

Shropshire Council Preferred Sites Consultation

Summary and Analysis of Consultation Responses
Shropshire Council

05 June 2019



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This document has 15 pages including the cover.

Document history

| Revision | Purpose description | Originated | Checked | Reviewed | Authorised | Date |
|----------|---------------------|------------|---------|----------|------------|------------|
| Rev 1.0 | First draft | BN | MG | VD | VD | 29/05/2019 |
| Rev 2.0 | Client Review | BN | MG | VD | VD | 30/05/2019 |
| Rev 3.0 | Final | BN | KD | VD | VD | 05/06/2019 |
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| Client | Shropshire Council |
| Project | Shropshire Council Preferred Sites Consultation |
| Job number | 5188227 |
| Client signature / date | |

Contents

| Chapter | Page |
|---|-----------|
| 1. Introduction | 4 |
| 1.1. The Consultation | 4 |
| 1.2. The Questionnaire | 4 |
| 2. Summary and Analysis | 4 |
| 2.1. Question 3 | 4 |
| 2.2. Question 4 | 5 |
| 2.3. Question 5 | 5 |
| 2.4. Question 6 | 6 |
| 2.5. Question 63 | 6 |
| 2.6. Question 64 | 7 |
| 2.7. Place Plan Area Questions | 8 |
| 3. Next Steps | 9 |
| Appendices | 10 |
| Appendix A. Quantitative Analysis | 11 |
| A.1. Introduction | 11 |
| A.2. Question 3 – Cross-subsidy exception site policy | 11 |
| A.3. Question 4 – Development mix | 12 |
| A.4. Question 5 – Windfall allowance for housing | 13 |
| A.5. Question 6 – Windfall allowance for employment | 14 |
| Appendix B. Place Plan Area Reports | |
| B.1. Albrighton Place Plan Area | |
| B.2. Bishop’s Castle Place Plan Area | |
| B.3. Bridgnorth Place Plan Area | |
| B.4. Broseley Place Plan Area | |
| B.5. Church Stretton Place Plan Area | |
| B.6. Cleobury Mortimer Place Plan Area | |
| B.7. Craven Arms Place Plan Area | |
| B.8. Ellesmere Place Plan Area | |
| B.9. Highley Place Plan Area | |
| B.10. Ludlow Place Plan Area | |
| B.11. Market Drayton Place Plan Area | |
| B.12. Minsterley and Pontesbury Place Plan Area | |
| B.13. Much Wenlock Place Plan Area | |
| B.14. Oswestry Place Plan Area | |
| B.15. Shifnal Place Plan Area | |
| B.16. Shrewsbury Place Plan Area | |
| B.17. Wem Place Plan Area | |
| B.18. Whitchurch Place Plan Area | |

1. Introduction

1.1. The Consultation

Following approval from Cabinet of the Shropshire Council Preferred Sites Consultation, consultation documents for this third stage of the Local Plan Review were published on 29th November 2018 and the consultation ran until the 9th February 2019.

This stage of consultation sought views from all parties on the Preferred Sites Consultation in Shropshire for the period 2016-36.

Specifically, the consultation sought views of all parties with an interest in the preferred development strategy and sites in these identified locations, so that relevant views and evidence can be taken into account in deciding the best way forward. The consultation document:

- Outlines a housing policy direction to improve the delivery of local housing needs;
- Establishes development guidelines and development boundaries for Shrewsbury, Principal and Key Centres and each proposed Community Hub; and
- Sets out the preferred sites to deliver the preferred scale and distribution of housing and employment growth during the period to 2036.

Responses were received from more than 3,600 unique respondents. These included local residents, businesses, town and parish councils, neighbouring local authorities, statutory consultees and a range of other organisations. The responses will be used to inform further development of the Local Plan Review.

1.2. The Questionnaire

The questionnaire comprised 64 questions. Questions 1, 2, 3, 4, 5, 6, 63 and 64 were general questions applicable to all respondents:

- Questions 1 and 2 sought information about the respondents themselves.
- Questions 3, 4, 5 and 6 asked respondents for their opinions on the introduction and operation of a cross-subsidy rural exception site policy and the role that windfall development should play in the delivery of housing and employment development.
- Question 63 sought the views of consultees on the potential removal or addition of 'Community Clusters'.
- Question 64 offered respondents the chance to express any other views on the Local Plan Review.

The key issues arising from the responses to questions 3, 4, 5, 6, 63 and 64 are summarised and analysed in this report. The quantitative analysis of the responses to these questions are set out in Appendix A of this document.

The remaining questions were specific to the Strategic, Principal and Key Centres and Community Hubs across Shropshire. Specifically, where relevant, these questions sought the views of respondents on the preferred housing and employment guidelines; proposed development boundaries; proposed Community Hub status; preferred site allocations; and preferred safeguarded land for these settlements. These questions were grouped by settlement and the settlements were grouped according to the Place Plan Area within which they are located.

This report provides an overview of the commonly occurring issues arising across all the Place Plan Areas. Summaries and analysis of the key issues for each question are provided in the individual summary reports produced for each of the 18 Place Plan Areas. These are appended at Appendix B.1. to B.18. The quantitative analysis of each question is also provided in these reports.

2. Summary and Analysis

2.1. Question 3

Question 3 sought views on whether Shropshire Council should introduce a cross-subsidy exception site policy allowing an element of open market housing to support the delivery of affordable housing.

An array of responses, both in support of and opposed to the cross-subsidy exception site policy were received. Respondents who expressed their support for the policy commonly argued that it would:

- Make otherwise undeliverable sites viable.
- Increase the number of sites brought forward by developers.
- Deliver more affordable homes across the county.

Opposition to the introduction of a cross-subsidy exception site policy made several points:

- Affordable housing is not well suited to the countryside where access to jobs and public transportation tends to be sparse.
- The existing supply of open market housing is adequate to meet current need.
- Insufficient affordable housing is provided by developers.

Respondents also raised several other issues within their responses including:

- A viability assessment should be undertaken to determine whether the proportion of affordable housing provided through traditional development sites could be increased, in order to make a greater contribution to meeting affordable housing need.
- The consultation document lacks a detailed explanation of the policy, making it difficult for local people to understand and provide meaningful comments.
- The use of open market housing to cross subsidise affordable housing could be used by developers as a mechanism for exploiting the rural exception site policy.

2.2. Question 4

Question 4 sought views on whether respondents preferred (subject to viability assessment) a development mix assessed on a site by site basis or a set development mix, which would be geographically defined and subject to the findings of a viability assessment undertaken as part of the Local Plan Review.

Respondents commonly highlighted flexibility as their reason for supporting the assessment of development mix on a site by site basis. Specifically, it was suggested that this approach would allow for:

- A consideration of the unique costs associated with site-specific constraints.
- The needs of the local community, in terms of affordable housing rates and the mix of housing type, size and tenure.
- Flexibility to account for changing demands and viability over the plan period.

These arguments were frequently linked back to ensuring viability for developers and landowners.

Those respondents that expressed support for a set development mix which would be defined geographically subject to the findings of a viability assessment, based their support on several commonly arising points:

- It would provide a greater level of certainty of the development mix at an early stage in the planning process, benefitting developers and stakeholders.
- It would provide assurances that a mix of housing types and tenures would be supplied across the county.
- It would reduce the likelihood of planning permissions being granted for development proposals which did not propose sufficient levels of affordable housing.

One respondent suggested a county-wide viability standard which would act as a benchmark for viability across the county and that site-specific viability assessments could be undertaken where issues arise on a specific-site. In a similar vein, some respondents identified benefits in both options and suggested a combination of the two; effectively proposing a geographically defined, set development mix acting as a framework with in-built flexibility to allow site-specific considerations to be addressed.

A number of respondents, generally consultants representing landowners, stated that due to its nature, assessing the development mix on a site by site basis could not contribute to strategic housing requirements.

It was apparent that some respondents did not understand this question and/or its relationship to Question 3.

2.3. Question 5

Question 5 sought views on whether it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines.

Supporters of a windfall allowance for housing referred to the increased availability of sites. Generally, support came with conditions, including:

- The windfall allowance should prioritise development on previously developed land;
- A windfall allowance should be provided only where the preferred housing guidelines propose a low percentage increase in population growth.

Some respondents called for the windfall allowance to be based on the sites identified within the Strategic Land Availability Assessment (SLAA), historic windfall delivery rates and future trends. Meanwhile others suggested that historic windfall rates are unlikely to continue as the majority of deliverable windfall sites have now been developed or have extant planning permission.

The most frequently raised reasons for opposition to the use of a windfall allowance for housing related to:

- The unpredictable nature of windfall development. Local residents in particular expressed concern over the lack of opportunities for consultation on and community involvement in development proposals on windfall sites.
- Concerns that the proposed windfall allowance was too large. Many respondents referred to paragraph 70 of the National Planning Policy Framework (NPPF). They felt that the consultation document did not provide adequate justification and/or compelling evidence to demonstrate that sufficient levels of sites are available to deliver the proposed windfall allowance. This led to concerns regarding the deliverability of the housing guideline and the soundness of the Local Plan.
- Concern over the proportion of the housing guideline that would be delivered as windfall development. Conversely, some respondents expressed their support on the basis that the contribution windfall allowance plays in delivering housing guidelines is reduced from that within the current Local Plan.
- Many respondents stated that the windfall allowance should not be used to deliver the shortfall between allocated sites and housing guidelines. It should instead provide opportunities for surplus development in addition to housing guidelines.

Respondents frequently referred to the proposed development boundaries being drawn too tightly around settlements, limiting the number of opportunities for windfall housing developments and posing a threat to deliverability of housing guidelines. It was suggested that the distance from development boundaries or the geographical extent in which Shropshire Council would consider windfall development acceptable needs to be clearly defined through policy.

2.4. Question 6

Question 6 sought views on whether it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines.

The same concerns were expressed for the inclusion of a windfall allowance to help deliver employment sites as were raised over a windfall allowance for housing sites. Those comments which relate specifically to employment include:

- Employment development should be permitted where local employment need is demonstrated; and
- Employment development should be focused in areas which reduce the need to travel.

2.5. Question 63

Question 63 sought views on whether any additional 'Community Clusters' to those identified within the Preferred Sites Consultation should be formed or whether any of the existing 'Community Clusters' identified in the consultation documents should be removed.

Generally, responses to this question yielded a variety of settlements which respondents felt should be added, removed or retained. These are detailed in each of the relevant Place Plan Area summary reports appended at Appendix B.1.-B.18.

Across Shropshire, two key thoughts emerged with regard to the appropriate body for recommending settlements as Community Clusters. Some respondents - generally local residents - suggested that the decision should be made by Parish Councils following consultation with local communities, whereas other respondents - often consultants - advised that Shropshire Council's Planning Officers should decide.

Some respondents used this question as an opportunity to comment on the Hierarchy of Settlements methodology; including highlighting perceived inaccuracies in the facilities and services stated to be present in settlements and criticising the appropriateness of scores attributed to facilities which respondents considered to be either inaccessible or to offer a limited quality of service.

2.6. Question 64

Question 64 sought any other views of respondents. Often respondents used Question 64 as an opportunity to summarise, consolidate and reaffirm the opinions expressed in response to the preceding questions. As such, many of the views expressed in response to this question are repeated elsewhere, particularly the Place Plan Area specific questions which are summarised in Section 2.7 of this report and in greater detail in the Place Plan Area summary reports appended as Appendix B.1.-B.18.

Other views raised by respondents include:

- The total proposed housing guideline constitutes a shortfall against the housing requirement of Shropshire.
- Site allocations should prioritise the use of previously developed brownfield land.
- Queries over the Council's justification for preferring sites for allocation which score more poorly in the Sustainability Appraisal than sites which have not been preferred for allocation.
- Issues with the Sustainability Appraisal including the failure to translate Sustainability Objectives SO2, SO3 and SO12 into the assessment criteria, and a failure to adequately consider and apply criteria relating to public transport. Historic England queried how the historic environment has been considered in the Sustainability Appraisal and evidence base.
- Settlement specific comments on the accuracy of the Hierarchy of Settlement scoring; including highlighting perceived inaccuracies in the facilities and services stated to be present in settlements and criticising the appropriateness of scores attributed to facilities which are considered inaccessible or offer a limited quality of service.
- The Local Plan Review should demonstrate greater consideration of Neighbourhood Plans and community-led Plans. It should also reflect responses to previous Local Plan Review consultations.
- Sport England state that the existing Playing Pitch Strategy and Built Sports Facilities Strategy are out of date. They recommend that both should be updated every five years. Sport England advise that robust assessments for sports facilities are a common examination topic raised by Inspectors and query whether consideration has been given to the capacity of existing facilities and the level of provision of new facilities.
- The Environment Agency provided a detailed response, which among other things, highlights the barriers to growth from several existing water treatment plants which will affect Ludlow, Oswestry, Shifnal, Wem and Whitchurch Place Plan Areas.
- The Environment Agency comment that further detailed work is required on Strategic Flood Risk Assessment in identified growth areas. They stated that hydraulic modelling may be necessary to demonstrate the actual extent of the flood plain where preferred allocations are located in proximity to Flood Zones 2 and 3. They recommended that the Water Cycle Study considers the strategic growth areas.
- Natural England submitted a range of advice for the Sustainability Appraisal and Habitat Regulations Assessment as well as suggestions for policies which encourage biodiversity net gain, protect areas of high environmental value and protect air quality.
- Natural Resources Wales confirmed that in terms of emissions from road traffic, the Local Plan Review is unlikely to affect Special Areas of Conservation and Special Protection Areas in Wales.
- United Utilities raised concerns over sewers in Market Drayton and advised that a policy covering surface water discharges from new development in Market Drayton is necessary. The statutory undertaker also suggests policy wording for finished floor levels, groundwater source protection zones and infrastructure to support new development.
- Severn Trent provided high-level advice and advised that urban areas are unlikely to have capacity issues, whereas significant development in rural areas may require investment to improve the network. The statutory undertaker states that more detailed advice and capacity assessments can be provided once the size and location of preferred allocations are confirmed.
- Severn Trent advised that greater emphasis on the consequences of extreme rainfall is necessary and development should ensure sewers are able to accommodate floods which exceed design capacity.
- The Association of Black Country Authorities (ABCA) summarised recent evidence which demonstrates that the Black Country cannot accommodate their identified development need for housing and employment. The Association expressed their support for the commitment made by Shropshire Council

in the consultation documents to supporting the growth aspirations of neighbouring authorities and referred to the potential of the M54 as a strategic growth corridor.

- Campaign to Protect Rural England (CPRE) stated that there is a need for a housing needs assessment which considers an ageing population.
- Some respondents felt that the consultation documents presented a strategy which is too focused on growth in urban areas and fails to support rural communities. In contrast, a commonly expressed view among respondents is that the allocation of sites for housing and employment development in Shropshire's small, rural settlements is less sustainable as it will increase the need to travel which would result in increased carbon emissions and air pollution.

Comments were also received on the consultation process, generally from local residents. The most commonly occurring comments on this theme include:

- The provision of a glossary or non-technical definitions of the planning terms used in the consultation would have assisted the general public in providing more meaningful responses to questions.
- The information provided in the consultation on the Local Plan Review was vague and difficult to find and there had been a lack of publicity on the Local Plan Review consultation.
- Respondents frequently commented on strategic sites which did not form part of the consultation.

Question 64 also presented would-be developers, landowners and planning consultants an opportunity to promote alternative and additional sites. In many instances, plans, development strategies and statements were submitted. These are summarised in greater detail in the Place Plan Area summary reports appended as Appendix B.1.-B.18.

2.7. Place Plan Area Questions

A significant number of comments were received in response to the questions relating to settlements across the 18 Place Plan Areas. Many of these responses are specific to a site or settlement. The summaries of responses to each question can be found in the relevant Place Plan Area summary reports at Appendix B.1.-B.18. There were several themes which were consistently raised across many of the settlements within Shropshire, including:

- Local residents expressed concern about Green Belt release - although on occasion, respondents mistook edge of settlement greenfield sites as Green Belt.
- Developers, planning consultants and organisations including CPRE also expressed concerns about Green Belt release. Specifically, they consider that the consultation document lacked the evidence necessary to demonstrate the exceptional circumstances which justify proposed Green Belt loss.
- There were general objections to development beyond existing settlement boundaries and concern was commonly raised over future development encroaching into open countryside resulting in harm to the rural character of settlements and landscape impacts.
- Comments on the consultation process were received from numerous local residents. Their concerns include a lack of explanation, definitions or supporting information to clarify various technical terms. Reference is made specifically to the terms cross-subsidy exception sites and windfall development. Consultees often misunderstood terms and questions.
- A number of respondents stated that development pressure from neighbouring authorities does not constitute an exceptional circumstance as per the NPPF.
- Local residents frequently referred to the shortage or lack of existing public services and facilities available for the current community and raised concern over the additional burden that the delivery of housing guidelines would have on these facilities.
- On a similar note, many respondents objected to preferred allocations and housing guidelines on the basis that there is a lack of available capacity in existing services, facilities and infrastructure to accommodate growth. In this regard, capacity concerns are most commonly raised for GP surgeries, primary and secondary schools and bus services; although nurseries, places of worship, libraries, bowling greens and convenience shops are also mentioned.
- A number of statutory undertakers provided advice on the capacity of existing infrastructure in settlements across the county.
- The impacts of a growing population on the county's highway network, most commonly in terms of traffic congestion and to a lesser extent road safety, was a frequently cited concern.

3. Next Steps

The responses made to this consultation will be considered and inform the ongoing Local Plan Review.

Appendices



Appendix A. Quantitative Analysis

A.1. Introduction

Questions 3, 4, 5 and 6 asked respondents for their opinions on the introduction and operation of a cross-subsidy rural exception site policy and the role that windfall development should play in the delivery of housing and employment development.

The questionnaire included a tick box element for these questions. Not all of the 3,619 unique respondents answered these questions; however, the breakdown of those that did is presented below.

A.2. Question 3 – Cross-subsidy exception site policy

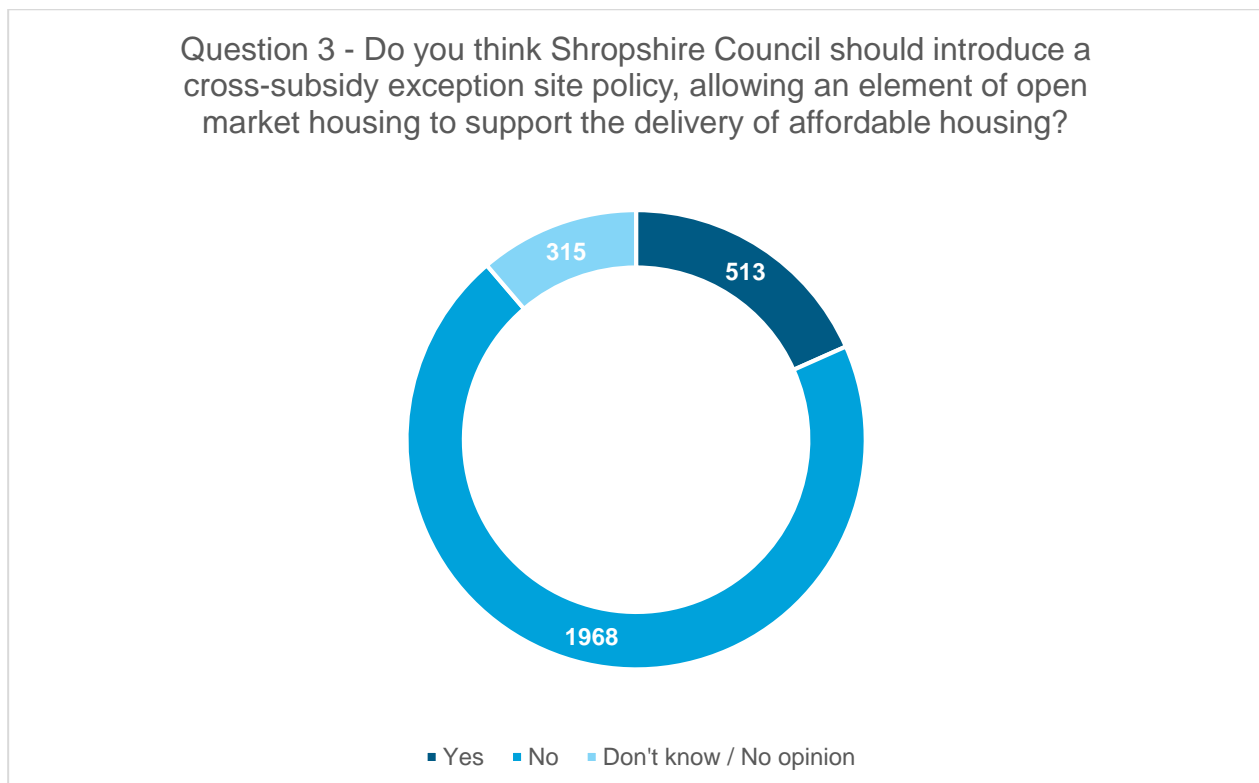
Question 3 sought views on whether Shropshire Council should introduce a cross-subsidy exception site policy allowing an element of open market housing to support the delivery of affordable housing.

The majority of respondents were opposed to the introduction of a cross-subsidy exception site policy. A large proportion of this objection was generated by residents of Much Wenlock, Shifnal and Shrewsbury Place Plan Areas. It appears that a series of standard responses were circulated in these communities, resulting in a high volume of duplicated responses.

Table 1: Question 3 – Cross-subsidy exception site policy

| Response | Quantity | Percentage of total |
|-------------------------|----------|---------------------|
| Yes | 513 | 18.5 |
| No | 1968 | 70.5 |
| Don't know / No opinion | 315 | 11 |
| Total Responses | 2796 | 100.00 |

Figure 1: Question 3 – Cross-subsidy exception site policy



A.3. Question 4 – Development mix

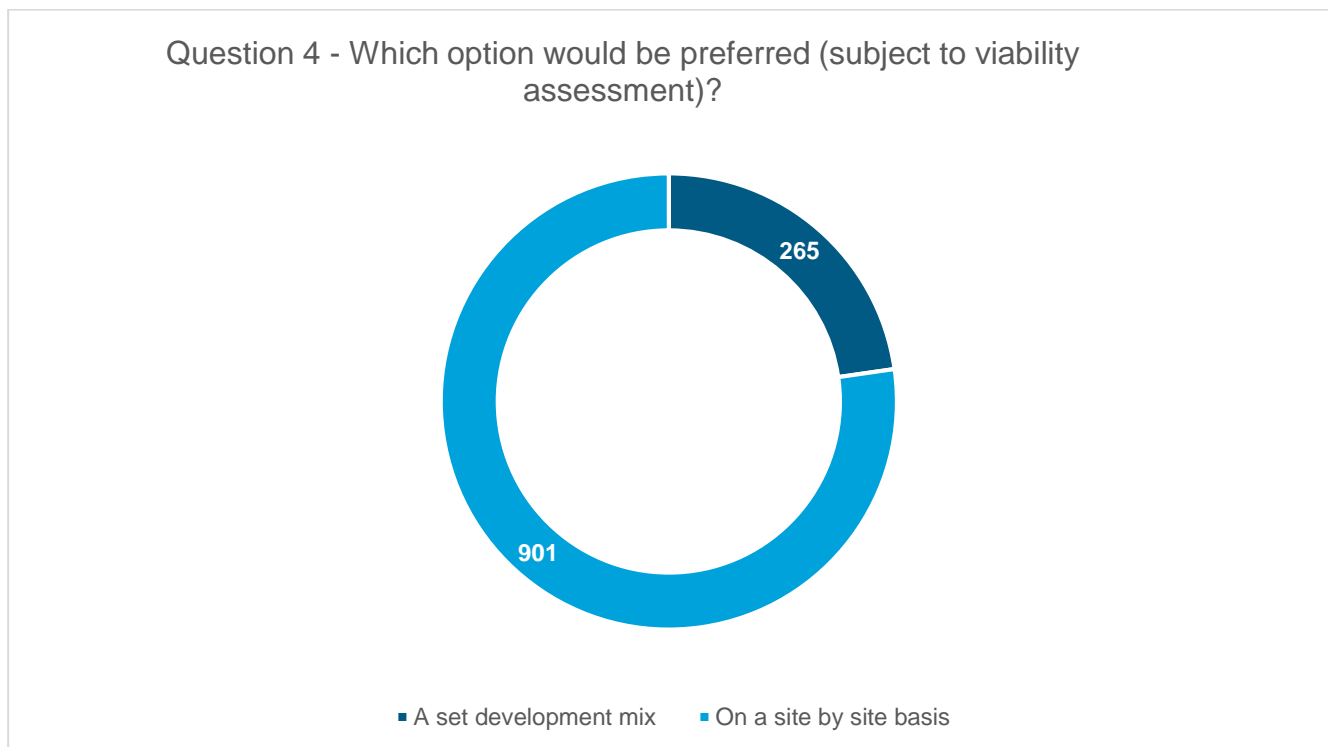
Question 4 sought views on whether respondents preferred (subject to viability assessment) a development mix assessed on a site by site basis or a set development mix, which would be geographically defined and subject to the findings of a viability assessment undertaken as part of the Local Plan Review.

The number of respondents answering this question was notably lower than the other Shropshire-wide question - approximately two thirds of respondents chose not to provide a response. This may be because the questionnaire didn't provide a 'don't know / no opinion' option. Also, the standard letters from the Shifnal Place Plan Area did not include a response to this question.

Table 2: Question 4 – Development Mix

| Response | Quantity | Percentage of total |
|-------------------------|--------------|---------------------|
| A set development mix | 265 | 22.5 |
| On a site by site basis | 901 | 77.5 |
| Total Responses | 1,166 | 100 |

Figure 2: Question 4 – Development Mix



A.4. Question 5 – Windfall allowance for housing

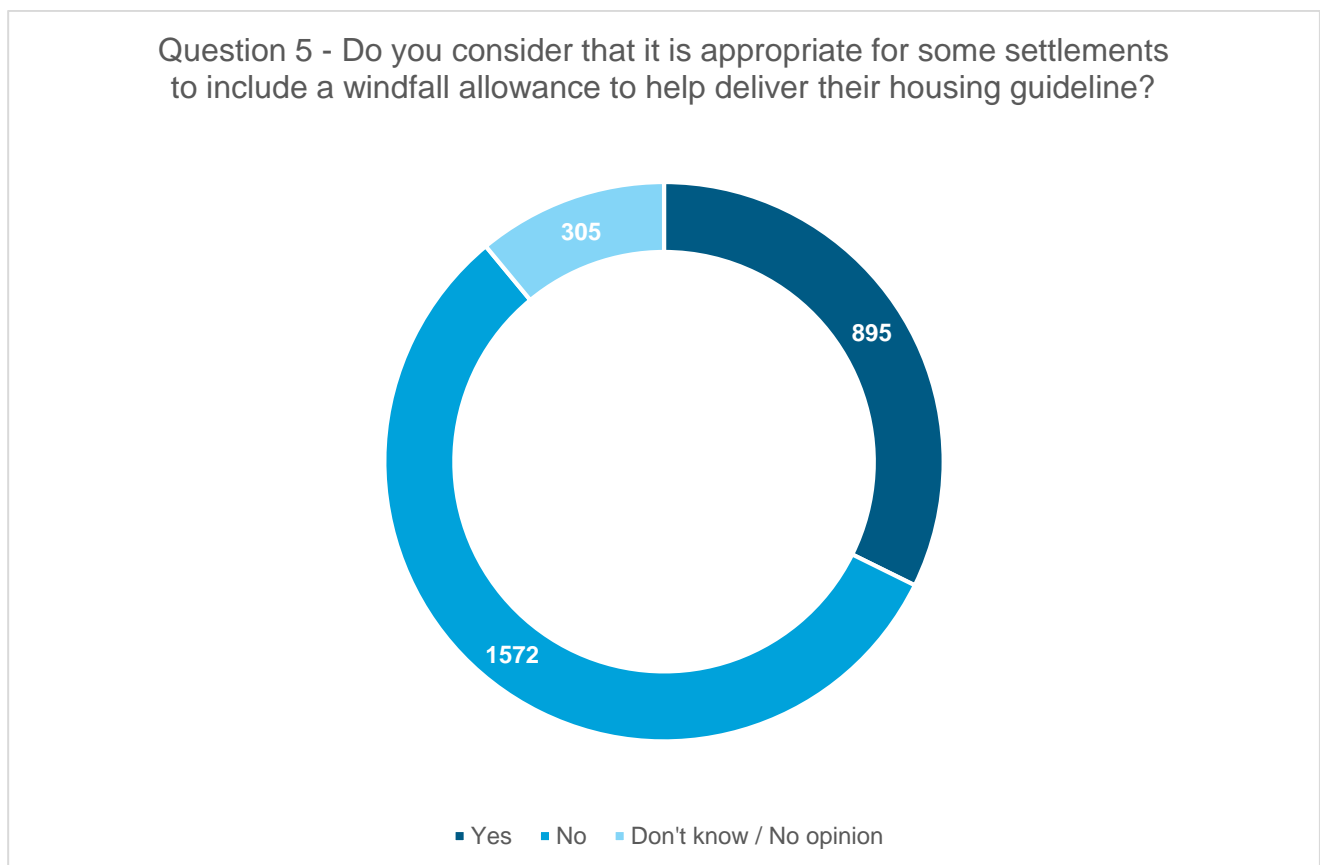
Question 5 sought views on whether it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines.

Over half of the total responses to this question disagree with the inclusion of a windfall allowance for housing. As with Question 3, a large proportion of the objection to Question 5 comes from the standard responses - particularly from residents in the Shifnal Place Plan Area.

Table 3: Question 5 – Windfall allowance for housing

| Response | Quantity | Percentage of total |
|-------------------------|--------------|---------------------|
| Yes | 895 | 32.5 |
| No | 1,572 | 56.5 |
| Don't know / No opinion | 305 | 11 |
| Total Responses | 2,772 | 100.0 |

Figure 3: Question 5 – Windfall allowance for housing



A.5. Question 6 – Windfall allowance for employment

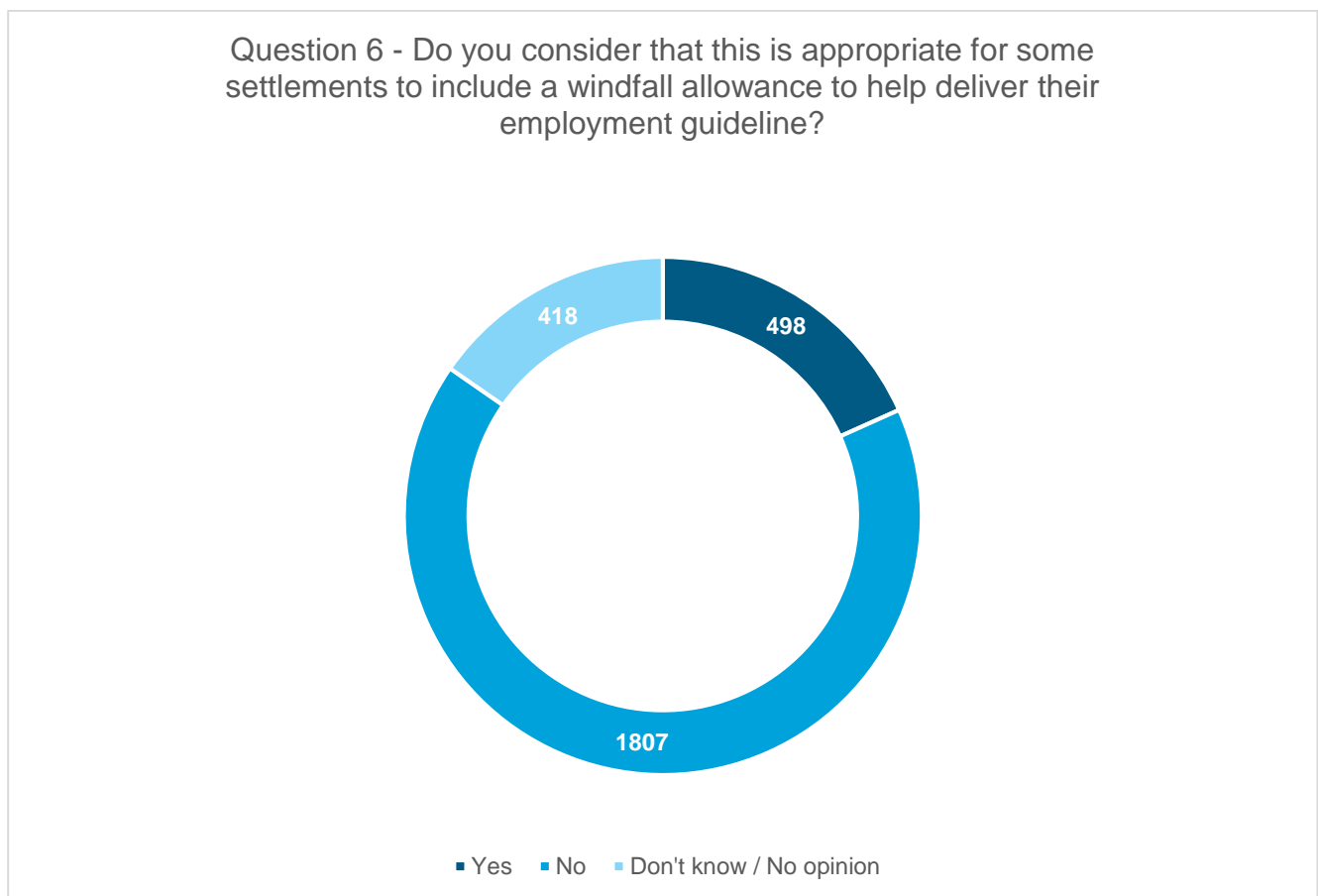
Question 6 sought views on whether it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines.

As with Questions 3 and 5, the submission of multiple standard responses from the Shifnal Place Plan Area comprised the majority of the opposition to the inclusion of a windfall allowance for employment.

Table 4: Question 6 – Windfall allowance for employment

| Response | Quantity | Percentage of total |
|-------------------------|-------------|---------------------|
| Yes | 498 | 18 |
| No | 1807 | 66.5 |
| Don't know / No opinion | 418 | 15.5 |
| Total | 2723 | 100 |

Figure 4: Question 6 – Windfall allowance for employment



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