been pre-determination with some proposals in the Plan. Only 8 weeks has been allowed and this over the main summer holiday. It is considered that this inconsistency in consultation period is legally unsustainable. Several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half has not been put on the evidence base. It is not considered that evidence has been submitted to show that consultation responses have been taken into account and why decisions have been taken contrary to those responses. Since February the LDS available for the public to view on their website is June 2019. Inadequate time for the TC to respond to Green Infrastructure Strategy. Statement of Community Involvement (SCI) has not been updated since 2011
A0311B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system
A0311B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated
A0311B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan
A0311B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete
A0311B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0311B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:“ The design and layout of development positively responds to our changing climateand maximises any opportunities to minimise carbon emissions and make efficientuse of water, in accordance with relevant policies of this Local Plan. “Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A0311B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an ‘extensive’ bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A0318B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Agree with the Plan in general, however the LPA should assess the impact of the White Paper consultation on the Local Plan. We agree with the government that Local Plans should be focussed on where real value can be added. Plans should set clear expectations on what is required on land that is identified for development, providing confidence in future growth. The simplification of the planning process could impact the delivery of the Shropshire Local Plan and therefore delaying the submission of the Plan would provide time to consider the implications of any significant changes to the national planning system. The proposed submission of the Shropshire Local Plan is timetabled to take place in early 2021; therefore, prematurity of the potential revisions should be considered. The amendments to the Infrastructure Levy are unclear in the emerging policy document how this will be accommodated in Shropshire.
A0323B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete (respondent ref; Form 4)
A0323B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding.It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county’s carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether (respondent ref; Form 5)
A0323B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:“ The design and layout of development positively responds to our changing climateand maximises any opportunities to minimise carbon emissions and make efficientuse of water, in accordance with relevant policies of this Local Plan. “Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A0323B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an ‘extensive’ bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A0323B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system (respondent ref; Form 11)
A0323B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The need for electric vehicle charging points is acknowledged in a number of places .Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn’t this aim – and more - included in the local plan The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them.A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated ((respondent ref; Form 12)
A0323B13	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	It is of great concern that the strategies supporting Shropshire’s economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan (respondent ref; Form 13).
A0323B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The way we use land is one of the four key net carbon zero strategies. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. We have enough land in the UK not only for producing food but to offer new potential income streams such as biomass. Forest area could be doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas (respondent ref; Form 16)
A0341B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county’s carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether (respondent ref; Form 5)
A0341B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The greatest energy demand of buildings is in the heating of homes – so reducing energy demands of existing homes should be the highest priority for carbon emissions reduction within the housing sector.The need to retrofit existing buildings is mentioned just once in the plan within SP3:“ Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings.”This significant step to reduce carbon emissions needs to have clear targets & timescales for all properties within council’s responsibility and to commit to active advice, encourage and support home owners. Leadership and creative thinking needs to be applied; a reduction in council tax to help offset costs to home owners may be cheaper in the long term than doing nothing.To achieve net zero carbon we will need to reduce the energy demand from our buildings and industry, and put in place systems that allow us to meet this reduced energy demand with renewable energy and carbon neutral fuels.To reduce the energy demand for heating we must improve our building stock. By reducing the heat our buildings lose we will reduce the energy needed to keep them warm. Heat loss from buildings can be reduced by:• Improving insulation. • Reducing draughtiness. • Recovering heat from air leaving the building through ventilation (respondent ref; Form 6)
A0341B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:“ The design and layout of development positively responds to our changing climateand maximises any opportunities to minimise carbon emissions and make efficientuse of water, in accordance with relevant policies of this Local Plan. “Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A0341B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an ‘extensive’ bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A0341B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system (respondent ref; Form 11)
A0341B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The need for electric vehicle charging points is acknowledged in a number of places .Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn’t this aim – and more - included in the local plan The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them.A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated ((respondent ref; Form 12)
A0341B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	It is of great concern that the strategies supporting Shropshire’s economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan (respondent ref; Form 13).
A0355B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Respondant feels that this consultation has been designed in such a way that deters Shropshire residents from responding. And that planning agents will be benefiting from siter promoters by submitting support preferred sites. Local residents will countenance the likely cost of professional help in negotiating the consultation
A0356B04	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete (respondent ref; Form 4)
A0356B05	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding.It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county’s carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether (respondent ref; Form 5)
A0356B07	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:“ The design and layout of development positively responds to our changing climateand maximises any opportunities to minimise carbon emissions and make efficientuse of water, in accordance with relevant policies of this Local Plan. “Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A0356B08	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an ‘extensive’ bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0356B11	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system (respondent ref; Form 11)
A0356B12	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The need for electric vehicle charging points is acknowledged in a number of places .Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them.A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated ((respondent ref; Form 12)
A0356B13	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan (respondent ref; Form 13).
A0356B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The way we use land is one of the four key net carbon zero strategies. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. We have enough land in the UK not only for producing food but to offer new potential income streams such as biomass. Forest area could be doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas (respondent ref; Form 16)
A0413B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	This draft plan is not ambitious enough and is not giving due consideration to climate change. The council has agreed to declaring a climate emergency and needs to respond with policies that deal with the requirements for adaptation and mitigation over the time period of the plan. The UK climate change act has been amended to include reaching Net Zero Carbon emissions by 2050 or earlier if possible. The council Climate Change strategy is being developed with a target for Net Zero by 2030 for the council estate. While the Shropshire climate action partnership is setting the target for Net Zero Carbon by 2030 for the wider Shropshire emissions. The local plan should therefore have full consideration of Climate change, Protection of the natural environment and also the needs for a Sustainable Low carbon economy. These priorities must be reflected in all the Strategic and Development policies, as outlined in the NPPF.The sustainability appraisal did not show any significant negative effects and we question if some issues were not given complete consideration, such as rising carbon emissions. It is important that reviews of the plan consider the levels of demand for developments and how fast the communities need to grow. The changes to government planning policies and the requirements to deal with climate change will need to be addressed. This draft plan is only good in certain sections and is weakened by the lack of connection with other Policies, many of which are waiting to be completed, including the Climate Change Strategy,the Rural Strategy, the Housing Strategy and the Local Transport plan. Hopefully these policies will soon be available to link with the Local Plan and subsequent reviews.
A0433B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Concerned about the complexity of the consultation response process.
A0457B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Support the decision not to proceed with the Bradford Estates proposals at Tong.
A0469B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Support decision not to proceed with Bradford Estates proposal
A0486B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Gases that contribute to climate change are more than just carbon. The LPR does not reflect the Council's declaration of a Climate Emergency. There is no encouragement for the generation of renewable energy. The Plan does not give climate change the over-riding significance it deserves. There is no convincing evidence that suggested policies will deliver carbon reduction.
A0486B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The TRICS database should have been used in the decision over the location of new homes.
A0486B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	It was our understanding from discussion with officers that landscape and wind power studies would take place to define an area where windfarms could be suitable for development. Shropshire Council subsequently commissioned no studies of the wind energy potential to fulfil this statement and have not provided any explanation for this U turn and abandonment of the potential development of wind power other than that it is for Neighbourhood and Community Led Plans to determine. This clearly is practically unworkable and is clearly a negation of the Council's responsibility to ensure that net zero emissions are achieved in Shropshire. The wind energy resource in Shropshire is of regional importance. The Council's Climate Change Strategy Framework envisaged the development of wind energy for both business and community needs 12 months ago. This Plan prevents this from happening. The Plan is not compliant with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 which requires the development and use of land in the LPA's area to contribute to the mitigation of, and adaptation to, climate change. We consider the Plan to be unsound in its omission of areas suitable for wind energy.
A0491B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Consultation timing over the summer holiday was very bad and community have had no time to respond.
A0501B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climateand maximises any opportunities to minimise carbon emissions and make efficientuse of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A0501B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 2.12 " There are 15 other railway stations across Shropshire and an extensive bus network which together aim to provide accessible public transport to residents and visitors. "I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The place plans from seven towns specifically mention the need for more or improved public transport by bus for their area. The need to link up neighbouring communities by bus was frequently mentioned and one place plan calls for a train halt to be re-instated (Baschurch). I live in a town that last year had its bus service cut from 2 routes to just one. It is a town with significant hills in all directions and narrow minor roads in and out of town. These factors make it difficult for so many citizens of the town to walk or cycle – so car use has become more vital to them, not less. The elderly, young and disabled are all at a significant disadvantage in travel because of the geography and narrow roads. Calling the bus network 'extensive' is – frankly – a lie. My town does not even have a direct bus link to Shrewsbury. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Shropshire council has made considerable cuts to the county's bus service in recent years is NOT in line with aims to provide a transport service that reduces the need to use private cars. In addition, the information coming out from the council about closure / demolition (carbon footprint implications) of the existing bus station is contrary to the principle of a sustainable transport system for the county. It also invalidates claims to link up public transport systems (it's a short walk from the bus station to the train station) which is key to making it possible for people to stop using cars.The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions.
A0501B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 2.2 I was pleased to discover that Shropshire has signed up to the 'UK 100 Network' which pledges the county to secure the future for the community by shifting to 100% clean energy by 2050. Although I personally believe that 2050 is far too late, this is a positive step. So where are the plans, framework and SMART targets to make this happen? Why is this pledge not included in the local plan, together with, at least the start of, a road map to achieve this? Paragraph 2.2 states the role of the Local Plan is to translate high level objectives into meaningful and positive frameworks at the local level to inform decision-making for the benefit of the County. Including how the County moves towards a net zero carbon economy. However the plan has nothing tangible, measurable or SMART. I disagree with this paragraph because the positive statements towards climate it contains are not put into actions within the plan. They are therefore meaningless words included to make the plan appear to be addressing the most critical issue the people of Shropshire and beyond face. The plan is not fit for the purpose of moving the county towards a net zero carbon economy
A0502B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Feels that the plan is vague and doesn't reflect the climate emergency; The Plan is low in ambition compared to other authorities i.e. Warrington Community Investment Scheme; Plan ignores the opportunities offered by the Shrewsbury Big Town Plan; The plan makes no mention of local low carbon networks; The Plan proposes the encouragement to sustainability., There is no reason the Authority cannot demands higher standards than the currently down graded Building Regulations (Part L) or incorporate an enhanced "Merton Rule" as part of any planning requirement
A0504B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 2.24 DUTY TO COOPERATE (See Section 5.1, "Regulation 18 Consultation Update Report", Based upon the work carried out by Bridgnorth Plan steering group, I consider that the case for allocating an additional 1,500 homes to meet the Black Country's projected shortfall is not sound. In particular, the referenced report notes that: 4. Shropshire is not adjacent to any of the Black Country authorities. 5.Progress on the Black Country plan has stalled due to Covid-19. 6. The Black Country authorities ... Urban Capacity study ... indicates a shortfall of just under 27,000 homes, but the worst shortage is in Sandwell borough making up over half the total. The Bridgnorth area wouldn't be an obvious place to make up for that shortfall ... 8. Telford & Wrekin rejected ABCA's request in 2019 - they said there wasn't any evidence to support them contributing to the unmet Black Country Housing Need.
A0514B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Plan is too long. Policies are overly complex and prescriptive with often competing objectives. Plan should be shortened with a keener focus on meeting objectives. The reference to supplementary documents which adds a further layer of complexity. Reference to these non-development plan documents should be removed, or they should be incorporated into the policies themselves. Changes to policies needed to take account of recent national level changes to the use class order.
A0600B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Disagrees that increased housing development can be sustainable - Since the year 2,000, the world population has increased by a further 1.65 billion people. Regrettably the planet is being overrun by the human race, much as a plague of locusts decimates everything within its path. In the above circumstances, any pretence, either on the part of National Governments or Shropshire Council, that rapid housing development is substantiable is laughable, or more truly, deceitful.
A0642B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2 The role of the Local Plan is stated to be focused around sustainable development (as required by NPPF). We do not believe (as explained in our responses below) that the plan as currently developed will lead to sustainable development or address the pressing needs of the climate and biodiversity emergencies. Instead the plan will result in 'business as usual' i.e. more, edge of town, car dependent housing estates with little or no provision of public transport or facilities for active travel.
A0642B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.2 These general statements are not translated into specific, tangible, enforceable and measurable outcomes that are in line with national policy and the Council's declaration of a climate emergency in 2019. We need measurable outcomes, in particular, robust targets for reducing transport carbon. The NWWR and 30,000 new homes will generate large amounts of additional carbon. Policies that lead to an increase in carbon must be discarded. Changes must be made before the end of the Plan period (2038). The Local Plan does not give climate change the over-riding significance it so obviously deserves, it contains policies that will add to carbon emissions which is unacceptable and it does not contain convincing evidence that the suggested policies will deliver carbon reduction.
A0642B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.19 There is reference to strategies, some still in draft format, but no reference to Local Nature Recovery Strategy. Given the contribution of transport to Climate Change (37% of Shropshire's emissions) we have particular concerns relating to the absence of an up to date and adopted Local Transport Plan to inform the Local Plan. The plan cannot reference the draft Climate Change framework or emerging Local Transport Plan as these do not exist in any meaningful sense at the moment and are certainly not available as part of the evidence base for the consultation on the local plan. We are not aware of the council having a Green Infrastructure Strategy or a Cycling and Walking Infrastructure Strategy. Both of these need to be rapidly developed to inform the revised plan and referenced here.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0642B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.20 There is reference to strategies, some still in draft format, but no reference to Local Nature Recovery Strategy. Given the contribution of transport to Climate Change (37% of Shropshire's emissions) we have particular concerns relating to the absence of an up to date and adopted Local Transport Plan to inform the Local Plan. The plan cannot reference the draft Climate Change framework or emerging Local Transport Plan as these do not exist in any meaningful sense at the moment and are certainly not available as part of the evidence base for the consultation on the local plan. We are not aware of the council having a Green Infrastructure Strategy or a Cycling and Walking Infrastructure Strategy. Both of these need to be rapidly developed to inform the revised plan and referenced here.
A0642B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.26 This doesn't seem to be consistent with experience to date that Shropshire Council has generally has not supported attempts to develop such plans which explains why so few have been completed to date
A0642B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.28 The growth target is too high and not supported by the people of Shropshire. New housing will increase traffic and thus increase carbon emissions. Location for new housing should make reference to trip estimation data by different modes available on the TRICS database. The Plan must define 'right location' and not ignore the impact of car trip generation and consequent increase in transport's carbon emissions. There is an Ecological and Climate Emergency; moving towards a zero carbon economy should be occurring now in order to be achieved by 2038. We would suggest rewording along the following lines: 'as Shropshire moves towards completing its progress a zero carbon economy.' We consider that whilst some aspirations for improved building standards have been included, these are inadequate in the face of a climate emergency and largely unenforceable: there clear definition of how viability would be assessed. we contend that the provisions contained within the plan of the natural and historic environment are a completely inadequate response to the current biodiversity and climate change emergencies
A0642B25	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	All DPs should contain an explicit link to the ways they will assist in achieving net zero carbon. They do not. It is astonishing and unacceptable that DP 11 (Tourism and Leisure) fails to recognise the importance of shifting tourism car trips as much as possible to public transport and bikes. This is unacceptable and DPs1-11 inclusive should be re-written to align them with the urgent need to get to net zero carbon
A0642B48	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The Plan uses words like 'encourage' and does not appear to consider the overall effect of all development. In addition, to continue to allow developers to put in plans for paths and cycle paths on their development only without firm plans and funding to link them to wider routes and without firm plans for public transport seems to us will cement the need for car use and is a recipe for future disaster. Shropshire Council has an agreed climate emergency policy. Traffic produces the largest amount of the carbon emissions in the UK. Traffic is also responsible for most of the air pollution. A shift to electric cars will help with NO2, but they still produce PM's and, even if there is rapid uptake, most of the fleet will be non electric for many years. Half of a vehicle's PM2.5 comes from brake pad, road and tyre wear. 75% of PM10 is from wear. This is why we ask for a commitment by Shropshire Council to make it a priority to reduce traffic and to improve air quality in the County. The plea of no money to do anything does not apply if decisions are taken now for future planning. Inaction now will cost lives, produce a less healthy population, impact on the climate emergency and will cost far more to correct in the future.
A0647B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Do not agree with the assertion in para 2.12 that Shropshire has an 'extensive' bus network. 7 Place Plans specifically mention the need for more or improved public transport by bus for their area. The need to link up neighbouring communities by bus was frequently mentioned and one Place Plan calls for a train halt to be re-instated (Baschurch). The County has a high level of car ownership but reducing public transport increases the need for cars, especially in the rural areas. Draft policy DP29 lists proactive measures to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Considerable cuts have been made to the County's bus service in recent years which is not in line with aims to provide a transport service that reduces the need to use private cars. Council information about closure / demolition (carbon footprint implications) of the existing bus station is contrary to the principle of a sustainable transport system for the County. It also invalidates claims to link up public transport systems (it's a short walk from the bus station to the train station) which is key to making it possible for people to stop using cars. The draft Local Plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A0647B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures (a recent decision not to reduce speeds in Shrewsbury is unhelpful). As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated. It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. The way we use land is one of the four key net carbon zero strategies. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. We have enough land in the UK not only for producing food but to offer new potential income streams such as biomass. Forest area could be doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas.
A0648B05	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Do not agree with the assertion in para 2.12 that Shropshire has an 'extensive' bus network. 7 Place Plans specifically mention the need for more or improved public transport by bus for their area. The need to link up neighbouring communities by bus was frequently mentioned and one Place Plan calls for a train halt to be re-instated (Baschurch). The County has a high level of car ownership but reducing public transport increases the need for cars, especially in the rural areas. Draft policy DP29 lists proactive measures to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Considerable cuts have been made to the County's bus service in recent years which is not in line with aims to provide a transport service that reduces the need to use private cars. Council information about closure / demolition (carbon footprint implications) of the existing bus station is contrary to the principle of a sustainable transport system for the County. It also invalidates claims to link up public transport systems (it's a short walk from the bus station to the train station) which is key to making it possible for people to stop using cars. The draft Local Plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A0648B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures (a recent decision not to reduce speeds in Shrewsbury is unhelpful). As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated. It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. The way we use land is one of the four key net carbon zero strategies. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. We have enough land in the UK not only for producing food but to offer new potential income streams such as biomass. Forest area could be doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas.
A0666B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A0672B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Consider information in the Draft Local Plan is reasonably well presented albeit with inaccuracies. Disagrees with the way guidance and format for response has been produced. The cumbersome format required to respond to this consultation has actively reduced the numbers who will reply. This was acknowledged when email were accepted from the general public. In these difficult times it is even more necessary that opportunities to participate are readily comprehensible to encourage and permit as many as possible to get involved. Do not believe this consultation has achieved its objective.
A0685B3	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Draft policies SP4 and SP5 are supported.
A0690B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 1.2 No specific comments

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0691B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 1.2 No specific comments
A0698B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 Object to WHT037/WHT044 north of Chester Road because the development of 200 new houses will accommodate 400 people and generate 200 vehicles. This will have a deleterious effect on the quality of life of existing residents. The respondent advocates the views expressed by the Local Councillor that:
A0698B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete. There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether. An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures (a recent decision not to reduce speeds in Shrewsbury is unhelpful). As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system. The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan? The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated. It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan. The way we use land is one of the four key net carbon zero strategies. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. We have enough land in the UK not only for producing food but to offer new potential income streams such as biomass. Forest area could be doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas.
A0897B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is a legal duty to cooperate with neighbouring authorities, outlined in paras 24-27 of the NPPF Question why Shropshire Council has not yet published any Statement of Common Ground. It is contrary to para 27 of the NPPF to wait until submission before publishing any Statements of Common Ground. To avoid challenges at later stages, it is important that Shropshire Council publishes Statements of Common Ground before the Final Plan publication stage. The Association of Black Country Authorities (ABCA) point in their various letters to the close functional relationship between the Black Country and east Shropshire. ABCA note the railway linking Shropshire to the Black Country, which has stops at Cosford and Albrighton. To demonstrate it is responding to ABCA, Shropshire Council may find it helpful to increase the Albrighton settlement housing guideline, this would be supported
A0955B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 2.2 2.2 states the plan needs to deliver on affordable housing. Nowhere in the evidence have documents including the draft housing strategy explained how current local need for affordable housing will actually be monitored or really delivered. Shropshire Councils comments outside of the local plan process indicate that possibly around one third of new housing is taken up by incomers to the County and to the relatively cheap house market in Shropshire. It is apparent from national figures that the first time buyers market is flat and likely to stay so for a number of years as many new properties are being bought as investment properties and they are priced out of the market. All estate agents have investors looking for relatively lower priced property in which to invest. This is in spite of the tax environment for private landlords being less favourable than that of a few years ago. Primarily tax relieve on interest payments being at 20% rather than the previous 40% and very low buy to let mortgage rates. Shropshire's low house price environment is an attractive attraction for buy to let investors. Building more houses will not in my view help local young lower paid families achieve their ambition of home ownership. I urge Shropshire Council to do a more in-depth study of who is buying new houses and from where they are coming and to consider what policies could be put in place to ensure affordable property is not gobbled up by buy to let investors or incomers downsizing. A suggestion may be as that use in Cornwall where many affordable houses on many sites have to be sold to local people who are first time buyers and these properties can only in future be occupied by owner occupiers
A0957B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Timing of the Local Plan Review is unfortunate as Government's new White Paper "Planning for the Future" has many aspirations to simplify Local Plans and to make them more specific. If translated into law, these ideas will quickly render the Plan out-of-date. The main changes would be: a drastic shortening of the Local Plan; identification of all land as "Protected", "Re-development" or as "Growth land" (where planning permission is not needed); more early stage public consultation; less high level aims; and more specific locally agreed 'design codes'. Some changes may already be aligned with this Local Plan. Meantime, the NPPF still applies and the draft Local Plan has been extended to cover up to 2038 (2 more years than the last draft). The draft Local Plan also includes the Shrewsbury Place Plan and it economic growth appears to be the main policy driver. The number of new homes planned for Shrewsbury has also been raised to 8,625 (some 28% of population). According to CPRE, this is some 11% greater than the Government requires. However, there are likely to be new ways of identifying local housing need and may re-configure governmental requirements upwards, if the White Paper takes effect. The draft Local Plan shows few of the implications of other changes proposed, such as: those to Permitted Development Rights; Public Consultation (e.g. the belated SCI); and the trends indicated in both the Government's National Design Guide and BBBBC's Living with Beauty.
A0970B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Draft policies SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan." Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?
A0970B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 of the introduction references bus and train links. Do not agree with the assertion that Shropshire has an 'extensive' bus network. Seven Place Plans specifically mention the need for more or improved public transport by bus for their area. The need to link up neighbouring communities by bus was frequently mentioned and one Place Plan calls for a train halt to be re-instated (Baschurch). The issue becomes chicken and egg: yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. Draft Policy DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Shropshire Council has made considerable cuts to the county's bus service in recent years is NOT in line with aims to provide a transport service that reduces the need to use private cars. In addition, the information coming out from the council about closure / demolition (carbon footprint implications) of the existing bus station is contrary to the principle of a sustainable transport system for the county. It also invalidates claims to link up public transport systems (it's a short walk from the bus station to the train station) which is key to making it possible for people to stop using cars. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions.
A0981B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Para 2.28 Spatial Vision Sport England supports the reference in the Spatial Vision to the promotion of healthy communities. It is recommended that this is expanded to reference physical activity i.e.. being healthy by being physically active. This would help to underpin several of the proposed policies elsewhere in the plan including in particular, policy DP30 relating to Health and Well-Being.
A0997B11	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	We would refer you to our previous comments in respect of the 2019 Strategic Sites consultation and historic environment elements and would welcome opportunity to discuss matters further ahead of the Regulation 19 consultation. Previous comments include. 1. Objection to allocation of sites P56 in Bridgnorth, SHF0032 in Shifnal and SHR166 in Shrewsbury. 2. Concern was also raised about the proximity of the following sites to Conservation Areas: Ludlow LUD052, Hodnet HHH001 and HHH014, Knockin KCK009, Llanymynech LYH007, Whittington WHN024 and Prees PPW025.
A1101B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The way in which documents are presented on the website makes it very difficult for interested parties and members of the public to navigate, to understand which documents are important and what status they have as part of the Regulation 18 process It is not made clear that all of the documents have equal "status" as part of the Regulation 18 consultation, and furthermore it does not make it clear that the Local Plan consultation welcomes comments on these documents and the promotion of alternative sites in the same way as comments are invited on the Strategic and Settlement Policies. These deficiencies mean that there is not a level playing field in terms of the options which are being consulted on for the proposed allocation in Bridgnorth. This is a fundamental flaw in the process. The decision to consult on the proposed allocation of the Tasley Site, without making it clear that the public have the opportunity to comment on the site assessment procedure and suggested alternative sites is flawed
A1139B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	A 'cut & paste' exercise undertaken by personnel who have limited experience of the infrastructure of Shropshire. The desk – based exercise appears to have been written in isolation, not taking account of The Climate Emergency, flood issues, loss of EU Funding and the decline of retail. Do not agree with High Growth. Shropshire was an ideal area for tourism, but with this level of growth its market towns are being stripped of their identity with 'growths' adhering to their periphery. There will be no gain for the people of Shropshire, no improvements to medical provision, poorer quality of life, and decreased areas for walking and increased mental health issues. The document is biased towards landowners and developers. It is not an objective document, but a frustrating gateway to allow developers and infra – structure providers to continue delivering the lowest level of provision to the council tax payers. Other local planning authorities insist on inclusion of renewables – Why not Shropshire? The Shropshire Test has no teeth – criteria against which a proposal can be measured is required, is meaningless and there is little evidence of any planner caring about design in Shropshire. The insistence of delivering high density development results in unrealistic parking allocations, therefore, leading to parked vehicles blocking pavements and roads. There is a lack of sensitivity on the part of the planning officer is apparent in villages, such as Kinlet where Little Stocks Close boasts of hideous constructions which stand out with no attempt at screening.
A1152B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Two aims of this response are (1) to indicate areas which might be found unsound at Examination in Public, and (2) to further develop arguments touched on at earlier stages of consultation. Endorse many of the policies within the Plan but are not commenting primarily on these. We naturally concentrate on the elements of the plan with which we have reservations, although this response is necessarily selective in what we comment upon. COVID-19 has caused widespread disruption to the economy and has caused society generally to re-appraise some of its priorities. Those changes may be so great as to alter the ethos behind parts of the Local Plan, particularly the drive for economic growth. There may instead be a realisation that economic stability and a smarter approach is more sustainable than a drive for growth. COVID-19 has cause more people to work from home than was previously the case, this may have highlighted places in Shropshire that have such poor broadband connections that they inhibit the ability of people in those locations to be able to work from home. Shropshire Council should carry on trying to remedy such black-spots. COVID-19 is only referenced once in the draft Local Plan, consider it should be given greater reference. The consultation was influenced by COVID-19. No public consultation events could be held, as they had been for the previous four rounds of consultation in this LPR process. The ability of people to see physical copies of the documentation was severely restricted, because appointments had to be made at the locations where a copy of the main consultation document had been deposited; the other supporting documentation was available only on-line, subject to a fee for non-library members. Consider that proper notice has not been taken of public opinion and that the Council is pursuing its own agenda regardless of the fact that public opinion is against the high targets in the plan. Key evidence documents referenced in Appendix 3 of the draft Local Plan were not published. The Council has indicated these will be available for the formal Regulation 19 Consultation, however consider this is an inadequate response and that the non-publication of such key evidence is symptomatic of the Council's resources being stretched, and that this consultation has been launched prematurely, before all supporting evidence is fully available to the public to ensure sufficient reason is provided for proposals and adequate consideration when responding to consultation. It is noted that the Authority Monitoring Report is referenced numerous times, but the latest version is over 3 years old. It would be very helpful if the final Regulation 19 version of the Draft Plan could be issued in a format which also makes plain exactly what changes have been made to this current Regulation 18 Draft Plan.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1173B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		Response from Shrewsbury Friends of the Earth - General concern that the consultation has not been laid out in a fashion which is not easy for members of the public to followClimate Change Crisis - The plan does not give climate change the over-riding position that it must have; The development plan doesn't give fact transport is the largest source of emissions in Shropshire sufficient weight. The plan assumes that locating new development in urbanised areas is enough to claim sustainability, but evidence from recent developments shows this not to be the case. Development of safe walking and cycling routes are essential if emissions are to be reduced. We see some positive aspirations in terms of domestic emissions, but with the climate emergency we feel that all new houses should be net emitters. Maximum on site generation must be sought not an arbitrary figure. The Big Town Plan proposed a Shrewsbury Test to ensure future development is to a high standard but this idea has not been carried forward. The proposed similar idea now covering the whole county would be a way forward if it sets adequate standards and is robustly applied. If this is the case then it would be important in the move towards making developments really sustainable. Renewable energy production is critical and there is a need to identify sites for this purpose. The plan fails to address this important issueNorth West Relief Road -Significant conflict with the aspirations of the plan with the development of this road. Road will add to emissions from its development and use, and with its threat to the water supply and natural environment this scheme should be cancelled. The Natural Environment - Special consideration should be given to robustly protecting Shrewsbury's green spaces as identified by the Big Town Plan, especially if the North West Relief Road does take place. the requirement for a minimum 10% biodiversity gain is a step forward. However, for a rural county like ours a higher figure would be more appropriate. Proposals for ensuring the enhancements are carried out, assessed and maintained are inadequateNew Green Infrastructure - This is a desirable objective but giving qualitative guidance on what should be delivered is needed. Remedies for non compliance need to be considered. A General Comment on Development - The collection of DP's that cover aspects of development are full of desirable intentions which we support. However, it is evident from recent developments and current proposals that implementation is the problem. In many cases developers have managed to get permission for schemes that could have been much better and applications continue to be the same. Comments on air quality aspects of Sustainability appraisal - Believes that transport is the main contributor to air quality issues in Shropshire and so much stricter assessments of the impact of transport should be included in the plan, and air quality should be considered for every application. Summary - Shropshire Council has an agreed climate emergency policy. Traffic produces the largest amount of the carbon emissions in the UK. Traffic is also responsible for most of the air pollution and the plan must do more to reduce emissions with clear enforceable policies. climate change and biodiversity must be at the heart of the plan.
A1180B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A1180B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A1182B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A1182B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A1183B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	General comments Thank you for the opportunity to comment on the pre-submission draft of the Shropshire local plan 2016 to 2038. We wish to make some general comments and then some more specific observations. We note that there are 14 strategic policies and 35 development management policies in the document. It's unclear from the information presented how compliance within specific policy areas or effectiveness of delivery is to be evaluated and what metrics are to be collected to evidence performance in general or performance specifically in policy areas that require specific information to be collected. We note that there is understandably a focus throughout the document on sustainability but very little reference to making particularly rural communities resilient but this is also an important Planning function. Comments on this in the submission would be useful. Significant development is often preceded by a Preapplication process and our experience is that in Shropshire local input from Parish Councils is obtained late in an application process of this sort though other unitary authorities involve the "Lowest tier" of Local Government to participate early in this process. No Policy as such for how to deal with Preapplication submissions is included. We would suggest this is considered and the process around this important area of activity clearly set out. Shropshire's Character is outlined in 2.4. The introduction notes that 35% of the population live outside the Strategic, Principal or Key areas with a low population density. To deal with this geography the county is split into place plan areas which have been established historically and aim to capture infrastructure needs to some extent though have no planning status as such. We are not particularly convinced that these localised strategies actually deliver very much and suggest their performance is also monitored. The draft local plan emphasises sustainability but doesn't really have a plan for areas that are not sustainable by the criteria used. This is a significant proportion of the population of Shropshire and a section on how the Planning Process can facilitate and deliver in a "rural hinterland" is not included. This topic should be mentioned.
A1609B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Would like to understand how Shropshire Council intend to respond to all of the comments received from the Regulation 18 consultation, in such a short period of time before the Regulation 19 (publication version) is published. As Policy Officers will be aware, there is usually an 8 to 12 month period between each review phase, to allow for comments to be reviewed and factored into the next subsequent publication document. The revised LDS is therefore unrealistic and should be revised so that comments received under Regulation 18 are considered and where applicable policies are amended when the Regulation 19 (publication version) document is published.
A1609B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Shifnal Matters support Shropshire Councils decision not to allocate land at J3 for the proposals put forward by Bradford Estates to provide a so-called garden village and vast area of employment land. There are no exceptional circumstances for such a huge development in the greenbelt of some 1750 acres.
A1624B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	don't know / no opinion	Generally in support of the Local Plan and make the comment that the development in Tern Valley should be strictly adhered to
A1630B14	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Food production The paper focuses in great detail on the natural environment and includes policy on landscape, green infrastructure and water. However it lacks a focus on food production which is disappointing given the importance of farming to Shropshire's economy. Any policy that relates to land use and the natural environment should be practical and support farming, within the context of environmental and landscape benefit, including climate change adaptation. Local farm businesses should be supported as producers of sustainable local food and key delivery mechanism for landscape and biodiversity assets. The policy should include support for farm infrastructure improvements, some which will be regulatory requirements to protect the environment and is necessary for food production. These could include but is not limited to; new muck/slurry storage infrastructure to protect the water environment and reduce ammonia emissions, new grain storage facilities to meet food hygiene standards, new livestock and dairy housing to meet the latest standards on animal welfare. With agriculture occupying over 70% of the UK landmass, farm businesses play an irreplaceable role in looking after our cherished natural environment. Livestock units and residential development Where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the countryside does not result in conflict between new residents and existing farm businesses.
A1634B10	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The way we use land is one of the four key net carbon zero strategies. The UK could become more self-reliant in food, reducing imports from 42% to 17%, and so reducing the impacts of food production for our consumption elsewhere in the world. We have enough land in the UK not only for producing food but to offer new potential income streams such as biomass. Forest area could be doubled to 24% of the land area of the UK – roughly one third is unharvested and two-thirds harvested for timber. These forests, the wood products they produce and the restoration of 50% of UK peatlands, results in the capture of around 47 MtCO2e on average every year. This is required to balance the residual emissions in the scenario and so make the UK net zero carbon. The changes would also provide more room for biodiversity in wild, restored, conserved or protected areas (respondent ref; Form 16)
A1634B13	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no mention within the local plan of the need to build new homes to PassivHaus standards. This is an area that the county should be encouraging, requiring and supporting developers, housing associations and others to undertake. The excellent Callaughtons Ash development in Much Wenlock needs to be the start of this initiative, not the end of it. I disagree with this policy because it is incomplete (respondent ref; Form 4)
A1634B14	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	There is no commitment within the local plan for supporting redevelopment of existing building rather than demolishing and rebuilding. It was previously argued that demolishing an old energy-consuming building and constructing a well-insulated replacement was better for the climate. This is now accepted as wrong due to the amount of carbon emitted during the construction of the new building. The Royal Institute of Chartered Surveyors has estimated that 35 per cent of the lifecycle carbon from a typical office development is emitted before the building is even opened. It says the figure for residential premises is even higher at 51 per cent. The Oswestry Place Plan comments that the town has started a survey of empty houses. Has Shropshire council gathered similar data across the county? Understanding what is available for refurbishment and renovation is integral to measuring and then reducing the county's carbon footprint. We cannot meet the 2050 carbon emission targets unless we tackle carbon emissions in our existing building stock. Retrofit reduces operational emissions but also avoids the embodied carbon of demolition. By considering our existing built environment as stock and making use of the already existing resources, we avoid the use of new materials and their impacts altogether.
A1634B16	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A1634B17	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A1634B3	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system.
A1634B4	regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The need for electric vehicle charging points is acknowledged in a number of places. Converting to an electric public bus service should be included in this plan. Recent examples in the UK include Surrey and Maidenhead councils and so given the bid that Shropshire made earlier in 2020, why isn't this aim – and more - included in the local plan. The government is also making it easier and more convenient to take the bus through a new £20 million fund to encourage the development and trial of on-demand ride sharing services in rural and suburban areas, helping people to plan their journeys down to the minute. The fund will boost traditional services by helping people use bus travel to get closer to where they live, at a time that is convenient for them. A further £30 million of funding in 2020 to 2021 has also been confirmed for local authorities to help them improve current bus services or restore those that have been lost. Every local authority in England, outside of London, is eligible for this funding to ensure that crucial bus routes can be revived or reinvigorated.

Page 384

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1634B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	It is of great concern that the strategies supporting Shropshire's economy make no mention at all of supporting renewable industries. There is nothing in the economy sections to give any encouragement, support or commitment to the development of solar arrays, wind turbines, hydro-electric power, battery or heat storage solutions and heat networks to help meet business and community energy needs. This industry has the potential to provide significant future employment, it is a fast growing industry and brings the carbon reduction energy that is needed. This strategy requires commitment to invest in, support and encourage renewables and this is missing from the local plan (respondent ref; Form 13).
A1644B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	The Plan refers to the ageing population issue but does not then set out a specific and effective policy approach to deal with the matter going forward. For the Plan to simply say that elderly accommodation will form part of general housing allocations is unrealistic and experience shows that it simply will not happen. The Plan should identify sites for the delivery of specialised care and retirement accommodation including purpose built care communities. The delivery of purpose built accommodation for the elderly has the double benefit of not only providing more suitable accommodation for them, but also freeing up under-occupied family housing to serve the needs of the younger active sectors of the population. We recommend and request a more specific policy approach to deliver appropriate accommodation in the right locations, including specific retirement living and care communities, and the allocation of suitable sites for this.
A1647B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	The proposals constitute an appropriate strategic approach to deliver housing and employment needs within Shropshire. The strategic approach represents a positive response to the challenge identified in the Shropshire Economic Growth Strategy of promoting a 'step change' in economic activity and seeking to balance increased levels of housing growth and economic development. Should Junction 3 be identified for allocation in the future, we would expect to see robust evidence produced to support this decision.
A1649B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	The proposed allocation of 250 within Highley in particular could adversely affect congestion in Bewdley town centre. By allocating the majority of development within the strategic and principal centres, the preferred sites document appears to be consistent with sustainable development as outlined in the revised NPPF. Wyre Forest District Council has serious concerns that the future development will result in adverse pressure on existing infrastructure that is important to Wyre Forest District, such as traffic levels on the A442 from Bridgnorth to Kidderminster and additional pressure on the Dowles Road/Welch Gate Air Quality Management Area junction in Bewdley and Stourport-on-Severn. Wyre Forest would furthermore oppose any development within parcels BA5 and BA6 which are adjacent to the district.
A1834B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments		The Strategic Road Network (SRN) in Shropshire comprises the M54 motorway, the A5, A49, A458 and A483 trunk roads. The sections of the SRN most relevant to this consultation include the M54, A5, A49 and A483. The Department for Transport (DfT) Circular 02/2013 (Strategic road network and the delivery of sustainable development) (Circular) sets out how interactions with the SRN should be considered in Local Plans. Para 16 of the Circular states: "Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth." There is also a need to consider the NPPF and other relevant policies. Any potential development site which is anticipated to have an impact on the SRN should be subject to consultation with Highways England, and appropriately assessed in line with the Circular to determine the extent of potential impacts on the SRN. Depending on the scale of likely impact on the SRN, the applicant/developer may need to identify suitable mitigation measures. Note that existing SAMDev Plan allocations yet to be delivered are to be saved, as the SAMDev Plan was adopted in 2015 do not expect any further consideration of these sites. Would expect proposed new site allocations, where impacts on the operation of the SRN in the area are anticipated, to be subject to consultation with Highways England, and appropriately assessed to determine the extent of their potential impacts on the smooth functioning of the SRN in the area (the cumulative impact of the proposed site allocations also needs to be considered as per the Circular, to understand the likely traffic impacts on the SRN in the area in terms of capacity and safety, and, identifying any possible mitigation measures).
A1844B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Canals are important part of Shropshire's industrial heritage and we consider that they should be referenced in this description of the character of Shropshire.
A1844B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The policy map should be corrected to show canal network and restoration lines in Shropshire to ensure consistency with policy DP11
A1857B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	No specific comments on the whole draft Local Plan
A1896B7	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A1896B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A2150B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?"
A2150B85	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A2158B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A2173B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Hierarchy of Settlements 2020 Paras 1.3, 2.6, 5.32; Tables 1, 4, 5, Para 5.13; Para 5.41 1) Hierarchy of Settlements 2020 - Para 1.3, Para 2.6, Para 5.32 "The lower threshold for Community Hub status has remained unchanged" By reference to the first HofS 2017 Para 5.40 this threshold was set by a "3point gap" in the original Table 10 settlement scoring. As previously raised, this gap never existed; and just removing written reference to that factor determining the threshold does not correct the mistake. The Threshold must be determined by the full Hub criteria, and not by the wording introduced to support the inaccurate scoring results i.e. outcomes must be set by the policy and not the policy re-written to fit the results. We consider that is "unsound". 2) Hierarchy of Settlements 2020 - Table 1, Table 4, Table 5, and para 5.13 Library - a mobile library visiting fortnightly does not give the same community benefit to a settlement as a full or part time library premises, and therefore should not carry full 3points value Chemist/Pharmacy - a Dispensary is a legally different service, which is only provided to registered patients of a Surgery and cannot be a 'walk-in' service to the general public. Therefore it does not give the same community benefit as a chemist or pharmacy, and therefore should not carry full 3points value Post Office - a part time or mobile service does not give the same community benefit to a settlement as a permanent full hours service, and therefore should not carry full 4points value. Also, this service is noted as having a higher 'day-to-day' ranking in a rural settlement due to its "special importance" from providing "banking, convenience and comparison shopping; and often acts as a community hub". When the Post Office service is purely a counter within the only village shop, it does not give additional "convenience and comparison shopping", nor provide a "community hub" over and above that provided by the shop. Therefore it does not give that higher "special importance" community benefit to a settlement that a separate and independent provision would, and therefore should not carry full 4points value These affect the true comparison of settlements by objective assessment. 3) Hierarchy of Settlements 2020 - Para 5.34 "Shropshire Council officers then used this information to identify similarities and groupings of settlements, which in turn informed decisions on specific categories of settlement" By reference to the first HofS 2017 the threshold was set by a "3point gap" in the original Table 10 settlement scoring. That threshold remains unchanged. As previously raised, this gap never existed; and just removing written reference to that factor determining the threshold does not correct the mistake. There are clear differences between settlements proposed by the officers as Community Hubs in the HofS 2020, as opposed to similarities, which calls into question their "informed decisions". The fundamental issue is that of officer's subjective assessment and decision making in determining settlement status, rather than it being based on the objective Methodology outcomes.
A2173B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Hierarchy of Settlements 2020 Paras 1.3, 2.6, 5.32; Tables 1, 4, 5, Para 5.13; Para 5.42 3) Hierarchy of Settlements 2020 - Para 5.34 continued One of the main factors in undertaking this Local Plan Review was the SAMDev Examination Inspector's concerns on the subjective 'opt-in' decision process by Parish Councils; and the need for it to be an objective decision based on set criteria. Report to Shropshire Council by Claire Sherratt DipURP MRTPI 30 October 2015:- Identification of Community Hubs and Clusters Paras 28-43 culminating in Para43 A main modification is required to Policy MD1 to clarify the process for designation of Community Hubs and Clusters in the future which would be through a review of the SAMDev Plan or through a formal Community-led Plan or Neighbourhood Plan (MM3). This is necessary to ensure the plan is positively prepared and effective. The purpose of the Hierarchy of Settlements Methodology was to be an "appropriate and robust assessment" of settlements against the full Community Hub key criteria:- 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. Those criteria requirements have been relaxed by the insertion of additional wording into Para 5.41 by officers following the inaccurate original Table 10 scoring. That is "unsound". 4)a) Hierarchy of Settlements 2020 - Para 5.41 The relaxation of the Community Hub key criteria for multiple significant employment and peak time public transport is still included - that is "unsound" and should be removed. Lack of these will fundamental requirements will result in additional private vehicle use travel use which is contrary to the Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is contrary to the "Spatial Vision" and SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 which seeks to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions. The officer's proposal of a "larger range" of services and facilities to compensate for the lack of these fundamental criteria is not defined, and is purely subjective. It is patently obvious that facilities such as fortnightly mobile library visits, children's playgrounds, outdoor sport facilities & green space cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hub assessment "unsound" and should be removed. This is particularly relevant when considered with:- 4)b) Hierarchy of Settlements 2020 - Para 5.41 Community Hubs to offer "a good range (at least 5) of services and facilities" in conjunction with employment and peak time public transport. This threshold is clearly too low.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2173B09	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Hierarchy of Settlements 2020 Paras 1.3, 2.6, 5.32; Tables 1,4, 5, Para 5.13; Para 5.43 4)b) Hierarchy of Settlements 2020 - Para 5.41Community Hubs to offer “a good range (at least 5) of services and facilities” in conjunction with employment and peak time public transport . This threshold is clearly too low. Table 1 lists 20 services and facilities 7 Primary “essential to everyday life”, and 13 Secondary expected in larger settlements but “not needed on a day to day basis”. Requiring only “at least 5” from the 20 for designation as a “Community Hub” is clearly too low Also it is not defined whether they must be Primary or Secondary services & facilities By reference to the 2020 Table 10 the top twenty “Other Rural” Settlements (down to 34 score) have “at least 5” services and facilities, so using that figure as the Hub threshold is clearly wrong. Similarly, the requirement in Para 5.40 for Principal / Key Centres to have “a large range (at least 12)” is equally clearly set low as well. All the proposed Principal / Key Centres have at least 15 services & facilities including all 7 Primary, and all have significant employment and peak time public transport. The full Hub criteria requires services sufficient to meet the “day-to-day needs” of residents so a high proportion of the Primary services & facilities must be required to fulfil that The Hub threshold requirement for services & facilities should include a minimum of 5 Primary plus a good range (more than 6/13) of Secondary services & facilities - more than 11 total. However, it is fundamental that to be designated as Community Hubs that settlement should have both multiple significant employment and peak time public transport as required by the full Hub criteria. As an absolute minimum there must be multiple significant employment opportunities in the settlement or peak time public transport for residents to access employment elsewhere without the use of private transport. When the very low threshold of “at least 5” for Hubs is used in combination with the proposed undefined “larger range” of services & facilities to compensate for a lack of employment and peak time public transport it is clearly “unsound”. Trefonen has no “significant employment opportunities” or “peak time public transport” It is the only proposed Hub settlement with neither of these key requirements. It is contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 which seeks to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions. Therefore Trefonen should be designated “Other Rural” settlement, for which it meets the full criteria.
A2173B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Hierarchy of Settlements 2020 Paras 1.3, 2.6, 5.32; Tables 1, 4, 5, Para 5.13; Para 5.44 5) Hierarchy of Settlements 2020 - Para 2.4 and Para 4.1 Para 2.4 “The assessment methodology, assessment results and its application have been informed by public consultation and have been approved by the Shropshire Council Cabinet.” Para 4.1 “The updated methodology was approved by Shropshire Council Cabinet on 18th October 2017” We would contest the “approval” by Cabinet as the original 2017 document was voted ‘on the nod’ by Cabinet simultaneously with the Preferred Options “for consultation” document without due presentation, consideration & debate of its content or status at meeting on 18th October 2017. When this fact is considered along with the inaccuracies and flaws identified in that document which have been repeated into the 2018 and current 2020 versions, we believe that make this document “unsound” for its purpose as a “robust methodology”. 6) Hierarchy of Settlements 2020 - Table 10 scores - inaccuracies We believe that there are still numerous incorrect scoring for employment, services and facilities for several settlements (additions and omissions), including some identified by ourselves in our Preferred Options response Dec 2017 and in January 2019. This makes the assessment “unsound”. We believe that if the scoring is to be used as the initial stage in making an objective criterion based determination of settlement status then the information must be 100% correct. The HoFS Para 2.8 disclaimer “Note” that “it is not intended to represent a comprehensive assessment of all every services or facilities” just compounds the inaccuracy. This assessment underpins the decisions on the development status of settlements and their development guidelines; and therefore it is critical that it is 100% accurate. As it is not, the whole outcome is flawed and “unsound”.
A2173B19	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Hierarchy of Settlements 2020 Table 10: Highlights a series of settlements in Shropshire whose scoring on the hierarchy of settlements is thought to be incorrect.
A2177B20	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The NPPF (paras 24-27) place a duty to cooperate on Local Authorities. This should be demonstrated through preparation of statements of common ground (SoCG), which should be made public during the plan-making process for transparency. The National Planning Practice Guidance (NPPG) confirms a key element of Local Plan Examination is ensuring that there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters when Local Plans are adopted. The NPPG explains that a SoCG sets out where effective co-operation is and is not happening throughout the plan-making process. The NPPG also sets out that by the time of publication of a Draft Plan, a SoCG should be available on the Council’s website. Once published, the Council should ensure that the SoCG continues to reflect the most up-to-date position of joint working. No SoCGs accompany this Draft Local Plan consultation. The Council has stated that a full SoCG will be made available ahead of submission of the Local Plan for examination, however this is inconsistent with the NPPG. Shropshire adjoins twelve other LPAs. The HBF would expect the Council to prepare and maintain one or more SoCG with these LPAs. There is also a functional relationship with the Black Country authorities of Dudley, Sandwell, Walsall and Wolverhampton, where there is an identified unmet housing need of up to 29,000 dwellings. It is proposed that 1,500 dwellings incorporated in Shropshire’s housing requirement will support housing needs from the Black Country. There is correspondence dated 30th September 2019 from the Black Country authorities supporting the proposed strategic allocation at J3 M54 in the Shropshire Local Plan. These strategic matters should be set out in a SoCG. Before the pre-submission LPR consultation, respective SoCG should be prepared and published, at which time may comment further.
A2180B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Welcome the Plan as a whole. There are some inadequacies, where it should shift away from being car-led, stronger focus on carbon reduction (particularly due to the Climate Emergency announced by the council), design issues – more focus on quality of design is desired, the development of affordable housing and Open Space being at plan-level. Overall view is that the Plan is good with some queries outlined below.
A2194B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	‘At the core of this process is continuous and meaningful community engagement, in line with the Council’s Statement of Community Involvement (SCI).’ SWT’s Clun & BC branch committee consider that continuous and meaningful community engagement has been neither attempted nor achieved in relation to the Local Plan consultation. These long, complex documents, with unfamiliar terminology, many layered structure, and numerous appendices and cross-referenced policies require presentation to the community in many more ways, if meaningful community engagement is to be achieved. We are aware of no presentations by councillors or council staff during the consultation period, to help and guide community members, simplify and explain the structure and the means of commenting. Even highly educated, academic members of our committee have found this process and the documents overwhelming and we have serious doubts about the validity of the consultation process. Whilst we appreciate that the Covid19 Pandemic has caused interruptions in the way normal council business can be conducted, there has been significant development in citizens’ use of new technology, such as Zoom for example, which could have been capitalised on to engage the public. Also community halls have been reopening widely which would permit safe face-to-face engagement with those whose use of the internet is limited or difficult. It is difficult to believe in the reality of a desire for consultation when none of this has been offered.
A2351B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Hierarchy of Settlements 2020; Appendix 3: Key evidence SP2/SP7 Clive I am concerned about the validity and the accuracy of the Shropshire Hierarchy of Settlements 2020, a piece of key evidence informing the local plan review. The methodology of the points allocation lacks much in the way of granularity and is not in alignment with many other national councils. Many other councils do not class libraries as an “essential service” and so do not consider them in the sustainability of settlements. They also consider mobile provisions to be “transitory” and therefore do not include them. This approach would address the apparent lack of face validity in Shropshire’s points allocations. Specifically I would consider the scoring of a mobile/hosted Post Office of two hours a week to not be comparable in sustainability terms to a permanent six days a week Post Office. I am also concerned about any methodology that fails to take into account the accessibility of the settlement. Clive village is the only proposed Community Hub that is not on a main road. All access roads to Clive village are single track roads. I do not think that the local infrastructure has been meaningfully taken into account when considering Clive to be suitable for ongoing development as a Community Hub. The population of each settlement varies significantly even amongst those on the same points allocations. Some extremely small settlements score higher than considerably larger settlements which also calls into question the face validity of the methodology. Knockin scores 50 points with a population of 181 whilst Cosford/Donington with a population of over 1750 scores 48 points. The sustainability of these settlements is not comparable. A cursory look at many of the settlements show accuracy errors and inconsistent applications. For example Grinshill is scoring 3 points for a Public House that closed many years ago and that is now operating as a bed and breakfast, not open to passing trade. Clive primary school is in the Parish of Grinshill and is within a 10 minute walk of Grinshill, yet Grinshill scores no points for this amenity. The inaccurate and inconsistent approach is in my opinion, open to challenge. With the inevitable challenge to local government finances that will result from the Covid-19 pandemic I am concerned that transient subsidised services such as mobile libraries and bus services will no longer be supported. I would want reassurance that decisions on the sustainability of settlements were not being made on the basis of subsidies that were under review.
A2353B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Comments from Shrewsbury Business Chamber. Broadly in agreement with the plan, but encourages the Council to consider implications of Covid outbreak and potential changes to national planning law. Feel that it is vital that there is a continuing and expanding supply of housing within the price range of local wage levels both to purchase and rent whether that is supplied on the open market or via Affordable Housing allocations. Providing quality standards in new development is also important. Supportive of the ‘corridor’ approach to Economic development, with Shrewsbury being central to the A49, and also via the M54/A5 to West Midlands /Telford leading to Oswestry/Wrexham. Important for the plan to be flexible in the allocation of employment land to reflect changing uses. Specific comments on some Shrewsbury sites included. Encourage SC to develop gypsy site in the plan. Support for NWRR but would like to see this linked with improvements to public transport in Shrewsbury given more weight in the plan. Continued work with partners is needed to address River Severn issues of flooding and pollution.
A2365B06	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:” The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. “Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A2365B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 2.12 “ There are 15 other railway stations across Shropshire and an extensive bus network which together aim to provide accessible public transport to residents and visitors.” I do not agree with the assertion that Shropshire has an ‘extensive’ bus network. The place plans from seven towns specifically mention the need for more improved public transport by bus for their area. The need to link up neighbouring communities by bus was frequently mentioned and one place plan calls for a train halt to be re-instated (Baschurch). The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Shropshire council’s decision to make considerable cuts to the county’s bus service in recent years is not in line with aims to provide a transport service that reduces the need to use private cars. In addition, the information coming out from the council about closure / demolition (carbon footprint implications) of the existing bus station is contrary to the principle of a sustainable transport system for the county. It also invalidates claims to link up public transport systems (it’s a short walk from the bus station to the train station) which is key to making it possible for people to stop using cars. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions. A reliable and affordable public transport is vital for keeping the community connected, giving freedom to those who are too young and importantly, those too old to be driving. If we are to live within planetary boundaries, we must take steps to make the need for private cars obsolete and invest in green public transport. (response ref form 8)
A2372B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:” The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. “Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A2372B6	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	para 2.12 I do NOT agree with the assertion that Shropshire has an ‘extensive’ bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A2372B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	An item included in every single one of the eighteen place plans, is the need for speed limits and/or traffic calming measures. As well as the safety issues, reducing the speed of traffic reduces the carbon emissions as well as increasing the amount of walking and cycling. This local plan makes NO REFERENCE to strategies to reduce speed limits or provide more traffic calming measure, despite the obvious requirement throughout the county. This indicates a real lack of joined up thinking over what it really means to have an active and sustainable transport system (respondent ref; Form 11).

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2375B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The pursuit of sustainable development is at the heart of the planning process. The National Planning Policy Framework (NPPF) quotes the United Nations General Assembly in defining what this means at a strategic level: "meeting the needs of the present without compromising the ability of future generations to meet their own needs" The United Nations has set out a clear and compelling need for Shropshire, alongside the rest of the world, to achieve net zero carbon as a matter of the highest urgency, and we request that you recognise this over-riding priority in all your future plans for Shropshire unitary authority area, and the consequent need to recognise priorities for a shift in strategy from your current priority for 'economic growth' to a new priority for 'sustainable economic growth'. This means that the 'Shropshire Local Plan' must consider the carbon footprint of current and future activities and available carbon budget and priorities for addressing the climate and ecological emergency, and offer support for the new technologies and enterprises that Shropshire needs for the future. This new strategy must explicitly recognise that your draft plan targets for 2050, a generation away, do not meet the NPPF definition of sustainable development because as set out in the Paris Agreement, to allow emissions to continue would compromise the ability of the next generation to meet their needs. In particular, your draft plan reference to the planning system needing to play a full role in the achievement of 80% reduction by 2050 is out of date now that SC has recognised the climate emergency, and your own corporate proposals for net zero 2030 will be at odds with this goal. I request that you also recognise the ambition of Shropshire residents and enterprises to ensure net zero carbon by 2030 at the latest and ensure that your plans will be re-aligned to support this target. Furthermore, I request that you recognise the implications of the United Nations Paris Agreement for Shropshire as set out in the recent Tyndall report as follows: 'the recommended energy only CO2 carbon budget for the Shropshire area for the period of 2020 to 2100 is 11.5 MtCO2', and a consistent emissions reduction rate of -13.5% out to the end of the century is appropriate.' This provides an 'energy only' carbon emissions budget for Shropshire of 10.7MtCO2 from now until the end of your Local Plan period in 2038, and a further 0.8 MtCO2 during 2039 to 2100. The UK Climate Change Committee reported last year that 'Current policies and plans are insufficient to meet the fourth or fifth carbon budgets (covering 2023-2027 and 2028-2032).' There is therefore a clear and pressing need to fundamentally reconsider the policy framework in relation to any plans that Shropshire Council wishes to adopt, in the light of the need for Shropshire to achieve net zero carbon in line with the reductions required by the Paris Agreement and UK obligations under international law. The Centre for Alternative Technology, and others, have demonstrated that we have the solutions we need for net zero carbon Shropshire to be achieved by 2030: 'Our work clearly demonstrates that we already have the tools and technology needed to efficiently power the UK with 100% renewable energy, to feed ourselves sustainably and so to play our part in leaving a safe and habitable climate for our children and future generations.' We need to consider the total carbon footprint rather than purely energy emissions, enabling the broadest possible scope for planning the change programme required for this fundamental but vital shift towards sustainable development, the investment in future enterprises and households fit for the future, and the discontinuation of unsustainable practices. I request that you ensure that your plan makes reference to the need to reach zero carbon Shropshire by 2030, and that you give formal requirement for all proposals and developments and priorities in your Local Plan that achieve at least that level of carbon footprint reduction in all that you plan to do from now on. I am sure you will agree the intention in all future plans must be that activities and developments are aligned to the achievement of net zero carbon Shropshire by 2030 at the latest. The changes required will be hugely challenging, but we must seize this opportunity for Shropshire to become a truly sustainable economic success, and I welcome the support of SC for this transformation. There is an exciting opportunity for Shropshire to succeed in this new world - local solutions from local enterprises for growth & success of a Shropshire economy based on products & services that a net zero world will need, promoting sustainable economic growth of our lovely county, and wealth creation from our world class environmental technology sector, which can export sustainable solutions around the UK and around the globe. Time is pressing, the pace of change will challenge all of us, and as we know we are in last chance saloon. Whilst we make plans, Shropshire's carbon emissions continue to race out of control (as typical UK citizens our carbon footprints are more than twice the global average, with 46% of it outsourced overseas). We will burn through this century's carbon budget by 2027 if we continue on current trends. The consequences of failure to implement a ZCSP and achieve net zero carbon Shropshire by 2030 would be catastrophic. https://unfccc.int/climate-action/introduction-climate-action https://carbonbudget.manchester.ac.uk/reports/E06000051/ https://www.theccc.org.uk/wp-content/uploads/2019/07/2019-Progress-Report-Summary.pdf https://www.cat.org.uk/info-resources/zero-carbon-britain/research-reports/zero-carbon-britain-rising-to-the-climate-emergency/ https://www.wwf.org.uk/sites/default/files/2020-04/FINAL-WWF-UK_Carbon_Footprint_Analysis_Report_March_2020%20%28003%29.pdf
A2394B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	The draft LDP recognises in various places the value of the canal network in the county and that the canals are worth protecting and enhancing. Their values fall into many sections of the Policy statements but there is no overriding drawing together of the various threads/benefit. For example, the value of the canals fall into health & well being; historic environment; water; natural environment; landscape & visual amenity; strategic corridors; economic growth; tourism & culture. We suggest there is a separate policy section for the canals – perhaps like the one for the Clun Valley? – which covers all the benefits and shows how the canals' policy links in with the other policies. Reason: To avoid the possibility that the essential protection of the canals could be mired by conflicting interpretations of the different policy areas
A2398B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Broadly support the vision. The economic aims and ambitions that are set out in the plan should be endorsed by all and it is imperative that the housing and infrastructure which support growth are delivered.
A2406B2	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	Natural England considers that the Plan's vision and emerging development strategy addresses impacts on and opportunities for the natural environment and sets out the environmental ambition for the plan area. The plan takes a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity.
A2407B04	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	During the site appraisal stage and before selecting which sites to take forward as allocations in the plan, the following may be useful to ensure opportunities for biodiversity net gain are secured: • Does the site present significant risks to biodiversity? If so, have alternative sites with lesser impacts been explored? • What site specific recommendations can help delivery biodiversity net gain, for example what further survey work may be required at the planning application stage? • Whether the site can accommodate on-site biodiversity net gain provision or whether there is a need for off-site contributions? What types of habitat creation or enhancement are most appropriate? • Does there need to be any restrictions on the type of development that will be acceptable or particular parts of the site that should be not be developed? During the site selection process, potential sites should be judged in accordance with all policies in the NPPF, including selecting land with the least environmental value, where consistent with other policies.
A2407B12	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 100 and 180 of the NPPF. Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available here and are a helpful source of evidence for the Local Plan. We note that tranquillity within the Shropshire Hills AONB is covered within the plan but you may wish to consider if there are other areas.
A2422B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	In many planning situations, compromise has to be sought. However, here I believe a more drastic approach will be needed. We are sleepwalking towards chaos. My perspective is unashamedly environmental. I cannot pass by the stirring words of policies, from the NPPF onwards, without reflecting on what kind of a mess we're in; and on how great are the changes that we must make, in order to stand any hope of surviving the coming, and predicted, difficulties. I shan't waste much time repeating the texts and data. You've seen them already. My job is to not let you forget, to continue with the old ways.
A2427B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: "The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan." This requirement is not included in the standards that are applied to SP5, SP6 and SP9.
A2427B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A2440B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	spelling mistake of Llanymynech. Sympathetic development of the Canal Yard Is essential for village canal heritage area and visitors. Montgomery Waterway Restoration Trust has been represented on Llanymynech Heritage Partnership for many years and would wish to take part in community discussions about future of the canal yard and the wider development of Llanymynech as a canal destination
A2441B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	agree with spatial vision but have concerns over the vagueness of the statement. Will there be a clear definition of what constitutes well-designed, decent and affordable homes in the right location? The approved housing application for the SUE shows cramped conditions with little parking and dangerously positioned outdoor spaces and play areas. Currently the area has 3 naturalised pools dating back to the glacial period and according to the spatial vision these would be protected and enhanced but in reality they are to be filled in and houses built on them. One only has to look at the Radbrook estate to see how well a housing estate can be designed unfortunately that blueprint appears to have been discarded in favour of money in the pocket for the developer.
A2441B8	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	In principal I agree with the policy but have the following concern which I would like addressed - how will Shropshire Council move the County to a net zero carbon economy when it has an aggressive housing supply target and the proposed housing developments largely depend on the use of private cars.
A2453B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Paragraph 1.11 The SLAA appraisal was a flawed process. The cut-off benchmark for what constituted a community hub was quite arbitrary. Communities on either side of this mark could easily have disagreed with the outcome. In North Shropshire the decision to distribute more housing into smaller communities where infrastructure was more limited was mistaken. Other constituency areas had a better balance going to the larger settlements where existing infrastructure will be able to cope with new development. CIL /s106 money would have not been sufficient to cover the gaps in infrastructure. So in the north more development should have been allocated to the larger settlements. This has distorted allocations with less sustainable sites being allocated where other more sustainable sites were available within the settlement itself or in another settlement
A2454B1	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 This introductory paragraph detailed car ownership as being at a high level and then goes on to say that there is an extensive bus network in the County. The limited bus network in our parish, results in an absolute need to have access to a car or van.
A2462B03	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	In terms of Water Quality (WQ) the supporting documents are clear that: Significant infrastructure upgrades would be required to serve growth in Shrewsbury, (Strategic Centre), and Bridgnorth and Ludlow (Principal Centres) as well as a number of Key Centre and Rural Areas settlements • Some treatment works could require upgrades to ensure growth can occur without causing the flow permits to be exceeded • At many of the WwTWs in the study area planned growth would cause either a 10% deterioration in water quality or a deterioration in water framework directive class. In some cases, this could be prevented by a tightening of environmental permit and/or upgrades to treatment processes. In other cases, this would not be possible under current technically achievable limit • At other WwTW, although deterioration was not significant, there is a risk that the additional flow from growth could prevent good ecological status being achieved in the future. In WQ terms we note the intention for early engagement with Severn Trent Water and Dwr Cymru/Welsh Water to ensure capacity / upgrades in time with development / further mitigation. Therefore, putting the onus on assessing capacity at planning stage of each development.
A2462B10	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	We advise that the DLP needs to consider that SSSIs as well as N2K sites in Wales might be impacted by air pollution originating from developments in Shropshire. We are concerned about impacts on cross border sites and sites near the border with lichen/bryophyte features, particularly: Llanymynech and Llyncllys Hills SSSI • Breidden Hill SSSI • Roundton Hill SSSI • Corndon Hill SSSI • Moel y Goffa SSSI • Fenn's, Whixall, Bettisfield, Wem And Cadney Mosses SSSI (see comments on the SAC which are applicable to the SSSI). All of these sites are SSSIs only, so it is unclear how impacts on these sites from development in Shropshire will be assessed (we are conscious they are not considered by the HRA). We note the Regulation 18 Pre-Submission Draft Shropshire Local Plan 2016 to 2038 - Sustainability Appraisal and Site Assessment - Environmental Report considers the effect of site allocations upon certain SSSIs. However, any potential effect on the sites listed above does not appear to be given consideration. The background levels of ammonia and nitrogen (according to APIS) at these sites already significantly exceed the critical level and critical load for the features present. Therefore, any additional impacts from proposed development e.g. the development proposed in Llanymynech and Pant (approx. 75 dwellings), will be adding to traffic movements and residential combustion, and associated air pollution that will be further impacting on the protected sites – particularly Llanymynech and Llyncllys Hills SSSI which is within 200m of the A483 at Llanymynech/Pant. We would like to make you aware of our general concern for the River Teme SSSI and any proposals likely to pollute or abstract water from it, and the need to consult with NRW about any such proposals. Corndon Hill SSSI and Moel y Goffa SSSI support nitrogen sensitive lichen and bryophyterich habitat, although they are not known for any particular rare species so increase in nitrogen deposition would lead to increase in growth of plants that will dominate the sward reducing diversity, structure and condition of the habitats present rather than bryophyte/lichen features. This has the potential if left unmitigated by inappropriate planning to cause these sites to fall into irreversible states.
A2469B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs: " The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan." Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2469B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 "There are 15 other railway stations across Shropshire and an extensive bus network which together aim to provide accessible public transport to residents and visitors." I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The place plans from seven towns specifically mention the need for more c improved public transport by bus for their area. The need to link up neighbouring communities by bus was frequently mentioned and one place plan calls for a train halt to be re-instated (Baschurch). The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Shropshire council has made considerable cuts to the county's bus service in recent years which is NOT in line with aims to provide a transport service that reduces the need to use private cars. In addition, the information coming out from the council about closure / demolition of the existing bus station, which in itself has carbon footprint implications, is contrary to the principle of a sustainable transport system for the county. It also invalidates claims to link up public transport systems (it's a short walk from the bus station to the train station) which is key to making it possible for people to reduce their use of cars. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions.
A2470B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Don't know / no opinion	To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the revised Framework (2019).
A2471B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these building with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of the Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9? (respondent ref; Form 7)
A2471B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions (respondent ref; Form 8)
A2477B02	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Agree	The pursuit of sustainable development is at the heart of the planning process. The National Planning Policy Framework (NPPF) quotes the United Nation General Assembly in defining what this means at a strategic level: "meeting the needs of the present without compromising the ability of future generations to meet their own needs". The role of the Shropshire Local Plan is to translate this high level objective into a meaningful and positive framework at the local level to inform decision making for the benefit of the County. This relates to both strategic issues, such as the amount of growth proposed and how it is distributed, and how the County moves towards a net zero carbon economy; through to more detailed issues, such as the design and layout of new development and how environmental assets are to be protected." The respondent supports and agrees with this statement fully and without reserve.
A2489B01	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A2489B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific items about the need to design these buildings with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan." Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?
A2490B5	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A2494B07	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	SP7 and SP8 both include specific item about the need to design these buildings with reference to climate change needs:" The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan. "Why has this requirement been omitted from the standards that are applied to SP5, SP6 and SP9?
A2494B08	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Disagree	Para 2.12 I do NOT agree with the assertion that Shropshire has an 'extensive' bus network. The issue becomes chicken and egg; yes the county has a high level of car ownership but by reducing public transport, the need for a car increases, especially in the rural areas. DP29 lists proactive measures the council can take to reduce car use, but the provision of a truly extensive and comprehensive public transport system is crucial, without it the county will continue on its current trajectory of increasing carbon emissions from transport. Recent cuts to bus services and the proposed closure of the bus station are contrary to the principle of a sustainable transport system for the county. The local plan must set out the framework for a public transport service that will facilitate the reduction in car use that is vital for reducing CO2 emissions
A2177B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Appendix 5	Disagree	Appendix 5 outlines the Councils housing land supply as some 29,384 dwellings. This appears to exclude sites in draft Policies S19-S21. Before the pre-submission Local Plan consultation, the overall HLS should be clarified by the Council. Strategic policies should ensure availability of a sufficient supply of deliverable and developable land to deliver the housing requirement. Supply should meet the housing requirement, ensuring maintenance of a 5 Years Housing Land Supply (YHLS) and achieve HDT performance measurements. The Council's overall HLS should provide some flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market. There is no numerical formula to determine the appropriate quantum for a contingency but greater numerical flexibility is necessary where HLS is dependent on a few large strategic sites or locations than in cases where HLS is more diversified. The HBF always suggests as large a contingency as possible (at least 20%). If during the Local Plan Examination, any of the Council's assumptions on lapse rates, windfall allowances and delivery rates are amended or any proposed housing site allocations are removed then any built in flexibility is also reduced. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. The Council's 5 YHLS Statement dated 3rd March 2019 estimates the 5 YHLS between 2019/20 – 2023/24 against the adopted Local Plan housing requirement is 6.42 years or against the minimum LHN is 8 years (based on a stepped trajectory, Sedgefield approach to shortfalls and 5% buffer). Before the pre-submission LPR consultation, the Council should prepare and publish an updated 5 YHLS Statement for 2020/21 – 2024/25 against the proposed housing requirement and trajectory.
A0853B4	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Appendix 7	Disagree	It is noted that the Draft Plan introduced additional strategic allocations in the Regulation 18 Pre-Submission Draft which were not included within the previous 'Preferred Site' consultation, notably Clive Barracks at Tern Hill and the Former Ironbridge Power Station. Whilst we do not object to the allocation of these sites, the Council needs to realistic in its expectations for delivery. In our view the delivery forecasts for these sites suggested at Appendix 7 are very ambitious having regard to the scale of proposed developments and the significant infrastructure requirements related to new settlements. It is therefore critically important that the plan still provides a sufficient supply of deliverable sites free of constraint, which are capable of coming forward in the early and middle parts of the plan period, to ensure the Council is able to demonstrate a five-year supply on adoption and throughout the Plan period, and to meet immediate needs within the key settlements (Shrewsbury and the Principal Centres).
A2177B18	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Appendix 7	Disagree	Appendix 7 : Forecast of Delivery Timescales for Local Plan Allocations is not a housing trajectory. The NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 73). The omission of a detailed housing trajectory is inconsistent with the NPPF. Before the pre-submission LPR consultation, a housing trajectory should be incorporated into the Local Plan.
A0306B067	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Disagree	We would question the assessment of Hencott Pool and the decision that the increased buffer (now 200m) between the proposed North West Relief Road and the site is sufficient to determine that there will be no significant impacts. The construction of a major road within 200m of a site of international importance surely raises some uncertainty as to the significance of impacts. The precautionary principle is a key element of the HRA process and so at the very least the site should have progressed to stage 2. Within this assessment the possibility of windfall development (the potential for this is identified in para 5.224 of the local plan consultation document) should also be considered.
A2389B2	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Don't know / no opinion	There are also further discussions probably to be had around the Clun catchment which we have spoken about previously i.e. around possible measures/solutions and potential concerns including Natural England.
A2407B06	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Agree	We note paragraph 3.30 of the HRA "states Shropshire Council is continuing to liaise with Natural England, the Environment Agency and Severn Trent Water as well as other stakeholders to find solutions and to update the Nutrient Management plan together with the underlying evidence base. A revised nutrient management plan or action plan, providing the required certainty that mitigation measures will be implemented, would help to unlock future development. The building industry is also being encouraged to seek innovative solutions for larger developments." Natural England agrees that additional work on the Nutrient Management Plan and actions arising from it are necessary, in order to provide appropriate certainty to enable development and restore the site
A2462B04	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Disagree	We note that the HRA includes an assessment of the effects upon the Fenns & Whixall Mosses SAC and Midland Meres & Mosses Phase 2 Ramsar (paragraphs 3.71 – 3.79). The assessment appears to focus on recreational pressures on the designations. However, the designations are highly vulnerable to nitrogen deposition and are already widely in exceedance for its bryophyte-rich bog habitat and the SSSI feature Waved fork-moss Dicranum bergeri. We would advise that the HRA give further consideration to the potential for airborne emissions from new, including agricultural renovations and yard upgrade, developments.
A2462B05	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Disagree	We have concerns about the Berwyn SAC/SPA/SSSI/ NNR, where background levels of Nitrogen already exceed the critical load for the habitat features present. We note section 2.34 of the HRA and in relation to SAC/SPA we do not agree with the approach taken. The HRA indicates that the contribution of traffic movements emanating from Shropshire will be small and that other local authorities should consider the impact in combination. However, it is uncertain that other local authorities will undertake the assessment. We would question what feedback mechanism exists to review the Shropshire Plan in the light of any findings. The HRA states "The HRAs of both Cheshire West and Chester's LP and the Wrexham LDP both conclude no likely significant effect, alone or in combination from airborne pollution on this international site." However, the HRA does not appear to consider the in-combination effects of those plans with the Shropshire and Powys plans. We note cross reference to an extract from the Powys Preferred Strategy HRA (2016), (Table 2, page 18) in relation to the Berwyn SPA and SAC (representation then quotes text from the Powys HRA which screens out the Berwyn SPA and Berwyn and South Clywd Mountains SAC from further assessment). Representation then sets out details of a previous consultation with NRW from Shropshire Council in February 2018 on a SC technical note covering the proposed methodology for assessing Annual Average Daily Traffic values. At this point, NRW had indicated they were satisfied that the Shropshire LPR was not likely to have an adverse effect on the integrity of the Berwyn SPA and Berwyn and South Clywd Mountain SAC at this stage. NRW then say: However, we do not agree that development and associated increased combined contributions e.g. combustion, traffic movements, intensive livestock units etc. will not have any impact on N2K sites when background levels already exceed critical levels and, in some cases, critical loads. We would also add that whilst the issue of traffic emissions was not raised in the Powys Preferred Strategy 2016 HRA, that does not mean that traffic movement is not an issue. Our understanding of air pollution has developed since 2016 hence the need to identify air pollution and its impact on protected sites. In addition, we advise that the concept of screening out development that contributes under 1% of the process contribution, and previously deemed "de-minimus" is no longer thought to be an approach that is compliant with the legislation or case law, regardless of the type of impact being assessed. This being the case, NRW is currently reviewing its own guidance note "GN020 Assessing the impact of ammonia and nitrogen on designated sites from new and expanding intensive livestock units" to address this, however this might also apply to the assessment of traffic movements and combustion processes from residential development etc. Therefore, we do not agree with the use of de-minims referred to in Table 2 in relation to Berwyn SAC. Particularly because the site is already subject to background levels of nitrogen deposition that exceeds the critical load for the habitats present. We advise that if it is known that the SAC is already 'under stress' from airborne pollution (from any source), it is particularly important to consider very carefully the additional impact of any new sources. Regarding recreation and other disturbance for the Berwyn SAC/SPA please note that parts of these designations are also included in the Berwyn NNR and are therefore accessible to the public. There is potential for increased visitor numbers to the uplands, as has already been seen in the post Covid-19 lockdown period, with sites such as Piston Rhaeadr being inundated with visitors, therefore the impact of an increased Shropshire population may be significant in particular in some honeypot attraction areas. NRW are aware of some small areas that appear to have been damaged by visitors and that there is the potential for this to increase without mitigation. The HRA should give appropriate consideration to this issue.
A2462B06	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Disagree	We note that the HRA has considered impacts on sections in England (we note reference to EA data from 2009 in paragraph 3.37) but makes no reference to NRW (or Natural England) assessments of the site. We could not find reference to any in-combination assessment. We note Appendix 6: Other Plans and Projects Considered for In-Combination Effects. The appendix includes reference to the conclusions of neighbouring Local Authority Local Development Plan HRAs (Wrexham and Cheshire West and Chester). However, it is unclear how the in-combination effects have been assessed. There is reference to the Shropshire Water Cycle Study. However, the HRA does not provide clarity on whether that study considered in-combination effects, including upon Welsh feature interest associated with the SAC. Confirmation that in combination effects have been considered would clarify this matter.

Page 388

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2462B07	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Disagree	In terms of Severn Estuary SAC, SPA, RAMSAR we note the conclusion that 'application of policies DP20. to 23. in the DLP will protect water courses and water bodies, and in so doing are likely to prevent adverse effects on site integrity, alone and in combination, on international sites (paragraph 3.20). We would anticipate that the local protection within Shropshire is likely to be around phosphate. Under the Water Framework Directive (WFD) phosphate is the physical chemistry element that is assessed in rivers as assumed to be the limiting nutrient, the exception will be the Clun SAC where we note in addition to avoiding an increase in P levels the intention is to avoid an increase in N or sediment inputs) whereas the Severn Estuary SAC is more likely to be nitrate limited being a marine environment. The HRA should clarify the current state of the Severn Estuary SAC in terms of nutrients / risk from nutrients. Furthermore, as Shropshire is just one of a number of areas that drain to the Severn estuary, we would question how an in-combination assessment of this issue has been considered.
A2462B08	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Don't know / no opinion	There is recent evidence to suggest that there is cross-border movement of Lesser Horseshoe bats between Shropshire and Powys, although not specifically from the sites that make up this SAC. This evidence has been gathered as a result of a ringing and radio-tracking project undertaken by the Shropshire Bat Group at Snailbeach Mine in the Stiperstones. Two Lesser Horseshoe bats ringed by this project have been found hibernating within Montgomeryshire. One of the individuals was found at Roundton Hill SSSI, and the other at an undesignated private residence within the locality of Welshpool. This may have implications where development could impact on potential commuting routes/ corridors of vegetation between the counties and should be taken into account at the planning application stage.
A2462B09	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Don't know / no opinion	We note references to the restoration and re-navigation of the Montgomery Canal in Shropshire. NRW are part of the ecology sub-group of the Montgomery Canal Partnership that meets regularly to discuss ongoing monitoring, restoration proposals, etc, but we advise that NRW should be formally consulted when any plans to re-open the canal to boat movements close to the Welsh border at Llanymynech come to fruition, and that project level HRA will be required.
A2462B11	Habitats Regulations Assessment	Comments on the Habitats Regulations Assessment	Disagree	We are of the view that the submission is not likely to be detrimental to the maintenance of the Favourable Conservation Status of any of the Welsh populations of EPS. We advise that our response identifies the requirement to consider mobile Habitats Directive Annex II species such as otter and lesser horseshoe bats among others. Considering the proposed allocations and locations of N2K sites, this will effectively be the otter in respect of the Dee catchment. We advise that our responses identify the requirement to ensure continued breeding, foraging and dispersal within the catchment.
A0268B6	Sustainability Appraisal	Comments on the Sustainability Appraisal		The Site Assessment and Sustainability Appraisal to inform the Preferred Sites Consultation concluded SHR197 lies within 250m of a designated Local Wildlife Site of linear form comprising Sunderton Pool and a thick belt of woodland stretching north to south from the A49 to the B5062. However, this assessment was based on the delivery of wider site. The updated Site Assessment papers correctly recognise that the developable area of the site will now lie a minimum of 500m from this designation. However it suggests that there are TPOs on the site, this is incorrect. Development of SHR197VAR would have a very limited impact on the trees and hedgerow which largely fringe the site and would not impact on any protected or veteran trees in any way whatsoever.
A0306B066	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	Shropshire Wildlife Trust has no confidence in the Sustainability Appraisal (SA) which fails to, in it's own words: consider how a plan contributes to improvements in environmental, social and economic conditions; identify any significant adverse effects that a plan might have; amend proposals in a plan to avoid any significant adverse effects; propose mitigation measures to counter any remaining significant adverse effects. Little has been done to address concerns flagged in previous consultations. To produce a SA that appears to state that the delivery of 30,800 new dwellings and around 300 hectares of employment land with all the associated infrastructure will have no significant negative effects is incredible. Amendments to the SA methodology are insufficient to address climate change. There are fundamental scoring errors in the assessments. Sites score well for climate change even though they will generate traffic. We suggest that the Sustainability Appraisal is subject to a thorough review and rewrite.
A0336B1	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	Agree with the suitability conclusion within Stage 2b of the Site Assessment process (taken from the SLAA) for WHT037 and WHT044, that the site is not currently suitable but future potential, the site is not suitable for development. WHT037 and WHT037VAR achieve a fair score in Stage 2a Sustainability Appraisal, this is due to proximity to a gold course. Remove this and it would be poor as there is little open space in the area (WHT046 provided very little). There is no evidence of a viability assessment being undertaken.
A0398B2	Sustainability Appraisal	Comments on the Sustainability Appraisal	Agree	Page 6: To meet the needs of future generations, please include food production. Place a higher value on agricultural land and soil quality. We import over 40% of our food so need to protect land capable to feed future generations. Homes are of course needed and I support more housing. Long term we need to look at other models of delivery. We need to build up rather than out so save land, e.g. the highly desirable condos as in Canada. Soundproof high quality builds with balconies and maintained gardens, ground floor laundry to prevent fires and floods.
A0407B3	Sustainability Appraisal	Comments on the Sustainability Appraisal		The Sustainability Appraisal is poor quality and cannot be taken to support the Strategy it purports to appraise. There is no evidence demonstrating that development in Hubs and Clusters is sustainable, in fact available evidence shows development in these rural settlements is unsustainable. Principal failings of the Sustainability Appraisal are: It fails to compare carbon emissions between available sites; It takes an absolute approach, asking "does development of this site meet the threshold for sustainability as defined by chosen measures", rather than "would development of this site be more sustainable than others", such that the cumulative result of all development would provide the most sustainable overall development pattern. In important respects, notably the efficiency of public transport as a competitive alternative to the private car; and the societal conditions offered to households and members of households without access to a private car, the appraisal fails to make a realistic assessment. No consideration of SA objective SO12 Reduce carbon dioxide emissions within the assessment of sites. With regard to SO5 and SO6, the criteria used to assess sites is not an indication of whether a site will encourage use of sustainable transport. A more appropriate question is the likelihood that a site location would lead to private car being the choice of mode. Paras 102-105 of the NPPF require that patterns of growth should be actively managed to achieve results which are encapsulated in Oswestry 2050, but the SA fails to address the requirements of these policies. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; and opportunities to promote walking, cycling and public transport use are identified and pursued. There is no "active management" of the pattern of development. The SA fails to address accessibility to the main trip generators – employment opportunities, weekly shopping locations, and secondary schools. Leaving out these locations skews the results in favour of rural development, and the SA is therefore defective. There can be little argument that sustainable development patterns are those which minimise the distance travelled; minimise the number of private car trips, and enable the provision of attractive public transport. SA1 and 2 proceed on the basis that a development is sustainable if it achieves the bare minimum of public transport access, and pays no regard to the accessibility of those services which are most used. Nowhere in government policy is support found for such an approach.
A0430B3	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	The Sustainability Appraisal process and a separate site assessment process have been conflated into a single document, the Sustainability Appraisal and Site Assessments Environmental Report (July 2020). No issue is taken with this per se, but the approach makes it somewhat difficult to navigate the document and the site selection process hard to follow. It is set out in the document that the Sustainability Appraisal represents Stage 2a of the site assessment process. A summary of the overall scores for each site is provided in the main part of the document with the full appraisals for Shifnal provided as Appendix P. SHF034 scores 'good' in the Sustainability Appraisal and is the best score of all the safeguarded land in Shifnal. Indeed, it scores better than two of the three allocations. Wallace concur with this score, as the Site is highly sustainable. It is set out in the document that the Screening of Sites represents Stage 2b of the site assessment process. This is presented as a series of proforma for each site. The proforma for the sites in Shifnal is also provided at Appendix P, and they include a summary of the findings of the SLAA and an overview of the availability and achievability of the site with a recommendation on whether it should be considered in the next stage of the process. Ultimately SHF034 was found to be available and achievable at this stage and recommended to be considered in the next stage. The Detailed Assessment of Sites represent Stage 3 of the site assessment process. This is again presented as a series of proforma for those sites which were taken forward from Stage 2b. The proforma include a summary of the strategic considerations for each site and officer commentary on highways, ecology, trees and public protection. Ultimately, it is recommended in the proforma that SHF034 be removed from the Green Belt and safeguarded other than land north of the western railway line, which was recommended to be retained in the Green Belt. Wallace have no issue with these findings as the Site can be delivered in a suitable and sustainable manner. However, they would like to stress that the land north of the western railway line has the potential to extend the proposed link road up to the A464 (west), and by choosing not to release this land from the Green Belt now the Council are preventing this benefit from coming forward until the next review of the Green Belt boundary. On a final point, and with regards to methodology, it is respectfully requested that the SAMDev Plan housing allocations that are proposed to be retained as allocations in the Regulation 18 Local Plan be given consideration in the Sustainability Appraisal and the site assessment process. This is considered to be a necessary step before a conclusion can be drawn on whether these allocations are still suitable for housing and so they can be compared to the reasonable alternative of other sites which are not currently allocated coming forward instead, such as this Site. It is understood that the SAMDev Plan housing allocations underwent a Sustainability Appraisal at the time of that plan, but different assessment criteria was used and it is safe to say that the spatial context within which the sites were considered will have changed since then. A failure to consider the SAMDev Plan allocations may be seen as a significant oversight on the basis that the PPG requires Sustainability Appraisals to develop Local Plan options including reasonable alternatives and evaluate the likely effects of the Local Plan and alternatives.
A0642B47	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	We have no confidence in the Sustainability Appraisal (SA) which fails to, in it's own words: consider how a plan contributes to improvements in environmental, social and economic conditions; identify any significant adverse effects that a plan might have; amend proposals in a plan to avoid any significant adverse effects; propose mitigation measures to counter any remaining significant adverse effects. Little has been done to address concerns flagged in previous consultations. To produce a SA that appears to state that the delivery of 30,800 new dwellings and around 300 hectares of employment land with all the associated infrastructure will have no significant negative effects is incredible. Amendments to the SA methodology are insufficient to address climate change. There are fundamental scoring errors in the assessments. Sites score well for climate change even though they will generate traffic. We suggest that the Sustainability Appraisal is subject to a thorough review and rewrite. Air Quality: Land transport is responsible for the greatest percentage of CO2 emissions in the UK, at around 28% (and 37% within Shropshire). Since transport is also responsible for most of the air pollution, both gas and particles, it is crucial that transport is made a main target of reduction and the absence of a Local transport Plan to support the Local Plan is a major omission. If, as now, the Local Plan does not seriously consider and mitigate this, then it will be storing up very costly future corrective action. Apart from the climate emergency, more and more research is confirming that all levels of air pollution are harmful and no amount is 'safe'. Restricting consideration to AQMA leaves most potential sites out of air quality consideration in the SA. It is not the presence of the development in the AQMA that is the issue but rather where the traffic generated by the development will occur. Sites within the county are being looked at on a piecemeal basis, each on their own merits, with no overall consideration of the cumulative effect on the Local Plan. Leaving a developer to produce a report on air quality which is only for the site in question leaves the way open to development and air quality worsening which will need correction at a later date at Council expense. Shropshire Council's Annual Air Quality Reports (ASRs) concur with current knowledge of the Public Health harm of any pollutants at any level, not just 'illegal' levels and yet it appears that action is not being taken within the Local Plan to ameliorate this. Sadly, we now see that the consideration given to a site in the latest Sustainability Assessment (Jul 19) (and therefore the Local Plan) consists of noting if a site is wholly or partly in an AQMA. This ignores the fact that a site outside an AQMA might result in a significant deterioration of air quality that might even mean a new AQMA is needed. To be in an AQMA, a site must have consistent yearly averages for NO2 of over 40ug/m3, but this is not able to be correctly measured. We also note that in the spreadsheet, ref table 2.4, air quality becomes criterion 9 instead of 10 and the scoring has changed so that the possible 'scores' are either one minus or a zero with no plus available. This also highlights that even if the site is totally within an AQMA, it can never 'score' more than one minus point whereas some other criteria can score two minus points. As a result of these policies, we therefore have Tern Hill, site ref BNT002, being put forward with no negative score at all for air quality, even though Tern Hill crossroads is 300m from the site and has had consistently high 'illegal' NO2 results. We are not saying that housing instead of barracks would necessarily adversely affect the crossroads, but that it merely illustrates the problem of the criteria system as this possibility is not even considered for a site proposing 750 new houses plus other services and facilities. Thus air quality considerations are ignored or, at best, left to a developer when detailed planning permission is applied for. At that stage, it is too late to do anything strategic and later problems will have to be corrected at Council expense. Also, considering each site on its own merits without regard to the impact on the whole area is not a sustainability approach. This piecemeal approach was criticised in the Stansted expansion inquiry.
A0642B52	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	Although the presence of an adjacent Local Wildlife Site and nearby SSSI are mentioned in various sections of Sustainability Appraisal text they are not counted in the assessment matrix. Also rather strangely the site scores well in terms of the climate change assessment (bus stop within 480m) despite the issue of the number of car journeys being generated being of such a scale that the development would be dependent on the proposed NWRR to accommodate the additional traffic.

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0697B04	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>The NPPF states that the preparation of Local Plans should be informed by Sustainability Appraisal (SA) and that significant adverse impacts on should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts pursued. PPG states SA should outline reasons alternatives were selected, rejected options were not taken forward and why the preferred approach was selected given the alternatives. It should provide conclusions on the overall sustainability of different alternatives, including those selected as the preferred approach. Development and appraisal of proposals should be iterative, with proposals revised to reflect findings.</p> <p>Given this, do not agree with the approach taken in the selection of the preferred allocations at Albrighton.</p> <p>The SA states that it can help make sure the plan proposals are the most appropriate, given the alternative. Do not consider that this has occurred.</p> <p>The SA for the Preferred Sites Consultation stated it directly informed selection of the 'most' appropriate sites for allocation.</p> <p>Note the main bulk of the site assessments (Stages 2a, 2b and 3) have been undertaken within the SA (Stage 1 SLAA assessment being the exception). However, the Council has not selected the appropriate sites consistent with the findings of the assessment and the overall sustainability conclusions presented in the SA. ALB014 scored overall 'Good' in terms of sustainability (with good accessibility - criteria 5) compared to other sites in Albrighton including the proposed allocation ALB017&ALB021) which overall scored fair (-6) and poor (-10). Noted mitigation is proposed in relation to ALB021.</p> <p>ALB014 is not covered by statutory designations for landscape character or quality. It lies wholly within the Green Belt. The Albrighton Conservation Area lies to north-east of the Site, approximately 260m away at its closest point, continuing east to include Albrighton Hall. The Boningale Conservation Area is south of the Site, approximately 820m from the Site at its closest point. A number of Listed Buildings lie within the wider vicinity of the Site.</p> <p>Consider that the Council has not given sufficient regard to the findings of the SA in considering the appropriateness of the preferred approach, in light of reasonable alternatives, contrary to NPPF and PPG advice. As a consequence, the site selection process has not been sufficiently 'iterative' as required by the PPG, given that no changes or amendments have been made to the preferred approach to reflect the findings of the assessment process. This is evident based on consideration of the specific scoring for the proposed allocations and the Site (ALB014) undertaken at Stage 2a of the process.</p> <p>Broadly agree within the Stage 2a Assessment underpinning the good score for ALB014. However the site is incorrect when stating it is not within 480m of a primary school, it is adjacent to one (the site layout proposes a footpath to improve access to this and the sites surroundings). This score should be amended from a minus to strong positive (given proximity, it is the closest of any site to a primary school) which would change the score from -2 to +1 the highest of any site in Albrighton.</p> <p>ALB014 is therefore one of the most sustainable of all the sites assessed, providing clear justification to support the allocation of ALB014, given there is no logical reason that prevents its inclusion on sustainability grounds.</p> <p>It should be noted only three sites assessed in Albrighton scored worse than ALB021 and even when ALB017 and ALB021 were jointly assessed, they only scored fair (-6). Difficult to understand why ALB017 and ALB021 (either separately or in combination) are considered more appropriate than ALB014, based on the evidence set out in the SA.</p> <p>The Council has gone against its own assessment, without setting out justification in the draft Local Plan (this has previously been raised). This represents a clearly failing and raises serious soundness concerns regarding the site assessment/selection process undertaken.</p> <p>Notes and broadly accepts the assessment and conclusions in Stage 2b regarding ALB014. However the residential suitability conclusion from the SLAA for ALB014 is 'not suitable' - only factors referenced are Green Belt, TPO's and proximity to heritage assets which the SLAA concluded could be made 'suitable'. Consider there are no constraints once Green Belt boundaries are addressed, therefore disagree the site is 'not suitable'. In stage 2a there are gaps in the conclusions for sites ALB017 and ALB021. Both these sites were 'not currently suitable', but both are proposed for allocation. The word 'currently' has therefore been used interchangeably, given the SLAA concludes that ALB014 could be made suitable. This raises further concerns as to the consistency and transparency applied in the site assessment process for Albrighton.</p> <p>Stage 3 is claimed to be a proportional and comprehensive assessment and iterative. ALB014 is proposed for safeguarding rather than allocation at this stage, the main reason being its location in the Green Belt, release of which would have moderate harm to the Green Belt. Agree that the site should be removed from the Green Belt, but disagree that it would cause limited harm to the wider Green Belt as it no longer meets the purposes of the Green Belt. It is noted that within stage 3 (and agreed with) that no site-specific/other policy reasons to reject ALB014 as being unsuitable, all relevant development-related matters can be resolved at the planning application stage.</p> <p>Justification for proposed allocation of ALB017&ALB021 provided in the stage 3 assessment include relationship to the settlement, consider ALB014 is equally 'well related' and represents a 'natural direction for growth' - no justification or analysis denies this.</p> <p>Reasoning has bias in that the Council has chosen a site that, without mitigation, would continue to perform poorly in SA terms with regards to accessibility, were it to be developed compared to other more appropriate site options. In this context, it is clear that site ALB014 is more accessible than site ALB021 and could deliver as much, if not greater, improved provision of green infrastructure than ALB021.</p> <p>Considers proposed allocation of ALB017 and ALB021 has not been adequately justified based on the SA (Stage 2a), site screening (stage 2b) and subsequent detailed review (Stage 3).</p>
A0888B9	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	See wider response.
A0897B10	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	The SA does not recognise that ALB017 is in proximity of a children's play area and amenity open space. These are being constructed on the adjacent development site (within 100m of ALB017). This converts two negative scores (-2) into two positive scores (+2) and thereby changes the Sustainability Appraisal scores for site ALB017 from -6 to -2, changing its rating from 'Fair' to 'Good'. The Final Plan Sustainability Appraisal documents should be changed accordingly.
A0898B3	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	Object to the Sustainability Appraisal for Highley site HNN016 land south of Oak Street which has an error for this site. The sustainability score is +4 and the conclusion should therefore be 'Good' rather than 'Fair' as 'fair' is for the range -1 to -6. The error is repeated on page 55 as the conclusion from the stage 2a sustainability appraisal. This error needs to be corrected before the Plan's examination stage.
A0956B05	Sustainability Appraisal	Comments on the Sustainability Appraisal		The Sustainability Appraisal (SA) for the draft SLP outlines the range of positive benefits for an urban focused strategy, particularly in comparison to other strategy options which would involve greater growth in the rural areas. This tested the scenario of around 75% of housing growth being directed towards the urban locations, which appears to be carried forward within the draft SLP (with around 70% directed to urban locations, as detailed above). Whilst it is recognised that there are some potential adverse effects arising from a more urban focused strategy, in light of its overwhelming positive effects the Council should consider directing a higher proportion of growth to these urban locations (namely the Strategic, Principal and Key Centres) whilst providing specific policy support for smaller scale affordable housing provision within the rural areas. The scenario of a higher level of growth within the urban areas (more than 75%) does not appear to have been tested within the SA to date.
A0966B05	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	key issues which are incorrectly factored in to the Feb 2019 Preferred Sites Consultation sustainability appraisal identified as:- mobile library stops; Multi-Use Games Area; amenity green space & footpaths; Accessible natural green space all less than 480m from the site should result in an adjusted score of +6 rather than (-2) therefore site more sustainable for development
A0984B30	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>The assessment excludes the existing SAMDev Plan allocations, the Council may be criticised for not comparing these allocations with the sites in the SA.</p> <p>Whilst it is recognised that SAMDev Plan allocations underwent SA at the time of that plan, different assessment criteria was used and the spatial context within which sites were considered will have changed. A failure to consider SAMDev Plan allocations may be a significant oversight on the basis that the PPG, which requires SA to develop Local Plan options including reasonable alternatives and evaluate the likely effects of the Local Plan and alternatives.</p> <p>The SA uses 480m as the average distance walked in 10 minutes, to ascertain the accessibility of a site. This distance is derived from the Council's Open Space, Sports & Recreation Interim Planning Guidance (September 2010). The main issue is that PPG17, on which this guidance is based does not reference this distance and in event has long since been revoked. A distance of 800m is the normal proxy for a 10 minute walk as established by reputable and much utilised sources. As such, the use of the 480m distance is not justified and the use of an 800m distance in the SA instead could prevent unnecessary scrutiny at submission and examination.</p> <p>It is also unclear how these measurements have been taken and whether this is a walking distance measurement or a simple point to point 'as the crow flies' measurement. From a review of the scoring of some of the sites it appears that the measurement is a point to point measure. It is recommended that this is confirmed within the methodology.</p>
A0984B31	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>Criterion 3 relates TPO's. The SA of BRD030 suggests a TPO is present within the site. We are not aware of any such TPO and this is not raised within the Stage 3 Site Assessment under the 'Tree comments' heading. As such, this may be an error</p> <p>Criterion 5 relates to proximity to a range of different services and facilities. As already highlighted, it is not clear how this measurement is taken (by routes or as crow flies, although appears as the crow flies). As the crow flies, the site is within 480m (448m) of a primary school and a children's playground (385m), yet these are both identified as beyond 480m. This should be corrected and would mean the sites performs fairly for residential and employment.</p> <p>It is also worth noting that although BRD030 scores 'Poor' in comparison to some other sites in the SA around Bridgnorth, the majority of these are small sites which are located within or on the edge of Bridgnorth. Some of these do not make it to Stage 3, as they are considered to be too small (less than 0.5 hectares). Tasley Garden Village measures approximately 119 hectares and therefore it is likely that it may score lower than other smaller sites which are not capable of accommodating the settlements future housing and employment needs</p>
A0984B32	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>Support conclusions reached with regard to BRD030 within this assessment, part of which is identified as an allocation for a mixed use SUE and part identified as a future direction for growth. The site can deliver a sustainable urban extension to address the housing and employment needs of Bridgnorth.</p> <p>Also agree with the overall comments provided, however we have some minor additional comments to make on some of the individual considerations.</p> <p>Highways: It is not clear within the main report or appendices why some sites have been scored a highways accessibility rating and others have not. BRD030 has not been provided with a rating and the report does not suggest how this would be scored and what would be considered a good score where the site has good accessibility and what would be considered a poor score with poor highways accessibility.</p> <p>Heritage: Comments note that given the size of the site, it may have archaeological potential. A Heritage Desk Based Assessment has been prepared in support of BRD030 which concludes that the potential for archaeological remains it considered to be low. The assessment also considers the potential harm to two listed buildings (in/in proximity of the site) resulting from its development, the level of harm to both heritage assets has been categorised as less than substantial harm, at the lower end of the spectrum, and such harm should be weighed alongside the public benefits of the development proposals.</p> <p>Public Protection: A Phase 1 Geo-Environmental Assessment has been prepared for BRD030 which has identified that the site was historically and currently remains agricultural fields with 9no infilled former ponds and 2no farms. Potential contamination sources are anticipated to be extremely limited or absent for the majority of the site. Should there be a contamination issues, there are likely to be very localised sections of the site, namely the infilled ponds, farms and land adjacent to the old clay put in the north west of the site. Further work would be carried out as part of a future planning application.</p>
A1101B17	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	Comments on the Sustainability Appraisal	Agree	<p>The SA forms the evidence base for the Plan and is flawed due to the incomplete evidence base including the justification for site selection and its failure to consider fully reasonable alternative sites including Stanmore Garden Village.</p> <p>At Bridgnorth, the SA demonstrates the preferred site, BRD030 does not score as well and is not rated as highly as an alternative, Stanmore Garden Village.</p> <p>The evidence base therefore does not support allocation of BRD030 and the approach does not accord with the policy of the NPPF that requires an alternative with a lesser impact to be considered. Stanmore Garden Village should be allocated.</p>
A1101B18	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>There are two limitations where the methodology falls short. The first is what is included in the baseline information and the second is the way the SA objective (SO15) assess heritage</p> <p>On the first limitation, baseline information should draw on the key sustainability issues facing Shropshire. A key issue is climate change, SA objective SO6 'Reducing the need of people to travel by car' has not been adequately considered in the assessment process.</p> <p>There is a need to consider self-containment to reduce in and out commuting, which generally takes place by car. Reducing the need to travel by car between home and employment will reduce commuting, miles travelled and can contribute positively to the climate change emergency (this is a particular issue in Bridgnorth but also a sound land use planning principle even where self-containment is not an issue).</p> <p>To address this, consider an additional Criteria 6 should also be added for 'An employment area within 480m of the site boundary' where Yes = plus score (+) and No = minus score (-). A previous change translated into criteria 6 (made following the Preferred Sites Consultation), added consideration of a 'Regular peak time public transport service within 480m of the site boundary'. For consistency the same distance is suggested for an additional criteria.</p> <p>On the second limitation, the SA scores sites on the basis of their proximity to designated heritage assets, using firstly criteria 13 whether a site has a designated asset within the site boundary; and secondly, criteria 14 whether a site falls within a standard specified distance. In the case of SA for another authority in the West Midlands, Historic England have expressed concerns about the limitations of this approach. It is effect on significance rather than proximity, of each allocated site and reasonable alternative that should be assessed. An assessment of significance of heritage assets is required so a sensitivity rating can be used and a highly sensitive site would have a significant negative effect. Therefore, an assessment of sensitivity should be used to assess potential impacts, rather than proximity.</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A1101B19	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>P56 (part of Stanmore Garden Village) clearly scores more favourably than the assessment shows: P56 does not have any Tree Preservation Orders on site (Criteria 3) (Arboricultural Appraisal provided as Appendix to Rep). P56 does not include any Ancient Woodland (Criteria 1), this falls within adjoining P55. P56 is also scored as 'high' landscape sensitivity (Criteria 15) when in fact it is medium. Furthermore, P56 scores is assessed as having a Scheduled Monument within the site. Currently, the scheduled boundary covers a minute area on the north-west edge, the site boundary could be redrawn to remove it. The subtly of a site boundary can make a difference to a score. P54 (part of Stanmore Garden Village) clearly scores more favourably than the assessment shows: P54 does not contain an existing waste management operation (Criteria 12), Swancote (the only such operation) is outside the boundary of the site and would not be impacted by the Stanmore Garden Village proposal (Swancote is close to the eastern element of the site but only the western element forms part of the proposed Stanmore Garden Village). In fact this would be an environmental benefit, offering access to electricity made from waste. All sites which form part of Stanmore Garden Village should be attributed a positive for being within 480m of accessible natural green space (Criteria 5), as Stanmore Country Park is on their boundaries. One of the deficiencies of SA is a 'criteria description' may only apply to a small part of a parcel, yet the whole parcel is blighted, giving the impression of significant effect when the reality is the criteria description is not representative of the whole parcel. All sites score a negative for being wholly or partly grade 1 or 2 or 3 agricultural land (best and most versatile). As there is no accurate survey it is not known what percentage of the parcels are classified as best and most versatile yet the possibility of a small part and may be not even in the development area scores a negative. Even with inaccuracies and deficiencies, Stanmore is still rated as 'Fair' for the elements proposed, save for the western extremity of P54 which is rated 'Poor' for employment. As that relates to such a small part of a very large parcel the effect cannot be considered representative of the reality.</p>
A1101B20	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>Sites rated as 'Poor' are considered to have likely significant adverse effects for which mitigation measures should be proposed BRD030 is proposed for allocation but rated 'poor'. As there are alternative sites in Bridgnorth that are not 'poor' rated, before looking to mitigate the alternative site should be favoured. The mitigation proposed to address the three reasons that lead to the 'Poor' for BRD030 are in doubt: The site is not in walking distance of many services and facilities, proposed mitigation includes as a minimum pedestrian and cyclist footbridge crossing of the A458 at an appropriate location near Ludlow Road roundabout, subject to ground investigations and available land. It must be demonstrated how necessary links can be achieved as this is not considered achievable in a satisfactory way. Part of the Site is within Flood Zones 2/3, mitigation proposed includes requirement for a suitable drainage strategy and that no development should take place in the areas at high risk of flooding. It should be demonstrated now that all development including access roads can be achieved on areas at low risk of flooding, taking account of other constraints that affect layout such as buffers for the livestock market and listed buildings. Locating open space in the areas at high risk of flooding compromises the recreational use and additional land might be needed. The site contains a Listed Building, mitigation proposed is through design and layout and that Green Infrastructure can create appropriate settings, although this is yet to be demonstrated</p>
A1139B1	Sustainability Appraisal	Comments on the Sustainability Appraisal	Agree	<p>The objectives are laudable, however, the document is not convincing that these objectives are any more than aspirations From current observations of new comers to Shropshire in new developments such as Leighton Park, Shrewsbury, they relocate to reliable 'Hot Spots' during working hours. This is an example of the regulatory body i.e. Shropshire Council Planning not insisting on providing basic standards to enable remote working from home, through a set of criteria against which planning proposals are measured, prior to being granted. It is likely to be difficult to focus growth in accessible locations so it may not be possible to reduce the need to travel by car. There is little mention of the plans for road improvement or the source of funding. Even during a time of unprecedented building in Shropshire bringing with it funding, this has not been spent in areas outside of Shrewsbury. The changes to the roads on the periphery of the town of Shrewsbury were inadequate by the time they were constructed. To be able to comment on this plan adequately, proposals to improve existing routes need to be included or the means of reducing car use</p>
A1152B01	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>Disagreement is in part. The report requires proofreading as Five 'Error! Bookmark not defined' errors found. Two particular deficiencies with the Sustainability Appraisal (SA) methodology exist, namely -objectives SO2, SO3 and SO12 had not been translated into any of the criteria (which extraordinarily, includes the objective SO12 to 'reduce carbon dioxide emissions'), and -criteria 6, about the proximity of regular peak time public transport had then not been translated into the criteria used for scoring sites within the stage 2a detailed site assessments. The documents explains why SO3 (reducing carbon dioxide emissions) has not been translated but incorrectly references it as SO1 - other SO's have elements of reducing carbon dioxide emissions and are included. Criteria 6 is now included, but table 2.8 incorrectly states that it is not. A huge amount of work must have been done to rescue each site by incorporating this missing Criteria 6, which in Table 2.7 is stated as 'regular peak time public transport service within 480m of site boundary', although, on the detailed stage 2a sheets, the criteria is stated slightly differently as 'site boundary within 480m of a public transport node with a regular service offered during peak travel times'. There do also appear to be further weaknesses in the SA methodology: -There is a mismatch between the services listed in criteria 4 and 5, and the primary and secondary services listed in Table 1 on page 3 of the Hierarchy of Settlements of Settlements (HoS) document. A similar list of services could have been used in both assessments. Furthermore the HoS applies weighting to these services with the SA does not. -The SA has no mechanism to rule sites out altogether because of a particular protected feature such as a SSSI. -Criteria in tables 2.7 and 2.8 have all been applied to residential assessments but 2 have not in the employment assessments (proximity to library and children's playground). No rationale is provided for this and it is considered illogical given proximity to a primary school is still used. -It is a weakness that there are no absolute scores for a site, only relative ones. Scoring for proposed allocations range from good (+2 to -6), fair (+4 to -13) to poor (-2 to -17). It is apparent there is a wide overlap in the good, fair and poor ranges which make it difficult to identify absolute scores. -Sites with poor ratings have progressed to stage 2b and 3 of the site assessment process. For example the Former Ironbridge Power Station with a score of -17. -18 proposed allocations were identified as poor in the stage 2a / SA. Mitigation measures are proposed for these sites in the SA report. In actuality 26 of the separate sites were assessed as poor in stage 2a / SA, so 8 do not have proposed mitigation measures. Some are proposed as safeguarded land to be removed from the Green Belt for future development. -Shropshire Council has declared a Climate Emergency, engaged with the Shropshire Climate Action Partnership, and is committed to achieving net-zero carbon by 2030, eight years before the end of this 22-year plan. It is recognised that the Climate Emergency is probably the greatest challenge facing mankind, much more so than the current, but temporary, Covid-19 emergency. Climate change considerations, and CO2e emissions considerations, should therefore be given the highest priority throughout the Local Plan process. The Welsh National Plan (Future Wales – the national plan 2040) summarises this issue cogently. At the very least the carbon emissions of each proposal should be assessed, to provide an idea of whether proposals contribute to the zero carbon goal or make the problem worse. It is noted that "climate action appraisals are now compulsory in all key council decisions, forcing climate impact to be considered and criteria to be met". In summary: -Reference to SO1 in Para 2.19 of the SA report needs to be changed to SO3. -In Table 2.8, Criteria 6 is assessed and needs to be added in. -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. -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. -The scoring system used in stage 2a should use absolute scores, not scores that are relative only to other sites in that particular settlement. -In order to assess the CO2 emissions saving potential of a site, it seems insufficient only to consider the items within Criteria 4/5 and 6. Other factors could have included the propensity of the site for solar gain (e.g. north facing or south facing), or the distance from a supermarket. -The whole methodology as summarised in the diagram at paragraph 2.2 above is undermined when it is possible to override a highly negative sustainability score, as is the case with the Ironbridge site, by proposing mitigation measures. The implication is that the site has been allocated for other reasons than sustainability, and in spite of the sustainability appraisal process. The draft Local Plan should pursue the overarching environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including "mitigating and adapting to climate change, including moving to a low carbon economy".</p>
A1191B7	Sustainability Appraisal	Comments on the Sustainability Appraisal		<p>BUR004's overall score is 'Good' within the SA. This is the highest score achievable within the SA and the highest score attributed to the three proposed site allocations in Burford Generally agree with the findings of the SA and consider the site to be worthy of its 'Good' score. Note that the scoring criteria 5 attributes positive '+' scores when a site is within 480m of one or more of the facilities listed. Consider this criteria doesn't reflect that proposed developments have the ability to provide facilities such as children's playgrounds, amenity green space and accessible natural green space, which would further enhance the site's sustainability. It is therefore requested that consideration is given to allotting further 'positive' scores when a site proposal will provide such benefits Concerned about the SA undertaken for Clive Barracks, Tern Hill with regard to Ancient Woodland and the nearby Local Wildlife Sites The SA provides a double minus score (denoting "Strongly Negative" effect) for featuring Ancient Woodland and being close to Wildlife Sites. The effect is described to be: "Likely to have a significant adverse impact on the whole, or on a large part of, Shropshire, on internationally or nationally protected assets or on areas outside the county. The effect is predicted to be direct, permanent, irreversible and of major magnitude". This is not considered a fair assessment as whilst Ancient Woodland falls within the site, it will be retained. Supporting work has informed proposed buffers to Ancient Woodland to ensure it is not impacted by the development (a buffer of a minimum of 30 metres). Local Wildlife sites fall outside of the site, but again have been considered in full in developing the proposals for the site. Buffers of a minimum of 15 metres have been taken forward in developing the masterplan. Redevelopment of Clive Barracks will provide additional woodland planting which will connect Ancient Woodland with other woodland onsite, providing an enhancement to both habitats. An appropriate woodland management regime could also be introduced to enhance the structural diversity of the woodlands. As such it is considered that the SA scoring relating to Ancient Woodland and Wildlife Sites should be amended from '-' to '0' score denoting a neutral impact. Also concerned over the scoring of the site in respect of accessibility to open space facilities. The site has been marked down within the SA because the site's boundary is not within 480 m of the following: • Children's Playground • Outdoor Sports Facility • Amenity Green Space • Accessible Natural Green Space (natural/semi-natural green space) The assessment does not however consider that all these facilities already exist on-site and proposed development (demonstrated by the Illustrative Masterplan) will reinstate these amenities, and more. The site should not therefore be marked down in respect of accessibility to open space facilities. Consider the scoring for these elements should be amended to '0'. Suggested amendments to the SA scoring would bring Clive Barracks total SA score from -14 (Fair) to -6 (Good)</p>
A1192B10	Sustainability Appraisal	Comments on the Sustainability Appraisal		<p>Shifnal Matters are concerned at the way the local plan review has been handled. The allocation of sites have not been properly assessed during the preparation of the plan under sustainability appraisal requirements and Shropshire Council have failed to demonstrate the reasons for rejecting reasonable alternatives. Shropshire Council have not ensured that potential environment effects have been given full consideration nor have they carried out a sustainability appraisal of each of the proposals in the plan during its preparation and S.39 of the Act requires the authority preparing the plan must do so "with the objective of contributing to the achievement of sustainable development". Shifnal suffers serious issues of congestion and stationary traffic in the centre. The proposed Employment land (SHF018b/Shf018d) will generate thousands of traffic movements both for employees and the transport supporting those businesses, which will move through the centre of Shifnal. In addition, the sites in LPR and those already approved will bring residents to 945 more homes in the LPR period. These homes are likely to represent another 1900 cars and residents moving to schools, shops, rail station or work are also likely to cross this central junction. These movements will all conflict with objective SO6. Shropshire Council have failed in all aspects in delivering a sustainable local plan.</p>
A1609B13	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>The assessment gives no mention of the environmental impact (across carbon, resources, waste, nature and biodiversity) of building development, nor the social impact of noise and nuisance. It indicates upsides throughout which are not realistic – for example improvements in local transport resulting from Bridgnorth development, so reduced reliance on car transport? This is highly unlikely with no rail connection. The proposed developments will not have impact on flood risk. This is an interesting assumption considering the flash floods of water coming down from the Stourbridge road in 2019-2020 and effecting the A442 which was closed for a number of days..</p>
A1652B3	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>S11.1 Market Drayton & MDR046 SA Summary Table page 174 Disagree SA doesn't recognise the potential for significant community benefits through the delivery of a marina and associated commercial uses & relocation of existing sports pitches and facilities, all of which could be accommodated on sustainable urban extension on site MDR046. MDR046 classed as a 'Good' location for strategic housing (Table 8.1) and a 'Fair' location for strategic employment (Table 8.2), but appears to be incorrectly summarised as a 'Poor' location – an error that should be acknowledged and rectified</p>
A2166B7	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	<p>S11.1 Market Drayton & MDR046 SA Summary Table page 174 Disagree SA doesn't recognise the potential for significant community benefits through the delivery of a marina and associated commercial uses & relocation of existing sports pitches and facilities, all of which could be accommodated on sustainable urban extension on site MDR046. MDR046 classed as a 'Good' location for strategic housing (Table 8.1) and a 'Fair' location for strategic employment (Table 8.2), but appears to be incorrectly summarised as a 'Poor' location – an error that should be acknowledged and rectified</p>

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A2308B29	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	Concerned that some of the conclusions within Part 2a Strategic Site Assessment for RAF Cosford (understood to be Part 28 and parts of CFD001, P30 and P40) are incorrect and should be updated: -It scores '-' for being "within 100m of a Local Nature Reserve". Donington and Albrighton Local Nature Reserve (DALNR) is not within 100m of the Strategic Site. Estimate that at its closest point the Strategic Site is just over 500m from the DALNR. Therefore, the site score for this criterion should be amended to '0'. -It scores '-' for a "Tree Preservation Order (single or group) within or on site boundary". Would welcome clarity on where the TPO(s) affecting the site is/are, as not aware of any TPOs at RAF Cosford. -It scores '-' for lack of a GP surgery within 480m. However, this is not unfair, there is a medical centre at RAF Cosford which is primarily for regular uniformed personnel and their families / dependants. Therefore, the score should be adjusted to a '+' or, at the minimum a '0'. -It scores '-' due to presence of a listed building on site. Fulton Block is Grade II listed, however, the double negative score does not appear to be a fair assessment as the building is being maintained and is in use and there is a significant amount of existing development in close proximity to the building. Therefore, it is not clear how the Strategic Site allocation would have such a negative impact on the listed building and the score should be adjusted accordingly to a '-' at most. -It scores '-' for being "within 300m of a Conservation Area". Whilst there are three conservation areas within Albrighton, and one at Tong, none are within 300m of the Strategic Site allocation. The closest point, which relates to the Donington and Albrighton Conservation Area appears to be in the region of 600m from the Strategic Site. Therefore, the site score for this criterion should be amended to '0'.
A2398B8	Sustainability Appraisal	Comments on the Sustainability Appraisal		Within Stage 2 of the site assessment process BAY039 is considered achievable and viable. The assessment concludes that the site is well related to the built form of development and benefits from well-defined hedgerow boundaries. Furthermore, the site presents an opportunity to provide a high quality area of open space in an area of the village with limited provision. The site does not suffer from any overriding constraints and is therefore proposed for allocation. Within the Sustainability Appraisal the site scores 'fair', however this assessment is binary in nature and fails to acknowledge that the location of Oak Meadow Primary School, Lythwood Sports Complex and two areas of accessible natural green space are located are located within walking distance of the site, but outside the stipulated 480m distance. Were these to be positively assessed in the Sustainability Appraisal, the site would be likely to score -1 and therefore be considered 'good' in sustainability terms. Commentary provided on each of the non-preferred sites. BAY005: The site's position within the undeveloped gap renders it not suitable for allocation in the emerging Local Plan Review. The physical and planning constraints affecting the site further enforce this position. BAY008 and BAY009: Availability unknown. The site has a number of physical and planning constraints which, even if the site was available, may cause it to be unsuitable for development. BAY011: The site scores well in the Sustainability Appraisal, mainly due to its proximity to key services and lack of physical constraints, however its location in the green gap overrides these positive conclusions. BAY022: Availability unknown. The site is not suitable for residential development due to likely access constraints and the requirement for the use of third party land. This however, is secondary to the lack of availability of the site. BAT026: Concerned about the ability to access the site, which would involve unidentified 3rd party land. As such conclusions on the sites suitability should be reconsidered. It is assumed reference to BAY019 is as an access option, however, this is not made clear and, in any case, this site is referenced as having unknown availability and is within public use. It cannot therefore be considered as a suitable location for access to BAY026. Furthermore, as identified within the SLAA but not the Sites Assessment, the site lies within a Mineral Safeguarding Area and is subject to medium – high visual impact. It also has no defined physical boundary to the south ensuring development would not be contained. The site scores 'good' in the Sustainability Appraisal and is located in close proximity to existing services. However, this is secondary to the points set out above and should not influence the decision as to whether this site is suitable for residential development. As stated within the Site Assessment, there are preferable sites within the settlement with better relationships to the settlement, more well-defined site boundaries, and which can satisfactorily access the highway network. BAY036: Availability is unknown. Whilst the site scores relatively well within the Sustainability Appraisal this does not override location within the Green Gap and proximity to scheduled monument and listed buildings. BAY037: Availability unknown. Located within the Green Gap; proximity to a Special Area of Conservation, Scheduled Ancient Monument and Listed Building; and located within an Air Quality Management Area. These issues combined with the distance from local services ensure that the site scores poorly in the Sustainability Appraisal. Putting aside the site's unknown availability, the physical and technical constraints identified ensure that it is unsuitable for residential development. BAY040: The site is significantly larger than other SLAA sites with an indicative capacity of over 500 dwellings. The site is therefore too large for consideration as an allocation. If split in two, the central and southern areas would have a lesser relationship with the existing built form of the settlement. Connectivity is also highlighted as an issue. Considered to have high visual sensitivity due to its position on the side of a valley slope. Off-site highways works are required and the assessment considers that these are unlikely to be achievable. There are also concerns raised within the Site Assessment with regard to ecology and heritage. The SA scores the site accordingly, although it does benefit from the northern section of the site being close to some existing services. BAY043: Located in the Green Gap. The site is located in a rural location with a poor relationship to the existing settlement. The Site Assessment concludes that there are preferable sites within the settlement, with better relationships to the existing built form. The site is scored extremely poorly by the SA for reasons including distance to existing services, the location of the site within Flood Zones 2/3, the presence of TPOs on site and the potential displacement of a Waste Management option. Not considered suitable for development. BAY048: Adjacent to BAY039 but landform makes the sites very different. Site Assessment concludes the site is not suitable for residential development due to overriding constraints such as its high visual sensitivity and the potential requirement for buffers to a watercourse which would reduce developable area. The site is also in close proximity to a non-designated heritage asset. The SLAA references the need to manage both heritage and access constraints, whilst the site is not considered within the Sustainability Appraisal and therefore cannot be thoroughly assessed in this regard. The site's visual, ecological and heritage constraints ensure the site is not considered suitable for residential development by the Site Assessment. Based on published evidence base supporting the Local Plan Review we have undertaken an analysis of all of the Long Term Potential SLAA Residential Sites within Bayston Hill. In light of the importance of the strategic gap to the north; the environmental constraints prevalent elsewhere in the settlement; highways and access issues; BAY039 represents the most sustainable and suitable site for allocation within Bayston Hill.
A2468B3	Sustainability Appraisal	Comments on the Sustainability Appraisal	Disagree	The Environmental Assessment of Plans & Programmes Regulations 2004 require such plans and programmes to be compared with reasonable alternatives at 12 (2)(b). Paragraph: 018 Reference ID: 11-018-20140306 of the NPPG requires the SA "to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted." The paragraph goes to state that in undertaking this, it is important to: "provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives." The SA process with this Plan fails to adequately compare the selected options with the reasonable alternatives, nor provide any reasons the rejected options have not been taken forward. No reasonable alternatives have been considered for the levels of growth identified for each settlement; the SA has only considered the number for each settlement as set out in the Plan. This is a failing of the SA process and also demonstrates a lack of evidence to justify the levels of growth proposed for each settlement. As noted in submission to Policy 5.11, the site selection process is insufficiently clear. Chapter 9 of the SA accompanying this Reg 18 Plan provides the SA for the policies in the Plan. Amendment to the SA site methodology are set out on page 162, with paragraph 9.8 identifying some changes that have been made in response to previous submissions. It was surprising to read that the previous criteria failed to assess a site's ability to reduce the need to travel by car. The SA notes that this has now been translated into criterion 6 in the Scoping Report as 'regular peak time public transport service within 480m of site boundary'. No indication is given to what is meant by the word 'regular', which of course impacts considerably on the ability of residents to use public transport. This therefore seems a rather narrow approach to the consideration of this highly important sustainability objective. It is noted that the SLAA form asks if the site is within 1,000m of a range of local facilities; this is considered a far more holistic and improved measure of a site's ability to reduce the need to travel by car than the one used in the SA. How a site scored as part of the SA process appears to have had little influence on the sites that have been selected, with a number of 'poor' sites being put forward. How the sites have been scored also appears questionable, an example being site MDR048, recorded in the SA that this is not within 480m of a regular peak time PT service, when this is factually incorrect. No reasons are given to why rejected sites have not been taken forward, contrary to the NPPG. Mitigation measure for 'poor' sites are set out in Table 10.4 of the SA; the measures proposed appear cursory and lacking in detail on whether what is suggested is actually deliverable. For example, the mitigation for sites MDR39 & MDR43 is for the proposal to enable sufficient improvements to the pedestrian, cycle and vehicle accessibility. Given the site is some 2 kms distant from the town centre, meaningful pedestrian and cycle access will be difficult to achieve. In summary, it is contended that the SA is inadequate and fails to accord with the Regulations in appropriately and fairly considering the reasonable alternatives.
A2470B01	Sustainability Appraisal	Comments on the Sustainability Appraisal	Don't know / no opinion	The Shropshire Council Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Shropshire Local Plan Review's decision-making and scoring should be robust, justified and transparent.
A0086B1				Blank Form.
A0110B1				Duplicate of A0273 B1
A0112B1				Duplicate of A2311 B1
A0112B2				Duplicate of A2311 B2
A0113B1				Duplicate of A2327 B1
A0113B2				Duplicate of A2327 B2
A0139B1				Duplicate of A1286 B1
A0139B2				Duplicate of A1286 B2
A0139B3				Duplicate of A1286 B3
A0139B4				Duplicate of A1286 B4
A0154B1				Duplicate Respondent Rep re-numbered A2188 B15
A0154B2				Duplicate Respondent Rep re-numbered A2188 B16
A0154B3				Duplicate Respondent Rep re-numbered A2188 B17
A0154B4				Duplicate Respondent Rep re-numbered A2188 B18
A0164B1				Blank Form.
A0165B1				Blank Form.
A0166B1				Blank Form.
A0173B1				Duplicate Respondent Rep re-numbered A0037B2
A0185B1				Duplicate Respondent Rep re-numbered A2277 B5
A0234B1				Blank Form.
A0252B1				Duplicate of A0118
A0262B1				Blank Form.
A0300B1				Duplicate of A0718
A0358B1				Blank Form.
A0471B1				Blank Form.
A0489B1				
A0517B1				No Form B attached.
A0683B1				Duplicate of A0397 B1
A0683B2				Duplicate of A0397 B2
A0683B3				Duplicate of A0397 B3
A0683B4				Duplicate of A0397 B4
A0792B1				Duplicate of A0039 B1
A0825B1				Duplicate of A0725B1 and A0727B1
A0893B1				Duplicate of A0573

Column 1: Respondent Reference	Column 2: Summary of Response to Q1. Relevant Document	Column 3: Summary of Response to Q2. Part of the Document (Grouped)	Column 4: Summary of Response to Q3. Agree or Disagree with Part of Document	Column 5: Summary of Response to Q4. Comments
A0996B01				Duplicate Respondent rep re-numbered A0970 B13
A0996B02				Duplicate Respondent rep re-numbered A0970 B14
A1110B1				Duplicate of A0415 B1
A1181B1				Duplicate Respondent Rep re-numbered A0705 B2
A1273B01				Duplicate of part of A1609
A1273B02				Duplicate of part of A1609
A1273B03				Duplicate of part of A1609
A1273B04				Duplicate of part of A1609
A1273B05				Duplicate of part of A1609
A1273B06				Duplicate of part of A1609
A1273B07				Duplicate of part of A1609
A1273B08				Duplicate of part of A1609
A1289B1				Duplicate of A0404
A1400B1				Duplicate of A1675 B1
A1400B2				Duplicate of A1675 B2
A1404B1				Duplicate of A1676 B1
A1404B2				Duplicate of A1676 B2
A1405B1				Duplicate Respondent Rep re-named as a1261 B1
A1405B2				Duplicate Respondent Rep re-named as a1261 B2
A1712B1				Duplicate of A0426 B1
A1763B1				Duplicate Respondent. Rep re-named A1757 B1
A1826B1				Duplicate Respondent Rep re-numbered as A0658 B2
A1832B1				Blank Form.
A1927B1				Paper Duplicate of A0689
A2010B1				Duplicate of A1793
A2011B1				Duplicate of A1795
A2114B1				No Form B
A2155B1				Duplicate of A1125
A2183B1				
A2217B1				Duplicate of A1792 B1
A2217B2				Duplicate of A1792 B1
A2233B1				Duplicate of A1673 B1
A2233B2				Duplicate of A1673 B2
A2234B1				Duplicate of A1672 B1
A2234B2				Duplicate of A1672 B2
A2253B1				Duplicate of A0335 B1
A2280B1				Duplicate respondent Rep re-numbered A0037B1
A2317B1				
A2333B1				Duplicate of A2091 B1
A2333B2				Duplicate of A2091 B2
A2336B1				No Part B submitted
A2377B1				Duplicate of A2331 B1
A2410B1				Duplicate Respondent. Rep re-numbered A0936 B2
A2418B1				Duplicate of A2090
A2437B1				Duplicate of part of A1183
A2437B2				Duplicate of part of A1183
A2437B3				Duplicate of part of A1183
A2438B01				Duplicate of A0997B01
A2438B02				Duplicate of A0997B02
A2438B03				Duplicate of A0997B03
A2438B04				Duplicate of A0997B04
A2438B05				Duplicate of A0997B05
A2438B06				Duplicate of A0997B06
A2438B07				Duplicate of A0997B07
A2438B08				Duplicate of A0997B08
A2438B09				Duplicate of A0997B09
A2438B10				Duplicate of A0997B10
A2438B11				Duplicate of A0997B11
A2438B12				Duplicate of A0997B12
A2438B13				Duplicate of A0997B13
A2445B1				Duplicate Respondent. Rep re-numbered A0123 B3
A2498B1				Duplicate of A0986 B1

This page is intentionally left blank